

Observations on Dart+ West Draft Railway Order



October 2022 – John Devitt

Introduction

Like most residents in the Coolmine/Carpenterstown area, I welcome the extension of Dart services to Maynooth. However, Irish Rail's proposed closure of every level crossing along the Maynooth line represents a disproportionate response to a perceived problem that is not supported by the available evidence or adequate public information and consultation.

I urge An Bord Pleanála to seek the amendment of the draft Railway Order to address the concerns set out below by requesting that Irish Rail undertake the following measures.

1. Undertake a capacity assessment on the Maynooth line after the electrification of the line before a final decision on the future of the level crossing at Coolmine.
2. Engage in meaningful public consultation and public information efforts with affected communities during the capacity assessment.
3. Improve signalling to reduce waiting times at Coolmine level crossing.
4. In collaboration with Fingal County Council, introduce appropriate safety measures along Coolmine and Carpenterstown Road and the approach to the level crossing.

The rationale for these recommendations is set out in the following observations. I should also use this opportunity to highlight the manifest lack of public information made available by Irish Rail to local residents in the Dublin 15 area during both the non-statutory and statutory consultation period.

I would be happy to make an oral submission to An Bord Pleanála and to share any further information that might be needed in the meantime.

Faithfully,



John Devitt
22 Stationcourt View, Coolmine, Dublin 15



Impacts

The proposals entail the closure of the only road that directly connects the townlands of Carpenterstown and Coolmine, as well as greater Blanchardstown. This will be felt by thousands of residents in the following ways:

1. Emergency Services

The Coolmine/Carpenterstown Road is the primary access route for emergency services from Blanchardstown Fire Brigade on Snugborough Road and estates in Carpenterstown and Laurel Lodge.

As can be seen from the screenshot at Figure 1 below, communities in Laurel Lodge and Carpenterstown that rely on emergency fire and ambulance services provided by Dublin Fire Brigade on Snugborough Road can be served within three minutes of a call being made to dispatch.

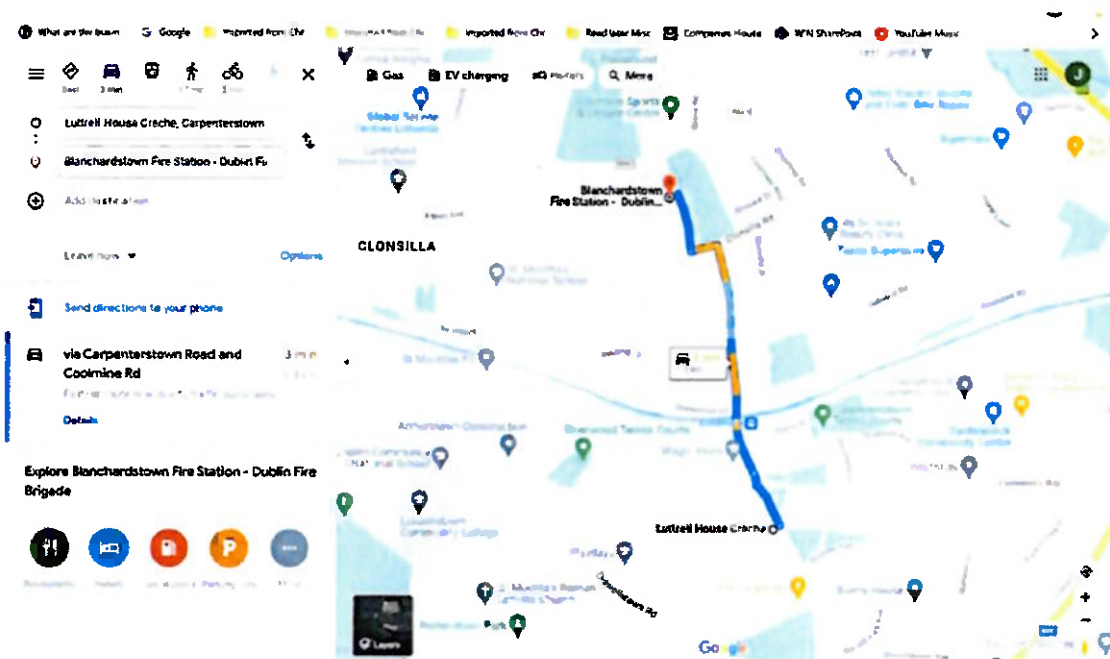


Figure 1 – Estimated time by road from Blanchardstown Fire Station to Carpenterstown (off peak) via Coolmine Level Crossing

