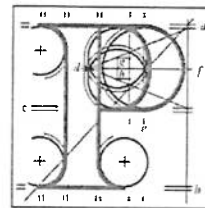


**Our Case Number:** ABP-317742-23



**An  
Bord  
Pleanála**

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

**Date:** 10 October 2023

**Re:** BusConnects Bray to City Centre Core Bus Corridor Scheme  
Bray to Dublin City Centre.

Dear Sir / Madam,

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

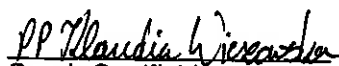
Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

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

If you have any queries in relation to this matter please contact the undersigned officer of the Board at [laps@pleanala.ie](mailto:laps@pleanala.ie)

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

Yours faithfully,



Sarah Caulfield  
Executive Officer  
Direct Line: 01-8737287

HA03A

Tel (01) 858 8100  
Glaó Áitiúil 1800 275 175  
Facs (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

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

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

Dáta|Date 10 October 2023

Ár dTag|Our Ref. TII23-124119

Do dTag|Your Ref. HA27.317742

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

Dear Sir/Madam,

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

*Project Ireland 2040, the National Planning Framework and National Development Plan, 2021 – 2030, outline the key sectoral priority of maintaining Ireland's existing national road network to a robust and safe standard for users. 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* (9 no.) explicitly complementary to the *Guidelines* and includes provision. no 1 as follows: *"The primary function of national roads is to cater for strategic traffic and this function must be protected."*

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

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

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

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

A review of the proposed Bray to City Centre Bus Corridor Scheme application notes that the proposal will interact with the national road network carriageways, structures and management as the proposed route is to utilise the N11 and proposes works, including alterations to junctions, within areas maintained as part of the M50 (Junction 17 M50/M11) and the M11 (Junction 5 Bray (North)).

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.

This submission identifies the interactions of the proposed BusConnects scheme with the national road network, 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.

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

TII advises that this submission has particular regard to official planning policy for development at or near national roads as outlined in the DoECLG *Spatial Planning and National Roads Guidelines* for Planning Authorities (2012) and also specific requirements established in TII Publications.

TII Publications (Standards) documentation defines the requirements that support policy, administrative and technical procedures developed by TII to govern activities with respect to the National Road network. For example, any crossing of the national road network, including by under or over pass will require prior consultation with TII and compliance with all relevant TII Publications available at [www.tiipublications.ie](http://www.tiipublications.ie).

## **2.0 National Road Interactions, Mitigations Requirements and Recommendations**

Moving south to north along the proposed Bray BusConnects route, interaction with the national road network occurs as the proposal includes works at Junction 5 of the M11 (Bray (North)) and Junction 17 of the M50 (M50/M11), and is proposed to run along the entire length of the N11 from the Loughlinstown Roundabout (N/M11 / R837 /Parc Na Silla) to Mount Merrion where the N11 terminates and the R138 Dublin Road begins. TII observes that the proposed Bray BusConnects scheme will interact with the national road network carriageways, structures and management for a significant portion of the BusConnects proposed route as follows and as summarised in table 1 over:

1. Includes works to revise the existing M11 roundabout with the R119 and R761 to a signalised junction. This roundabout is part of Junction 5 of the M11 (Bray (North)) and part of Motorway Maintenance and Renewal Contracts (MMaRC) Network Area A.
2. Includes works to the N/M11 at the Loughlinstown Roundabout (N/M11 / R837 /Parc Na Silla) which is part of Motorway Maintenance and Renewal Contracts (MMaRC) Network Area A.
3. Includes works along the N11 from the Loughlinstown Roundabout (N/M11 / R837 /Parc Na Silla) to its terminus at Mount Merrion.

The national road network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations. As part of this network, the N/M11

and M50 are also 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.

Having regard to official policy and standards for the national road network and a dedicated national roads authority in TII, the national road network forms a distinct element of the built and traffic and transport environment of the Scheme that is appropriate to consider as part of an EIA. Therefore, TII also would highlight to the Board that the existing national road network does not appear to be separately considered as discreet chapters or subsections of the submitted EIAR, including at Chapter 19 *Material Assets*. In this way, it is not apparent to TII that impact 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.

