



Dublin Cycling Campaign

5 Foster Place

Dublin

D02 V0P9

26th March 2024

## MetroLink Oral Hearing

Dublin Cycling Campaign is a volunteer-led charity, founded in 1993, with the goal of creating a liveable Dublin where people of all ages and abilities can safely enjoy everyday walking and cycling.

We have engaged with TII throughout the planning and design process including via public consultations, 1:1 meetings, and the EIAR scoping process. We have collaboratively resolved issues with TII during earlier stages of this process including severance issues near Swords and access to the Royal Canal Greenway during construction works.

There's three topic areas we wish to ask questions regarding the written responses from TII:

1. The types of HGVs to be used to construct MetroLink stations
2. Bike parking at MetroLink stations
3. Pedestrian and cycle bridge over the M50

## 1 Use of direct-vision HGVs to construct MetroLink stations

In our submission we recommended that TII look to implement international best practice around the types of HGVs that are allowed in urban areas to reduce risks to vulnerable road users on the general road network. In particular, we recommended the Direct Vision Standard used by Transport for London during the construction for Crossrail, High Speed 2 and the Silvertown Tunnel.

The written response from TII (submission 073, item 5) to us said:

*"TII confirm that their main works contractors will be required to comply with the Direct Vision Standard (DVS) and safety permit for heavy goods vehicles (HGVs)."*

No more details have been provided.

A vehicle can have a DVS rating of zero stars (the lowest rating, with poor direct vision) up to five stars (the highest rating with excellent direct vision).

The response from TII is meaningless unless there is some commitment around what star rating of vehicle will be allowed, or what mitigation measures like additional mirrors, camera monitoring systems, warning sensors, or side-underrun protection must be applied for HGVs with low direct vision star ratings to make them safer.

1. What commitments are TII actually making about the safety of the HGVs their contractor will use to mitigate the risk to vulnerable road users on the general road network?
2. Can TII publish that information onto their website?

## 2 Bike parking at MetroLink stations

Bike parking at public transport stations is one of the key elements that creates integration between public transport and cycling. It is important to provide a variety of high-quality publicly accessible cycle parking to suit the needs for various types of users. This is important not just at suburban stations to expand the catchment area of the metro but also at key interchange and city centre stations to provide for last-mile connections in the busy city core.

### 2.1 Errata Note

Table 4.9 (shown in our original submission to ABP) from the original EIAR included errors that overstated the number of cycle parking stands provided at each station. It incorrectly stated that all stations between Northwood and Charlemont would have double the number of cycle stands as is currently planned.

The updated table from Errata Appendix 6 is below:

**EIAR CHAPTER 4 DESCRIPTION OF THE METROLINK PROJECT, TABLE 4.9 STATION CYCLE PARKIN  
PREDICTED AND PROPOSED**

Station	2030 Predicted Demand		2030 MetroLink Proposals		
	Total Cycles	Stands	Total Cycles	Stands	% Provision
Estuary*	0	0	254	127	N/A
Seatown	433	216	480	240	11%
Swords Central	941	471	942	471	100%
Fosterstown	373	186	422	211	113%
Dublin Airport**	0	0	72	36	N/A
Northwood	538	269	204	102	38%
Ballymun	656	328	292	146	45%
Collins Avenue	1,003	502	370	185	37%
Griffith Park	248	124	176	88	71%
Glasnevin-Metro Only	185	92	120	60	65%
Glasnevin Metro+Rail	278	139			43%
Mater	150	75	70	35	47%
O'Connell Street	215	107	0	0	0%
Tara- Metro Only	470	235	256	128	54%
Tara- Metro + DART	1,940	970			13%
St Stephen's Green	560	280	82	41	15%
Charlemont-Metro Only	544	272	162	81	30%
Charlemont - Metro +Luas	928	464			17%

Note: provision at Seatown station is actually 111% not 11% as shown in the table.

## 2.2 Contravening Development Plans

On the first day of the Oral Hearing, TII noted that the proposed project does not comply with the cycle parking requirements of either the Fingal or Dublin City Development Plans.

