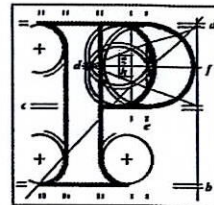


**Our Case Number: ABP-317121-23**



**An  
Bord  
Pleanála**

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

**Date:** 30 June 2023

**Re:** BusConnects Swords to City Centre Bus Corridor Scheme  
Swords to Dublin City Centre

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.

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

Yours faithfully,

Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

HA03A

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

RE: TII submission ABP Ref. HA06D.317121\_ Swords BusConnects\_NTA, TII ref. TII23-123087

Sarah Caulfield <s.caulfield@pleanala.ie>

Fri 6/30/2023 12:52 PM

To: LandUsePlanning@tii.ie <LandUsePlanning@tii.ie>

Cc: Klaudia Wiezowska <klaudia.wiezowska@pleanala.ie>

Dear Cliona,

The Board acknowledges receipt of your email and attached submission in relation to the above-mentioned application.

Kind Regards,  
Sarah

---

From: Landuse Planning <LandUsePlanning@tii.ie>

Sent: Friday, June 30, 2023 10:47 AM

To: SIDS <sids@pleanala.ie>

Cc: Landuse Planning <LandUsePlanning@tii.ie>

Subject: TII submission ABP Ref. HA06D.317121\_ Swords BusConnects\_NTA, TII ref. TII23-123087

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](mailto: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](mailto:landuseplanning@tii.ie)

Address: [Parkgate Business Centre, Parkgate Place, Parkgate Street, Dublin 8, Ireland, D08 DK10](#)



In accordance with TII's Right to Disconnect policy, if you are receiving this email outside of normal working hours, I do not expect a response or action outside of your own working hours unless it is clearly noted as requiring urgent attention.

De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílím ag súil le freagra ná le gníomh uait lasmuigh de do ghnáthuaireanta oibre féin mura bhfuil sé ráite go soiléir go bhfuil gá gníomhú go práinneach.

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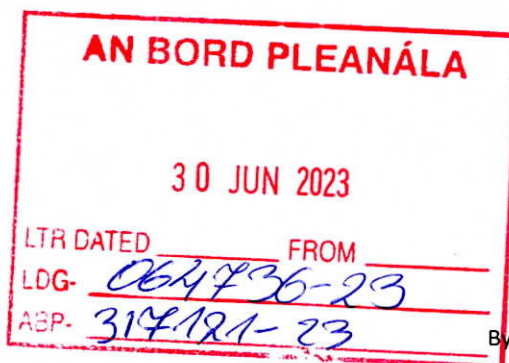
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Córas r-phoist BIE: Tá an ríomhphost seo agus aon chomhaid a tharchuirtar leis faoi rún agus beartaithe lena n-úsáid ag an duine aonair nó ag an eintiteas a bhfuil siad dírithe chuige/chuici amháin. Más rud é go bhfuair tú an ríomhphost seo trí bhotún, cuir sin in iúil do [postmaster@tii.ie](mailto:postmaster@tii.ie), le do thoil, agus scríos an ríomhphost bunaidh agus aon cheangaltáin.

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



By email: [sids@pleanala.ie](mailto:sids@pleanala.ie)

Dáta|Date 30 June 2023

Ár dTag|Our Ref. TII23-122375

Do dTag|Your Ref. HA06D.317121

**Re: BusConnects Swords to City Centre Bus Corridor Scheme**

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the BusConnects Swords 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.

As the Board is aware, 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 in 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"; and*

*"9. The primary functions of the Dublin Tunnel will be maintained and protected. These functions are to facilitate the movement of goods vehicles between Dublin Port and the national road network and to facilitate access to the City Centre for public transport service vehicles, whilst also facilitating the 'strategic' movement of goods to and from Dublin City Centre, subject to appropriate vehicle size and time restrictions. It is also essential that the structural integrity of the Tunnel from incompatible over ground development is ensured."*

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag [www.tii.ie](http://www.tii.ie).  
TII processes personal data in accordance with its Data Protection Notice available at [www.tii.ie](http://www.tii.ie).

