



MetroLink Preferred Route Public Consultation

Introduction

Dublin Cycling Campaign is a registered charity that advocates for better cycling conditions in Dublin. Dublin Cycling Campaign is the leading member of Cyclist.ie (Irish Cycling Advocacy Network). Our mission is to build a liveable city where people of all ages and abilities can cycle.

Dublin Cycling Campaign continues to be supportive of the MetroLink. It is good to see improvements in how pedestrians and cyclists will access MetroLink.

Our submission is broken down into four major sections:

1. Intermodality between cycling and MetroLink
 - 1.1. Bike parking
 - 1.2. Bikes on off-peak metro vehicles
 - 1.3. Access to stations along the Swords Bypass
 - 1.4. Access to Tara Street Station
2. Community severance
 - 2.1. Lissenhall
 - 2.2. M50 overbridge
3. Construction impacts
 - 3.1. Traffic Management and Construction Management Plan
 - 3.2. Temporary and permanent impacts on the Royal Canal Greenway
4. Future upgrade of the Luas Green Line

We hope that these issues can be resolved by the MetroLink design team before TII make the Railway Order application to An Bord Pleanala.

1.0 Intermodality between cycling and MetroLink

We are encouraged by the acknowledgement of the need for MetroLink to integrate walking and cycling. All MetroLink passengers will be multi-modal travellers at both ends. People will make many decisions before deciding to use MetroLink.

1.1 Bike Parking

A key decision passengers will make is how easy is it to get to their nearest MetroLink station. The availability of appropriate bike parking facilities at stations will be a key influence on people's decisions to choose to cycle. As we highlighted in our submission to the EPR, enabling people to arrive by bike increases the local catchment of stations. This in turn improves MetroLink's business case.

There is a need for varying kinds of bike parking facilities as part of MetroLink. The National Cycle Manual section 5.5 highlights the varying design choices.

One of the key principles of good cycling and public transport integration is reduce transfer distance. Reducing the distance between bike parking and the platforms enables an attractive transfer. This is similar to interchange between public transport modes.

The MetroLink report indicates that bike parking will be provided 'where feasible'. All stations require adequate bike parking to meet various local and national policies.

National Cycle Policy Framework

This is a national policy document. The following will apply to all stations:

- Policy 8.2 requires that proper quality bike parking be included in all future public transport stations
- Unfortunately DTTAS have not produced the National Guidelines on Bike Parking (policy 7.1). There are relevant development standards in the Dublin City Council and Fingal County Council development plans.

Dublin City Development Plan 2016-2022

The following will apply to all stations from Charlemont to Northwood:

- Policy MT5 to facilitate integration of active travel (walking and cycling) with public transport

- Policy MT9 to promote bike and ride by providing secure, dry bike parking facilities
- Objective MTO8 to promote and facilitate, in cooperation with key agencies and stakeholders, the provision of high density cycle parking facilities at appropriate locations
- The Section 16.39 of the development plan covers the development standards for bike parking as part of developments. It includes general requirements for bike parking design. It also states that bike parking shall be provided in new public transport interchanges. Train station developments are required to provide a minimum of 7 bike parking spots per number of trains at the two-hour peak period a.m. (minimum of 100 spaces)

Fingal County Development Plan 2017-2023

The following will apply to all stations from Dardistown to Estuary:

- Objective MT16 to promote the provision of adequate, secure and dry bicycle parking facilities and a bike rental scheme at appropriate locations, including stations and other public transport interchanges.
- Page 454 covers the development managements standards concerning cycle parking including that "Bicycle Parking Stations should be provided in strategic new Public Transport Interchanges."

NTA's National Cycle Manual

- The guidelines in the NTA's National Cycle Manual are that 2.5% of number of daily boarders at that point / station, subject to minimum of 10 bicycle places for public transport pick-up points.

Appropriate bike parking facilities are required at all MetroLink stations.

Additional information can be found in Bike Parking Infrastructure Guidance by Dublin Cycling Campaign:

https://www.dublincycling.com/sites/dublincycling.com/files/dcc_online_brochure_-_august_2017.pdf

1.2 Bikes on off-peak MetroLink vehicles

Policy 8.5 of the National Cycle Policy Framework requires any future Irish metro system to allow the carriage of bicycles on off-peak metro vehicles and counter-flow on-peak metro vehicles.

In our submission on the EPR we included information on how MetroLink can enable this policy. We expect to see more information about how MetroLink will enable this as part of the Railway Order application to ABP.

