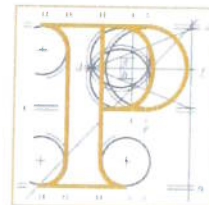


Our Case Number: ABP-321937-25



An
Bord
Pleanála

Transport Infrastructure Ireland
C/O Cliona Ryan Land Use Planner
Transport Infrastructure Ireland
Parkgate Business Centre
Parkgate Street
Dublin 8
D08DK10

Date: 01 May 2025

Re: This proposed development is for flood defences at key locations along the Carrickmines and Shanganagh rivers including new walls/raised existing walls, culverts, localised screens upgrades and localised works in the river. An Environmental Impact Assessment Report (EIAR) is submitted with application
This proposed Flood Relief Scheme for the Carrickmines-Shanganagh Rivers at sites in the townlands of Woodside, Kilgobbin, Carrickmines, Brennanstown, Shankill, Loughlinstown, Shanganagh and Hackettsland

Dear Sir / Madam,

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

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

If you have any queries in relation to the matter please do not hesitate to 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,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

JA02

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64 Marlborough Street
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D01 V902

From: LAPS
Sent: Tuesday 15 April 2025 10:17
To: Aisling Reilly
Subject: FW: TII submission to Flood Relief Scheme for the Carrickmines and Shanganagh Rivers, ABP-321937-25, (TIIref. TII25-130475)
Attachments: TII25-130475 - Carrickmines Shanganagh River Flood Relief Scheme ABP ref. JA06D.321937_issued 14.04.2025.pdf

From: SIDS <sids@pleanala.ie>
Sent: Monday 14 April 2025 12:04
To: LAPS <laps@pleanala.ie>
Subject: FW: TII submission to Flood Relief Scheme for the Carrickmines and Shanganagh Rivers, ABP-321937-25, (TIIref. TII25-130475)

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Monday 14 April 2025 11:47
To: SIDS <sids@pleanala.ie>
Subject: TII submission to Flood Relief Scheme for the Carrickmines and Shanganagh Rivers, ABP-321937-25, (TIIref. TII25-130475)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

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](#)



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.

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

By email: sids@pleanala.ie

Dáta|Date 14 April 2024

Ár dTag|Our Ref. TII25-130475

Do dTag|Your Ref. JA06D.321937

Re: Flood Relief Scheme for the Carrickmines and Shanganagh Rivers

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the notice of the Flood Relief Scheme for the Carrickmines and Shanganagh Rivers application by Dun Laoghaire-Rathdown County Council.

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. 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." To assist the Board in ensuring sustainable compatibility between the State's national road transport asset and proposed flood relief measures, TII's submission seeks to address the safety, capacity and strategic function of the national road network with TII's statutory functions, and the provisions of official policy.

A review of the proposed Flood Relief Scheme (FRS) for the Carrickmines and Shanganagh Rivers application notes that the proposal will interact with the national road network carriageways, structures and management as the proposed scheme works extents occur concurrent with an area maintained as part of the M50 (Junction 15 Carrickmines) by Motorway Maintenance and Renewal Contract (MMaRC) and the N11.

TII welcomes and is supportive of proposals aimed at achieving *Project Ireland 2040* National Strategic Outcomes (NSO) including *NSO 8 Transition to a Low Carbon and Climate Resilient Society* and *NSO 9 Sustainable Management of Water and other Environmental Resources*. TII consider that Individual proposals, by observing provisions of official development policy and in having regard to national road network maintenance and safety should also proceed where they are complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with *NSO 2 Enhanced Regional Accessibility*.

TII considers it is critical to the safe and efficient operation of the national road 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. Therefore, this submission identifies the interactions of the proposed FRS scheme with the national road network, sets out potential impacts arising and identifies appropriate revisions and mitigations in order for the proposed FRS Scheme proceed complementary to, and integrated with the national road network.