Timed appropriately to avoid delays caused by oncoming trains, ambulances and fire engines still use the junction at Coolmine level crossing to avoid unnecessary traffic congestion or diversions to Porterstown or Blanchardstown Village (as illustrated at figure 2).



Fire engine from Blanchardstown Fire Station attending to collision in Laurel Lodge on 5 October 2021 at 9.42am

However, the permanent closure of the level crossing at Coolmine to road traffic will more than double the time it takes to access Carpenterstown at off peak times from three to seven minutes (see figure 3)

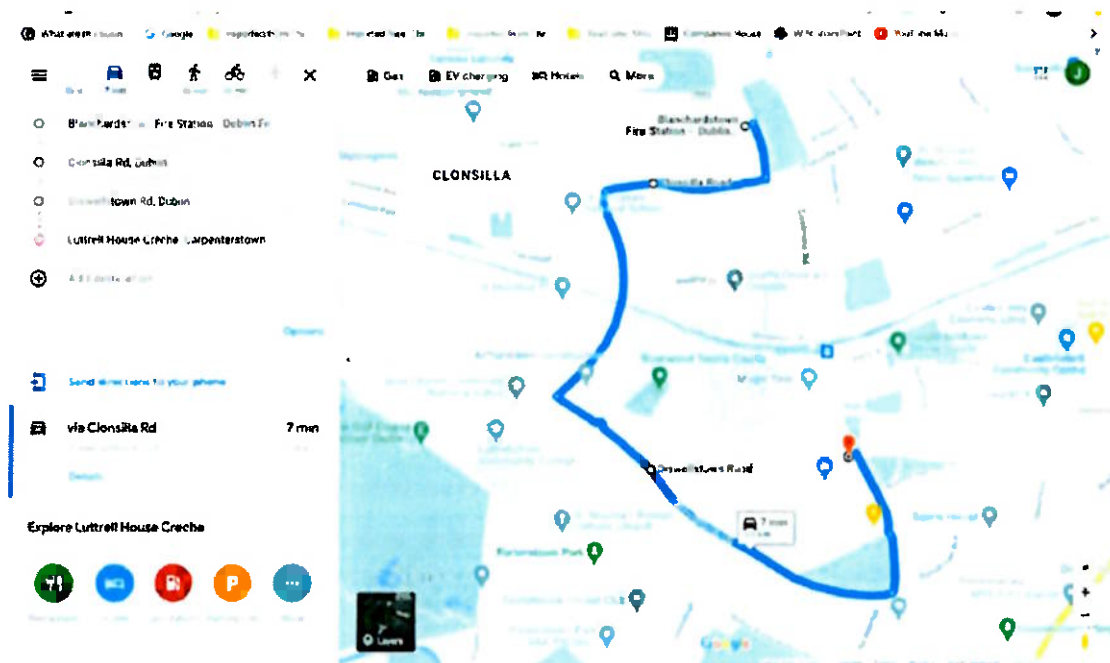


Figure 3 – Estimated time by road from Blanchardstown Fire Station to Carpenterstown

The potential impact of increased response times to medical and other emergencies is both significant and avoidable if appropriate measures are adopted to improve waiting times and safety measures at Coolmine Level Crossing (see Recommendations). It is equally pointless, given that there are no proposals to run Dart and Commuter Rail services after midnight. The closure of the level crossing for 24 hours a day to road traffic will needlessly delay local emergency services at

Blanchardstown Fire Station in responding to emergencies to the 20,000 residents of Castleknock.