For the Fingal Development Plan the witness statement from John Kehoe said:

*"The approach taken by the Proposed Project in relation to cycle parking has been to develop a tailored MetroLink-specific methodology. The numbers of cycle parking to be provided preserves the capacity of the NTA and planning authorities in determining appropriate bike parking standards and objectives with public input in future strategic land use plans as the use of the proposed Project grows. However, the project is not fully in accord with objective DMSO109."*

Objective DMSO109 - Bicycle Parking (as amended in 2023):

*"Ensure that all new development provides high quality, secure and innovative bicycle parking provision in accordance with the bicycle parking standards set out in Table 14.17 and the associated design criteria for bicycle parking provision set out in this Plan, where feasible, practical and appropriate, having regard to local, national and international best practice."*

Table 14.17, Chapter 14 Development Standards of the Fingal Development Plan was amended in 2023 to include the following text:

*"Rail, Metro, Light Rail Stations and Stops: Sufficient to meet the anticipated demand for cycling when planned cycling and active travel infrastructure is in place. Where the anticipated demand for cycling to a metro/heavy rail/light rail station hasn't been estimated, a norm of 10 to 30% of trips to rail stations being made by bicycle will be used for the provision of bicycle parking"*

The analysis done by TII was to assume 2.5% of daily boarders to require cycle parking (EAIR Appendix A4.1).

Objective DMSO110 - Provision of Bicycle Parking at Public Transport Stations / Stops of the Fingal Development Plan:

*Ensure that all new and renovated public transport stations/stops provide appropriate levels of cycle parking provision based on the existing and proposed passenger levels, surrounding environments and future transportation infrastructure*

The Eastern and Midland Regional Authority's Regional Spatial and Economic Strategy under the heading of "Integration of Land Use and Transport" reads:

*"Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided."*

## 2.3 Need for Proper Planning and Sustainable Development

These deficiencies would normally be material contraventions to the development plans. As noted by Mr McGrath in legal submissions on the first day, material contraventions do not apply to Railway Orders.

From reading s.43 Transport Railway Infrastructure Act 2001, it seems that TII are correct that the Board isn't bound by the Development Plans in the same way that they would be for a more standard planning application. However, the Board shall have regard to "proper planning and sustainable development", by virtue of the reference to s.143 of the Planning Act 2000.

s.143 of the Planning and Development Act 2000, as amended (emphasis added):

*143.— (1) The Board shall, in performing its functions, have regard to—*

*(a) the policies and objectives for the time being of the Government, a State authority, the Minister, planning authorities and any other body which is a public authority whose functions have, or may have, a bearing on the proper planning and sustainable development of cities, towns or other areas, whether urban or rural,*

*(b) the national interest and any effect the performance of the Board's functions may have on issues of strategic economic or social importance to the State, and*

*(c) the National Planning Framework and any regional spatial and economic strategy for the time being in force.*

The question for the board to answer is:

1. Do the proposed level of cycle parking provided as part of this planning application meet the threshold of proper planning and sustainable development?

If the answer to that question is not an unequivocal yes then:

1. Why has TII not complied with public development policy in this regard?
2. Has TII worked hard enough to meet its obligations to provide cycle parking?

Why was cycle parking not provided to meet the predicted 2030 demand?

Cycle parking demand was predicted out to 2030 (opening year) unlike other areas of transport assessment, which assesses out to 2050 or 2065. Even still the area amount of cycle parking provided for in the Dublin City Area is only 31.2% of predicted demand (764 of expected needed 2,543 stands).

The written response from TII (submission 073, item 2):

*As set out by EIAR Chapter 6, MetroLink Operations and Maintenance, due to space constraints in the vicinity of stations in the DCC area, it has not been possible to provide 100% of bicycle parking required to meet demand at every station. However, the maximum number of bicycle parking has been provided at each station taking cognisance of available space.*

## 2.4 Questions

1. On day one, Fingal County Council mentioned that TII had agreed to provide more than the planned 250 cycle parking spots at Estuary station to support future development in this area. Can TII publish the information related to these changes to their website please?
2. Do any of the cycle parking spots provide for accessible cycles, cargo bikes, tricycles etc?
3. Why has TII not leveraged two-tier cycle parking at indoor cycle parking areas or at the back of Glasnevin interchange station (43% provision) cycle parking?
4. Why was an additional underground cycle parking area included in the plan for the Griffith Park station but not for other stations?

There is no city centre station with more than 50% provision. The Mater (47% provision, none covered) and Stephen's Green (15% provision, none covered) stations are near sensitive receptors. The O'Connell Street station (0% provision) is beneath a private development. Similarly, Charlemont (30% provision, none covered) has no available underground space as it abuts private development. Tara Street (13% provision) is the only likely city centre location that could provide for a city centre integrated cycle parking location to compensate for the lack of cycle parking at all other city centre stations. It is a key interchange station and on both the primary and secondary GDA Cycle Network, with easy access to the Liffey Cycle Route.

