

Bláthnaid & Pádraig Mac Criostail
Páirc Ghort an Chaisleáin,
Cluain Saileach, BÁC 15
28.10.22

Ref: Railway Order pertaining to the DARTWest project.

A chara,

Herewith is our observation to An Bord Pleanála in relation to the Railway Order that Irish Rail have submitted for the DARTWest project.

1. Foreword

We, as residents of Clonsilla Village have grave concerns over the implications of the proposals submitted by Irish Rail regarding the DARTWest project.

It is important to state at the outset that all improvements to public transport are welcome, including an upgrading of the train line with greater train frequency, however they must be made in consideration of all of the implications, some of which are outlined below.

In addition to this submission, we also wish to request an oral hearing on this proposal.

While Irish Rail have conducted consultation, and while we have actively engaged with that consultation process, it is clear that they have not been listening to the local communities over our concerns about shutting the level crossings.

We have included a few recommendations in this document for a more realistic alternative which we believe serves the purpose of Irish Rail to increase capacity and train usage and that respects the environment and quality of life of the community.

We urge that An Bord Pleanála take these real concerns into account in their deliberation as otherwise there will be a very negative impact on traffic congestion, pedestrian safety, cyclist safety, general sense of community and the general mental wellbeing of all those living in the environs of the train stations under scrutiny.

2. Summary of Concerns

As residents of Clonsilla, we are hugely concerned about the impact of the proposed plan to close the level crossings at Coolmine Station, Porterstown Road and Clonsilla Station. We are also very disheartened at the prospect of the unsightly bridges proposed at Porterstown and Clonsilla Station which are situated in Clonsilla Village.

Consultation process

Irish Rail have been consulting, but not listening to the local communities over concerns about shutting the level crossings. The public consultation to date has been inadequate. The manner in which Irish Rail has conducted their non-statutory consultations has been poor and contrasts with the extent of information and publications supplied to impacted areas by the Bus Connects project. There has been an over reliance on online consultation, which has meant the exclusion of the older population, which is a large demographic in the Clonsilla and Coolmine area. There has been a shortage of hard copy material, which would have enabled residents to read the information pertaining to their locality. The huge number of online documents - grouped by subject, rather than by area – has made it much more difficult to determine the specifics relating to each location. There is also a shortage of photomontages, pictures, drawings and pedestrian/cycle bridge measurements in the documentation, which has made it even harder to visualise the changes proposed. A large part of the community is in the dark about the proposals.

The Public Consultation process has not extensively explored alternative infrastructure upgrades, such as the tunnel at Coolmine, tunnel at Riverwood/Stationcourt, or re-visiting the option of a bridge immediately west of Clonsilla station.

Upgrading versus Level Crossing Closure

The level crossings do not need to close in order to extend the DART to Maynooth. In its place we urge that the upgrading of the level crossings be considered as an interim measure. This could be achieved by way of installation of automatic level crossings, in conjunction with accompanying road safety and traffic calming measures in the vicinity of level crossings. As a permanent solution, we urge that infrastructure upgrades be made such as the tunnel at Coolmine, tunnel at Riverwood/Stationcourt, etc.

Keeping access open for vehicles is crucial so that the local population is not cut off from local amenities & resources – as are currently accessible on both sides of the Canal, that the Clonsilla Road does not become clogged with heavy traffic and that there is a safe environment for local residents.

Closure of the level crossings (3) between Coolmine and Clonsilla Train stations will have a clear detrimental impact on the character and viability of Clonsilla Village, which must be avoided.

Current Traffic Conditions

As it stands, the Clonsilla Road, Porterstown road and Dr Troy Bridge are in complete gridlock at all peak times. On the occasions where we have no choice but to use the car, the only alternative is the Ongar distribution road – and that is also blocked up from beginning to end. It is a complete nightmare as it stands. Exiting the estate is a dangerous and arduous task. If this proposal is approved we will all become prisoners in our own homes, not to mention the

environmental pollution issues for us and our kids. It would take a significantly longer time to get anywhere.

As a cyclist, it is a dangerous journey from our estate – all down the Clonsilla road and on into Blanchardstown. I currently have to choose for the sake of my personal safety between not cycling on a very heavily congested single-lane highway, or delay my journey by walking with my bike on the footpath to a point, up to 2 kms. from my departure point, where the traffic congestion begins to ease and the dangers associated with such congestion begin to ease. A good deal of my daily commute is spent walking and meandering along the footpath through pedestrians including schoolchildren who simply cannot use the Clonsilla road.

Should these proposals be approved, I will not feel safe cycling in this area anymore nor will I allow my children. This runs counter to the ambition to encourage cycling for environmental and health reasons.

The proposed level crossing closures would result in a significant increase in traffic volumes on the Dr. Troy bridge, which is already congested at peak times. Hundreds of new apartments are still uninhabited behind St. Mochta's estate – their access point being the Clonsilla Road. Even if there were never proposals on the table to close the level crossings, we are facing a traffic crisis when these apartments become occupied. The assumption simply cannot be made that of all these prospective residents, as well as the current community will travel by train on every occasion for their work and personal life. It ignores the fact that people have lives in their local communities. Clonsilla has been very underresourced in terms of local amenities – in an ideal world, we would walk to satisfy all our commercial, educational, social and medical needs – but that is simply not the reality in Clonsilla Village or Coolmine.

The proposed traffic junction alterations at this bridge will not be sufficient to handle the additional traffic volumes.

The proposed upgrade of junctions will have no impact on traffic congestion or travel times. The bottleneck will be Dr Troy Bridge which remains single lane in each direction.