The following parts of the submitted are highlighted:

- Chapter 2 *Need for the Proposed Scheme* provides a rendition of relevant international policy, European Union law and policy and national, regional, and local policy. Having regard to the proposed Bray BusConnects Scheme proposing to utilise part of the national road network that is also part of the TEN-T Comprehensive network, TII consider that it would have been appropriate to include official national policy for development at or near national roads is set out in the DoECLG *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.
- Chapter 5 *Construction*: This Chapter of the EIAR divides the proposed scheme into 4 no. sections to describe works. The sections within which the interactions with the national road network occurs are identified at Table 1 of this submission.
- Chapter 6 *Traffic and Transportation*: Subsection 6.2.2 *Relevant Guidelines, Policy and Legislation* states that the policies and legislation which are applicable to the *Traffic & Transport* chapter are detailed in Chapter 2 (*Need for the Proposed Scheme*) of the EIAR and in Appendix A6.1 (*Transport Impact Assessment Report*). This subsection of the submitted EIAR goes on to cite *Traffic and Transport Assessment Guidelines, 2014* and the *Design Manual for Urban Roads and Streets (DMURS)*.

As set out in DMURS section 1.3 *Application of this Manual*, DMURS applies to the design of all urban roads and streets i.e. those with a speed limit of 60 km/h or less except; (a) motorways, (b) in exceptional circumstances, certain urban roads and streets with the written consent of Sanctioning Authorities. The Board is advised that TII is the sanctioning authority in the case of urban national roads.

TII sets guidance and standards for traffic and road assessments and construction that may be necessary by reason of proposed development location, scale, or typology in TII Publications. Works to or impacting the national road network, including by under or over pass will require prior consultation with TII and compliance with TII Publications which subsumed national road authority manuals including the Design Manual for Roads and Bridges (DMRB).

Having regard to the role of TII Publications in respect of works affecting the national road network along which it is intended to route the Bray BusConnects proposal, TII advise that it would have been appropriate to include TII Publications alongside DMURS as relevant design guidance.

Subsection 6.5 sets out the intended *Mitigation and Monitoring Measures* to be deployed as part of the scheme and for the construction phase refers to the Construction Environmental Management Plan (CEMP). A commitment is made that a detailed Construction Traffic Management Plan will be prepared to be included in the CEMP, also part of the mitigation and monitoring proposed 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 network as part of the scheme in Chapter 22 and the CEMP.

- TII would highlight that Chapter 6 and 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 5.2.3.3 *Routing of Construction Vehicles* of the CEMP to the use of the M50, M11, N11 and N31.

The proposed BusConnects works interactions with the national road network are summarised in Table 1 of this submission.

**Table 1. Summary of interactions of proposed Bray Bus Connects scheme with the national road network (south to north).**

<b>Proposed Bray to City Centre BusConnects General Arrangement Drawing</b>	<b>Summary National Road interface</b>
A. General Arrangement Drawings – Sheet 49	<p><b>Identified interface with the M11 by works to revise the extant M11 roundabout with the R119 and R761. This roundabout is part of Junction 5 of the M11 (Bray (North)).</b></p> <p>Occurs at the intersection of Section 4: Bray North (Wilford Roundabout) to Bray South (Fran O’Toole Bridge) (Section 4a: Bray North (Wilford Roundabout) to Old Connaught Avenue; and</p> <p>Section 3: Loughlinstown Roundabout to Bray North (Wilford Roundabout) (Section 3c: Quinn’s Road to Bray North (Wilford Roundabout) as described in the submitted EIAR.</p> <p>Construction compound BR1 is indicated at the south western quadrant of the Bray North (Wilford Roundabout) on Figure 5.1 Work Location Drawing of the submitted EIAR.</p>
B. General Arrangement Drawings – Sheet 40	<p><b>Identified interface with the N11, M11 and M50 by works to and in the vicinity of the Loughlinstown Roundabout (N/M11 / R837 / Parc Na Silla).</b></p> <p>Occurs at the intersection of Section 3: Loughlinstown Roundabout to Bray North (Wilford Roundabout) (Section 3a: Loughlinstown Roundabout to Shanganagh Road); and</p> <p>Section 2: Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout (Section 2b: Whites Cross (Leopardstown Road) to Loughlinstown Roundabout) as described in the submitted EIAR.</p> <p>Works are also proposed in the vicinity of <i>St. Columcilles Hospital Footbridge</i>.</p>
C. General Arrangement Drawings – Sheet 40, Sheet 39, Sheet 38, Sheet 37, Sheet 36, Sheet 35, Sheet 34, Sheet 33, Sheet 32, Sheet 31, Sheet 30, Sheet 29, Sheet 28, Sheet 27, Sheet 26, Sheet 25, Sheet 24, Sheet 23, Sheet 22, Sheet 21, Sheet 20, Sheet 19, Sheet 18	<p><b>Identified interface with the N11 by proposed works along the N11 from the Loughlinstown Roundabout (N11 / R837 / Parc Na Silla) to Mount Merrion where the N11 ends.</b></p> <p>Occurs within Section 2: Donnybrook (Anglesea Road Junction) to Loughlinstown Roundabout (Sections 2a: Donnybrook (Anglesea Road) to Whites Cross (Leopardstown Road); and Section 2b: Whites Cross (Leopardstown Road) to Loughlinstown Roundabout) as described in the submitted EIAR.</p> <p>There are a number of structures crossing under or over the N11. Works are proposed in the vicinity of these structures with significant works proposed in respect of St. St Laurence’s Subway where the underpass is to be widening and a parallel structure proposed.</p>

