

ABP-314232-22 – DART+ West Oral Hearing: Oral Submission on behalf of Ciara O'Neill to Irish Rail's responses to Ciara O'Neill's observations

Ref 4.47 of Submission on Observations to the Draft Railway Order Application May 2023

1. Effect on Emergency services – diversions and length of journeys:

- Detailed response was provided in Section 2.4.8. "increased traffic congestion":
 - This states "From a level crossings perspective long closures of barriers cause long delays for vehicular traffic and queuing vehicles grid lock all junctions around them, which in turn also have an impact on emissions, noise and air quality in the local environment." However this is only relevant during peak train times – in off peak times the traffic runs smoothly through level crossings, so emergency services use this access if it is the shortest route at the time of day/night - closing the level crossing means the emergency services have to use a different route.
 - In addition where the response specially refers to emergency services it does so in relation to "at all times during construction" and does not refer to the operational stage.
 - The response does not a) have any reference to data on how often the emergency services currently use roads with level crossings and how their journey time may be affected if the level crossing is closed or b) have any opinion or feedback provided by the emergency services in the area.

2. Amount of construction will nullify any environmental benefits of scheme that this whole electrification process would bring:

- While I welcome that the response admits that "the proposed projects embodied carbon is sizeable" and that Irish Rail are "committed to the minimisation of this figure" it only then specifically refers to planned works at Spencer Dock only which is only one small part of the overall project and the planned concrete and iron structures. So therefore the response does not address the point raised or prove that there would eventually be a carbon neutral affect.

3. Traffic effects as a result of closures and re-routing due to tailbacks. Fear that if traffic problems then occur then new road bridge as previously proposed may be required.

- Detailed response was provided in Section 2.4.8.
 - I acknowledge that the "future year growth and traffic generation in Blanchardstown area are coming from National Transport Authority's (NTA) East Regional Model" which takes into account future traffic levels based on future development – but did this study take into account the closing of level crossings?
 - If not, then how is it a relevant response?
 - It is noted that the response refers to "congestion at adjoining junctions due to level crossing barrier closures" but this is only at peak times and not outside of peak times. However the permanent closure of level crossings pushes traffic to other roads at all times.
 - It is also noted that the response states that "It is proposed that the existing level crossings will not be closed until capacity improvements on other routes is completed. Much of the capacity enhancement works can be constructed off-road while maintaining traffic on the roadway. This will facilitate phased capacity enhancement prior to the implementation of road closures." Is this only in relation to

the capacity enhancement of the surrounding roads or does it also refer to the train frequency?

- If only for the capacity enhancement of the surrounding roads, then why not also take the same approach for train frequency/capacity – i.e. leave the level crossings open so that there is a gradual introduction of increased train capacity and therefore a gradual shift in the time the level crossings are naturally closed due to train crossings at peak times, showing that at other times the level crossing can be open to allow vehicle crossings.
- While we welcome this revised Railway Order proposed by Irish Rail that has now eliminated the requirement for a vehicle bridge at Riverwood and related areas, following outcry from the communities and support from public representatives, my observation refers to the possible effect of the permanent closure of the level crossings on traffic and the response from Irish Rail does specially address this. While Fingal Country Council specifically voted to include a ref in their area development plan that precludes building a bridge at this site, we have seen throughout this process and since the beginning of this hearing how different county councils (including Fingal County Council) have added or removed previously stated restrictions/preservations from their plans to suit some of the requirements of this rail order and therefore there is nothing to stop them doing the same with the bridge in the future. Therefore I am asking that this be future proofed by not closing the level crossing at Coolmine so that any future issues are eliminated.

4. Contradictive to the Fingal Development plan.

- I acknowledge that the Fingal Development Plan has since been updated and accept Irish Rail's response. However, I am disappointed that Fingal have voted to remove the need for vehicular access at Coolmine level crossing that existed in their previous area development plan and which the response by Irish Rail now refers. Therefore I ask that the inspector look beyond this and consider the numerous submissions in relation to the closure of the level crossing at Coolmine and request that the Coolmine level crossing remain open as part of any approval of this rail order.