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.

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

The submission is in 3 parts:

1. Summary of potential interaction of the proposed BusConnects scheme works with the national road and light rail networks
2. National Roads Interactions, Mitigations Requirements and Recommendations
3. Light Rail Interactions, Mitigations Requirements and Recommendations

## **Part 1: Summary of Potential Interaction of the Proposed BusConnects Scheme Works with the National Road and Light Rail Networks**

The BusConnects scheme application contains an Environmental Assessment Report (EIAR), Appropriate Assessment (AA) Screening Report, Compulsory Purchase Order Schedule and Deposit Maps and Supplementary Information including a Preferred Option Report. The EIAR contains 4 no. volumes; 1. Non-Technical Summary, 2. Main Chapters, 3. Figures, and 4. Appendices. The proposed works include physical works which are capable of impacting the national road and light rail networks directly and indirectly.

From review, TII observes that the proposed Swords BusConnects scheme will interact with the national road network carriageways, structures and management, and the light rail network tramways, tramstops and associated under and overground services at five general locations (moving north to south along the BusConnects proposed route) as follows and as summarised in table 1 over:

1. Includes works to the R132 Airport Roundabout adjacent to Junction 2 of the M1 (Dublin Airport) that is part of Motorway Maintenance and Renewal Contracts (MMaRC) Network Area A.
2. Crossing under the M50 on the R132 between Junctions 4 (Ballymun) and 3 (M1/M50),
3. Travelling along the R132 and to include works to Coolock Lane adjacent to Junction 2 of the M50 (Santry),
4. Part travelling over the Dublin Tunnel along the Swords Road (R132) between Shantalla Road to the north and Whitehall (R103) to the south, and
5. At the junctions of Parnell Square East (Cavendish Row) and at Parnell Square West junction with Parnell Street over which Luas travels.

**Table 1 Summary of interactions of proposed Swords BusConnects scheme with the national road and light rail networks**

<b>Proposed Swords to City Centre BusConnects General Arrangement Drawing</b>	<b>Summary National Road or Light Rail interface</b>
General Arrangement Drawings – Sheet 8	<b>Identified interface with the M1 by works to R132 Airport Roundabout.</b> Occurs within Section 2 Airside Junction to Northwood Avenue (Section 2a: Airside Junction to Airport Roundabout) of the submitted EIAR
General Arrangement Drawings – Sheets 14 and 15	<b>Identified interface with the M50 by works to R132 under the M50 at the M50 Swords Road Bridge.</b> Occurs within Section 2 Airside Junction to Northwood Avenue (Section 2b: Airport Roundabout to Old Airport Road) of the submitted EIAR. The submitted EIAR identifies this bridge as <i>M50 Turnapin Bridge CBC002-ST04 IC-M50-001.00</i> .
General Arrangement Drawings – Sheet 18	<b>Identified interface with the M50 by proposed works adjacent to Junction 2 of the M50 (Santry)</b> Occurs within Section 3 Northwood Avenue to Shantalla Road (Section 3a: Northwood Avenue to Omni Park Shopping Centre) of the submitted EIAR
General Arrangement Drawings – Sheet 23 Sheet 24 Sheet 25 (and part of Sheet 26)	<b>Identified interface with the Dublin Tunnel by proposed works on the R132 over the Dublin Tunnel between Shantalla Road to the north and Whitehall (R103) to the south.</b> Occurs within Section 4 Shantalla Road to Botanic Avenue (Section 4a: Shantalla Road to Griffith Avenue) of the submitted EIAR. The Construction Compound (SW4) is proposed to be located at Collins Avenue Junction.
General Arrangement Drawings – Sheet 36	<b>Identified interface with Luas by works adjacent to the Luas Line at the junction of Parnell Street with Parnell Square East (Cavendish Row) and Parnell Square West.</b> Occurs within Section 5: Botanic Avenue to North Frederick Street (Section 5c: Parnell Square including North Fredrick Street) of the submitted EIAR

TII considers it is critical to the safe and efficient operation of the national road and light rail networks 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.

