

Submission to An Bord Pleanála  
Case reference: NA29S.314232  
DART + West Railway Order - Dublin City to Maynooth

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#### Overall intention of this submission

The proposal of Irish Rail to electrify the Maynooth line is a welcome, if long overdue, development. However we would request that approval be granted subject to a number of conditions in order to ensure the maximum benefit to be gained from this project. The rationale for these suggested conditions will be provided for consideration. Given that we live close to Coolmine crossing our comments are made with a particular focus on Coolmine crossing but in many cases they have relevance also in relation to other crossing decisions along the Maynooth line.

#### Background comments in order to clarify the context

- 1) The two 'public' consultations processes, prior to the Railway Order, have been so inadequate as to make it reasonable to question the democratic nature of the process. These both took place during the period of the pandemic which precluded the meeting and gathering of people thus greatly inhibiting serious discussion and debate. In addition, these consultations were initiated during holiday periods when people were likely to be away thus reducing the chance of becoming aware of the process; it took a lot of public pressure to then extend the consultation period.
- 2) No posters were ever displayed at any point of the entire process at our local train station, Coolmine.
- 3) No leaflets were distributed to local households and as a result the vast majority of people are entirely unaware of this major initiative proposed for their area.
- 4) All communication was online thus disenfranchising people who are not technically literate and in a mature area it is reasonable to assume that this may be a considerable number of people.
- 5) Online zoom meetings were strictly controlled by Irish Rail minimising the opportunity for questioning and debate. Questions had to be submitted in advance, not all were 'selected' by Irish Rail and time was limited to raise points with no opportunity to follow

up if answers were unclear or not entirely responded to. All-in-all the process has been extremely frustrating.

- 6) The information available on the Irish Rail website was poorly organised and presented, making it difficult to locate essential points. At various times information would be changed with some things being removed and new information provided. Photomontages were very vague and it is difficult to see how the actual dimensions given were accurately represented in these photomontages.
- 7) Given the nature of all the above points it would only be appropriate that an oral hearing be granted prior to a final decision, and that is now being formally requested by us.

#### Proposed conditions for this project

1. Additional information not already gathered and considered should be gathered and examined prior to the commencement of any works as the request by Irish Rail is exceptionally unbalanced giving simply their view of the proposed developments. In essence for this submission, this additional information should include the impact on the wider Dublin 15 area and most especially on traffic amelioration. Once this is finalised to the satisfaction of Fingal County Council (FCC) and shown to support the management of traffic only then should the active development of the project commence. It is possible that FCC could pilot road closures to vehicular traffic for a period in order to assess bottlenecks and trial solutions. To do this after the event would allow for a possible period of traffic chaos and congestion in the interim; the impact on traffic of the vicinity of the Blanchardstown Shopping Centre needs to be kept in mind.
2. The permanent nature of the proposed closure of the crossings needs to be examined. No evidence has been provided for the capacity of the trains. No rationale nor evidence has been provided for the frequency of trains at peak times and no information at all on what will happen off-peak. A regular detailed passenger census needs to be the basis of tailoring the frequency to the ACTUAL demand. In particular, the rationale for closure of crossings at nighttime and at weekends should be justified using verifiable data. Put simply, why should the roads be closed when they are needed by the local community and not in use by Irish Rail?
3. In the event that the decision to close crossings is not required at this time then the building of bridges for non-vehicular access should be reviewed and delayed till they are shown to be necessary.
4. In the interim, electrification of the railway should proceed and the automation of the barriers should take place as per the current DART services. In addition the use of all technology to ensure absolute precedence of rail services should be utilised to ensure no delays for rail passengers. The flexibility of priority seen for the Luas trains at junctions shows that there is potential here to be applied for Irish Rail trains too. Automatic barriers are in use in many situations internationally so it is not a new concept.

#### Irish Rail Proposals

The plan to electrify the Maynooth line was worked on and developed in the pre-pandemic period. Some of our learning and thinking acquired during the pandemic should be applied to the proposals in order to make them work better and for longer.

One of the key words of the pandemic time has been 'pivot'. We have all realised that the new world order needs to have an inbuilt flexibility to adapt to changing and in some cases, unanticipated, situations. An Bord Pleanála has the opportunity to adapt a traditional fixed style of plan and to enable it to be applied to the same end with the capacity to adapt to changing environments.

Some consideration of increased housing demands along the line needs to be balanced with working from home and possible working hubs. The impact of energy costs needs to be considered also in relation to working from home. The fact that so few people in Dublin 15 actually use the train even though it connects with the Luas needs to be teased out. What factors will come into play in the future is hard to say but the service will need to be adaptable rather than fixed and it appears that the current proposal is very fixed at this time.

In the information provided there is a dearth of consideration of the impacts to the Dublin 15 area both in the vicinity of the stations and the knock on effects across the greater area. We will try to highlight some of these for consideration in order to balance what appears to be a very comprehensive plan from the perspective of Irish Rail but really blinkered in the total context of the impact. Unfortunately this weakens the credentials of Irish Rail to move this essential project forward. It is so focussed on the narrow goals of Irish Rail that it has failed to give consideration in a balanced manner to the totality of the impact.