2. Disconnecting Communities

The closure of the Coolmine-Carpenterstown road and right-of-way to normal road traffic will cut off the two communities for the first time since the 18th Century. Indeed, the NTA's transport study has described how level crossing closures will 'sever important connections to the communities on either side of the rail tracks. Without a convenient and safe way to access either side of the tracks, it could cause severance issues that will undermine nearby residential areas, schools, sporting facilities, etc..¹

In proposing the permanent closure of Coolmine level crossing, during non-statutory consultations Irish Rail and the NTA proposed the construction of a major vehicular bridge at Riverwood and Stationcourt estates in Coolmine. This they stated, would address the risk of community disconnection by the closure of the level crossing. However, in acknowledging the environmental damage and societal impact of building a major traffic bridge through quiet housing estates and parkland, the proposals for the overbridge were withdrawn. Nonetheless, the proposal for the closure of Coolmine level crossing and the resulting impact on local communities remains.

The closure will mean that the majority of those that rely on car transport to access local amenities, schools, shopping, or GP services between Coolmine and Carpenterstown – such as the elderly, young children and the disabled — will have to travel or be transported much longer distances by car (via Granard Bridge, Dr Troy Bridge or Ongar) or to make alternative plans. The closure of Coolmine level crossing and its replacement with a proposed pedestrian bridge at Coolmine, without lift access, would also increase walking times for pedestrians significantly, with elderly and the infirm having to walk an additional five minutes each way to cross the new bridge.²

3. Traffic Congestion

The wider Dublin 15/Dublin West constituency area spans c.30 square kilometres and has a larger footprint than that of Cork and Galway City (c.22 square kilometres). With a population of over 120,000, if the Blanchardstown/Castleknock area was a city, it would be the third biggest after Cork.³

Few people have the option of travelling by public transport around Dublin 15. Most links in the area move passengers west to east along rail or bus corridors. Indeed, Coolmine and Clonsilla stations, which are located in south Dublin 15 only serve passengers along the line and into Dublin City and Maynooth.

Moreover, by NTA's estimates, some 1,000 road users cross Coolmine level crossing (north-south/south north) daily by car to access local services or work at peak times.⁴ If they did not need to use the level crossing they would choose other routes or means to travel other than tolerate long delays at the level crossing. These road-users will be forced to move on to the already congested bridges at Diswellstown and Castleknock and through housing estates in Glenville, Delwood (at which a primary school is located) and Roselawn, or along a very busy Clonsilla road to access

¹ Maynooth Line Transport Study, National Transport Authority, Systra, 2019 p.7

² Ibid, p.143

³ Dáil Éireann Constituency Profile, Dublin West, 2020

https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2020/2020-02-09_dublin-west-constituency-profile_en.pdf

⁴ Maynooth Line Transport Study, National Transport Authority, Systra, 2019

Castleknock, Coolmine as well as north Blanchardstown (including Ballycoolin and Blanchardstown Shopping Centre).

The resulting impact on traffic was highlighted in Irish Rail's own traffic study which noted that 'These areas are already congested in the peak hours and experience increases in traffic volumes of approx. 65% and 38% respectively'.⁵

4. Societal and Environmental

The wider impact of traffic congestion, disruption or loss of access to amenities and services for those relying on private transport (such as the elderly or infirm) will not be remedied by widening road junctions or moving traffic to the east or west of Coolmine. Traffic congestion is likely to lead to more air pollution in the local area as well as risks to children and other users in surrounding housing estates who will be met with substantially increased traffic volumes with the closure of Coolmine level crossing.

Irish Rail's Flawed Assumptions

Irish Rail's revised proposals for the closure of Coolmine level crossing are based on one or more of the following flawed assumptions:

1. Vastly increased passenger numbers and train journeys will require the closure of level crossings.

The primary justification for closing level crossings is based on Irish Rail's own passenger number projections which appear unchanged from those presented in 2020. It is suggested that passenger capacity will increase from approximately 5,000 to 13,200 passengers per hour – thus requiring a doubling of train journeys from six per hour to 12 trains per hour - along the Maynooth line.⁶

Firstly, these projections do not take account of the substantial increases and the likely further increase in those working from home as a result of changing working practices since the pandemic.⁷ Furthermore, they assume that any increased demand for housing in the Dublin 15 and Kildare will lead to a corresponding increase in commuter rail demand. This assumption is also not supported by evidence.

