

Development Plan Team,
Planning and Property Development Department,
Civic Offices
Wood Quay
Dublin 8.

Dáta | Date

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22 August 2022

TII22-119578

Re: Proposed Material Alterations to Dublin City Draft Development Plan 2022 – 2028.

Dear Sir/Madam

Transport Infrastructure Ireland (TII) supports the intent and delivery of the Draft City Development Plan especially with regard to the thrust towards building an integrated transport network and encouraging the provision of greater choice of public transport and sustainable travel modes. TII seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment being made in national roads and light rail network are protected in accordance with official policy.

TII has reviewed the CEO Report on Submissions and notes with concern that a number of issues highlighted in the TII submission have been not addressed. These matters are outlined in Part A of this correspondence. These TII's responses proposed for the protection of national road and light rail assets do not appear to have been addressed. TII is unsure if the planning authority considers that they are editorial issues. However, the Authority would request that they are addressed and clarified prior to the adoption of the draft plan. Part B of this correspondence addresses TII's observations on the proposed material alterations for the Council's consideration.

PART A - TII ISSUES OUTSTANDING

TII has reviewed the CEO REPORT on Submissions and notes with serious concern that the following items associated with the protection of NRA and light rail assets were not summarised, evaluated nor addressed. TII is unsure if the planning authority considers that they are editorial issues, however the Authority would request that they are addressed and rectified prior to the adoption of the draft plan:

1. TII ASSETS, CHAPTER 15

The Dublin Tunnel is one of the largest and most complex infrastructural projects to have been undertaken in the history of the State. The Tunnel provides direct access to Dublin Port for HGV traffic from the national road network, as a public transport conduit and, in conjunction with Dublin City Council's HGV management strategy, provides for a significant reduction in the number of HGV movements on Dublin's streets. Transport Infrastructure Ireland is charged with managing the operation and maintenance of the Dublin Tunnel, an important aspect of which is managing its capacity to cater for current and future transportation citywide demands.

The Luas system has become a core and integral part of the public transport network of Dublin. Luas has proven itself as an attractive and popular means of transport for Dublin and has met and exceeded its projected patronage, proving highly effective at achieving modal shift from the private car. It is critical that the operation and maintenance of the existing network is protected

TII has and continues to engage in active asset management of Luas and national road infrastructure. There is a need to ensure that service reliability and capacity of existing Luas lines and the Dublin Tunnel can be maintained and meet future demand along these corridors.

As previously indicated TII welcomes the text in Section 8.5.9 Street/Road, Bridge and Tunnel Infrastructure, Policy SMT29, appendix 5 and associated with the Tunnel and Luas. However, TII consider that these texts in the written statement should be further supported in Chapters 15 Development Standards due to the need for development applications to address matters related to the Dublin Tunnel and Luas.

Recommendation:

TII recommends that Table 15-1: Thresholds for Planning Applications should be amended as follows to add requirements for Luas and Dublin Tunnel.

	Residential Threshold	Commercial Threshold	Other
Dublin Tunnel Guidance Notes, The Assessment of surface and sub-surface developments in the vicinity of the Dublin Port Tunnel (TII March 2009)			Any development within Zones 1& 2.
Light Rail Environment-Technical Guidelines for Developments (December 2020)			Any development or project within 500 metres of a Luas line or infrastructure.

2. NATIONAL ROAD SCHEMES: M50 SOUTH PORT ACCESS.

TII notes that Material Alteration Reference Number 8.29 For clarity, TII advises again that the NDP M50 Dublin Port South Access Road Scheme is currently being progressed through pre-appraisal and early planning in accordance with the requirements of Project Ireland 2040 by TII, National Transport Authority, and Dublin City Council. Due to the required tie-in with the Dublin Tunnel (M50), TII advises that careful coordination will be required between TII, NTA, DCC and the Dublin Port Company in the planning of the future M50 Dublin Port South Access Scheme and adjacent land uses.