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 EIAR, including at Chapter 19 *Material Assets*. However, the following parts of the submitted are highlighted:

- Chapter 5 *Construction*: This Chapter of the EIAR divides the proposed scheme into 5 no. sections to describe works. The sections within which the interactions with the national road and light rail networks occur are identified at table 1.
- Chapter 6 *Traffic and Transportation*: This Chapter of the EIAR divides the proposed scheme into 5 no. sections to describe the existing environment at subsection 6.3.1. *Overview*. Section 6.5 sets out the intended *Mitigation and Monitoring Measures* to be deployed as part of the scheme and for the construction phase refers to the Construction Environmental Management Plan (CEMP). TII would highlight that a commitment is made that a detailed Construction Traffic Management Plan will be prepared to be included in the CEMP, part of the mitigation and monitoring at Chapter 5 *Construction* of the submitted EIAR.
- It is noted that Chapter 22 of the submitted EIAR is a *Summary of Mitigation and Monitoring Measures* and the Construction Environmental Management Plan (CEMP) is included as Appendix A5.1 of the EIAR. TII consider that it would have been appropriate to include and record mitigation of potential impacts for the protection of the national road and light rail networks as part of the scheme in Chapter 22 and the CEMP at Appendix A5.1.

- TII would highlight that the CEMP at Appendix A5.1 of the submitted EIAR indicates the intended use of national and regional routes for the purposes of construction haul routes with specific reference at subsection 5.3.3.3 *Routing of Construction Vehicles* to the M50 and N1/M1.

## **Part 2: National Roads Interactions, Mitigations Requirements and Recommendations**

One of TII's core functions is to deliver modern, efficient and safe network of national roads. Elements of the national road network are operated and managed by a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. The MMarC is tasked with the maintenance of current existing infrastructure. In interests of clarity of responsibility and to avoid maintenance gaps where the Bus Connects introduces new infrastructure within the MMarC boundary, liability and maintenance responsibilities for such infrastructure will remain with the relevant local authority (who are Road Authority within their administrative area) and NTA unless agreed otherwise with TII.

TII advises that this part of the TII submission has particular regard to official planning policy for development at or near national roads as outlined in the DoECLG *Spatial Planning and National Roads Guidelines* for Planning Authorities (2012) and also specific requirements established in TII Publications. TII Publications (Standards) documentation defines the requirements that support policy, administrative and technical procedures developed by TII to govern activities with respect to the National Road network. For example, any crossing of the national road network, including by under or over pass will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website [www.tiipublications.ie](http://www.tiipublications.ie).

In addition, TII would highlight that the Dublin Tunnel forms part of the national road network. The critical role of the Dublin Tunnel as recognised in the EMRA RSES and Greater Dublin Area Transport Strategy is echoed at Section 8.5.8 *Street/Road, Bridge and Tunnel Infrastructure* of the current Dublin City Development Plan 2022 – 2028, that highlights the role and requirement for the protection of the M50 and Dublin Tunnel. Under *Policy SMT31* of the Dublin City Development Plan, development proposals in the vicinity of the Dublin Tunnel are required to undergo specific development assessment for Tunnel integrity. This includes for both above and below ground assessment. Assessment requirements are set out in Appendix 5, subsection 9.1 Dublin Tunnel Structural Safety of that Development Plan. TII guidance on the preparation of this assessment is available in TII's "*Guidance Notes for Developers The assessment of surface and sub-surface developments in the vicinity of the Dublin Port Tunnel.*"

The proposed BusConnects works interactions with the national road network are summarised at Table 1 of this submission. The interactions identified are set out below.