Irish Rail also fails to acknowledge the large gap between existing passenger numbers and passenger capacity. NTA data shows that 9,602 passengers used the Maynooth line daily to commute to the city centre in 2018.⁸ This suggests that daily passenger numbers were much less than was suggested by claimed hourly passenger capacity figures cited in Irish Rail's publicity material to justify the closure of Coolmine level crossing as part of the Dart+ expansion.

Moreover, the number of rail commuters to and from Maynooth into Dublin City Centre before the pandemic represented less than 10% of the population of Blanchardstown alone. Instead, a multiple

⁵ Ibid, p.80

⁶ <https://www.dartplus.ie/en-ie/projects/dart-west>

⁷ <https://www.irishtimes.com/news/ireland/irish-news/government-wants-remote-working-to-become-permanent-fixture-as-workplaces-prepare-to-reopen-1.4678069>

⁸ https://www.nationaltransport.ie/wp-content/uploads/2019/07/National_Heavy_Rail_2019_FA_ONLINE.pdf

of those current or projected rail users work or avail of services locally. Residents in Dublin 7, Dublin 15 or east Kildare (in local industrial estates, schools, hospitals, professions, leisure or retail) that rely on existing road networks – including level crossings - to travel to and from school, local amenities and services or work. In short - the vast majority of residents in Dublin West will never be served by the Dart West upgrade because they do not work or live in areas served by the train line.

Instead, the impact of level crossing closures will severely impact their daily lives as they go about their business locally. These include the more than 10,000 residents of Blanchardstown over the age of 65 who do not commute to the city centre daily, do not cycle, or the many of whom are unable to walk long distances and instead rely on road transport along the same local road network to access GP and health services, shopping, or to visit relatives.⁹

Finally, there is no evidence to show that there will be such demand for increased capacity to require the closure of the level crossing outside of peak hours. The service is used infrequently at weekends or weekdays between the hours of 10am and 4pm. It is not used at all after 11.50pm when the last commuter train leaves Coolmine. There is no reason why the level crossing needs to remain closed during these periods - even with significantly increased journeys at other times.

2. The proposed bridge is the only available option to provide safe access for pedestrians and cyclists across Coolmine level crossing.

No alternative pedestrian/cycling bridge designs have been considered or presented that would allow for the retention of Coolmine level crossing. For example, there are no alternative proposals that might allow for a pedestrian/cycling bridge to be erected to the east of Coolmine train station or spanning the Royal Canal from the north bank. Furthermore, there are no proposals for lifts similar to those provided at Broombridge interchange to allow for easier access for the elderly and/or disabled.¹⁰ Neither option would require the closure of the level crossing.

3. Level crossings are dangerous.

Few road safety/level crossing safety measures have been proposed or installed at the approach to Coolmine level crossing. This is in spite of the fact that there is enough distance between junctions and the crossing/Kirkpatrick bridge to lawfully erect speed ramps within 30 metres of the crossing.¹¹

There are no other traffic calming measures on the approach to the junction such as rumble strips or radar speed signs. The speed limit on the level crossing approach is the same for other connecting roads in the area when a 30 kph speed limit would be more appropriate. In addition, other than CCTV on the crossing for use by Irish Rail, there is no highly-visible road safety/detection camera at the junction to deter, detect and prosecute motorists passing red lights at the level crossing.

⁹ See https://data.oireachtas.ie/ie/oireachtas/libraryResearch/2020/2020-02-09_dublin-west-constituency-profile_en.pdf

¹⁰ See also Maynooth Line Transport Study, National Transport Authority, Systra, 2019 <https://www.irishrail.ie/Admin/getmedia/090827a5-9c8a-4c9d-aa75-c92580a659d6/Annex-3-1-Maynooth-Line-Transport-Study-Final-Report.pdf> page 47.