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TII would highlight that the applicant in Chapter 5 *Consultation* refers to and records the invited TII EIAR scoping response for this proposal from March 2024 issued under TII24-126434, with much of its content set out in *Table 5.2 Detailed summary of EIAR Scoping Responses*. TII further notes that the entire of the response is exhibited as item 5.4 of *Appendix 5 Consultation Responses of Volume 3 Appendices* of the submitted EIAR. The TII EIAR scoping response included rendition of official national roads policy and TII Publications compliance requirements. TII unfortunately advises that it appears that the applicant has not taken cognisance of elements of the correspondence issued which has material consequences for both TII's evaluation of the documentation submitted and also the proposal in its current form. TII considers that there are material matters which need resolution prior to a decision being made on this application and advises as follows:

1.0 National Roads Policy and National Road Network Maintenance and Safety

One of TII's core functions is to deliver modern, efficient and safe network of national roads. TII advises that this 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 (Technical and Standards) 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 Publications available at www.tiipublications.ie. The Government's NGS *Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland*, states that TII Publications are the Government recommended design guidance for all roads where speed limits of greater than 60 kph apply.

In addition, the Board is advised that 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 and assets. Development proposals having a direct or indirect impacts on the national road network must demonstrate that the proposed development will not have a detrimental impact on the capacity, safety or operational efficiency of the national road network by consideration, design and integration of adequate mitigation of potential impacts into the proposed development and associated works. Therefore, TII advises that it is essential that plans and details which accompany planning applications must demonstrate the protection of the safety, operational efficiency and physical integrity of the national road assets encompasses carriageways, structures, and associated services such as lighting, drainage etc.

Having regard to the foregoing, proposals which impact TII structures must be subject to co-ordination with, and the prior approval of, TII. Having regard to the currently proposed development, TII's EIAR scoping response of March 2024 highlighted the need to undertake the procedure under TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. This Standard specifies the procedures to be followed, in order to obtain Technical Acceptance for structures on motorway and other national road schemes and for the submission of as built records. The procedures cover the design of all road structures, including bridges, tunnels, subways, culverts, buried corrugated steel structures, retaining walls, reinforced earth structures, gantries, environmental noise barriers and temporary structures under or over motorways or other roads carrying public traffic. The Technical Acceptance Requirements for the assessment, alteration, modification, strengthening and repair of all road structures must be prepared in accordance with the TII standard: TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*.

Based on the information associated with this application and TII's own records, no procedure under TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads* has been undertaken. This is a concern given the nature of the proposals, proximity to TII Structures, the potential disruption and cost associated if issues arise, and also the clear requirements that had been established in TII's EIAR scoping response of March 2024.

It is therefore TII's opinion that any decision associated with the proposals associated with this scheme would be premature pending the advised undertaking of the requirements of TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. TII advises that there is a need for the current application to demonstrate that the proposal has been designed to protect of the safety, maintenance and operation of the heavily trafficked national road network at and in the vicinity of the proposed development's location, and to meet the technical feasibility of the proposal having regard to TII Publications requirements, as appropriate.

2.0 National Road Interactions, Mitigations Requirements and Recommendations

The submitted scheme site location maps identify 6 no. "areas" within which works are proposed to occur. Interaction with the national road network occurs in indicated "Area 3" and "Area 5" as the proposal includes works at Junction 15 of the M50 (Carrickmines) and at the N11.

In particular, TII observes that the proposed FRS Scheme will interact with the national road network carriageways, structures and management as follows:

- A. Includes works to at the M50 slip / R842 Glenamuck Road North roundabout. This roundabout and entire of its western and eastern arms is part of the M50 as M50 Junction 15 (Carrickmines) and part of Motorway Maintenance and Renewal Contracts (MMaRC) Network Area A.

Extent of proposed works area indicated on submitted Drawing entitled *Site Location Maps Area 3 - Glenamuck Road North*, Drawing No. 20108-JBB-00-XX-DR-Z-02903 Rev. C01, dated 20-02-2025.

- B. Includes works along the N11 on the western and eastern side of its junction with the Bray Road and Cherrywood Road (R116). On the eastern side of the N11 and Cherrywood Road junction works are proposed in the N11 in immediate proximity of existing TII Structures (Eirspan Structure Name: *Loughlinstown River Bridge*, ID: *DR-N11-003.00* and Name: *Loughlinstown River Culvert*, ID: *DR-N11-002.00*).

Having regard to potential disruption of national road network traffic flows and physical interventions, TII notes in particular that the proposed development includes "measure 4C" proposing a new 2.4 metre diameter culvert across the N11 to be installed by open cutting immediately adjacent the existing *Loughlinstown River Culvert*.