### **1. Proposed scheme (Section 2a), Interactions with the M1 at the R132 Airport Roundabout**

The BusConnects proposal includes works to the Airport Roundabout of the R132 and the M1, with further local road interfaces with Corballis Road North and East Link Roads.

As noted above, elements of the national road network are operated and managed by a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. TII advise that the Airport Roundabout, M1 and the M50 (to the Tunnel) is subject to a MMarC Network A Scheme. Any works within MMarC Network Area A will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website [www.tiipublications.ie](http://www.tiipublications.ie).

TII observes that access to the Airport Roundabout for the duration of construction, indicated for an 18 month period, is to be through the MMarC maintained area and works to the Airport Roundabout, part of the MMarC maintained area is proposed.

TII advises that consultation and appropriate protocol agreement with the Motorway Maintenance and Renewals Contract Network A Contractor is required in relation to any works proposed, including signage, traffic management, lining, timetabling etc., that may affect the operational requirements of motorway/national roads and associated junctions during construction and for ongoing maintenance of the Airport Roundabout. TII is unable to ascertain from the material submitted if these matters have been considered.

## **2. Proposed scheme (Section 2b), Interactions with the M50 at M50 Turnapin Bridge (TII Structure ID IC-M50-010.00), identified in submitted plans as M50 Turnapin Bridge CBC002-ST04**

The scheme proposes to cross (under) the M50 on the R132 at a single point – Turnapin Bridge (TII Structure ID IC-M50-001.00) which is an underbridge carrying the M50. TII notes that minor modification to the verge underneath the structure has been agreed with the NTA.

However, TII advise:

- a) There is a necessary requirement for the protection of the national road network function that all of the works proposed under and in vicinity of the bridge be identified and undergo detailed design and execution in accordance with TII Publications standard. The applicant should continue to follow TII structures technical approvals as required under TII publication DN-STR-03001.
- b) Any works that require access to the national road network maintained by a contractor, M50 PPP Contractor at this location, must follow the maintenance contractor's third party access protocol in advance of carrying out any works.

## **3. Proposed scheme (Section 3a), interactions with the M50 by proposed works adjacent to Junction 2 of the M50 (Santry)**

The BusConnects proposal includes works adjacent to Junction 2 (Santy) of the M50, including works to Coolock Lane.

The M50 and Junction 2 including part of the R104 (Coolock Lane) forms part of TII Motorway Maintenance and Renewals Contract (MMaRC) Network A.

In recognition of the proximity of the proposed works to the MMarC Network Area A boundary, and the requirement for the maintenance of the safe and efficient operation of the M50 throughout the construction and operation of the proposed scheme, prior consultation with TII in accordance with TII Publications will be required for any works that may impact the national road network including pavement, structures and infrastructure including drainage.

Such consultation will include TII and the MMarC Contractor to ascertain any operational requirements such as delivery timetabling, etc. and to ensure that the strategic function of the national road network is maintained during construction and operation of the proposed scheme.

## **4. Proposed scheme (Section 4a), interactions with the Dublin Tunnel by proposed works to the R132 between Shantalla Road to the north and Whitehall (R103) to the south**

The BusConnects proposal includes works described at subsection 5.3.4.1 Section 4a: *Shantalla Road to Griffith Avenue* in the submitted EIAR. These works, including diversion and/or protection of under and overground services, will occur over the Dublin Tunnel between Shantalla Road to the north and Whitehall (R103) to the south. It is also noted that

proposed Construction Compound (SW4) will be located at Collins Avenue Junction, also in the vicinity of the Dublin Tunnel.

Due to the location of works associated with the scheme relative to the Dublin Tunnel asset, there is potential for impacts and interactions between this section of the national road network and the BusConnects scheme which, based on the material submitted, does not appear to have been evaluated.