¹¹ <http://www.irishstatutebook.ie/eli/1988/si/32/made/en/print>

None of the recommendations made by the European Road Safety Observatory on enhanced safety measures at level crossings have been adopted by Irish Rail.¹² It also appears that very little effort has been made by either Irish Rail or Fingal County Council to address safety concerns on the assumption that the level crossing will be closed. The assumption is self-fulfilling.

4. All level crossings must close to allow for electrification of the Maynooth line

Irish Rail acknowledged in correspondence with local residents in 2020 that some level crossings will remain open during and/or after Dart+ upgrades 'pending capacity assessments' including Baldoyle Road, Sutton Station, Cosh, Claremont and Fernslock (sic).

Line	Serial No.	Description	Type	Functional Area	Eastng	Northng	DART+ Requirement
Sligo Line	K0004	Attended Crossing	ATC/ACC	DCC	313000	217500	Closed, subject to design and Railway Order approval
	K0006	Coolmine	SCTy	FCC	303940	217550	Closed, subject to design and Railway Order approval
	K0010	Portlough	SCTy	FCC	306150	217740	Closed, subject to design and Railway Order approval
	K0010	Attended Crossing	ATC/ACC	FCC	304990	218090	Closed, subject to design and Railway Order approval
	K0012	Barrowdown	SCTy	FCC	303860	218150	Closed, subject to design and Railway Order approval
	K0014	Barrowdown	SCTy	FCC	297940	218340	Closed, subject to design and Railway Order approval
Howth Branch Line	K0019	Remlock	SCTy	FCC	285604	218540	Remain, subject to capacity assessment
	K0011	Ballyvaughan	SCTy	FCC	324000	219500	Remain, subject to capacity assessment
	K0002	Sutton Station	SCTy	FCC	325004	219600	Remain, subject to capacity assessment
	K0003	Cosh	SCTy	FCC	325000	219600	Remain, subject to capacity assessment
North Line	K0008	Claremont	SCTy	FCC	327400	219520	Remain, subject to capacity assessment
	K0011	Coffins	Field King	FCC	329600	220400	Remain, subject to capacity assessment
Rosslare Line	K0011	Landsdowne	SCTy	DCC	318020	232970	Closed, subject to design and Railway Order approval
	K0002	Seeperside	SCTy	DCC	318340	232980	Closed, subject to design and Railway Order approval
	K0003	Sandyhook	SCTy	DCC	318390	232980	Closed, subject to design and Railway Order approval
	K0004	Trillick Road	SCTy	DCC	318210	233100	Closed, subject to design and Railway Order approval
	K0005	Strand Rd (New)	SCTy	DCC	319670	233440	Closed, subject to design and Railway Order approval
	K0011	Bray	SCTy	DCC	329600	233600	Closed, subject to design and Railway Order approval
	K0012	Bray Lane	Field King	DCC	328714	233670	Closed, subject to design and Railway Order approval

It is also worth noting that none of the level crossings on the Rosslare line were closed after electrification in 1984.

If level crossings could remain open along the Rosslare line upon electrification and along the Howth Branch line during and after upgrades, there is no reason why some level crossings along the Maynooth line, including Coolmine, cannot also remain open. The Maynooth line can and should be electrified, with necessary upgrades installed. Thereafter, a future capacity assessment should be undertaken before any further intrusive or disruptive infrastructural works or level crossing closures are pursued by Irish Rail.

5. Coolmine level crossing slows down both rail and road traffic

With the exception of freight or express inter-city trains to and from Sligo, trains will need to slow down on approach to Coolmine train station in the same way they will need to slow on approach to any station – irrespective of whether there is a level crossing at the junction.

Irish Rail has previously stated that 'The level crossings are closed for up to 41.5 minutes every hour (Coolmine). With the proposal to increase the number of trains to 30 [from the current number of 12] it is clear that these level crossings would not be able to operate as an efficient crossing point for pedestrians, cyclists and motorists'.¹³

¹² See page 9 https://road-safety.transport.ec.europa.eu/system/files/2021-07/road_safety_thematic_report_railway_level_crossings_tc_final.pdf

¹³ Preliminary Options Selection Report Main Report, Irish Rail and the National Transport Authority, p.28.