1.3 Access to Stations

1.3.1 Access to Swords Bypass Stations

Access by bike to stations along the Swords Bypass (R132) has improved in the preferred route. This is mainly due to the proposed walking and cycling bridges over the Swords Bypass (R132).

These bridges should provide a segregated path for walking and cycling, inline with the National Cycle Manual. This will reduce conflicts between pedestrians and cyclists. It will also separate people on bikes from visually impaired people who are walking.

1.3.2 Access to Tara Street Station

The MetroLink team need to consider the design of the new road network around the Tara Street station. The drawings show Luke Street, New Luke Street, Poolbeg Street, Townsend Street and Tara Street all as one-way streets. This will make access to the station difficult for people on bikes.

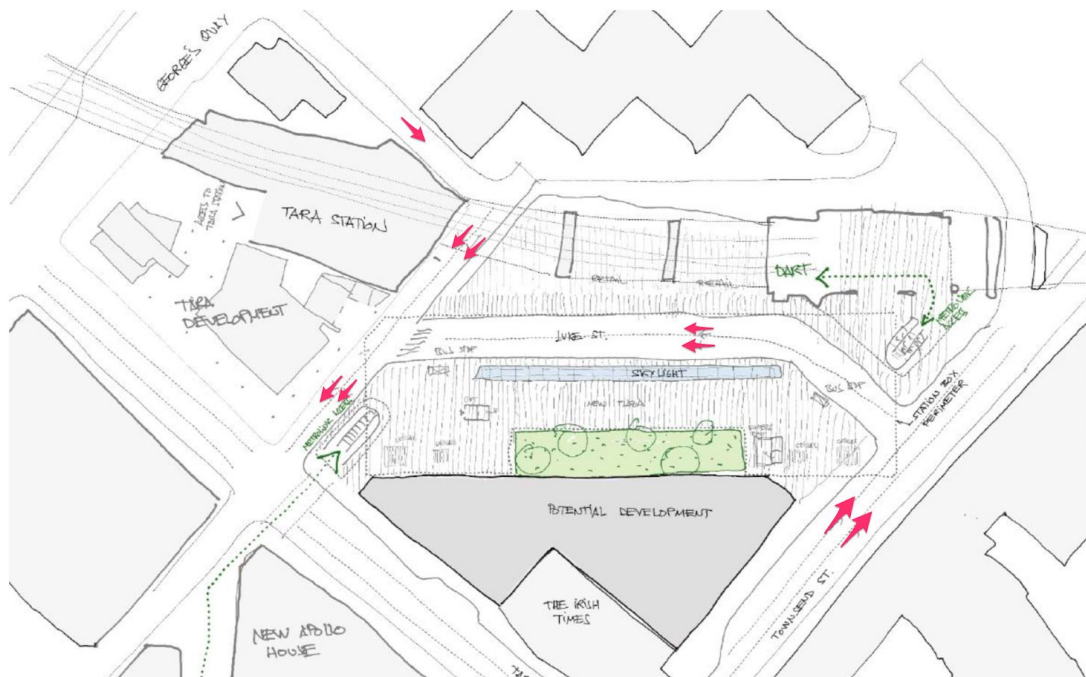
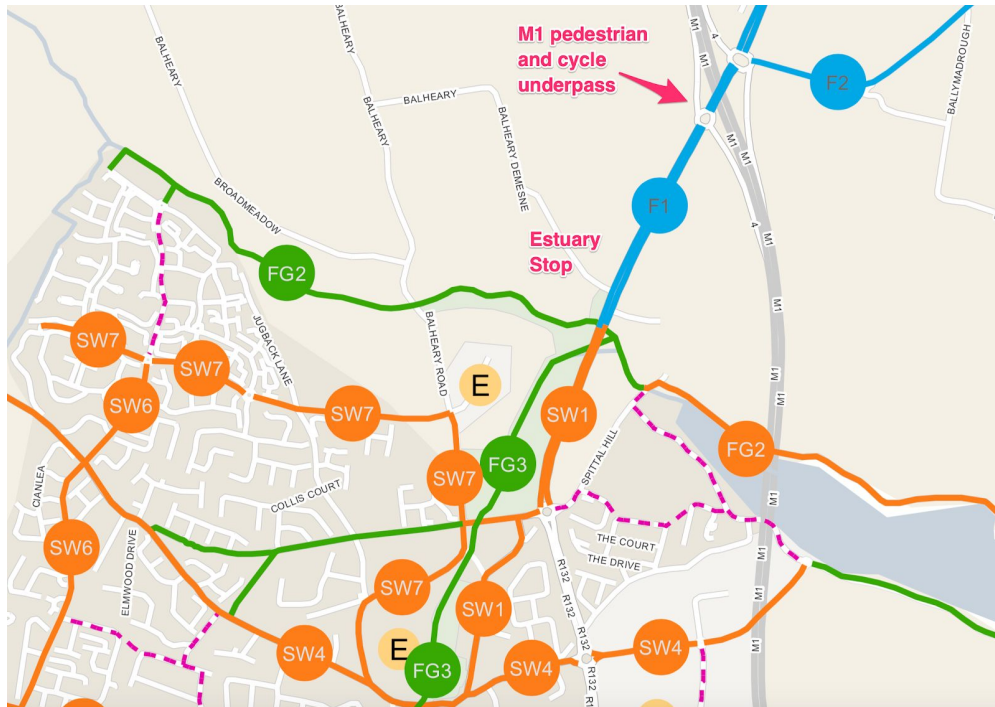