Details of these interactions identified are set out below:

**A. Proposed scheme (at the intersection of Sections 3c and 4a), Interactions with the M11 at the Bray North (Wilford Roundabout)**

The BusConnects proposal includes works to the M11 Junction 5 (Bray (North)) roundabout with the R119 and R761 called the Wilford Roundabout in the proposal application. It is proposed to alter the current roundabout to a “*new three-arm signal-controlled junction*” as recorded at Table 4.18 *Major and Moderate Junctions (Signalised) Within Section 3 of the Proposed Scheme* of the submitted EIAR. In addition, a temporary construction compound Identified as “BR1” is indicated proposed on the southwestern quadrant of this roundabout. The M11 access road and the Wilford Roundabout form part of TII Motorway Maintenance and Renewals Contract (MMaRC) Network A.

Chapter 5 *Construction* of the submitted EIAR describes the works at Wilford Roundabout at subsection 5.3.4.1 *Section 4a: Bray North (Wilford Roundabout) to Old Connaught Avenue* that identifies the revision of the existing roundabout to signalised junction, reconstruction and resurfacing of the roads, footpaths, and cycle tracks, and new kerbs. Construction



activities will also consist of additional signage, new road markings, new and amended traffic signal infrastructure, new street furniture and landscaping works. In addition, it is indicated that MV Sub Station will be constructed at the Wilford Junction with various under and overground utility diversions and/or protections. The expected construction time is stated to be 12 months.

Image 5.1 of the submitted EIAR is *Location and Extent of Construction Compound BR1*. The image indicates the proposed compound in the context of the proposed revised junction and not the current roundabout arrangement. It is noted that the access to the compound is indicated off the R837 close to the junction and at a location that would appear to be currently within the MMarC maintained area.

Due to the location of works associated with the scheme relative to the M11, there is potential for impacts and interactions between this section of the national road network and the BusConnects scheme which, based on the material submitted, does not appear to have been separately identified and therefore evaluated for mitigation in the proposed scheme. The following elaborates:

### **I. National Road Network Maintenance and Safety**

As noted above, elements of the national road network are operated and managed by a combination of (Public Private Partnerships) PPP Concessions, Motorway Maintenance and Renewal Contracts (MMaRC) and local road authorities in association with TII. TII advise that the M11 Junction 5 Wilford Roundabout and M11 forms 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](http://www.tiipublications.ie).

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

### **II. M11 Junction 5 Wilford Roundabout replacement with signalised junction**

TII notes that Chapter 6 *Traffic and Transport* of the submitted EIAR holds a set of Appendices: Appendix A6.1 Transport Impact Assessment (TIA) (sub-appendices 1 - Transport Modelling Report, 2 - Junction Design Report, 3 - Maps, and 4 - Impact Assessments); Appendix A6.2 Transport Modelling Report; Appendix A6.3 Junction Design Report; Appendix A6.4 Impact Assessments.

The submitted Appendix A6.3 *Junction Design Report* identifies this junction as *Dublin Road / M11, Junction Ref. 42* and describes that full bus priority is provided and that northbound and southbound buses and cycle movements run together.

TII advises that the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) indicates that planning authorities must make sure that development which is consistent with planning policies can be catered for by the design assumptions underpinning such junctions and interchanges, thereby avoiding potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users. Potential safety and queuing impact on Junction 5 of the M11 will require integrated monitoring throughout construction and operation of the proposal. Appropriate monitoring and signalisation response arrangements will require prior consultation and agreement with TII to ensure the co-ordination of national road network and Bus Connects functions. This will require resolution prior to a decision being made.

**B. Proposed scheme (at the intersection of Sections 2b and 3a), Interactions with the N11, M11 and M50 by works to and in the vicinity of the Loughlinstown Roundabout (N/M11 / R837 / Parc Na Silla).**

The BusConnects proposal includes works to the Loughlinstown Roundabout that is the interface of M50 junction 17 (M50/M11) and the N11. The Loughlinstown Roundabout also serves the R837 and Park na Silla. The Loughlinstown Roundabout and Junction 17 (M50/M11) access road form part of TII Motorway Maintenance and Renewals Contract (MMaRC) Network A.