5. People on both sides of the level crossing will be cut off from each other - longer journey times to access within community.

- Detailed responses were provided in Section 2.2.16 and Section 2.4.10
 - The response in Section 2.2.16 is confusing and contradictory in places: it refers to Section 7.5.1.4.4 of EIAR Chapter 7 which states, "where alternative vehicular access is not provided and/or is changed at the existing at-grade level crossings there will be a perceived negative, moderate- significant, permanent residual community severance effects for the properties and communities either side of the level crossings." Which is the point made in my observation – while the provision of a pedestrian / cycle bridge allows for an element of specific access, the level crossing closure would cut off a major vehicle thoroughfare.
 - In addition, any gain or positive affect referred to in the response is only in reference to peak times and not the rest of the day. Peak times are not 3 hours in the morning and 3 hours in the evening as quoted by Irish Rail at the oral hearing on Tuesday 3rd October 2023, they are currently about an hour in the morning and about an hour in the evening, so even an increased train frequency would not bring it anywhere near the times stated by Irish Rail. There are 24 hours in a day so making decisions to

close a level crossing based on 2 hours per day is just ridiculous and shows Irish Rail's ongoing contempt for the people living near these level crossings.

- Section 2.4.10 refers itself back to 2.2.16 so nothing new here! So same points apply as noted above

6. There is credible potential for an increase in antisocial behaviour in areas such as where dead-end roads, underpasses and long elevated pedestrian bridges.

- Detailed response was provided in Section 2.2.17 and Section 2.4.9.
 - 2.2.17 refers to Section 23.3.4 in Chapter 23 Human Health which categorises potential impacts including those relating to anti-social behaviour. It notes that there is likely negative psychosocial hazards relating to the improvements to existing and/or new infrastructure developments including issues such as nuisance and anti-social behaviour. Irish Rail say "there could also be positive impacts on the community due to improved connectivity particularly for public transport users, pedestrians, and cyclists and also as a result of regeneration associated with land use changes and associated increased economic prosperity. Anti-social behaviour or safety concerns is subjective, and therefore it is not possible to use a standard based assessment approach."
 - So firstly, while there may be positive effects, they do not negate the possibility of anti-social behaviour.
 - Secondly, while my safety concerns may be considered by Irish Rail as subjective, I would like to point out that currently I can currently walk across the level crossing in plain site and feel safe at night – but I would not feel safe going across a pedestrian bridge on my own, especially at night when it is quieter and when I don't know what lurks around the corner. I would kindly ask Irish Rail representative here present to ask themselves if they would be happy with their wives, mothers, sisters or daughters crossing one of those bridges by themselves at night?
 - While I acknowledge that Irish Rail have put some great security features in place, many of those referred to in the response have nothing to do with the areas at the closed roads or the pedestrian/cycle bridges. Even if CCTV was introduced on the bridges it is no use if I am attacked. And it is not preventative as it a) can be sprayed so that it is useless and b) any attacker can cover their head/face.
 - Section 2.4.9 states "A number of submissions have referred to these locations as cul-de-sacs, however the level crossing closures will continue to provide access and connectivity for pedestrian and cyclists." I would like to thank Irish Rail for the correction of definition, but at the end of the day it will create a dead end of vehicles, so let's not get too pedantic. The current level crossings are on roads that have vehicles so there is an inherent safety for someone walking in this area that an attacker can easily be seen and prevented. However, in comparison, the proposed structures are not as safe for people on their own.

7. In addition to the potential anti-social behaviour that the closing of the level crossings could bring, there is the added issue of the pedestrian bridges for mobility impaired.

- Detailed response to point 7 of this submission are provided in Section 2.2.1 and 2.2.7.
 - 2.2.1 states that The pedestrian bridge designs adhere to a number of standards including Building for Everyone (ADA-The National Disability Authority) – if this is the

case and the bridge is accessible and meets the required standards for a wheelchair user to traverse then I accept this response.