Figure 12 – Urban Setting

Figure 12, Appendix M. Tara Street Station - MetroLink Report

The MetroLink team could make access to these stations by bike easier by adding contraflow cycle lanes to these one-way streets. This would increase permeability of the area for people on bikes. It would also connect the Tara Street station to the Liffey Cycle Route. It would also align with objective MTO13 of the Dublin City Development Plan to provide contraflow cycling on one-way streets.

How can a pedestrian or cyclist travel from point A to point B on the map above? It does not look possible to cross the MetroLink tracks or the River Broad Meadow. Connection between points B and C by foot or bike is now possible by utilising the historic Lissenhall Bridge.



An extract of Sheet N9 of the GDA Cycle Network Plan

If it is impossible for pedestrians and cyclists to cross the MetroLink tracks south of the Broad Meadow River then MetroLink will cause community severance. There are potential solutions. The metro bridge over the Broad Meadow River could provide enough space for pedestrians and cyclists to cross underneath.

2.2 M50 Overbridge

We welcome the recognition of objective MT15 of the Fingal Development Plan in Appendix D: Crossing the M50 of the MetroLink report.

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 walking and cycling bridge will undo the community severance caused by the M50. It will reconnect the residential areas of North Wood and Ballymun with the playing fields north of the M50.

On the southside the bridge should connect to the Santry Greenway.

We understand that the decision has not been made if walking and cycling we be accommodated on the proposed metro bridge or on a parallel bridge. From our point of view either option works as long as there is adequate width for a segregated pedestrian and cycle path on the bridge.

It will make more sense for the walking and cycling side of the bridge to be to the west side. This means that the walking and cycling path north of the bridge will not conflict with the tracks from the depot. It also allows for the walking and cycling path to connect into the proposed access road on map 9 & 11 of the public consultation document.

3.0 Construction Impacts

3.1 Construction Management and Traffic Management Plans

The construction phase will bring a large numbers of heavy goods vehicles (HGVs) into urban areas. HGVs pose an outsized risk to vulnerable road users such as pedestrians and cyclists. The management of these HGVs will be an important part of the construction management plan for MetroLink.

TII/NTA need to set high standards for HGV vehicles that work on the MetroLink project. TII and NTA have a responsibility to protect vulnerable road users.

The CrossRail project in the UK set a good example. It required [high standards for all HGVs](#). They required sensors, underrun guards and other measures to improve safety of vulnerable road users.

Transport for London (TfL) has set [direct vision standards \(DVS\)](#) for all HGVs entering London. Direct vision standards assesses how much a driver can see directly from their HGV cab. This is the solution to “blind-spot” issues that lead to the deaths of cyclists and pedestrians near HGVs.

During the construction phase there may be impact on existing cycle lanes that will require temporary closure, for example at Stephen’s Green East. TII must provide alternative facilities as required by the Health and Safety Authority (HSA). Where this is not possible how cyclists will re-integrate with traffic will have to be carefully managed. This might include advanced stop locations (ASL) for cyclists, cycle priority lights or manual traffic management. We look forward to these details being handled in the traffic management plan for MetroLink.

3.2 Royal Canal Greenway

What are the permanent and temporary impacts on the Royal Canal Greenway near Glasnevin station? How will the station construction and realignment of the Irish Rail lines affect the greenway? It is not clear from the published documents or from discussions with TII staff at public consultations.

The Royal Canal Greenway is part of the national cycle route from Dublin to Galway. It is National Route 2 in the NTA’s Greater Dublin Area Cycle Network Plan. It is a key commuting corridor for cyclists coming from west Dublin to the city.