### Tara Street questions:

1. The Property Details Book shows that TII is requesting a permanent CPO of land around Tara Street station. The land is marked for "future development by others", these areas already include MetroLink infrastructure like fire fighting lifts and ventilation shafts. Can this land in TII's control be used to provide cycle parking as part of this application? Why is providing for future private development more important for TII than meeting their obligations?
2. The Dublin Bikes stand outside Markiewicz is being removed but not replaced. Why not?
3. Did TII engage with Irish Rail about providing additional cycle parking within the railway arches at Tara?

### 3 Pedestrian and Cycle Bridge over M50

In our original public consultation response we raised the issue of Fingal County Council Development Plan Objective MT15;

*"Investigate and avail of the opportunities provided by new Metro North and any other public transport infrastructure to provide new cycle and pedestrian links including crossings of the M50 which currently represents a major barrier to active transport modes"*

A recent AIE request (AIE/138/24) to TII returned a document from October 2019 (attached as appendix) showing shared agreement by TII and NTA that:

*"Recommendation: Provide a separate 2 way cycleway and 2 way footpath bridge to the west of the existing [MetroLink] bridge, of an overall width of at least 6m."*

*"Locating this bridge on the west side of the existing bridge will impact less stakeholders, allow the foundations for the Old Metro North M50 Bridge to be utilised, and allow for efficient construction and design."*

Section 7.3.3 of EIAR Chapter 7, Consideration of Alternatives states:

*"An analysis was also undertaken to identify if a pedestrian and cycle lane could be added to the M50 Viaduct. However, it was determined not to be feasible because, there would need to be significant separation from the running train alignment for safety reasons and this would result in a much more significant bridge structure spanning the M50 than that required for the proposed Project."*

Questions:

1. If the bridge was both feasible and recommended, why was this proposal for integrating active travel into the project dropped from the planning application?
2. Does the lack of an active travel bridge over the M50 at this location impact on the future sustainable development of the Daristown lands zoned for 'High Technology' or 'General Employment'?

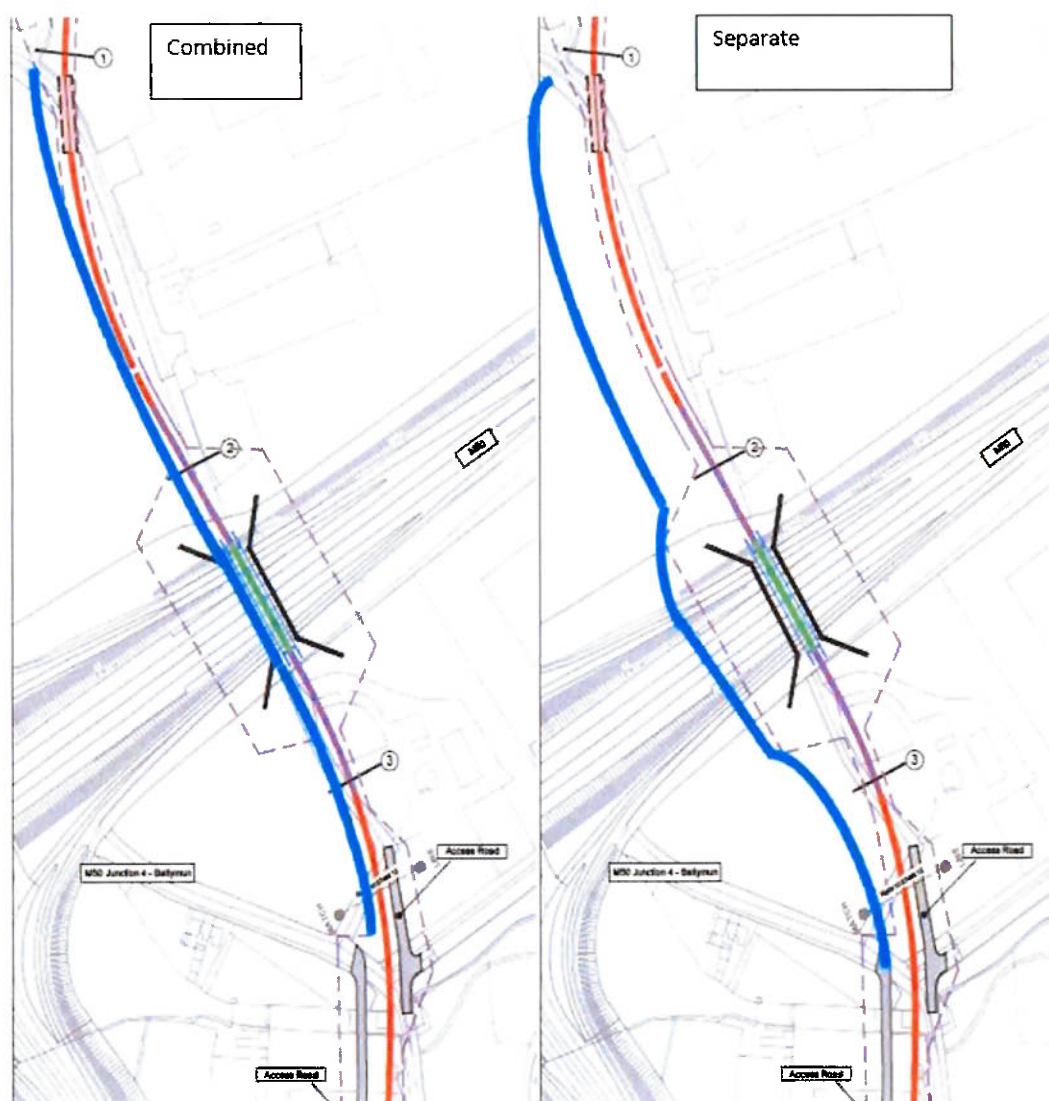
## FOR INFORMATION – TII, NTA, Cycle Facilities – October 2019

