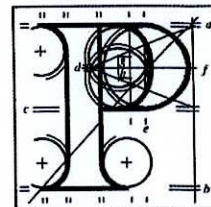


Our Case Number: ABP-316828-23



**An
Bord
Pleanála**

Transport Infrastructure Ireland
Land Use Planning
Parkgate Business Centre
Parkgate Street
Dublin 8
D08 DK10

Date: 19 July 2023

Re: Tallaght/Clondalkin to City Centre BusConnect Core Bus Corridor Scheme.
Tallaght/Clondalkin to Dublin City.

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.

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,

Niamh Thornton
Executive Officer
Direct Line: 01-8737247

HA03

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

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

Niamh Thornton

From: LAPS
Sent: Tuesday 4 July 2023 16:56
To: Niamh Thornton
Subject: FW: TII submission ABP Ref. HA29N.316828_ Tallaght / Clondalkin BusConnects_NTA, TII ref. TII23-122863
Attachments: TII23-122863 - Tallaght-Clondalkin BusConnects_issued 04.07.2023.pdf

From: SIDS <sids@pleanala.ie>
Sent: Tuesday, July 4, 2023 4:28 PM
To: LAPS <laps@pleanala.ie>
Subject: FW: TII submission ABP Ref. HA29N.316828_ Tallaght / Clondalkin BusConnects_NTA, TII ref. TII23-122863

From: Landuse Planning <LandUsePlanning@tii.ie>
Sent: Tuesday, July 4, 2023 4:26 PM
To: SIDS <sids@pleanala.ie>
Cc: Landuse Planning <LandUsePlanning@tii.ie>
Subject: TII submission ABP Ref. HA29N.316828_ Tallaght / Clondalkin BusConnects_NTA, TII ref. TII23-122863

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.

De réir pholasáí BIÉ An Ceart gan a bheith Ceangailte, má tá an ríomhphost seo á fháil agat lasmuigh de na gnáthuaireanta oibre, nílim 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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An Bord Pleanála
(Strategic Infrastructure Division)
64 Marlborough Street
Dublin 1
D01V902

By email: sids@pleanala.ie

Dáta | Date 04 July 2023

Ár dTag | Our Ref. TII23-122863

Do dTag | Your Ref. HA29N.316828

Re: Tallaght / Clondalkin to City Centre BusConnects Core Bus Corridor Scheme

Dear Sir/Madam,

Transport Infrastructure Ireland (TII) acknowledges receipt of referral of the BusConnects Tallaght / Clondalkin to City Centre Core 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 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 provision 1 as follows:-

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

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

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

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

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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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 and existing Luas networks 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 capable of impacting the national road and light rail networks directly or indirectly.

The proposed Tallaght/Clondalkin BusConnects scheme will interact with the national road network schemes, carriageways and structures, and the light rail network tramways, tramstops and associated under and overground services at four general locations (moving west to east along the BusConnects proposed routes).

National Road Network Identified Interactions:-

1. Crossing under the M50 along the Nangor Road (R134) alongside the Grand Canal north of M50 Junction 9 (Red Cow).
2. Crossing over the M50 utilising two new pedestrian and cycle bridges alongside the existing Greenhills Road (R819) bridge, a TII Structure just south of M50 Junction 10 (Ballymount)

Light Rail Network Identified Interactions:-

3. Crossing the Luas Red line just east of Tallaght Luas Tramstop
4. Travelling along the Naas Road over which Luas Red Line travels from the junction of New Nangor Road (R134), Long Mile Road and Naas Road (R110) where a new overbridge is proposed, eastward past Robinhood Road including Kylemore Luas Tramstop to junction of Kylemore Road, Walkinstown Avenue (R112) and Naas Road (R810).

In addition, 4 no. of the construction compounds proposed for the scheme are in the vicinity of either the national road network (TC1 and TC5 and TC6) or the light rail network (TC13). The location of these compounds in the vicinity of the national road and light rail networks and the traffic they will generate may give rise to indirect impacts on the national road and light rail networks.