Extent of proposed works area indicated on submitted Drawing entitled *Site Location Maps Area 3 - Lower Brides Glen, N11 & Bray Road*, Drawing No. 20108-JBB-00-XX-DR-Z-02905 Rev. C01, dated 20-02-2025.

In this area, the N/M11 and M50 are identified as part of the TEN-T Comprehensive Network. The Authority's priorities in relation to existing national roads are the maintenance of the existing national road network, including junctions and safeguarding the Exchequer investment in national roads to date. TII considers it is critical to the safe and efficient operation of the national road 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.

Therefore with concern, TII would highlight to the Board that the existing national road network subject to official national roads development policy and TII Publications compliance does not appear to be separately considered as discreet subsections of the submitted EIAR, including at Chapter 11 *Material Assets – Traffic and Transport*.

Due to this omission TII is unable to evaluate the impact of the proposal on the maintenance of the safe and efficient operation of the national road network has been adequately considered and therefore TII is not assured that mitigation of potential impacts on the national road network have been captured in the submitted EIAR.

TII has reviewed the EIAR and would highlight the following parts of the submitted EIAR *Volume 2 Main Report* are highlighted:

- **Chapter 2 Examination of Alternatives.** Volume 3 Appendices for Chapter 2 records "No appendices".

Subsection 2.1.3 *Initial screening summary* identifies 5 no. "flood cells" depicted at Figure 2.1 that indicate that flood cells 3 and 4 include the M50 and flood cells 4 and 5 include the N11. TII observes that *Table 2.1: Measures*

considered and tested at initial screening stage appears to set out all “measures” considered, those “screened out” and those taken forward. Section 2.2. contains *Table 2.2: Summary of measures for Option 1* that describes all works measures of the proposed Scheme.

TII is of the opinion that there will be a significant impact on the heavily trafficked N11 carriageway and traffic that will have onward negative traffic disruption impact on the N11 and M50 (which is under MMarC management), for the installation of measure 4C in flood cell 4 “4.C: Upgrade of N11 culvert – Addition of culvert running parallel to existing” consisting of a 2.4 metre diameter pipe be installed by open cutting. This approach is promoted instead of TII preferred horizontal directional drilling (HDD). The applicant, in assessing reasonable alternative design or technology for culvert crossing of the N11, proposes a more disruptive and physically invasive construction open cutting construction approach over underground proposal for the proposed culvert. This is a concern. TII notes the basis for rejection of underground method of installation of the N11 culvert at EIAR subsection 2.2.3. It is TII’s opinion that the carrying forward of the open cutting method has not been appropriately identified as having inherently significant potential negative impact on traffic in the absence of mitigation.

TII is of the opinion that the potentially significant adverse impact on the existing TII Structure *Loughlinstown River Culvert*, the N11 carriageway and associated traffic disruption by the open cutting installation method of a new culvert adjacent does not appear sufficiently detected as adverse in *Table 2.4: Summary of the environmental impacts of the measures in each cell, as assessed in the Options Report stage of the FRS*. As a result of the the absence of the identification of the adverse traffic impact of the open cutting method of installation of the proposed N11 culvert, it does not appear to TII that adequate and appropriate specific, tailored mitigation for this disruption has been provided as part of the proposal.

In addition, and related to item 1 of this observation, TII is seriously concerned that options assessment at section 2.2 does not appear to have had regard to TII Publications, in particular TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. This would be critical to establish the impact of the proposed culvert on the existing TII Structure, and / or the new proposed culvert that by proposed installation in the N11 is subject to TII Publication compliance. TII advises that this element of the proposal presents significant implications for TII and road authorities in the future management and maintenance of the strategic national road network assets. TII is of the opinion that the consideration of alternatives should reflect the provisions of official policy in related to national roads and consideration of and compliance with relevant TII Publications which are currently not reflected.

It is therefore TII’s opinion that any decision associated with this proposal would be premature pending the resolution of this issue especially in respect of the requirements of TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. TII advises that there is a need for the current application to demonstrate that the proposal has been designed to protect of the safety, maintenance and operation of the heavily trafficked national road network at and in the vicinity of the proposed development’s location, and the technical feasibility of the proposal having regard to TII Publications requirements, as appropriate.

- **Chapter 3 Description of the Proposed Development.** Volume 3 Appendices for Chapter 3 records “No appendices”.