Recommendation:

The Authority advises that the development plan should ensure it will not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes/corridors have been identified and brought to the attention of the planning authority in accordance with Section 2.9 of the DOELG’s Spatial Planning and National Roads Guidelines for Planning Authorities. In the interim, the Council is advised that TII’s Dublin Eastern Bypass Corridor Protection Study Sector A: Dublin Tunnel to Sandymount Strand 2014 continues to afford protection for the M50 Dublin Port South Access within the Eastern Bypass corridor until a decision is made on the preferred solution for the future M50 Dublin Port South Access Scheme.

3. MAPPING IN GENERAL

TII welcomes the improved mapping but advises that the information associated with the Tunnel bores does not reflect the location of the tunnel bores with the associated protection zones 1& 2. TII are available to assist to have the correct information for the City Council in the final mapping to facilitate better understanding of the tunnel extent for the public, the preparation of plans and development management.

PART B - MATERIAL ALTERATIONS

1. Material Alteration Reference Number 2.1

TII advises that M50 Port Tunnel has been omitted from the mapping. The map should be amended to indicate the M50 Port Tunnel

2. Material Alteration Reference Number 5.5 Chapter 5 Section: 5.5.2 Regeneration, Compact Growth and Densification Page: 166, Objective QHSNO2 Lands at Alfie Byrne Road Amendment:

TII notes this amended objective and notes that no reference has been made with respect to the Dublin Tunnel which underlays part of these lands despite TII's previous submission. The Council is advised that development, by reason of proximity to the Dublin Tunnel can pose a risk to the structural stability and safety of the Tunnel, national traffic management and endanger public safety. Great care needs to be taken with regard to management of development in this area. Therefore, TII would highlight that reference needs to be included on this matter in the adopted plan. This is especially important as details of the procedure and status for the masterplans has not been outlined.

Recommendation

There are important requirements which relate to structural engineering of any proposed development that lies over the Dublin Tunnel corridor area. In view of this critical issue, TII advises that the status of this masterplan and details of consultations needs to be clarified in an amended Draft Development Plan. In particular TII's requirements will need to be taken of the requirements for Dublin Tunnel Structural Safety as included in appendix 5 of the draft plan. This should be highlighted in the text associated with this amendment for clarity purposes.

3. Material Alteration Reference Number 7.15 Chapter 7 Section: 7.5.8 Public Realm, Objective CCUVO13

The Luas Green Line runs via College Green. Unlike buses, trams require fixed tracks, overhead lines, fixings and associated infrastructure which are more difficult and costly to alter. In addition, changes to this infrastructure and the also the implementation of amended street management practises can create disruption to the Luas network service which should be avoided and/or ameliorated. Luas can also be classified as traffic. This is an important factor which have implications for the practical implementation of this proposed scheme, and which needs to be acknowledged and clarified in this amendment prior to the adoption of the development plan.

Recommendation

TII advises that the requirements for the running of Luas through College Green needs to be acknowledged therefore TII recommends the following text change in green highlight to this amendment:

"To implement a programme of environmental and public realm improvements along the Grand Civic Spine from Parnell Square to Christchurch Place and along the city quays, and to prioritise ~~(the redevelopment of College Green as a pedestrian friendly civic space including the pedestrianisation of Foster Place)~~ {and deliver the redevelopment of the College Green and the Dame Street area up to the junction with South Great George's Street and including Foster Place, as a premier civic space for the city with world class pedestrian public realm.}"

4. Material Alteration Reference Number 10.9 Section: 10.5.4 Parks and Open Spaces Page: 371 Insert a New Objective after GIO30.

TII notes and supports the principle to to expand Mount Bernard Park northwards to the Royal Canal. The Green Line Luas interacts and runs within this area. The maintenance of the operation and safety of the system is therefore essential and would need to be addressed as part of such an exercise.

Recommendation:

TII advises that any structures erected which interacts with Luas infrastructure will be required to comply with TII's "Code of engineering practice for works on, near, or adjacent the Luas light rail system" and appendix 5 of the Draft Development Plan. TII requests consultation with regard to public realm and pedestrian improvements schemes.

