

Larry O'Sullivan 5/10/23
Submitted →

Response to IR Submission by Delwood Residents Association Oct. 2023

Introduction

Thank you, Mr. Inspector, for this opportunity to make a public submission on the Applicant's report titled: "Submission on Observations to the Draft Railway Order Application".

I have some very brief, but I believe pertinent, points to make on behalf of Del Res. I request your forbearance for the next couple of minutes.

My name is Larry O'Sullivan, and I am here representing DRA. For context, Delwood Housing Estate was built in the mid-1970s. It comprises 259 houses with approximately 900 residents. It is adjacent both to the Royal canal and the railway line, and its residents are very frequent users of the Coolmine Level crossing and have been so for many, many, years. At this stage a good number of the residents are getting old, but it is regenerating with a good number of young families taking up residence over the last 10 years. Many of these have Delwood connections.

I was heartened, Mr Inspector, to hear you say last Thursday the 28th that you are very au fait with all the submissions made to ABP. It is good to know, therefore, that you are familiar with our submission of 22/10/2022. Also based on what I heard last Thursday in your responses to IR and others, I feel confident that you will give due attention to our concerns as expressed and give them due weight in your consideration and decision making associated with IR's Railway Order which is before you.

You will know from our submission that we stated we are very much in favour of the electrification of the railway line from the city centre to Maynooth, notwithstanding some issues we have with the development. In particular, we are against the permanent closure of Coolmine Level Crossing as we don't believe it is necessary.

Regarding these issues, we were disappointed to find that, on page 168 of the Applicant's report, no specific comments were made by IR on our submission. Rather, we found the following bland statement and I quote: "All concerns raised are common issues

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Regarding these issues, we were disappointed to find that, on page 168 of the Applicant's report, no specific comments were made by IR on our submission. Rather, we found the following bland statement and I quote: "All concerns raised are common issues

dealt with in Section 2” end quote. This in our view was very unsatisfactory.

Be that as it may, we are not satisfied that the Applicant dealt sufficiently well enough with our concerns in Section 2 of their report.

I give some examples as follows: -

2.2.2 Headed “Lack of Consultation”

Regarding the lack of consultation, we point out that only a relatively small number of people were engaged in the Consultation Processes as they were all online during the Covid Pandemic. In this regard, it is interesting here to quote Professor Rose Anne Kenny Principal Investigator of TILDA (The Irish Longitudinal Study on Ageing) of TCD on a major study carried out by TILDA in 2020.

and I quote: “The impact of this information goes beyond the current pandemic. More and more financial and commercial institutions rely on the internet and allied technologies to interact with customers. *This leaves a significant number of citizens marginalised and disenfranchised.* It is incumbent on Government and other organisations to ensure that all citizens can engage fully with organisations.” End quote.

1.1 <https://tilda.tcd.ie/news-events/2020/2016-%20covid19-techhabits/2016-1.pdf>

1.2 To view the full report, please visit: <https://www.doi.org/10.38018/TildaRe.2020-06>

We gave links both to the press release and the report itself in our submission. We can find no specific response to this in IR’s report, so we ask did IR check the press release and the report by taking the time to go to those links given and study the findings.

Under Public Consultation No. 1 within 2.2.2 bullet point 4 Page 6, a mail drop of circa 13,000 information leaflets is mentioned. In our view a mail drop is no proof of delivery and given the number of post boxes with “no junk mail” it means that there was more than likely incomplete coverage of the targeted population. The same applies to bullet point no 5 under Public Consultation no 2.

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In our view this communications method can be discounted as it was ineffective in terms of informing the public.

Webinars

Regarding multiple webinars as in Bullet point 6 under Public Consultation No. 1 and bullet point no 7 under Public Consultation no 2, these were most unsatisfactory and can only be described as the most lopsided of affairs as IR had full control of them. In the earlier ones, we as attendees weren't allowed to speak - only listen. In later ones when we as attendees were allowed to speak, IR had control of the Mute Button so one could find oneself being cut off. No verbal questions were allowed, only text ones in a chat box. Even then we were never sure of getting an answer as it appeared IR only chose to answer the ones that suited them. So much for fair and balanced communications. I am speaking here from firsthand knowledge, as I attended them all.

2.4.8 Increased Traffic Congestion.

In our submission under the heading Our Concerns with The Railway Order the second part of bullet point 4 gave an example of a fire brigade having to make a time-consuming detour to reach the scene of a house fire or other major incident due to the closure of the Coolmine crossing. While paragraph 7 of 2.4.8 refers to emergency services having to be diverted, it doesn't acknowledge that it would at least double the time it would take to get to the scene of an incident versus going through the Coolmine level crossing. I don't have to explain to you the probable consequences of such lost time. This example demonstrates the vital importance of the level crossing to all our emergency services.