### Background

Following recent discussions with FCC and as per Fingal County Council Development Plans Objective MT15; *"Investigate and avail of the opportunities provided by new Metro North and any other public transport infrastructure to provide new cycle and pedestrian links including crossings of the M50 which currently represents a major barrier to active transport modes"*

The new MetroLink scheme will operate using an automated GOA4 system, and as a result, will be designed to be fully segregated from all other means of transport to ensure its secure operation.

Proposals considered are a combined Bridge to include for an additional 6m consisting of a 2 way cycleway and pedestrian link or a separate bridge as per Image 1 below:



### Recommendation

Provide a separate 2 way cycleway and 2 way footpath bridge to the west of the existing bridge, of an overall width of at least 6m.



### *Separate bridge*

Combining the pedestrians and cyclists on a separate bridge will provide better visibility for users without the need for high segregation barriers from Metro. Locating this bridge on the west side of the existing bridge will impact less stakeholders, allow the foundations for the Old Metro North M50 Bridge to be utilised, and allow for efficient construction and design.

Provision of a separate bridge will provide a high quality, visually appealing, cyclist and pedestrian only bridge, capable of having the required flexibility and ability to link into the surrounding cycle network.

### *Issues with providing a combined bridge*

As MetroLink is fully automated, for safety purposes combining cyclist, pedestrian and Metro functionality would require a 2.4m high barrier on either side of the metro to segregate between MetroLink, cyclists and pedestrians. The installation of 2.4m high barriers, or cage, to segregate users from the Metro System will lead to a corridor effect, this effect will be magnified if pedestrians and cyclists are facilitated on either side of a combined metro bridge.

The increased bridge width to accommodate cycle and pedestrian flows, as well as safety barriers will widen the current bridge deck width by at least 50% (from 11m to 17m). To avoid a complex cantilevered bridge design and construction, a simple standard bridge deck cross section would be preferred.

Below are some examples of cycle and pedestrian footbridges with and without high safety barriers.