The proposed works identified as directly impacting the national road network are measures “3.A Addition of defences in the area around Glenamuck Rd North Roundabout” and “4.C Addition of flood relief culvert at the N11 crossing”, further described at subsections 3.3.4 *Glenamuck Road North – 3.A* and 3.3.8 *N11 Overflow Culvert – 4.C* and provided with separate site layout, elevations and sections drawings.

TII is concerned that the description of the proposal does not identify that measure 3.A is proposed to be undertaken in an area managed as part of MMarC Network Area A. In addition, as already explained, TII is more seriously concerned that the measure 4.A description does not appear to identify that culvert design and installation requires compliance with TII Publications. Nor does the applicant identify that the existing N11 and associated TII Structures require assessment of impact also having regard to compliance with TII Publications.

Construction duration is stated to be expected to be 18 to 24 months. Subsection 3.4.2 *Construction Traffic Route* refers to the national road network M50, M11 and N11 and directs the reader to Chapter 11 of the EIAR. However TII notes that in section 3.5 *Maintenance and Operational Activities*, it is stated that “*Following construction, each proposed measure will have its own bespoke management plan.*”

TII is again concerned that the proposed resulting structures inspection and maintenance does not refer to MMarC maintenance boundary in respect of Glenamuck Road North Roundabout or to the requirements associated with TII Publications in respect of the proposed N11 culvert crossing.

- **Chapter 11 Material Assets – Traffic and Transportation.** Volume 3 Appendices for Chapter 11 records “No appendices”.

TII notes with concern that EIAR Chapter 11 at section 11.2 *Assessment Methodology*, subsection 11.2.1 *Legislation and Policy* omits official planning policy for development at or near national roads set out in the Planning and Development Act 2000, as amended section 28 Guidelines: DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012). However, it is noted that National Roads 2040, a statement of TII’s strategy, which is not development policy is recorded at EIAR subsection 11.2.1 *Legislation and Policy*. In addition, Chapter 11 of the submitted EIAR includes a section 11.10 *Reference* that does not record official national roads policy nor relevant TII Publications for works proposed that impact the national road network. It would appear that the applicant is not aware of national planning policy and design requirements associated with the national road network despite TII’s EIAR scoping response of March 2024.

Section 11.5 sets out the intended *Mitigation Measures* to be deployed as part of the scheme and for the construction phase. Associated with national road matters already outlined and explained TII notes and has concerns in respect of the following:

- Having regard to the occurrence of parts of the works within the M50 MMarC Contract Area A at Glenamuck Road North and in the N11, the likely impact of traffic diversion on the N11 and M50, and the utilisation of the national road network for the construction traffic haul routes, it is appropriate that TII as the National Roads Authority be a primary consultee for the committed “Traffic Management Plan” and “construction management plan” and “construction traffic management” plan within.

However, upon review of submitted application documents TII observes with concern that TII is not included as a stakeholder in the Preliminary Traffic Management Plan described in the Preliminary CEMP as to be prepared “... *in full consultation with DLRCC, An Garda Síochána, the Fire Service and the Ambulance service prior to the issuing of tender documents.*” Nor is TII recorded for approval of the “construction management plan” that includes a “construction management plan” at section 11.5 *Mitigation Measures* of the submitted EIAR; “...*a full and detailed construction management plan will be submitted to and agreed in writing with the DLRCC, which shall include, inter alia, a construction programme for the works, hours of operation, a traffic management plan, noise and dust mitigation measures and details of construction lighting.*” Nor is consultation with TII included in the “general mitigation measures” listed after Table 11.8 for agreement with “*DLRCC prior to construction*” that appear to relate primarily to construction traffic.

- EIAR Table 11.8: *Specific Mitigation Measures* describes mitigation measures at “Glenamuck Road North” where the roundabout is within the MMarC managed area of the M50 and “N11 Overflow Culvert” that is in the N11 immediately adjacent existing TII Structures. In both specific mitigation instances, consultation and prior agreement with TII and the MMarC Contractor, as appropriate for traffic and works management does not appear recorded and/or considered as part of proposed mitigation.

As already indicated, TII is seriously concerned that Technical Acceptance of the proposed N11 culvert and assessment of impact on the existing culvert in accordance with TII Publications, in particular TII Publication DN-STR-03001 is not identified as required mitigation.