However, the average closure times at Coolmine are based on the current signalling system running diesel powered trains. A more useful comparison could be drawn by using data gathered on the existing Dart line at Lansdowne Road level crossing where the average closure time (based on rail traffic volumes) of 1.5 minutes is almost half that at Coolmine level crossing (3.4 minutes).

There is no evidence presented by Irish Rail to show that closure times could not be reduced at Coolmine with upgraded signalling and electrification. If waiting times were reduced to that at Lansdowne Road, waiting times at Coolmine would remain largely unchanged even with a doubling in the number of trains. Moreover, road traffic volumes and waiting times would not be impacted at all outside peak times during which demand for rail services falls dramatically.

Public Consultation

I should note that I have participated in numerous public consultations over the past 15 years in a professional capacity and managed or assisted consultations around Ireland's National Action Plan for the Open Government Partnership since 2014. I regret to say that this is one of the most flawed public consultations I have ever witnessed or in which I have participated.

No public information was made available by Irish Rail by post to affected communities in the Blanchardstown/Castleknock area at any point during in the preparation of the draft Rail Order. Most of those consultations that did take place took the form of public briefings via Zoom or Skype during lockdown with little opportunity for those that are not IT-literate to participate. Due to public safety measures during the pandemic, no public meetings were held by Irish Rail. However, after the public safety measures were relaxed in early 2022, Irish Rail made little effort to share information on its proposals or to seek public feedback on them from local communities.

The failure of Irish Rail to adequately consult local communities runs contrary to Department of Public Expenditure and Reform guidance on public consultations which encourages state agencies to 'make systematic efforts to ensure that interested and affected parties have the opportunity to take part in open consultations at all stages' and to 'tailor the consultation to the needs and preferences of particular groups, such as older people'.¹⁴

Given the likely impact of the closure of all level-crossings along the Maynooth line, it is incumbent on Irish Rail to engage in meaningful dialogue with affected communities. The undertaking of a capacity assessment during the electrification of the Maynooth line would offer another opportunity to do just this and ensure that any future decision on the future of Coolmine level crossing is fully informed by the public.

¹⁴ Department of Public Expenditure and Reform Consultation Principles and Guidance, 2014
<https://assets.gov.ie/5579/140119163201-9e43dea3f4b14d56a705960cb9354c8b.pdf>

Recommendations and Conclusion

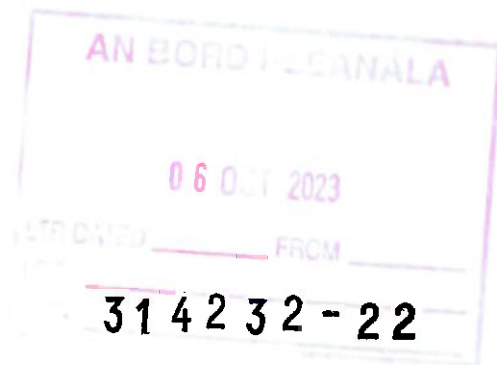
All of the likely costs and risks associated with the closure of Coolmine level crossing outweigh its stated or suggested benefits – none of which are supported by available evidence.

Irish Rail should therefore be instructed to undertake the following measures to facilitate the speedy implementation of its plans to extend the Dart line to Maynooth, while addressing the potential impact of its proposals:

5. Undertake a capacity assessment on the Maynooth line after the electrification of the line before a final decision on the future of the level crossing at Coolmine.
6. Engage in meaningful public consultation and public information efforts with affected communities during the capacity assessment.
7. Improve signalling to reduce waiting times at Coolmine level crossing.
8. In collaboration with Fingal County Council, introduce appropriate safety measures along Coolmine and Carpenterstown Road and the approach to the level crossing.

There is nothing to prevent this work from happening as the Maynooth line is electrified.

The alternative is to increase emergency-service response times to Castleknock, disconnect two major suburban population centres, increase road congestion and air pollution and to potentially deny thousands of local residents with mobility issues road access to local amenities.



AN BORD PLEANALA

06 OCT 2023