Apart from raising some details of relevance to the communities in Dublin 15, we will also look in more detail at some aspects of the Irish Rail proposals. It is in all our interests to have this project done quickly, cost-effectively and sustainably.

#### Some consideration on the possible effects of the current Irish Rail Plan on Dublin 15 especially in the vicinity of Coolmine train station

Some thoughts in no particular order:

- During the pandemic the value of local services and shops became obvious. The local area here has virtually all of the requirements of the '15 minute city' which is designed to reduce unnecessary travel as most of day-to-day life can take place locally. It is shocking and disappointing to think that the design of the current plan will disrupt this approach to life as the significant number of permanent closures over a small area will provide a number of barriers to much local access.
- Most people who live in Dublin 15 actually work, go to school, shop, access healthcare, socialise, go to the gym and play sports in the local area. While it is fully accepted for the need for national rail access to the centre of Dublin, any disruption to the lives of a very large community here should not be disproportionately adversely affected.
- The bus service is utilised more frequently as it has the capacity to be more flexible in the routes provided. Bus Connects needs to be able to apply the same flexibility to

developing their routes to meet the needs of the community and this capacity to evolve will be limited by the many proposed road closures. This would be our best opportunity to get people out of cars as they can facilitate access to many locations rather than the limited rail access.

- Starting with the bridge at Castleknock and finishing with the one at Clonsilla there are five roads traversing the railway line. All of these have a single lane in each direction. As Dublin 15 is already extremely congested it is difficult to imagine that this will now be reduced from five crossings to two. It is not obvious how either of the remaining bridges can facilitate extra lanes and one of these certainly has a protection order prohibiting interference in its structure. A 60% reduction in access is massive. Apart from managing local travelling, Dublin 15 handles a large volume of traffic accessing the Blanchardstown Shopping Centre; many people avoid tolls on the M50 by coming via Chapelizod and this is a major factor in local traffic especially around Christmas shopping time and will remain a permanent feature of life in Dublin 15 into the future.
- As the current plan stands those living south of the railway line will have decreased access to the fire and ambulance services from the Snugborough Road Station as the most direct route will be closed; increased traffic on other bridges are likely to be a delaying factor too. This is a health and safety risk.
- Those north of the line will have access to the car park at Coolmine train station blocked when the road is closed. This could increase the already difficult situation about parking in local estates to avoid the charges for the station car park which is rarely, if ever, half full.
- Those south of the line will have reduced access to all major supermarkets ie Dunnes in the Blanchardstown Shopping Centre, Tesco in Roselawn and SuperValu in Blanchardstown village. Shopping is rarely done on foot or by bicycle.
- Those north of the line will not have access to the newly revamped Shackleton Gardens.
- It also appears that access to the Royal Canal amenity area will be problematic due to proposed railings in the vicinity of the stations.
- This area of Dublin 15 is residential and is a mature community housing a number of older people. Communities, built up over many years, will be sundered by this development.
- It is proposed that bridges will be built for non-vehicular access. These will have ramps but no lifts. Walking up inclines can be a problem for those with health issues and it is certainly ageist not to provide lifts.
- When the actual dimensions of the bridges are considered in reality rather than in the misleading photomontages, they are a significant eyesore in a mature and residential area.
- The building of a sub-station on a beautiful quiet green area which is used by the community for all sorts of activity especially tennis, dog-walking and as a play area for children has not been communicated at all to the residents of that area. Their amenity will be significantly and adversely impacted.
- While cyclists are present in Dublin 15 there are really very few of them and indeed as people get older the likelihood of cycling regularly in a very congested area is low.

- Traffic will increase in residential areas as access to limited crossings are sought. This will result in increased risk for children going and coming from school. It will result in an increase in noise pollution with consequent health implications. Until electric cars become the norm it will also result in a decrease in air quality and consequent health risks there too.
- Adjacent to the Kirkpatrick bridge at Coolmine is a unique area of the Royal Canal known as the Deep Sinking. The many floodlights at the pedestrian bridge will cause light pollution in this ecosystem which has a large nocturnal activity.
- There is real concern of the likelihood of antisocial behaviour in the vicinity of the station at Coolmine as the lack of traffic and back-to-back cul-de-sacs will be an obvious location for undisturbed activity.
- Living beside a train station has positives and negatives. Train access is positive. Delays at the crossings are negative. However on balance people happily accept the delays and the understanding that rail ALWAYS has precedence.

#### Potential consideration to maximise the Irish Rail Plan

The plan from Irish Rail is presented as having two main goals - an improved service for commuters and to do this in a manner that is environmentally friendly by moving from diesel trains to electric ones.

##### Service for commuters:

The basis for the proposals are vague and should be clarified. For peak services this is described as 'turn up and ride' and the current eight trains per hour in each direction will be increased to 15 trains per direction.