As noted at the outset of this section of the submission, under Policy SMT31 of the Dublin City Development Plan, development proposals in the vicinity of the Dublin Tunnel are required to undergo specific development assessment for Tunnel integrity. Assessment requirements are set out in Appendix 5, subsection 9.1 Dublin Tunnel Structural Safety of that Development Plan. TII guidance on the preparation of this assessment is available at:

<https://www.dublincity.ie/sites/default/files/media/file-uploads/2018-07/Port Tunnel Guidance Notes for Developers.pdf>

TII advises that the proposed BusConnects scheme includes works to be carried out on, and in close proximity to the national road network, which includes the Dublin Tunnel, structures and associated services such as drainage, that must be subject to co-ordination with and the prior approval of TII in accordance with TII Publications and also the City's Development Plan. TII is unable to ascertain from the documentation submitted that these matters have been addressed.

#### **5. Necessary national road network mitigation measures as part of the BusConnects scheme proposal**

TII considers that Chapters 5 (*Construction*) and 6 (*Traffic and Transportation*), and the Construction Environmental Management Plan (CEMP) of the submitted EIAR do not appear to identify specific methods or techniques proposed for mitigation of potential impact for works traversing or in proximity to the national road network, including PPP, MMaRC Scheme Areas and the Dublin Tunnel.

Having regard to the stated intention in the submitted CEMP to utilise the national road network for construction haul routes and for significant construction undertakings within the national road maintenance boundary of the M1 at the Airport Roundabout and adjacent to and Junction 2 of the M50, there is a requirement for mitigation of potential construction and operation stage impacts through coordinated and managed in consultation with the Network Management section of Transport Infrastructure Ireland.

The national road network is a vital national asset performing a strategic traffic function. The proposed BusConnects scheme must be able to proceed complementary to the protection of the safe and efficient operation of the national road network in the interests of effective integration of sustainable and active travel modality.

It is appropriate that specific mitigation and monitoring commitments for potential impact on the national road network are reflected in the scheme, and in the proposed CEMP at Appendix A5.1 of the EIAR.

To ensure the strategic function of the M50 motorway, in the vicinity of the proposal and utilisation of the national road network for construction haul routes is safeguarded the following is advised:-

- Compliance with TII Publications (Standards) in accordance with relevant TII Publications (Technical) will be required for any work that may impact the national road pavement, structures and infrastructure including drainage. In particular, Design Reports for any works on, over or within the motorway reservation will be required to be prepared and submitted as a Departure Application in accordance with TII publication GE-GEN-01005 and PE-PMG-02041 and any works to structures forming part of the national road network requires TII Technical Acceptance in accordance with TII publication DN-STR-03001.
- Assessment and mitigation of the potential impact of the proposed scheme on the Dublin Tunnel and its associated services is required.
- Access for the construction period and any subsequent monitoring and maintenance in relation to any works proposed, including temporary and permanent signage, that affect the national road and associated junctions in terms of operational requirements, timetabling, etc. will require prior consultation with the MMaRC Network

A and M50 PPP Contractors and fulfilment of requirements to complete their 3<sup>rd</sup> party protocols, via the relevant road authorities and TII.

- Separate structure approvals/permits and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.

The resolution of the foregoing matters and their reflection as part of the proposed development is essential to avoid detrimental impact on the capacity, safety or efficiency of the national road network, is in the interests of sustainable development, and the promotion of an integrated approach to land use and transportation planning.

- In particular, the Authority request that the Construction Traffic Management Plan to be prepared as part of the CEMP specifically include TII, alongside roads authorities and the NTA, amongst its primary stakeholders to ensure embedded mitigation of potential national road impacts.

## **6. National Road Network Recommendations**

As outlined, the proposed scheme includes works proposed to be carried out on, and in close proximity to the national road network, which includes structures, the Dublin Tunnel and associated services such as drainage, and signage as well as traffic management planning must be subject to co-ordination with and approval of TII.