*General Arrangement Drawings* Sheet 40, indicates *St. Columcilles Hospital Footbridge*, a TII Structure (Structure ID DR-N11-001.00) which demarcates the edge of the MMaRC Area A. This footbridge is indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no. 40 as *St Columcille Footbridge (CBC13-ST16, ID: DR-N11-001.00)*.

The submitted EIA and drawings identify walls as part of “structures”. In addition, *Structures General Arrangements*, Sheet no. 40 identifies the eastern side of the Loughlinstown Roundabout as holding a “structure” described as: *existing wall R13-RW043, 3.6m retained height, approx. 110m length*. Chapter 5 *Construction*, subsection 5.3.2.2 *Section 2b: Whites Cross (Leopardstown Road) to Loughlinstown Roundabout* of the submitted EIA states that it is intended that this existing retaining wall be strengthened through ground improvement works.

Chapter 4 *Proposed Scheme Description* of the submitted EIA states that it is proposed to signalise the existing roundabout on three arms and to provide a continuous bus lane southbound through the junction towards Shankill at the Loughlinstown Roundabout. In addition, it is stated that widening of the carriageway and “a setback of existing vehicle restraint systems in front of the pedestrian footbridge will be provided on the southbound carriageway to ensure a continuous southbound bus lane through the Loughlinstown Roundabout.” Anticipated duration of works is stated in subsection 5.3.2.2 of the submitted EIA for Section 2b and the Loughlinstown Roundabout is expected to be 12 months.

Due to the location of proposed works associated with the scheme relative to the N11, M50, and M11, there is potential for impacts and interactions between the national road network and the BusConnects scheme which, based on the material submitted, does not appear to have been separately identified and therefore evaluated for mitigation in the proposed scheme. The following elaborates:

**I. National Road Network Maintenance and Safety**

TII observes that access to the Loughlinstown Roundabout for the duration of construction is indicated for a 12 month period. The Loughlinstown Roundabout and *St. Columcilles Hospital Footbridge* are part of the MMaRC maintained area and the footbridge is a TII Structure. Works to and signalisation of the Loughlinstown Roundabout are proposed as are works in the vicinity of the footbridge. Any works within MMaRC Network Area A will require prior consultation with TII and compliance with all relevant TII standards as detailed within the TII publications website [www.tiipublications.ie](http://www.tiipublications.ie).

TII reiterates that advice 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 Loughlinstown Roundabout. TII is unable to ascertain from the material submitted if these matters have been considered. This is an issue which will require resolution.

**II. M50 Junction 17 and N11 Roundabout Signalisation**

By the works to, and in the vicinity of the Loughlinstown roundabout there is potential for impact on the maintenance of the safe and efficient operation of the N11, M11 and M50. Impact on the national road network will require integrated monitoring throughout construction and operation of the proposal. Appropriate monitoring and signalisation response arrangements will require prior consultation and agreement with TII to ensure the co-ordination of national road network and Bus Connects functions. This will require resolution.

**C. Proposed scheme (Sections 2a and 2b), Interactions with the N11 the Loughlinstown Roundabout (N/M11 / R837 /Parc Na Silla) to Mount Merrion**

The scheme proposes to utilise the N11 from the Loughlinstown Roundabout to the N11 terminus at Mount Merrion. As previously advised, 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 N11 from the Loughlinstown roundabout is maintained by the local roads authority and is subject to urban speed limits.

Notwithstanding, the N11 is part of the national road network and 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, it is noted that Chapter 4 *Proposed Scheme Description*, section 4.5.2 of the submitted EIAR describes modifications to all junctions along this section as summarised at *Table 4.11: Major and Moderate Junctions (Signalised) within Section 2 of the Proposed Scheme*. The proposed new junction layouts at all major junctions along this section to remove existing left turn slips and to provide improved cycle movements alongside cycling and footpath works.