At present a number of the trains at peak times are extremely packed and without doubt more capacity is required. Capacity can be increased by increasing frequency but also by simply increasing the capacity per train. DART carriages hold more passengers than diesel ones so a straight change to DART carriages would be advantageous. In addition DART trains can be significantly longer than diesel ones which would further increase capacity. It is feasible that simply changing from shorter diesel trains to longer DART ones may provide the complete solution to the current situation without increasing frequency. But because no rationale has been provided by Irish Rail it is not clear why increasing frequency is the only potential solution. This really does need to be examined.

Passenger numbers are not readily available but the National Rail Consensus Report 2019 indicates that on the Maynooth line 'overall patronage is down by 2% since 2018' (pages 8/9) and that follows from a decrease the previous year also from 2017 (page 37). Given the fact that during the preparation of the plan by Irish Rail it appears that the number of passengers was actually decreasing it is mystifying why an increase in frequency is planned.

Sense would indicate that an annual census of passenger numbers would be the basis on which planning for upcoming services would be made. This should also allow a margin for incremental increase so that congestion in carriages would not occur especially at peak times. It would also seem logical to consider optimising the current service capacity before increasing the frequency.

Even with the current capacity it appears that Connolly station cannot cope with the service from Maynooth as the train on the line very often has to stop and wait for long periods outside the station to facilitate the DART and other commuter services. Radical changes would certainly be needed to facilitate a smooth integration of any increased service frequency.

Off-peak trains are rarely even half full at present so a requirement for any increase in this service would be uncalled for unless need is demonstrated.

The length of time that the barrier to traffic is down therefore causing traffic congestion is worth examining too. At the present time the barriers are not automatic and are controlled manually from a central point (not by a person locally as in Ashtown). The average time that the barriers remain down is well over four minutes and is certainly much longer than the barriers controlling the DART. This is a human decision.

Of note too is the time factors between stations. In the case of Coolmine, the adjacent stations are Clonsilla and Castleknock but each of these stations are only two minutes away from Coolmine. In addition when the train arrives from Castleknock it is only one minute in Coolmine station before moving on. Logic would indicate that the barrier at Coolmine is closed BEFORE the train has even left the previous station. When this is considered against an average closure of more than four minutes, it is hard to understand why this is the case and it would raise a question mark over the use of closure times as an argument to permanently close the barriers. This point needs further clarification by Irish Rail and some mathematics provided to explain the numbers.

The greening of the railway service:

This is a welcome development and never has it been more needed. Our awareness of the green agenda and especially its role in transport is a real and pressing one. We would contend that the simple change from diesel to electric would be a lost opportunity unless maximised, and would request that Irish Rail make this change the most efficient and sustainable one possible by examining opportunities within the headline proposal.

Some thought needs to be given at this time and for the foreseeable future, as to how the electricity to run the trains is generated as we have not yet decoupled electricity generation from greenhouse gases. So a simple changeover to electricity at this time is not as green as would be ideal. However it is better to proceed with the change than to remain with diesel.

In addition it would be a waste of energy for Irish Rail to run trains that are not optimally occupied ie if frequency was increased before maximising capacity. In addition it should be noted that these trains will also be running a time peak usage ie 5-7pm in the evening which is precisely the time when all consumers are requested to minimise their usage. Irish Rail have a responsibility to do likewise by planning in an evidence-based manner to minimise their use to appropriate levels. Running half empty trains is unjustifiable and is wasteful.

However there may be other invisible carbon generation within the project that needs considering too. To build steel and/or concrete bridges (especially if the actual need has not yet been quantified) will also be a significant source of carbon generation.

If barriers remain permanently closed then longer car journeys and idling in traffic jams will also increase carbon emissions. It could be argued that these will disappear when the change to electric cars happens, but any car which is not moving while being switched on is wasting

energy. The electricity to charge these cars will also have a carbon footprint. This waste would be indirectly caused by Irish Rail's proposal to permanently close the barriers.

It is easy to classify moving from diesel trains as a green initiative but true responsibility lies in accepting the implications of ALL ASPECT of carbon generation not just for the construction of the project but the lingering and more invisible aspects e.g. permanently increasing car journeys. This could be mitigated to a significant degree to allow the sharing of the crossing space with road traffic as is currently the case when no rail traffic is using the line; trains are currently always given precedence and given this fact it is hard to comprehend why the crossing must remain closed when not in use.

#### Some thoughts on cost consideration

This is an expensive project and if carried out exactly as proposed it will most likely cost more as building costs have already increased and it is quite likely that this will continue. There is a responsibility to use public taxpayers money wisely and even more so if this is funded by international loans which may incur high interest paid back from the public purse.

We would contend that our terms proposed in conjunction with the approval would provide for a cheaper, flexible and more sustainable approach which would provide for the same outcome as that proposed by Irish Rail in their plan; all it would take is a few tweaks!