Footbridge and safety cage over M60  
Motorway in Greater Manchester uk



Gateway Bridge - Brisbane



Cycle Bridge in Utrecht over canal and school



Cyclebridge across M5 Motorway Exeter

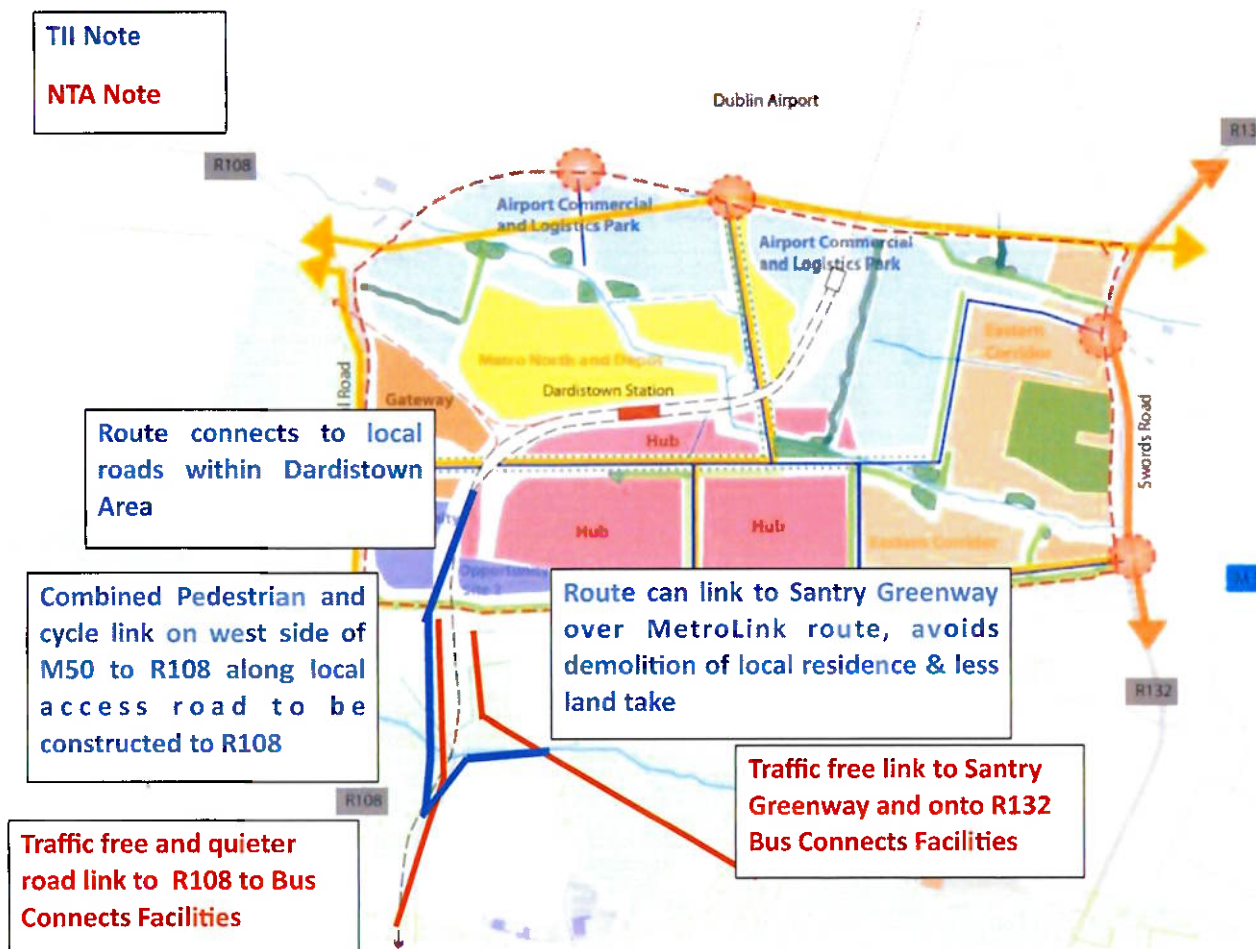
*Other Items for Consideration from NTA:*

1) The cycle network plan in this area was developed on a strategic level, accordingly individual link proposals are subject to refinement and amendment as part of the planning and development process while maintaining the overall intent of the network.

**TII Response: Agreed, this will be incorporated into the design.**

2) The provision of cycle and pedestrian facilities on the proposed metro link bridge would provide the basis of an alternative routing for pedestrian and cyclists to the R108 and R108/M50 junction. This is currently a hostile cycling and walking environment. Southbound cyclists and pedestrian have to share a substandard 2m wide path. Improving this would likely involve widening the gyratory over the M50. Refer to sketch below.

**TII Response: A separate bridge will achieve this requirement.**



- 3) If cycling and pedestrian facilities could be provided on the bridge it would provide options for cycle and pedestrian networks for the Dardistown area that could reduce a severance effect, if any, of the Metro in the area, allow for more flexible development solutions on either side of the metro alignment and future proof against changing land uses.

**TII Response:** See notes on image above. A separate bridge will achieve these objectives, accommodate future proofing with less overall land take and severance.

- 4) Provision of cycling and pedestrian facilities on the bridge could provide a high quality connection from Dardistown over the M50 to the Santry river greenway to the south and from there then onto the high quality cycling and pedestrian facilities proposed on the Bus connects corridors at Santry and Ballymun.

**TII Response:** A separate bridge will achieve this linkage

- 5) Traffic free pedestrian and cycling links are very attractive, calibration work showed the model behind the cycle network underestimates by up to a factor of 5 the use of traffic free facilities, as the model is based around shortest distance and cannot account for other actors that can significantly affect route choice such as quality of cycling facility.

**TII Response:** Agreed