5. Material Alteration Reference Number 12.36 Chapter 12 Section 12.5.7 Culture in the Public Domain, insert New Objective after CU055 - Broadstone Plaza.

TII supports the City Council's requirement for the developing Culture in the Public Domain at Broadstone Plaza. However, the integrity and safety of the light rail operation must be protected by ensuring that risks associated with vehicular, cyclist and pedestrian access are addressed. Inappropriate management of the public realm on areas bordering light rail corridors can lead to adverse impacts on safety, efficiency and service reliability of the light rail service. In addition, public safety needs to be safeguarded. TII would welcome the opportunity to work with Dublin City Council, TU Dublin and Grangegorman Development Agency to ensure all are objectives are achieved. In this regard TII recommends consultation and an addition to the text included.

Recommendation

TII recommend the additional text highlighted in green to take account of the Luas management interactions at this location:

To undertake a study to examine the potential of utilizing the Broadstone Plaza for hosting public events and markets and to explore opportunities to work with TU Dublin and Grangegorman Development Agency **and TII** in developing new opportunities for public events in this area.

6. Material Alteration Reference Number 13.60 Chapter 13 Figure 13-14: SDRA 14 St. James Healthcare Campus and Environs

TII supports the City Council's requirement for the further regeneration and intensification of health, research and educational uses within this site. TII also notes that this will be subject to the key guiding principles set out and the requirement for a Masterplan to be agreed with the Planning Authority. No details are provided with regard to the status of this Masterplan.

In accordance with official policy provisions, TII is of the opinion that where such masterplans are proposed to be used to inform development management decisions, particularly in relation to areas with the potential to impact the transport network, planning authorities should incorporate them in the development plan or local area plan. Public consultation should also be integrated into their preparation. Primary concerns relate to the absence of appropriate plan-led evidence-based planning and the absence of future liaison and collaboration with TII in relation to planning exercises promoted by the local authority that have significant implications for light rail operations and safety in the area concerned.

This would, in particular, be an issue with regard to the St. James's Street Gateway where public realm improvements are proposed and James's Walk/ Grand Canal Park with access across the Luas track indicated. TII advises that with respect to access across or parallel with the Luas line there are issues for the safety of pedestrians and cyclists as well as tram safety and operation which need to be addressed.

The integrity and safety of the light rail operation must be protected by ensuring that risks associated with vehicular, cyclist and pedestrian access are minimised by carefully managing access to the light rail corridors. Vehicular, cyclist and pedestrian access to properties bordering light rail corridors can lead to adverse impacts on safety, efficiency and service reliability of the light rail. Increased vehicle access across light rail corridors may also negatively impact on light rail operating times and service level performance targets and increase risk to public safety. The safety of pedestrians, cyclists, road users and light rail transport infrastructure can be safeguarded by appropriately managing access to the light rail corridor at the earliest stages of planning and design.

TII would advise that any new vehicular, cyclist or pedestrian access arrangement cannot be facilitated, apart from where exceptional circumstances exist and agreement with TII has occurred during the application pre-planning stage or during the preparation of city, county or local area development plans. In this situation no such agreements have been achieved.

Recommendation

The Authority requests that this issue of Masterplanning and also interaction with Luas within the St. James Medical Campus and Environs is clarified and addressed by the amendment of Draft Plan to address facilitate consultation, liaison and evidence base requirements required by official policy provisions.

7. Material Alteration Reference Number 13.69 Chapter 13 Figure 13-16: SDRA 16 Oscar Traynor Road Page: 595

The Dublin Tunnel is one of the largest and most complex infrastructural projects to have been undertaken in the history of the State. The Tunnel provides direct access to Dublin Port for HGV traffic from the national road network and, in conjunction with Dublin City Council's HGV management strategy, provides for a significant reduction in the number of HGV movements on Dublin's streets. Transport Infrastructure Ireland is charged with managing the operation and maintenance of the Dublin Tunnel, an important aspect of which is managing its capacity to cater for current and future transportation citywide demands.