Table 1 Summary of interactions of proposed Tallaght / Clondalkin BusConnects scheme with the national road and light rail networks

Proposed Tallaght / Clondalkin to City Centre BusConnects General Arrangement Drawing	Summary National Road or Light Rail interface
General Arrangement Drawings – Sheet 46	<p>Identified interface with the M50 by works along the Nangor Road (R134) including under M50 overbridge north of M50 Junction 9 (Red Cow) with N7</p> <p>Occurs within proposed scheme Section 5: New Nangor Road between Woodford Walk / New Nangor Road junction to Long Mile Road / Naas Road / New Nangor Road junction (Section 5a: New Nangor Road) of the submitted EIAR.</p> <p>TII Structure M50 bridge consisting of: TII Structure Name <i>Nangor Road Canal Bridge West</i> Structure ID: <i>IC-M50-011.01</i> TII Structure Name <i>Nangor Road Canal Bridge East</i> Structure ID: <i>IC-M50-011.00</i></p>
General Arrangement Drawings – Sheet 12	<p>Identified interface with the M50 by works to M50 overbridge holding Greenhills Road (R819) just south of M50 Junction 10 (Ballymount) with R838</p> <p>Proposes additional overbridge structures with segregated cycle facilities.</p> <p>Occurs within proposed scheme Section 2: Ballymount to Crumlin (Section 2a: Greenhills Road, Ballymount) of the submitted EIAR The submitted EIAR identifies this bridge as “<i>ST01.09 Greenhills Road Pedestrian and Cycle Bridges</i>” (refers to drawing <i>BCIDA-ACM-STR_GA-0009_RW_08-DR-CB-101 & 102</i> for plan and details).</p> <p>TII Structure Name <i>Greenhills Road Bridge</i> Structure ID: <i>SD-M50-013.00.</i></p> <p>Proposed construction compounds TC5 and TC6 in the vicinity.</p>
General Arrangement Drawings – Sheet 2	<p>Identified interface with Luas Red Line alongside the Blessington Road at Tallaght Luas Tramstop.</p> <p>Occurs within proposed scheme Section 1: Tallaght to Ballymount (Section 1c: Old Blessington Road) of the submitted EIAR</p>
General Arrangement Drawings – Sheet 51 Sheet 52 Sheet 53	<p>Identified interface with Luas Red Line from junction of New Nangor Road (R134), Long Mile Road and Naas Road (R110), eastward past Robinhood Road including Kylemore Luas Tramstop, to junction of Kylemore Road, Walkinstown Avenue (R112) and Naas Road (R810).</p> <p>Occurs within proposed scheme Section 5: New Nangor Road between Woodford Walk / New Nangor Road junction to Long Mile Road / Naas Road / New Nangor Road junction (Section 5b: Naas Road / Long Mile Road Junction) of the submitted EIAR.</p> <p>Proposed construction compound TC13 in the vicinity.</p> <p>and</p> <p>proposed scheme Section 6: Long Mile Road / Naas Road / New Nangor Road junction to Drimnagh (Section 6a: Naas Road) of the submitted EIAR.</p> <p>and</p> <p>proposed scheme Section 6: Long Mile Road / Naas Road / New Nangor Road junction to Drimnagh (Section 6b: Naas Road / Walkinstown Avenue Junction) of the submitted EIAR.</p>
Proposed Construction Compounds within the vicinity of the national road and light rail networks	<p>Identified potential interface with the N81</p> <p>Construction compound TC1 proposed to be located at the western end of Old Blessington Road, adjacent to the junction with the N81 Tallaght Bypass.</p> <p>Occurs within Section 1: Tallaght to Ballymount (Section 1a: Old Blessington Road / Belgard Square South Junction) of the submitted EIAR.</p> <hr/> <p>Identified potential interface with the M50</p> <p>Construction compound TC5 proposed to be located at a green space along Greenhills Road, outside Tallaght Truck Dismantlers north-east of the M50 Motorway.</p>