It is our positions that:

- There can be no permanent impacts on the Royal Canal Greenway alignment
- Temporary closure would severely impact a key cycling commuter corridor akin to fulling closing a major road. A suitable alternate route must be provided if temporary closure is required.

Figure 16, Appendix K of the MetroLink report indicates a permanent impact on the Royal Canal Greenway in order to provide a 4m heavy rail platform. This would be unacceptable. A solution must be found.

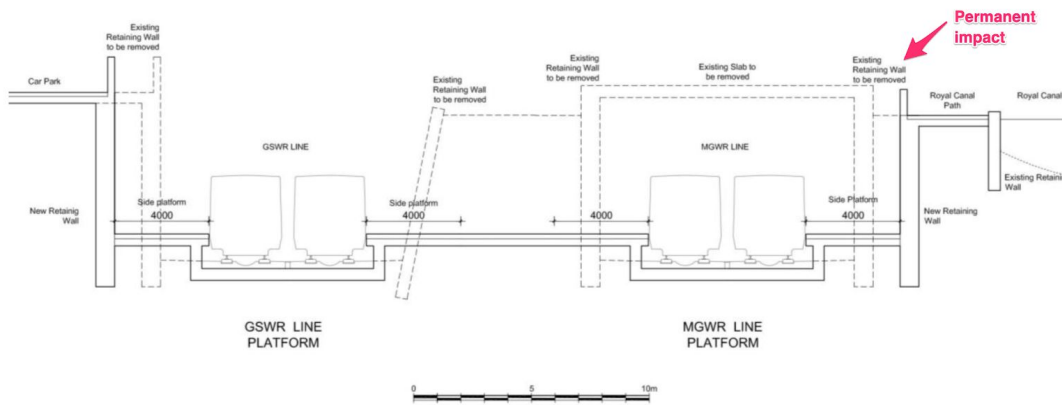


Figure 16 – Cross Section through Irish Rail Lines and Royal Canal (looking east)

Figure 16, Appendix K - MetroLink Report

If TII must close the Royal Canal Greenway during construction then TII must provide a suitable alternative on the south bank of the canal. This will allow pedestrians and cyclists to bypass the construction area. This will require a bridge over the Royal Canal for pedestrians and cyclists.

The Phibsborough Local Environmental Improvements Plan (LEIP) 2017-2022 from Dublin City Council includes a plan for a new bridge over the Royal Canal from Mount Bernard Park to the greenway path. The new bridge is on page 13-15 and is part of actions 6 and 8 of the Phibsborough LEIP.

The completion of this new bridge as part of MetroLink would achieve a key objective of the Phibsborough LEIP. It would also mitigate the temporary closure of the Royal Canal Greenway path on the north bank by providing an alternative on the south bank.

4.0 Future upgrade of Luas Green Line

We are concerned over the delay of the Luas Green Line upgrade to metro-standard. The short-term capacity solution will increase the frequency and length of Green Line trams. This will see greater competition for space in the on-street sections of the Luas Green Line. Dublin City Council will need to provide even greater priority to the Luas Green Line trams to maintain headways. This priority will be over pedestrians, cyclists and other public transport in the core city centre. Turning back trams before the city centre will mitigate this but it will not solve the underlying competition for space.

One reason we are supportive of MetroLink is because it reduces the competition for space by moving high-capacity public transport underground.

We understand that TII estimates that there is still 20 years worth of remaining capacity in the Luas Green Line. Remaining capacity should not be the only determining factor on when the Luas Green Line is upgraded to metro. The NTA and TII should not delay Metro South until the Luas Green Line is overcapacity.

Our preferred option would be for the Luas Green Line metro upgrade to occur as soon as possible after MetroLink is operational. Otherwise the Luas Green Line will continue to require more space and time from pedestrians, cyclists and other public transport in the core city centre.

Building the Clonskeagh to city centre cycle route will reduce demand on the Luas Green Line closer to the city centre. It has a similar catchment area. It would provide an alternative sustainable transport mode reducing demand on the Luas. This will reduce the need for medium-term upgrades of the Green Line. This would effectively buy more time before more drastic upgrades are needed.

Conclusion

We trust that TII and NTA will assess and address our concerns as the design for this scheme progresses. We are open to meeting the design team to clarify any of the issues identified above. That way all issues can be resolved before TII make a Railway Order application.

Kevin Baker
Dublin Cycling Campaign
Tailor's Hall,
Back Lane,
Dublin 8

Dublin Cycling Campaign,
Registered Charity Number (RCN): 20102029