TII is also concerned that proposed specific mitigation for proposed working hours to minimise impacts of physical N11 carriageway works and associated traffic disruption does not represent reliable or monitorable mitigation as it does not appear there is a proposal to limit construction working hours or require transport assessment/management to maintain free and safe flow of traffic during construction works.

In this regard, TII notes that the EIAR specific mitigation for the N11 works extends to “advise” night-time working but allows for a future Contractor to “opt” for day-time working and that a “full traffic assessment” would only be required where day-time working is proposed. This is despite identifying the N11 as “...a heavily trafficked national road”. This is a serious concern and requires much more detailed consideration than addressed in the applicant’s documentation as it relates to a critical national road which serves a significantly greater catchment than the Council’s administrative area and legal jurisdiction.

Allied to this TII would highlight that the proposed new culvert and open cut method of installation represents significant works that will impact the N11 carriageway and will have significant traffic disruption impacts, including onto the national road network N11 and M50 where they are managed as part of MMarC Contract Area A. It is TII’s opinion that these impacts are not sufficiently mitigated in the proposal especially with a lack of consideration of the TII preferred horizontal directional drilling (HDD). As indicated the applicant in assessing reasonable alternative design or technology for culvert crossing of the N11, proposes to undertake more disruptive and physically invasive construction open cutting construction approach over underground proposal for the proposed culvert on a heavily trafficked and strategic national road.

- A Preliminary Construction Environmental Management Plan (CEMP) has been submitted in addition to the EIAR. TII notes that subsection 6.6.2 *Culvert Design* again does not include reference to the requirement for Technical Acceptance in accordance with TII Publication *DN-STR-03001*.

TII also again observes that the existence of part of the works occurring within the MMarC area A and requiring the necessity for consultation with the MMarC Area A contractor via TII do not appear to be recorded. In addition, the ongoing maintenance arrangements associated with the proposal do not appear to be considered as part of the mitigation that the CEMP represents.

This CEMP indicates the utilisation of the national road network N11, M11 and M50 for construction haul routing and commits to the preparation of a Construction Traffic Management Plan.

Having regard to the format of the submitted EIAR and preliminary CEMP, TII consider that it would have been appropriate to include and record mitigation of potential impacts for the protection of the national road network and compliance with relevant TII Publications as part of the FRS Scheme in Chapter 11 of the EIAR and in the CEMP.

Details of direct interactions identified are set out below:

A. Proposed FRS Scheme - Interactions with the M50 at the Glenamuck Road North Roundabout

The proposal includes works for measure “3.A Addition of defences in the area around Glenamuck Rd North Roundabout” identified on submitted drawings and on figure 3.5 of the submitted EIAR. The proposed associated works include alterations to roadside walls and railings which part occur within the area that forms part of the M50 subject to TII Motorway Maintenance and Renewals Contract (MMaRC) Network A.

Due to the location of works associated with the scheme relative to the M50, there is potential for impacts and interactions between this section of the national road network and the FRS Scheme which, based on the material submitted, does not appear to have been separately identified nor evaluated for mitigation in the proposed scheme.

As noted above, elements of the national road network are operated and managed by Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. TII advise that the Glenamuck Road

North Roundabout is part of MMarC Network Area A. 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. This has not occurred.

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 Glenamuck Road North Roundabout.

TII is unable to ascertain from the material submitted if these matters have been considered. This is again an issue which will require resolution prior to a decision being made.

B. Proposed FRS Scheme - Interactions with the N11

The proposal includes works for measure “4.C Addition of flood relief culvert at the N11 crossing” identified on submitted drawings and on figure 3.7 of the submitted EIAR. The proposed associated works include an open cutting installation of a 2.4 metre diameter culvert of approximately 53 metres in length in the N11. Crucially, this proposed culvert appears to lie immediately adjacent the existing N11 *Loughlinstown River Culvert* (Structure ID: DR-N11-002.00), and *Loughlinstown River Bridge* (Structure ID: DR-N11-003.00). These are both existing TII Structures.

The N11 is part of the national road network, and as already explained, works impacting that road and its structures, including drainage must be identified and undergo detailed design and execution in accordance with TII Publications standards.