	<p>Occurs between proposed scheme Section 1: Tallaght to Ballymount (Section 1p: Bus Route Parkview) and proposed scheme Section 2: Ballymount to Crumlin (Section 2a: Greenhills Road, Ballymount) of the submitted EIAR.</p> <p>Construction Compound TC 6 proposed to the east of the M50.</p> <p>Occurs within proposed scheme Section 2: Ballymount to Crumlin (Section 2a: Greenhills Road, Ballymount) of the submitted EIAR.</p> <p>Construction Compounds TC5 and TC6 will be located at the green spaces on the east side of the Greenhills Road, either side of, and adjacent to, the M50.</p> <p>Identified potential interface with Luas Red Line</p> <p>Construction compound TC13 proposed located at southern side of Junction of Naas Road and Long Mile Road (R110).</p> <p>Occurs within proposed scheme Section 5: New Nangor Road between Woodford Walk / New Nangor Road junction to Long Mile Road / Naas Road / New Nangor Road junction (Section 5b: Naas Road / Long Mile Road Junction & 6a: Naas Road) of the submitted EIAR.</p>
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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:

- Chapters 4 *Description of the Scheme* and 5 *Construction*: This Chapter of the EIAR divides the proposed scheme into 6 no. sections to describe the proposal and 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 similarly divides the proposed scheme into 6 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 submitted 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. It further appears that the CEMP at Appendix A5.1 includes mitigation under "Traffic Management Provisions" for Luas only during the construction phase stating that "The operation of Luas Red Line will be maintained at all times, with works which may affect Luas operation restricted to times outside of peak hours during night-time and weekend possessions", and that a temporary pedestrian crossing to provide access to the Kylemore Tramstop when the footway alongside the left turn slip is closed. It does not appear that any mitigation provisions are recorded in relation to the maintenance and protection of the national road network in the CEMP.
- 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 N81, part of the national road network and to the R810 and R110 over which Luas travels.

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. This part of the submission is made having regard to official policy for development at or near national roads as outlined in the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012).

TII as the national roads authority sets development guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale or typology.

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. 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.

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

2.1 Proposed scheme (Section 5a), Interactions with the M50 at Nangor Road (R134)

The BusConnects proposal includes works along the Grand Canal on Nangor Road (R134) that passes under and M50 where two TII Structures carry the M50 (TII Structure Name *Nangor Road Canal Bridge West*, Structure ID: *IC-M50-011.01* and TII Structure Name *Nangor Road Canal Bridge East*, Structure ID: *IC-M50-011.00*).

The national road network includes associated infrastructure assets including lighting, gantries, signage, substations, boundary treatments and drainage arrangements. South of the M50 overbridge structures is a further TII structure in the form of a culvert (TII Structure Name *Cammock River Culvert* Structure ID: *IC-M50-012.00*).

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.

By reference to the submitted *Mainline Plan and Profile* drawings (Sheet no. 35) it does not appear that any alteration in existing R134 Nangor Road elevation and therefore bridge clearances is proposed as part of the scheme and no alteration is indicated to the bridge. Notwithstanding, it is appropriate and necessary for the protection of the national road network function that all of the works proposed under and in vicinity of the bridge be captured, undergo detailed design and execution in accordance with TII Publications standards.

Works proposed in the vicinity of TII structures will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website www.tiipublications.ie.

This part of the M50, including the bridge, is managed and operated by M50 Concession Ltd. under a PPP Concession Contract. Consultation with the PPP Contractors is required, via Transport Infrastructure Ireland (TII), in relation to any works proposed that affect the motorway and national roads and associated junctions in terms of operational requirements such as timetabling.

2.2 Proposed scheme (Section 2a), Interactions with the M50 at Greenhills Road Bridge (TII Structure ID SD-M50-013.00), identified in submitted plans as Structure ST01.09

The BusConnects proposal includes works to, and in the vicinity of, an existing TII Structure (TII Structure Name *Greenhills Road Bridge*, Structure ID: *SD-M50-013.00*) that carries the Greenhills Road (R819). To the immediate south of the bridge, on the M50 northbound carriageway is a gantry identified on the submitted *General Arrangement Drawings* Sheet no. 12.