On IR's traffic analysis, which dates from 2019. The argument is made that it is comparable to 2022. This comparison does not factor in the huge increase in population in Dublin 15 during these years. Fingal for instance, of which D15 is part, had an 11.6% population increase change between the 2016 National Census and the 2022 one. This is higher than the national increase over the same period, 8.1%.

<https://www.cso.ie/en/releasesandpublications/ep/p-cpsr/censusofpopulation2022-summaryresults/populationchanges/>

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So, evidence suggests that the population is growing faster in this area than other areas of the country, which would suggest that a new traffic analysis is warranted.

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To quote IR.

“For example, Coolmine level crossing is closed for approximately 40 minutes between 08.00-09.00 each weekday for 6 trains per hour per direction. In order to achieve the project objectives of significantly higher train frequencies, it is not viable to retain the level crossings (i.e. increasing from 6 trains per hour per direction to 12 trains per hour per direction)

A few points about this statement:

- **The Irish Rail response says above that between 8:00 and 9:00 each weekday the level crossing is closed for forty minutes. The converse of this, which is not acknowledged in the IR report, is that the level crossing is, therefore, open for twenty minutes in that hour, allowing traffic to flow smoothly, and there is significantly more open time in subsequent nonpeak hours.**
- **Current Closure times**
- **In any event, the current time allowed for each closure at Coolmine is significantly longer than in other areas. The report suggests that this is for safety reasons. However, if one compares these times to those currently used on the DART crossings, such as Lansdowne, they are longer. If the times allocated to each train were reduced, increasing the number of trains would not result in increased time closure compared to what is there currently.**
- **IR's project objective of doubling trains from 6 per hour per direction to 12 is dependent upon demand**

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Closing Coolmine Level Crossing on safety grounds

Regarding closing Coolmine Level Crossing on Safety grounds, IR's own statistics in their document of July 2021 titled: "Technical Note: Need for DART+ West Level Crossing Closures" shows that the Coolmine Level Crossing has an excellent safety record by any standard.

Of the 21 incidents shown in Table 2.2 of that report, 9 involved vehicles over the 6-year period 2014-2019. These were mostly minor in nature and no major injuries or fatalities are reported. That's 1.5 incidents per year, certainly not a compelling case for closing the level crossing. Taking into account the nature of these incidents, it is well in the capacity and capability of IR to implement additional risk mitigation measures at Coolmine Level Crossing

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Of the 21 incidents shown in Table 2.2 of that report, 9 involved vehicles over the 6-year period 2014-2019. These were mostly minor in nature and no major injuries or fatalities are reported. That's 4.2 incidents per year, certainly not a compelling case for closing the level crossing. Taking into account the nature of these incidents, it is well in the capacity and capability of IR to implement additional risk mitigation measures at Coolmine Level Crossing

Removing periodic blockages

The report further states that closing the level crossing would remove “periodic blockages of the road system”. This is disingenuous, as closing the level crossing does not magically remove these vehicles from the locality, it just adds them to other junctions which are already overloaded.

***As an example (from a resident), during rush hour it currently takes 5 minutes to travel from Delwood Rd. to Tír na nÓg park by car. It can take up to fifteen minutes if the level crossing at Coolmine is closed. However, it currently takes 30 minutes to travel the same distance via Castleknock Rd. or Diswellstown Bridge. This demonstrates how overwhelmed those routes are currently. In our view, restructuring these junctions is not going to fix the current traffic situation let alone manage to incorporate the additional traffic fed into the system from the closure of the Coolmine crossing.**

Access Points

From our perspective there are currently four entry/exit points to the Laurel Lodge/Carpenterstown area. Closing Coolmine level crossing will reduce this to three.

Hundreds of houses and apartments have been built in this area in the last number of years. Reducing the number of access/exit points will significantly increase pressure on an already overburdened system. Has IR factored in this housing and associated population increase into their decision to close Coolmine Level Crossing permanently, with its attendant effect on road journeys in Dublin 15?

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2.2.16 Community Infrastructure and Severance

IR states under this heading, quoting from Section 7.5.4.1 of EIAR that there would be “reduced perceived community severance” during the operational stage. We beg to differ, as community severance is not a perception it is a reality.