TII advises that the BusConnects proposes to introduce new infrastructure within the TII MMaRC boundary, which will have consequences for liability and maintenance responsibilities especially where no agreements have been made. TII advises that this matter requires resolution prior to a decision being made on the current proposal to provide clarity on scheme developments and to ensure the avoidance of maintenance gaps to both the national road network and BusConnects infrastructure.

In addition, the proposed BusConnects scheme includes works to be carried out on, and in close proximity to the national road network, which includes the Dublin Tunnel, structures and associated services, that must be subject to co-ordination with and the prior approval of TII in accordance with TII Publications and also the Dublin City Development Plan.

Subject to the resolution of these matters prior to a decision being made, TII recommends the following conditions should be considered to form part of the scheme in the event of Board approval for the proposal in respect of proposed relevant works on or in the vicinity of the M1, M50 and the Dublin Tunnel and in the interests of the protection of the safety, capacity and efficiency of the national road network:

1. Development shall be undertaken in accordance with TII Publications. Prior to commencement of development, plans and details of works on, or in the vicinity of the national road network required under TII Publications shall be submitted for the written agreement of the planning authority in consultation with TII.
2. The long term maintenance of permanent elements of the proposed development, within areas currently managed by the Motorway Maintenance and Renewal Contracts (MMaRC) or the M50 PPP Contractor shall be agreed between the relevant local authority/NTA and TII.
3. Where relevant, Design Reports for any works on, over or within the motorway reservation will be required to be prepared and submitted as a Departure Application in accordance with TII publication GE-GEN-01005 and PE-PMG-02041. Works to structures forming part of the national road network requires TII Technical Acceptance in accordance with TII publication DN-STR-03001.
4. Prior to commencement of development, the Construction Environmental Management Plan (CEMP) shall be submitted for the written agreement of the planning authorities subject to the written agreement of TII for national road elements. The CEMP will include:-
  - a) mitigation and monitoring for the national road network, and
  - b) resolution Dublin Tunnel interfaces including an appropriate TII approved risk assessment for works associated with these interfaces.

5. Prior to commencement of development, the construction traffic management plan including access to services, shall be submitted for the written agreement of the planning authorities subject to the written agreement of TII and shall:-
- demonstrate consultation with the relevant MMarC and PPP Contractors, via TII and the relevant road authorities,
  - demonstrate contact with [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in advance, as a works specific Deed of Indemnity will be required by TII where temporary works within any MMarC Contract Boundary are required to facilitate construction haulage, and
  - include detailed information on traffic management, including signage (static and VMS) to ensure the strategic function of the national road network is protected.

Where revisions to the proposed scheme application documentation arise as a result of this submission consideration, it is understood and accepted that additional / new mitigation measures that ameliorate potential significant negative impact on the national road network may form the subject of agreements between TII, MMarC, the M50 PPP Contractor and the developer.

### **Part 3: Light Rail Network Interactions, Mitigations Requirements and Recommendations**

This part of the TII submission is concerned with ensuring 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 BusConnects scheme potential interactions with Luas are set out in this submission at Table 1. The Interaction identified is set out below:

#### **1. Proposed scheme (Section 5c), Interactions with Luas at the junction of Parnell Street with Parnell Square East (Cavendish Row) and Parnell Square West**

The BusConnects proposal includes works adjacent to the Luas Line running along Parnell Street and in the vicinity of Luas Parnell Tramstop. The works proposed appear to end at the edge of Parnell Street. However, it is noted that the scheme boundary includes the entire of Parnell Street at the Cavendish Row / Parnell Street junction which is an area over which Luas runs.

Potential road closures, and under and overground works for proposed works have the potential to impact Luas infrastructure including trackbed, rails, Luas Overhead Conductor System (OCS) and associated under and overground services; Luas passenger services; and passenger access to Luas.

In accordance with TII's *Code of practice of engineering practice for works on, near, or adjacent the Luas light rail system*, the proposed works will require commensurate specific construction methodology approach, co-ordinated with TII and the Luas Operator to ensure protection of the asset and minimal Luas service disruption.