The proposed scheme includes two new single span pedestrian / cycle bridges immediately parallel to the Greenhills Road Bridge over the M50 at this location. The submitted EIAR at Chapter 4 *Description of the Proposed Scheme*, subsection 4.5.2.1 includes reference to the requirement to acquire lands either side of the M50 to facilitate construction of these bridges. The submitted *Bridge and Major Retaining Structures* drawings include drawing *BCIDA-ACM-STR_GA-0009_RW_08-DR-CB-201 Tallaght / Clondalkin to City Centre Scheme ST01 Greenhills Road Pedestrian & Cycle Bridges Plan* and drawing *BCIDA-ACM-STR_GA-0009_RW_08-DR-CB-202 Tallaght / Clondalkin to City Centre Scheme ST01 Greenhills Road Pedestrian & Cycle Bridges Details*.

The submitted EIAR at Chapter 5 *Construction*, under 5.5.4 *Structural Works* and subsection 5.5.4.1 *Principal Structures* describes the proposed "Greenhills Road Pedestrian and Cycle Bridge (Structure Reference: ST-01)" as Warren Truss type structures supported by concrete abutments within the embankments on either side of the M50 carriageway. Access for works is described as proposed from adjacent verge area of the Greenhills Road and from the M50 west and eastbound merge lanes. Each bridge structure is proposed to be lifted into place over one night with the M50 proposed to be closed in both directions for that lifting operation. Commitment to liaison by the NTA and the appointed contractor with TII in advance of this operation is described in the EIAR but does not appear to be captured in the CEMP at Appendix A5.1 or Chapter 22 *Summary of Mitigation and Monitoring* of the submitted EIAR.

TII advise that this part of the M50, including lands either side of the motorway, 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.

TII observes that temporary construction compounds TC 5 and TC 6 appear to be within or adjacent to the MMarC maintained area.

TII advises that:

- 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.

2.3 Proposed scheme (Section 1a and Section 2), potential interactions with the national road network by the location of construction compounds and associated traffic

As summarised table 1 above, proposed temporary construction compounds TC 1 (adjacent to the N81) and TC 5 and TC 6 (adjacent to the M50) are either within national road network maintained areas, or in the vicinity of that network such that construction traffic must be specifically managed to avoid impact on the safe and efficient operation of the national road network.

The M50, is a critical part of the motorway and national primary road network. In addition, the N81 forms part of the national road network. Therefore, potential construction and operation stage impacts on the safety, capacity and efficiency of the national road network must be carefully coordinated and managed in consultation with TII and (Public Private Partnerships) PPP Concession Contractors, Motorway Maintenance and Renewal Contractors (MMaRC) and local road authorities in association with TII.

2.4 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 fully 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.

Having regard to the stated intention in the submitted CEMP to utilise the national road network for construction haul routes and for construction undertakings within the national road maintenance boundary of the M50 that will include closing the motorway and installing new overbridges, 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 and N81, 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.
- 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 like timetabling, etc. will require prior consultation with the MMaRC Network A and M50 PPP Contractors 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.

- 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.

2.5 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 that includes structures and associated services such as drainage, gantries, telemetry and signage as well as traffic management planning that must be subject to co-ordination with and approval of TII.

TII advises that the BusConnects scheme introduces new infrastructure in the form of pedestrian cycle bridges alongside the *Greenhills Road Bridge* (TII Structure ID *SD-M50-013.00*), identified in submitted plans as *Structure ST01.09* 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 that includes structures and associated services, that must be subject to co-ordination with and the prior approval of TII in accordance with TII Publications.