This section of the proposed route holds a number of TII Structures as follows:-

- *General Arrangement Drawings* Sheet 39, Loughlinstown River Bridge (Structure ID DR-N11-003.00) and Loughlinstown River Culvert (TII Structure ID DR-N11-002.00). Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no. 39 as *Loughlinstown River Bridge* CBC13-ST14, ID: DR-N11-003.00 and *Loughlinstown River Culvert* CBC13-ST15, ID: DR-N11-002.00.
- *General Arrangement Drawings* Sheet 38, Wyattville Overbridge. Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no.38 as *Wyattville Overbridge* CBC13-ST13, ID: DR-N11-003.20.
- *General Arrangement Drawings* Sheet 33, Johnstown Road Footbridge (TII Structure ID DR-N11-004.00). Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no.33 as *Johnstown Road Footbridge*, CBC13-ST12, DR-N11-004.00.
- *General Arrangement Drawings* Sheet 31, Clonkeen Road Footbridge (TII Structure ID DR-N11-005.00). Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no. 31 as *Clonkeen Road Footbridge*, CBC13-ST11, DR-N11-005.00.
- *General Arrangement Drawings* Sheet 27, Foxrock Church Footbridge (TII Structure ID DR-N11-006.00). Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no. 27 as *Foxrock Church Footbridge*, CBC13-ST10, ID: DR-N11-006.00.
- *General Arrangement Drawings* Sheet 20, St. Laurence Park Subway (TII Structure ID DR-N11-007.00). Indicated in the submitted drawing entitled *Structures General Arrangements*, Sheet no. 20 *St Laurence Park Subway*, CBC13-ST08, ID: DR-N11-007.00.

As described at subsection 5.5.4.1.1 *St Laurence's Subway (ST01)* of the submitted EIAR, it is noted that an extension to St. Laurence Park Subway is proposed to include a new toucan crossing across the Stillorgan Road. This underpass is identified as a "*Principal Structure*" in the submitted EIAR ref. "*ST01*" and is proposed to be widened with the construction of a parallel independent structure proposed.

The proposed Bus Connects proposal will interact directly with the N11 and junctions and structures along that route. 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 St. Laurence Subway, be identified and undergo detailed design and execution in accordance with TII Publications standards as highlighted by Section 1.3 of DMURS. The applicant should continue to follow TII structures technical approvals as required under TII publication DN-STR-03001. This will require resolution.



### **3.0 Necessary national road network mitigation as part of the BusConnects scheme proposal**

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

Having regard to the stated intention in the submitted CEMP to utilise the national road network for construction haul routes and for significant construction undertakings within the national road maintenance boundary of the M11 at the Wilford Roundabout and of Junction 17 of the M50 at the Louglinstown Roundabout that also interfaces with the N11, there is a requirement for mitigation of potential construction and operation stage impacts through coordinated and managed in consultation with Transport Infrastructure Ireland.

The national road network is a vital national asset performing a strategic traffic function. The proposed BusConnects scheme must and will 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 subject to specific mitigations to be agreed. 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 M11 and M50 motorways and the N11 within and 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, timetabling, etc. will require prior consultation with the MMarC Network A Contractor and fulfilment of requirements to complete their 3<sup>rd</sup> party protocols, via the relevant road authorities and TII.
- Separate structure approvals/permits, and other licences may be required in connection with the proposed works, including where temporary modification to the road network may be required.

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

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

### **4.0 National Road Network Recommendations**

As outlined, the proposed scheme includes works proposed to be carried out on, and in close proximity to the national road network, which includes structures 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 BusConnects proposes to introduce new infrastructure within the TII MMarC boundary and on national road assets, which will have consequences for liability and maintenance responsibilities especially where no agreements have been made. TII advises that this matter would best 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 to both the national road network and BusConnects infrastructure and associated traffic.

In addition, the proposed BusConnects scheme includes works to be carried out on, and in close proximity to the national road network that must be subject to co-ordination with and the prior approval of TII in accordance with TII Publications.

Subject to clarification for the resolution of these matters prior to a decision being made, TII recommends the following conditions should be considered to form part of the scheme in the event of Board approval for the proposal in respect of proposed relevant works on or in the vicinity of the M11, M50 and N11 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. Prior to the commencement of development, the maintenance of permanent elements of the proposed development, within areas currently managed by the Motorway Maintenance and Renewal Contracts (MMaRC) shall be agreed between the relevant local authority/NTA and TII.
3. Prior to the commencement of development, appropriate traffic monitoring and signalisation arrangements at Wilford Junction with the M11 and the Loughlinstown Roundabout shall be agreed between the relevant local authority/NTA and TII.
4. Prior to the commencement of development 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.
5. 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.
6. 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 Contractors, via TII and the relevant road authorities,
  - b) demonstrate contact with [thirdpartyworks@tii.ie](mailto:thirdpartyworks@tii.ie) in advance, as a works specific Deed of Indemnity will be required by TII where temporary works within any MMaRC Contract Boundary are required to facilitate construction haulage, and
  - 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.

## 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 BusConnects Bray to City Centre Bus Corridor Scheme.

TII would appreciate acknowledgment of receipt of this submission.

Yours faithfully, 

**Cliona Ryan, Land Use Planner**