

Oral statement from John Devitt on Irish Rail's Submission Observations to the Draft Railway Order Application - 4 October 2023

For references and citations which have not been included, please see my observation dated 2022 which accompanies this statement.

Thank you, Mr Inspector for the opportunity to address this oral hearing today. I will speak to Irish Rail's response to my observations on the draft railway order but with your permission I should provide some context.

I am here in my capacity as a local resident and grew up in the Glenville estate having moved there in 1977. I now live at Stationcourt beside Coolmine railway station.

Although the local road network remains largely unchanged since the 1970s, we have seen the area grow significantly to the point where Dublin 15 has a bigger population than Limerick and Galway (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.

In the north of Dublin 15 are large housing estates and business parks and the largest shopping in the country. The area is divided north and south by the Royal Canal, as well as the N3.

Thousands of its local residents travel south to north and vice versa for their shopping, services, creches, school and work via the Castleknock, Coolmine and Diswellstown Roads - far more people indeed than travel east to the city centre by rail. Moreover, there are some 10,000 residents over the age of 65 in the area – the bulk of whom are not travelling to the city for work and a similar number of those with disabilities (based on CSO data from 2016) are more likely to depend on **road transport** including private cars, taxis and buses to avail of local services as well as to visit friends and family in Coolmine and Castleknock.

However, the plans to close Coolmine level crossing mean that **one of only three roads** directly connecting Blanchardstown and Castleknock will be closed to road traffic. There will be no through road connecting the two major population centres for more than two kms between Diswellstown and Castleknock roads. While the townlands of Coolmine and Carpenterstown will be disconnected for road traffic for the first time in 200 years.

It will as Irish Rail acknowledge in paragraph 2.4.10 of their submission, create at least 'a perception of **community severance**' – a point they made in justifying their proposals for an overbridge at Riverwood and Stationcourt during a meeting with residents in 2020. It is a perception which will feel very much like reality for thousands of local residents but one that is scarcely referenced or addressed in Irish Rail's submissions.

I set out a number of concerns in my submission which were partly summarised by Irish Rail on page 177. With your permission, I will address most of these points later but I wanted to draw your attention to one in particular that Irish Rail makes barely a passing mention in its submission.

Nowhere is it noted in any of Irish Rail's submissions that the Coolmine/Carpenterstown Road is the primary access route for emergency services from **Blanchardstown Fire Station** on Snugborough Road to estates in Castleknock, Carpenterstown and Laurel Lodge 24 hours a day. I should note that I took these two photos walking home by the level crossing in the past couple of years. It appears that the level crossing is sometimes opened for emergency vehicles, and Dublin Fire Brigade time their approach to avoid closures and associated congestion. It is evident that the route is used to save on

response times to medical emergencies. At just one kilometre from Carpenterstown, it is **the shortest and most direct route** between the fire station and Castleknock. If it was not the most accessible route, the emergency services would not use it.

Moreover, the 20,000 residents of Castleknock rely on emergency fire and ambulance services provided by Blanchardstown Fire Station. The nearest fire station at Phibsborough is some 10 km away.

In spite of the Coolmine area being one of the most heavily congested in Dublin 15, within four minutes of leaving Blanchardstown Fire Station, emergency services (both ambulance and fire services) can currently attend to an accident, medical or fire emergency in Carpenterstown using the junction at Coolmine level crossing. Currently, estimated journey times are anywhere between six and eight minutes in rush hour from the fire station to Laurel Lodge using the same route.

However, in its response to my submission in paragraph 2.4.8, Irish Rail state that access for fire services from Blanchardstown Fire Station to the south of the rail line will be via the Diswellstown Road or the Castleknock Road. What they do not address is the likelihood that emergency response times to Carpenterstown will be doubled by redirected them via Diswellstown Road and will be significantly increased to Laurel Lodge if forced to reroute through the Castleknock Road.

Separately, Irish Rail admit in 2.4.10 that 'routes and journeys by vehicles will be changed which may result in lengthening of journeys' in the area, while also stating in paragraph 2.4.8 that capacity enhancements are proposed on the local network to facilitate diverted traffic and to ensure access for emergency vehicles.

Leaving aside any changes to junctions, what Irish Rail do not and cannot address is the glaring contradiction in their responses to my submission, which is to say how capacity enhancements will be made for a fire engine on narrow roads while acknowledging later in their submission that road journeys will inevitably be lengthened by the closure of Coolmine level crossing. Moreover, they make no comment on any capacity enhancements through Roselawn or through Blanchardstown village – largely because there are no enhancements to be gained on local roads which will be even more congested with the closure of Coolmine level crossing.