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 proposed relevant works on or in the vicinity of the M50 and N81 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 mitigation and monitoring for the national road network.
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:-
 - a) demonstrate consultation with the relevant MMaRC and PPP Contractors, via TII and the relevant road authorities,
 - b) demonstrate contact with 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
 - c) 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, signal detection infrastructure, 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 Interactions identified are set out below:

3.1 Proposed scheme (Section 1c), Interactions with Luas Red Line alongside the Blessington Road at Tallaght Luas Tramstop

The BusConnects proposal includes works adjacent to and crossing Luas Red Line in the vicinity of Luas Tallaght Tramstop and terminus. The BusConnects proposal includes for a bus interchange and associated road finishes, markings and arrangements to Blessington Road and Belgard Square West that run parallel to, and cross Luas.

Submitted drawings, including *General Arrangement Drawing* Sheet no. 2 indicates that the proposed scheme will include the pedestrian dwell area of the existing uncontrolled pedestrian crossing of Luas from Blessington Road to Belgard Square West that is located to the west of Luas Tallaght Tramstop and terminus.

Potential road closures, and under and overground works for the proposed scheme 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 during construction and operation phases of the scheme.

3.2 Proposed scheme (Sections 5b, 6a and 6b), Interactions with Luas Red Line from junction of New Nangor Road (R134), Long Mile Road and old Naas Road (R110), eastward past Robinhood Road including Kylemore Luas Tramstop to junction of Kylemore Road, Walkinstown Avenue (R112) and old Naas Road (R810).

The BusConnects proposal includes significant works adjacent to, crossing and oversailing Luas Red Line along a section of the Naas Road over which Luas Red Line travels and includes Luas Kylemore Tramstop. The BusConnects scheme proposes landscaping, surfacing, signage and signalling changes along this section of Luas. Works proposed include alterations to crossings of Luas, junctions shared by Luas and adjacent to it.

In addition, to existing junctions, this section of Luas currently holds four pedestrian crossings. These are located on the Naas Road on the western side and eastern (city) side of the junction with Nangor and Long Mile Roads, close to Robinhood Road and adjacent to the Luas Kylemore Tramstop at the junction with Walkinstown Avenue. The BusConnects scheme proposes a new pedestrian and cycleway crossing (overbridge) at the junction with Nangor and

Long Mile Roads and alterations to the other two pedestrian crossings of Luas. It is further noted that bus stops and laybys in the vicinity of Luas Kylemore Tramstop are proposed that have the potential to negatively impact pedestrian movement and behaviour that may in turn impact Luas in an area with a current pedestrian trespass issue.

A new pedestrian and cycle bridge is proposed over the junction of Naas Road with Nangor and Long Mile Roads. This proposed overbridge is to oversail Luas. As noted at the outset of this section of the submission, technical guidance in relation to Luas is contained in *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. This guidance and the physical interfaces, including electromagnetic interference (EMI), with Luas during the construction and operation phases of the overbridge does not appear to have been evaluated in the submitted EIAR, particularly Chapter 5 *Construction*, Chapter 6 *Traffic and Transportation*, Chapter 22 *Summary of Mitigation and Monitoring* and Appendix 5A.1 CEMP, and drawings entitled *Tallaght / Clondalkin to City Centre Scheme ST02 Naas Road Pedestrian & Cycle Bridge Plan*, Drawing no. BCIDA-ACM-STR_GA-0809_BR_00-DR-CB-0101 and *Tallaght / Clondalkin to City Centre Scheme ST02 Naas Road Pedestrian & Cycle Bridge Details*, Drawing no. BCIDA-ACM-STR_GA-0809_BR_00-DR-CB-0102.

This section of Luas is in a highly trafficked multi-modal environment. Any reduction in the level of signal priority, as appears proposed, would significantly negatively impact Luas services.

This section of Luas, especially in the vicinity of the Luas Kylemore Tramstop, experiences relatively high levels of fugitive pedestrian crossing of the Luas line that increases sensitivity of Luas to alterations in pedestrian crossing arrangements.

In addition to the underground and overground services installed for Luas operation at this section of Luas a significant level of installed underground services, including those related to signalisation and Automatic Vehicle Location Systems (AVLS) is installed at junctions and Tramstops.

This section of Luas Red Line is critical to Luas services because of tram frequency and is particularly sensitive to alterations in view of the highly trafficked environment where specially designed and installed Luas under and over ground infrastructure and services is already significant.