Regarding severing communities that have had social, cultural and economic interactions on both sides of the North South route over centuries, the question arises as to who has precedence over the right of way when it comes to proposing permanently closing off inter-communal arteries such as the Coolmine Road to Carpenterstown. We argue that the North - South route has a greater right than the East West route. Has IR considered the right of way aspect here.

Historically, The Kirkpatrick Bridge, built in the mid-1790s, which predates the Railway, built in the 1860s, by many decades, connects, inter alia, Coolmine and Carpenterstown. The proposed closure of this North - South route level would curtail local journeys and impact multiple daily journeys for school, work, emergency services, family and retail purposes between these and other communities.

You can't have East West connectivity at the expense of North South connectivity.

2.4.10 Severance due to level crossing closures

The idea of perceived severance comes up here again. The inference is made here that walking and cycling infrastructure will be able to replace the road network. This suggestion does not reflect an understanding of how the roads are used and the profile of those users and their journeys. IR would have Delwood grannies and grandads getting out their old bikes and pedalling over bridges to collect their grandchildren from schools and creche. A job I often do myself by the way. Let me repeat again that community severance is a reality and not a perception, it is actually felt.

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2.4.10 finishes by stating and I quote: “Routes and journeys by vehicles will be changed which may result in lengthening of journeys resulting in perceived severance” End quote

A vehicular alternative route to the creche my grandchild is in WILL, not MAY as stated above, result in a longer and more time-consuming journey. This is a fact and will persist long after my grandchild is no longer in creche.

2.2.17 Anti Social Behaviour and Safety Concerns

IR quotes EIAR Chapter 23 Section 23.3.4 on this topic. The last sentence states that: ‘anti-social behaviour is subjective.’ This section, itself by the way, is also subjective and speculative also, when it says: ‘there could be positive impacts on the community due to improved connectivity’. However, that means there could be negative impacts where communities are disconnected due to the closure of the level crossings.

Our concern is about the additional anti-social behaviour that will inevitably be afforded along the line by closing the level crossings, whereby at Coolmine for instance, a cul-de-sac will be created. The sentiment expressed in 23.5.3.8 I’m afraid is wishful thinking as anti-social behaviour will not be temporary but will be continuous.

It is worth quoting here a recent statement by the Minister for Justice, Helen McEntee.

- “Community safety is a much broader concept than crime or fear of crime. It is about people being safe and feeling safe in their communities. It can include the responsiveness of emergency services, mental health issues, education, drug abuse prevention, alcohol and substance abuse, domestic violence, youth crime, anti-social behaviour (our bold), hate**

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***crime and the built environment (our bold). This is reflected in the key principle in the programme for Government: Our Shared Future, to build stronger and safer communities. The well-being of communities is among our highest priorities, and we want members of the public to feel confident and secure in going about their daily lives"* End Quote**

- (<https://www.oireachtas.ie/en/debates/debate/dail/2020-11-18/22/> accessed 24/10/2022)

The well-being of communities is best served by openness, the freedom of ease and movement to allow inter-communal contact for a multiplicity of reasons and not by closing things down. The reduction of 6 openings to 3 under the Dart+West proposal will have a deep, negative effect on community well-being.

Conclusion

Thank you for your time, Mr. Inspector, and in conclusion, may I appeal to you on behalf of Delwood Residents to disallow the permanent closure of Coolmine Level Crossing in the Railway Order before you and that you request IR to come back to you with a realistic, viable and technological solution, that we believe is possible in this technological 21st century which would permit the Coolmine Level Crossing to remain open.

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(18/22) (Volume 34/30/2022)

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A few points about this statement:

12 trains per hour is a train every 5 minutes whizzing up and down the line. Is this proposed for 24/7 or just for the couple of peak hours in the 5 working days of the week? If only for peak hours why close Coolmine Level Crossing permanently?

I presume there are less trains per hour in the nonpeak hours and would these not be manageable while retaining the Coolmine Level Crossing open?

How many trains in the nonpeak hours?