In this regard, there is a necessary requirement for the protection of the national road network function that all of the works proposed under, over and in the vicinity of the N11, especially the specific protection of existing TII Structures adjacent the proposed new N11 culvert, be identified and undergo detailed design and execution in accordance with TII Publications (Standards). Having regard to the intention of the proposed N11 culvert to be located in the N11, it is required to comply with TII Publications. The applicant is required to pursue TII Structures technical approvals as required under TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads* which do not appear to have been considered or undertaken for either existing TII structures or the N11 culvert proposed. As stated earlier in this correspondence, this will require resolution prior to a decision being made on this application.

3.0 Necessary national road network mitigation as part of the proposed FRS Scheme

TII considers that the submitted EIAR by particular reference to Chapters 3 (*Construction*), 5 (*Consultation*) and 11 (*Traffic and Transportation*), and the Preliminary Construction Environmental Management Plan (CEMP) 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 MMarC Areas.

As already highlighted, having regard to the stated intention in the submitted EIAR and CEMP to utilise the national road network for construction haul routes and most critically for significant construction undertakings within the N11 and, to a lesser extent, within the national road maintenance boundary at the Glenamuck Road North Roundabout part of Junction 15 of the M50, there is a requirement for the mitigation of potential construction and operation stage impacts through coordinated and managed in consultation with Transport Infrastructure Ireland (TII).

The national road network is a vital national asset performing a strategic traffic function. The proposed development, to be able to proceed complementary to the protection of the safe and efficient operation of the national road network in the interests of successful integration of sustainable development policy, must and needs to be subject to specific mitigations to be agreed. It is also appropriate that specific mitigation and monitoring commitments for potential impact on the national road network are reflected in the proposed FRS Scheme as assessed in the submitted EIAR, and in the submitted Preliminary CEMP.

To ensure the strategic function of the M50 motorway and the N11 within and in the vicinity of the proposed 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, any works to structures forming part of the national road network requires TII Technical Acceptance in accordance with TII Publication *DN-STR-03001*. For the avoidance of doubt, compliance with TII Publication *DN-STR-03001* is required to demonstrate the protection of the existing N11 TII Structures *Loughlinstown River Culvert* (Structure ID: DR-N11-002.00), and *Loughlinstown River Bridge* (Structure ID DR-N11-003.00) and the proposed N11 culvert.
- Consideration of the TII preferred horizontal directional drilling (HDD) for the proposed new N11 culvert. As indicated the applicant in assessing reasonable alternative design or technology for culvert crossing of the N11, proposes to undertake more disruptive and physically invasive construction open cutting construction approach over underground proposal for the proposed culvert on a heavily trafficked and strategic national road without due evaluation of the above item and EIAR scoping response.
- 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 Contractor and fulfilment of requirements to complete their 3rd 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.

The Authority also requests that the Construction Traffic Management Plan to be prepared as part of the CEMP specifically include TII amongst its primary stakeholders to ensure embedded mitigation of potential national road impacts.

4.0 National Road Network Recommendations

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

TII advises that the proposed development includes works that must be subject to co-ordination with and the prior approval of TII in accordance with TII Publications. In particular, TII advises that the FRS Scheme proposes to introduce significant new infrastructure in the N11 that must be subject to TII Publication compliance as must its potential impact on existing adjacent TII Structures. The outcomes of these requirements may create material alterations to the current proposal. In addition, TII advises that the FRS Scheme proposes to introduce alterations to the Glenamuck Road North Roundabout which is part of MMarC Area A, that will have consequences for liability and maintenance responsibilities especially where no agreements have been made.

The proposed works identify the M50, N11 and M11 elements of the national road network as part of the intended construction haul route. In addition, works proposed within MMarC Area A and on the N11 have the potential for significant traffic disruption which will impact the maintenance of the safety and efficiency of the national road network in the vicinity of the proposed scheme sites which in TII's opinion has not been addressed appropriately.

TII advises that these matters need to be achieved by resolution prior to a decision being made on the current proposal to provide clarity on scheme developments and to ensure the avoidance of future maintenance gaps.

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 and MMaRC Network Area A Contractor 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 the national road network. TII trusts that the foregoing comments will be of assistance to the Board in considering the proposed Flood Relief Scheme.

TII would appreciate acknowledgment of receipt of this submission.

Yours faithfully,



Cliona Ryan
Land Use Planner