In view of the above, potential road closures and under and overground works for the proposed scheme have the potential to impact Luas infrastructure including trackbed, rails, Luas Overhead Conductor System (OCS) and associated under and overground services and signalisation infrastructure. The proposed works have the potential to impact Luas passenger services and passenger access to Luas during construction and operation phases.

Having regard to *TII's Code of practice of engineering practice for works on, near, or adjacent the Luas light rail system*, and in the interests of the safe and efficient continuing operation of Luas Red Line services across that network, proposed works and resulting traffic priorities will require careful co-ordination with TII and the Luas Operator ahead of construction and during construction and operation of the proposed Bus Connects scheme.

3.3 Proposed scheme (Section 5b), potential interactions with the light rail network by the location of construction compounds and associated traffic.

As summarised table 1 of this submission, proposed temporary construction compound TC 13 (adjacent to the junction of the New Nangor, Long Mile and Naas Roads) is located adjacent to Luas such that construction traffic must be specifically managed to avoid impact on Luas.

Therefore, potential construction and operation stage impacts on the safety, capacity and efficiency of the light rail network infrastructure and passenger services must be carefully co-ordinated and managed in consultation with TII, the Luas Operator and local road authorities.

3.4 Necessary light rail 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 fully identify specific methods or techniques proposed for mitigation of potential impacts on Luas infrastructure or service beyond a commitment under "Traffic Management Provisions" during the construction phase stating that "The operation of Luas Red Line will be maintained at all times, with works which may affect Luas operation restricted to times outside of peak hours during night-time and weekend possessions", and a temporary pedestrian crossing to provide access to the Kylemore Tramstop when the footway alongside the left turn slip is closed.

The Luas tramway has been designed and operates in a highly trafficked environment. The geometry, associated underground and overground services, trackbed and surface of this tramway are specially designed and built as a tramway. Signalisation in the area, including underground ducting and services is designed to accommodate this dedicated tramway. Any alteration to tramway and associated services and signalisation, including installing an overhead bridge, will require pre-development assessment and modelling at the interfaces with the proposed BusConnects scheme at Tallaght and along the Naas Road and associated junctions and assessments of secondary and cumulative impacts on the operation of the service.

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.

TII advises that the works associated with the scheme 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 it appropriate that specific mitigation and monitoring commitments for potential impact on Luas that have regard to *TII's Code of engineering practice for works on, near, or adjacent the Luas light rail system*, are reflected in the scheme, and in the proposed CEMP at Appendix A5.1 of the EIAR.

3.5 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 and having regard to *The Greater Dublin Area Transport Strategy 2022-2042 at Measure LRT11 – Enhance Priority for Trams*, 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. Luas signalisation infrastructure including Automatic Vehicle Location System (AVLS) is 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) Locations of all Luas signalisation infrastructure and / or
 - (ii) Existing, temporary and subsequent alterations, and / or
 - (iii) Temporary traffic management proposals.

The developer shall be liable for all costs associated with the removal and reinstatement of the Luas related infrastructure.

3. The *Naas Road Pedestrian & Cycle Bridge*, overbridge access, Luas Kylemore Tramstop and proposed pedestrian and cycle accesses during and after construction shall be subject to detailed design and execution in accordance with TII technical approval. TII technical design approval must be obtained prior to commencement of development.
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. 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.*"
5. 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.
6. 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.

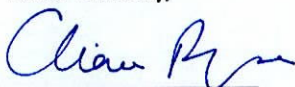
Conclusion

The content of this submission and revisions requested by TII are submitted to be in the interests of the capacity, safety and efficiency of national roads and Luas and therefore the protection of the strategic capacity of the national road and light rail transport networks.

TII trusts that the foregoing comments will be of assistance to the Board in considering the BusConnects Tallaght / Clondalkin to City Centre Bus Corridor Scheme.

Please acknowledge receipt of this submission.

Yours faithfully,



Cliona Ryan
Land Use Planner