- The Irish Rail response says above that between 8:00 and 9:00 each weekday the level crossing is closed for forty minutes. The converse of this, which is not acknowledged in the IR report, is that the level crossing is, therefore, open for twenty minutes in that hour, allowing traffic to flow smoothly, and there is significantly more open time in subsequent nonpeak hours.**
- Current Closure times**
- In any event, the current time allowed for each closure at Coolmine is significantly longer than in**

**Table 5 National daily passenger journeys by direction and by line
2012 - 2022**

| Line | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2021 | 2022 |
|---|----------------|----------------|----------------|----------------|----------------|----------------|----------------|----------------|---------------|----------------|
| DART Northbound | 28,425 | 28,152 | 27,330 | 32,239 | 33,595 | 36,691 | 40,704 | 38,668 | 21,720 | 32,712 |
| DART Southbound | 28,410 | 27,769 | 27,673 | 32,666 | 33,528 | 37,974 | 41,201 | 40,021 | 21,146 | 32,031 |
| Connolly Commuter - Northbound | 10,219 | 9,600 | 9,663 | 9,143 | 11,480 | 13,056 | 11,998 | 12,595 | 6,928 | 10,878 |
| Connolly Commuter - Southbound | 9,836 | 10,392 | 10,427 | 10,467 | 11,808 | 13,049 | 12,431 | 13,244 | 7,255 | 11,036 |
| Connolly Commuter - Eastbound | 9,703 | 9,305 | 10,027 | 10,903 | 12,177 | 13,890 | 14,172 | 14,559 | 7,353 | 11,908 |
| Connolly Commuter - Westbound | 9,697 | 9,160 | 9,786 | 11,097 | 11,228 | 12,493 | 13,685 | 13,565 | 7,178 | 11,942 |
| Heuston Commuter - North & Eastbound | 10,143 | 11,167 | 11,773 | 12,538 | 12,891 | 16,476 | 17,553 | 17,984 | 10,238 | 17,276 |
| Heuston Commuter - South & Westbound | 10,659 | 10,902 | 11,492 | 12,255 | 12,161 | 15,514 | 17,147 | 17,554 | 9,885 | 17,929 |
| Cork Regional - Northbound/ Cork Commuter Inbound | 2,200 | 2,620 | 1,968 | 2,448 | 2,803 | 2,974 | 3,111 | 3,362 | 2,073 | 4,997 |
| Cork Regional - Southbound/ Cork Commuter Outbound | 2,433 | 2,447 | 1,774 | 2,442 | 2,788 | 2,920 | 2,864 | 3,162 | 2,044 | 4,038 |
| Regional Northbound | 1,172 | 803 | 1,313 | 1,274 | 1,190 | 1,368 | 1,655 | 1,460 | 1,001 | 2,039 |
| Regional Southbound | 1,326 | 1,095 | 1,115 | 1,229 | 1,299 | 1,462 | 1,537 | 1,730 | 1,272 | 1,865 |
| Total | 124,223 | 123,412 | 124,341 | 138,701 | 146,943 | 167,867 | 178,058 | 177,904 | 93,093 | 153,651 |

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| Incident No | Incident Date & Time | Incident Title |
|-------------|----------------------|---|
| INC-12070 | 10/08/2016 17:10 | Road vehicle strikes level crossing gate or barrier XG006 |
| INC-12121 | 13/08/2016 19:20 | Cat 1 Near miss with pedestrian at level crossing XG006 |
| INC-13763 | 08/10/2016 14:13 | MoP Trespass onto cleared LX at XG006 Coolmine |
| INC-21118 | 28/07/2017 15:53 | Person interferes with barrier operation at XG006 Coolmine |
| INC-21002 | 24/07/2017 08:24 | Vehicle strikes level crossing barrier at XG006 Coolmine |
| INC-21573 | 17/08/2017 08:48 | Vehicle drives onto line during lowering sequence at XG006 |
| INC-23373 | 18/10/2017 09:56 | Trespasser (XG006) Coolmine level crossing |
| INC-27463 | 20/04/2018 19:34 | Poor visibility at Coolmine LC XG006 |
| INC-29473 | 02/07/2018 00:00 | Trespass on railway line at XG006 Coolmine LC |
| INC-30375 | 13/08/2018 17:57 | MoP Trespass onto cleared LX at XG006 |
| INC-30419 | 15/08/2018 09:27 | Road vehicle struck LX XG006 - No damage to crossing |
| INC-30816 | 02/09/2018 12:35 | LX Barrier closes on road vehicle - No damage crossing No XG006 |
| INC-31214 | 19/09/2018 07:17 | CCTV camera / image failure at crossing XG006 Coolmine |
| INC-32822 | 01/11/2018 18:23 | MoP Trespass onto cleared LX at XG006 |
| INC-36110 | 19/03/2019 18:00 | LX Barrier closes on road vehicle - No damage . crossing No XG006 |
| INC-37107 | 26/04/2019 13:31 | Cat 1 Near miss with pedestrian at XG006 Coolmine |
| INC-40901 | 12/09/2019 19:21 | Person interferes with XG006 Coolmine |

In addition to accidents on the railway, there is evidence of hazard in respect of level crossings for road users and the public. The graphic in Figure 2-6 is a snapshot of the Road Safety Authority Road Collision Statistics in respect of Coolmine. It illustrates the record of collisions in the vicinity of Coolmine Road between 2005 and 2016. It is evident that four of the incidents are either at the level crossing or on the immediate approach to it.