In any given scenario, we will see **distances nearly trebled** [from 1km to 3km] for emergency services using Diswellstown Road to Carpenterstown [Luttrell House Creche is used for reference] instead of Coolmine Road and could see emergency response times to Castleknock overall increase anywhere between 50% and 100%. Those additional five minutes might not seem much to someone sitting in traffic listening to the radio but for someone in a medical emergency, those few minutes are the difference between life and death or a healthy life and a life-changing injury.

Irish Rail are determined to close all but one of the level crossings on the Sligo line as part of its **Level Crossing Elimination Programme** while leaving others including Fernslock and all lines open on the Howth Branch and Northern lines open pending capacity assessment. Irish Rail has argued that these level crossings will be left open because of the relatively low frequency of road and rail traffic. If this is the case, why is Coolmine level crossing not left open when there is no commuter rail traffic at all between midnight and 6am? How can Irish Rail justify closing the only main road connecting two highly populated townlands and the most direct route for emergency services from Blanchardstown to Castleknock even when there are no trains running at all? We know the answer from their response to our submissions: they can't.

It is worth noting in reference to point 2 of my summarised observation, that contrary to its submission, there is no evidence that Irish Rail ever consulted with residents in neighbouring townlands or estates including Laurel Lodge or Roselawn on the closure at any stage in this process. In their responses to numerous submissions, they claim and I quote, to have 'consulted extensively' yet they provide no details on the consultations engaged in communities in the wider Blanchardstown and Castleknock area, other than what was made available online and a small number of Zoom meetings during the Covid pandemic.

It is also clear from the Planning Report that Dublin Fire Brigade did not share its views on the closure of Coolmine level crossing as provided for under Article 213 of the Planning and Development (Strategic Infrastructure) Regulations, nor is there any evidence that they actively sought the views of Dublin Fire Brigade or Blanchardstown Fire Station on the proposed closure.

I should add that I had to ask a neighbour to send me the updated proposals for the pedestrian bridge at Coolmine level crossing which was found on the An Bord Pleanála website and which shows a radical departure from Irish Rail's original plans. It is inevitable that others have found it difficult to access such information without being pointed to it too.

As outlined in point 4, I urged Irish Rail to work with Fingal County Council (FCC) in enhancing safety measures – an appeal which they dismissed by claiming they that they are already in place. Yet, they have given no consideration to working with FCC in enhancing safety measures at level crossings including reduced speed limits on approach roads, secondary traffic lights at Sheepmoor Lane and the station park and ride, or road safety detection cameras which would have allowed for the identification and prosecution of a lorry driver who damaged the gates in 2021.

Indeed, I am not aware that Irish Rail has considered any of the European Road Safety Observatory recommendations on enhanced safety measures at level crossings – such as speed ramps at [30 metres from] level crossings or reducing closing times of level crossings to prevent risk-taking behaviour by motorists (I should add that the average level crossing closure times of 3.4 minutes, at Coolmine are double those at Lansdowne Road).

In addition, given the welcome movement of the proposed pedestrian bridge away from the level crossing, which would avoid the permanent closure of Coolmine level crossing, one can only conclude that the proposed closure is as much prompted by Irish Rail's unwavering commitment to its Level Crossing Elimination Programme and the maintenance costs of level crossings, as it is by train frequencies, safety concerns or any consideration of the impact on the local community of the proposed permanent closure.

In conclusion, Mr Inspector, I urge you to recommend an amendment to the Railway Order to allow for the upgrade of Coolmine level crossing and the introduction of enhanced safety measures at the level crossing during electrification of the line and the construction of the pedestrian bridge to the east of the level crossing. During this time, and as is the case with other level crossings on the Dart line, **capacity assessment** should be undertaken that evaluates both demand for rail services that would justify level crossing closures at peak times and the impact of those closures on the local community as well as their access to essential services - and most importantly speedy access to emergency services.

If Irish Rail's request to close this arterial road traffic route is approved by the board now, it cannot and will never be reversed. However, if Irish Rail are asked to amend the order to accommodate this modest compromise, that decision can be revisited in light of all the available evidence. Thank you

AN BORD PLEANÁLA

06 OCT 2023

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