- It is noted however in Section 2.2.7 that Irish Rail admits that they are unable to maintain lifts properly and therefore prefer the use of the pedestrian/cycle bridges.

8. Bus routes would also be greatly affected by this closure include the 37 bus route, the 39 bus route as well as the 38 and 70D.

- My observation was in relation to the operational phase which Irish Rail have stated in their response that “in the operational phase no routes are affected by the proposed works.” But closing the level crossings pushes extra traffic on to roads used by the buses so how would the route not be affected? How have Irish Rail arrived at this conclusion?

9. Vastly increased passenger numbers and train journeys will require the closure of level crossings: the passenger numbers are based on assumptions and projections that are now out of date.

- Detailed response was provided in Section 2.2.8. “Train Demand Figures”.
 - It says that “while increase in passenger demand is one of the reasons that called for an increase of the capacity on the line, it is not the only one”. However, the other reasons are not relevant to the observation that was raised.
 - It goes on to say that “A correct analysis of passenger demand trends requires observation over long periods of time”. So basically the response cannot verify the required increase in demand.
 - It makes further reference to “The 12 trains per hour per direction used as the basis for the project will be implemented using a phased rollout and depending on demand figures, and represent the peak hour target number for design and environmental impact analysis. During off-peak hours, the timetable will be adjusted based on different aspects, rail census being one of them.” So, my question is why close the level crossings if there is a possibility that we may never reach this peak demand?
 - I also note at the oral hearing on Tues 3/10 the Irish Rail reference to the timings of closures currently at Coolmine of 41 mins in the hour at peak times - which is questionable - and the projected time of 83 mins per hour at peak capacity – please note there are only 60 minutes in an hour, so this already puts a question mark over Irish Rails current timing measures.
 - Also Irish Rail continue to ref peak times in all correspondence and at the oral hearing with no ref to off peak when level crossings could easily be left open.

10. None of the recommendations made by the European Road Safety Observatory on enhanced safety measures at level crossings have been adopted by Irish Rail. 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.

- Irish Rail’s response “Iarnród Éireann monitors the safety of level crossings on an ongoing basis and is satisfied that level crossings on the railway network in Ireland are safe.” So there is no specific reference in this response to the recommendations or why they would not take them on board to improve the safety and therefore allow the level crossings to remain open. In addition, if Irish Rail are satisfied that level crossings on the railway network in Ireland are safe then why is there a need to close them permanently?

11. Irish Rail also says that Coolmine level crossing slows down both rail and road traffic however, all of these proposed closures could be avoided by simply upgrading the already outdated signalling system.

- Detailed response to point 11 of this submission is provided in Section 2.2.8 (train demand figures) – but this has no reference to the signalling system or any consideration of improving same.

12. There are numerous level crossings along the current DART route that work absolutely fine with similar predicted train volumes.

- Detailed response was provided in Section 2.2.5. "Closure of level crossings not required (signalling upgrade)"
 - This response notes the different options considered and concludes "The design team has examined the feasibility of meeting the project objectives while keeping the existing level crossings in place and it has concluded that the project objectives cannot be delivered on this basis." I would like to ask Irish Rail, on what basis?
 - At the oral hearing on Tuesday 3rd October there was some data shared about the number of level crossings closed over the years and the response refers to "Measures implemented to remove level crossings from the network have resulted in some of the strongest safety enhancements across the network over the last 20 years." But Dublin has been developed over the years without consideration of this and as a result there are multiple busy roads that have level crossings on the existing Dart East line and on the proposed Dart West line – it would seem that Irish Rail are going for an easy option from their perspective and have not provided any concrete evidence for the proposed closure of Coolmine level crossing.

Therefore I ask the inspector to require that Coolmine level crossing NOT be closed permanently and that the project be reassessed by Irish Rail with this as a working level crossing. Thank You.

AN BORD PLEANÁLA

06 OCT 2023

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