## **2. Necessary light rail network mitigation measures as part of the BusConnects scheme proposal**

From review of the documentation available, it is not apparent in the submitted EIAR that dedicated mitigation for construction traffic and associated traffic management at Luas is identified or reflected at *Chapter 5 Construction* or *Chapter 6 Traffic and Transportation*, or in the submitted Construction Environmental Management Plan (CEMP) at Appendix A5.1.

TII advises that the works associated with the scheme at Parnell Street have the potential to impact on the capacity and efficiency of the Luas network infrastructure and associated services, on passenger services, and passenger access to Luas. Therefore, TII consider that specific mitigation and monitoring commitments for potential impact on the national road network are reflected in the scheme, and in the proposed CEMP at Appendix A5.1 of the EIAR.

## **3. Luas Light Rail Network Recommendations**

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.

Subject to the resolution of the above, TII recommends the following conditions should be considered to form part of the scheme in the event of approval for proposed works in the vicinity Luas in the interests of the protection of the safety, capacity and efficiency of the light rail network:

1. Overhead Conductor System (OCS) poles are located on / or adjacent to the proposed scheme. Prior to commencement of development, the following plans and details shall be submitted for the written agreement of the planning authority subject to the written agreement of TII:
  - (i) OCS pole protection and safety distances, and / or
  - (ii) Existing, temporary and subsequent permanent fixings.The developer shall be liable for all costs associated with the removal and reinstatement of the Luas related infrastructure.
2. Prior to commencement of development, the Construction Environmental Management Plan (CEMP) shall be submitted for the written agreement of the planning authorities subject to the written agreement of TII. The CEMP will contain a method statement to resolve all Luas interface issues that shall:-
  - (i) identify all Luas alignment interfaces,
  - (ii) contain a risk assessment for works associated with the interfaces, including all electrification fault scenarios and
  - (iii) contain mitigation measures for unacceptably high risks, including electromagnetic interference (EMI) and vibration and settlement monitoring regime if necessary.

The method statement shall be in accordance with TII's "*Code of engineering practice for works on, near, or adjacent the Luas light rail system.*"

3. All works associated with removal, temporary and final installation of Luas infrastructure are to be undertaken outside of Luas operational hours, under system shutdown and Overhead Conductor System isolation with prior agreement with TII and the Luas Operator as required.
4. Prior to commencement of development, a Construction Traffic Management Plan including access to services, shall be submitted for the written agreement of the planning authorities subject to the written agreement of TII. The Construction Traffic Management Plan shall include identification of mitigation measures to protect operational Luas infrastructure.

5. The Luas operator/TII will require 24hr access to Luas infrastructure. Prior to the commencement of development, the developer shall enter into an access and maintenance agreement with TII.
6. The developer or contractor will be required to apply for a works permit from the Luas Operator by virtue of the Light Railway (Regulation of Works) Bye-laws 2004 (S.I. number 101 of 2004) which regulates works occurring close to the Luas infrastructure in accordance with TII's *"Code of engineering practice for works on, near, or adjacent the Luas light rail system"*. The developer shall be liable for all of TII's costs associated with the removal and reinstatement of Luas related building fixings and infrastructure. The permit application will require prior consultation, facilitated by the Luas operator, Transdev.

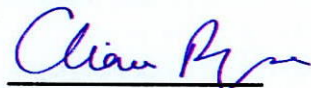
Where revisions to the proposed scheme application documentation arise as a result of this submission consideration, it is understood and accepted that additional / new mitigation measures that ameliorate potential significant negative impact on Luas may form the subject of agreements between TII, Luas Operator and the developer.

## 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 Swords to City Centre Bus Corridor Scheme.

TII would appreciate acknowledgment of receipt of this submission.

Yours faithfully,



Cliona Ryan  
Land Use Planner