TII is unclear if the planning authority has undertaken an assessment to examine issues to mitigate adverse effects from the existing Dublin Tunnel traffic for development proposals at this location, such as access, drainage, severance traffic noise and vibration, vehicle generated emissions; lighting/glare; dust and non-point source pollution and visual impact as previously advised. In addition, TII would highlight that there is Tunnel infrastructure located on the western boundary which needs to be protected.

Recommendation

Dublin City is advised to consult Chapter 3 of DOECLG's Section 28 Statutory Guidance Spatial Planning and National Road Guidelines for Planning Authorities 2012 with regard to development locations in proximity to existing and proposed national road infrastructure. This would include area adjacent to the exits and entries of the M50 Tunnel. In addition, TII would also refer to the national road interface drainage issues and Tunnel Infrastructure on the Western Boundary associated with SDRA 16 – Oscar Traynor Road and severance issues need to be addressed.

8. Material Alteration Reference Number 15.15 Chapter 15 Section: Section 15.19 Amendment: 179

TII welcomes the inclusion of Dublin Port in the development plan but notes with concern that the Dublin Tunnel which provides direct access to Dublin Port for HGV traffic from the national road network, has not been referenced despite the need to protect its finite capacity and to ensure the protection of this critical piece of national infrastructure to cater for current and future transportation citywide demands. This would need to be addressed in the final adopted development plan.

Recommendation

TII requests that the additional bullet highlighted below is added:

"15.19 Dublin Port

In assessing proposals for the Dublin Port area, Dublin City Council will have regard to the following:

- Recognition of the important role of Dublin Port in the economic life of the city and the region and the consequent need in economic and employment terms to facilitate port development.
- The periphery of the port area facing residential areas shall be designed to minimise the impact of its industrial character.
- The impact on nature conservation, recreation and amenity use, and other environmental considerations, including having regard to the designation of Dublin Bay as a UNESCO biosphere and other environmental designations such as Special Area of Conservation (SAC) and Special Protection Area (SPA).
- The protection of the amenities of residential and commercial uses in adjoining areas,
- **"Impact on capacity efficiency and safety of the Dublin Tunnel."**
- Design criteria including appropriate landscaping, finishes, signage, boundary treatments and site layout where development adjoins residential and commercial uses.

9. Maps Amendments Map Reference E-0046

TII advises that the northeastern segment of this zoning is located over the Dublin Tunnel corridor protection area. In this instance for any development within this area a Tunnel Assessment is required as per the Dublin Tunnel Guidance Notes, The Assessment of surface and sub-surface developments in the vicinity of the Dublin Port Tunnel (TII March 2009).

10. Maps Amendments E-0060

The Dublin Tunnel is one of the largest and most complex infrastructural projects to have been undertaken in the history of the State. The Tunnel provides direct access to Dublin Port for HGV traffic from the national road network and, in conjunction with Dublin City Council's HGV management strategy, provides for a significant reduction in the number of HGV movements on Dublin's streets. Transport Infrastructure Ireland is charged with managing the operation and maintenance of the Dublin Tunnel, an important aspect of which is managing its capacity to cater for current and future transportation citywide demands.

The area concerned is adjacent the Dublin Tunnel especially with regard to the Southeastern area. TII is unclear if the planning authority has undertaken an assessment to examine issues to mitigate adverse effects from the existing Dublin Tunnel traffic for mixed use development proposals at this location, such as access, traffic noise and vibration, vehicle generated emissions; lighting/glare; dust and non-point source pollution and visual impact.


Recommendation

TII therefore strongly recommends that this zoning is reviewed taking account of these matters and to avoid any adverse impacts for potential residents/communities and to maintain the efficient operation of the Dublin Tunnel

CONCLUSION

To conclude, Transport Infrastructure Ireland as a provider of transport infrastructure and services wishes to emphasise that the importance of the national roads network and light rail infrastructure within the Dublin City region as an integral part of the Dublin City integrated transport strategy as determined by Government thus the issues highlighted in this submission need to be addressed in an amended Draft City Development Plan.

Yours sincerely



Tara Spain
Head of Land Use Planning.