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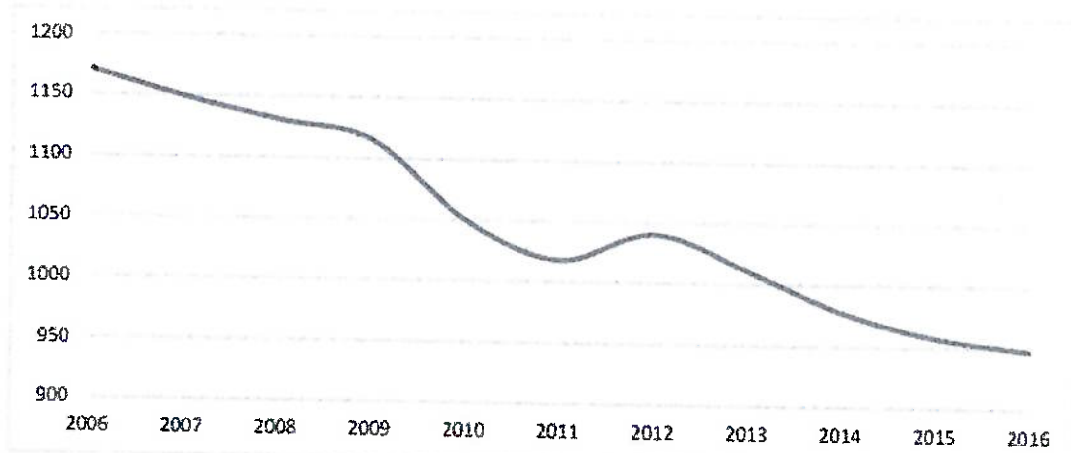


Figure 2-5 – Number of Level Crossings in Ireland by Year

'The graph also demonstrates the long term trend of level crossing elimination. Sustained efforts by Iarnród Éireann have contributed greatly to reducing the risk presented by level crossings.'

The above serves to illustrate the mandate that has been in place by IE and from government to enhance safety on the railway through the removal of road rail level crossings from the railway network. Railway Accident Statistics associated with level crossings are presented in Table 2-1.

Table 2-1 Railway accident statistics pertinent to level crossings

| Category | 2003 | 2004 | 2005 | 2006 | 2007 | 2008 | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 |
|--|------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| Train collision with a motor vehicle at a level crossing | 1 | 2 | 2 | 1 | 4 | 4 | 0 | 2 | 1 | 2 | 1 | 2 | 0 | 0 |
| Train collision with pedestrian at a level crossing | 0 | 0 | 0 | 0 | 1 | 0 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Train collision with attended gates at a level crossing | 2 | 4 | 2 | 2 | 2 | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 1 | 0 |
| Train collision with large animal(s) on the line | 43 | 40 | 42 | 43 | 42 | 33 | 20 | 24 | 35 | 26 | 29 | 9 | 29 | 35 |

The CRR Statistics document reports 'Total train collisions (with obstacles/large animals) have risen to 68 in 2016 from 33 in 2015. There has been some volatility in the data between 2013 and 2016, but the trends show it continues to be a cause for concern. As discussed in previous reports, animals, (deer, cattle and sheep) are a major contributor to collision statistics in Ireland. Iarnród Éireann continues to invest in fencing systems to protect against incursions to its railway. In addition the reduction in the number of level crossings should also be assisting in this trend.'

Iarnród Éireann maintains a safety database for the railway network. By way of example, between 2015 and 2019 for Coolmine level crossing the database records 21 incidents that impacted on rail services, road traffic or both. These are summarised in Table 2-2 as follows:

Table 2-2 IE Incident Records 2014 to 2019 Coolmine Level Crossing

| Incident No | Incident Date & Time | Incident Title |
|-------------|----------------------|---|
| INC-03169 | 28/04/2015 00:00 | Road vehicle strikes level crossing gate or barrier XG006 Coolmine LC |
| INC-04503 | 20/10/2015 15:58 | Road vehicle strikes level crossing barrier at XG006 |
| INC-06511 | 30/12/2015 12:00 | Strong Wind impacts services at XG006 |
| INC-11048 | 28/06/2016 09:20 | Road vehicle strikes level crossing gate or barrier at Coolmine XG006 |

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