The proposal does not take into consideration the increased traffic volumes that will occur when the remaining lands in Clonsilla Village namely Kellystown, the Aldi site, the site at the lodge near the train station, the site at the Old School House and the site opposite are inevitably developed. The proposed development of the land at Luttrellstown Castle would also impact traffic in the area. The Kellystown Local Area plan provides for up to 857 additional units that will use Dr Troy Bridge to provide access to the National Roadway Network (N3, M50) and local amenities like Blanchardstown Shopping Centre. This development will put extra pressure on an already congested Dr Troy Bridge. The bridge does not have the capacity to handle existing traffic, Coolmine Level Crossing Traffic, Porterstown Level Crossing Traffic and Clonsilla Level Crossing Traffic.

The closing of the level crossing blocks both existing residents and future residents in these future developments from access to local amenities & resources and has a detrimental impact on the character and viability of Clonsilla Village.

The proposal does not take into consideration the increased traffic volumes that will occur when Kellystown LAP is developed.

There is zero acknowledgement in these proposals for the importance of local journeys and people making community journeys back and forth over these railway lines.

Navigating the proposed bridges

As a cyclist, I would not feel safe navigating the bridges as proposed in terms of their structure and in facing the decline, at any time but in particular on a wet day. Needless to say, walking with the bike would be required. Travel time for all, regardless of mode of transport would be significantly increased.

In my experience, these pedestrian bridges are often used as spots for clustering of anti-social behaviour and can be very intimidating. Clonsilla is currently experiencing extreme anti-social behaviour and drug abuse. We are very concerned that the bridges by their size and nature would become local hot-spots for such unwelcome behaviour.

Any person with mobility issues, including the elderly would no longer be able to traverse the crossing. Anyone with anti-social safety concerns would avoid the bridges. Anyone pushing a bike or a buggy would have a nightmare of a journey.

Further safety concerns

This proposal would render some roads as cul-de-sacs, increasing the potential for anti-social behaviour. This is the case at all train stations and is a major cause of concern.

Alternative Options

The investigation of the alternative options in the Rail Order is not complete as all the “Do Something” options only consider built options they ignore the upgrade of the level crossing or hybrid options such as closing the level crossing during peak times only.

A tunnel proposal is being included in the railway order for Ashtown, which has less traffic movements than Dublin 15 closures. This must be considered for the stations under scrutiny.

The proposed bridge at Barberstown will not serve residents of Clonsilla or the rest of Dublin 15. It will only serve commuter traffic using local roads to bypass the M50. A typical journey from Clonsilla Village to Carpenterstown would be approx. 8.5km longer using the proposed Barberstown bridge (Source: Google Maps). This will force traffic to use and already congested Dr Troy Bridge

Invalid data as a basis for the proposal

The data used to justify the need to close the level crossings is not relevant as it is data from the system as it is operated today i.e., manually operated level crossings where the amount of time the level crossing is closed is fully controlled by Irish Rail. The data that should be used is the amount of time that the level crossing would be closed if it was upgraded and fully automated.

Irish Rail's data pre-dates Covid. Clearly an increase in hybrid working has not been factored in. FCC's own data (2016) shows 91,000 Fingalians work and study in Fingal, versus 56,000 Fingalians who travel into Dublin City for work and study.

Rational for level crossing

The rationale offered by Irish Rail for closing the level crossing includes safety. However, as outlined above, safety issues are amongst our concerns should the level crossings be closed.

Information provided by Irish Rail in an on-line article to mark International Level Crossing Awareness Day (<https://www.rte.ie/news/ireland/2022/069/1303814-level-crossings/>) Porterstown and Clonsilla level crossings were not listed in the top ten level crossings where incidents had occurred.

Manually operated level crossings can be closed for a long time, however any potential negative behaviour brought about by frustration can be mitigated by having clear informational signage as to length of closure – affording cyclists, pedestrians and car users the opportunity to make a choice as to whether or not they will wait.

The introduction of automated level crossings which would be closed for less time in conjunction with proper signage could improve safety at the level crossings.

Visual Amenity of Proposed Bridges

The proposed access bridges at Clonsilla and Porterstown are visually appalling in design, size and materials and will dominate the view in these areas. They would lead to untold damage to the canal and the environmental sanctuary that we are trying to protect. This is of particular concern as both bridges are being built near historic elements that form part of the unique heritage and character of Clonsilla Village. The Porterstown bridge is beside the Old Schoolhouse which is a protected structure and the Clonsilla bridge is beside St Mary's Church (also a protected structure). The area around the Old Schoolhouse and the area around St Mary's Church are of key significance to the unique character and built heritage of Clonsilla Village. There are more suitable locations for any bridge further to the west of these protected structures.

The recently refurbished Shackleton Gardens, newly-opened as an amenity for the public, would also be adjacent to the Clonsilla Bridge. The value to the community of the Gardens,

and other aforementioned historic sites would be severely compromised by the building of the bridge as envisaged.

Environmental Concerns

The proposed access bridges at Clonsilla and Porterstown are located at the site of the proposed Greenway and in a proposed National Heritage Area. The large size and unsightly nature of the bridges will impact negatively on the Greenway and the ecology and biodiversity of the proposed National Heritage Area. Irish Rail must, however, be cognisant of the fact that the Maynooth line is located directly beside the Royal Canal, a proposed Natural Heritage Area (pNHA), with wildlife protected under the Habitats Directive. While a Natural Impact Statement is provided, it is inevitable that wildlife would be impacted during the construction phase and in the 24/7 lighting that would be required once completed. This would destroy the wildlife and biodiversity in the area.

The visual impact of the proposed pedestrian/cycle bridges in Coolmine, Clonsilla and Porterstown, is awful and would detract from the landscape along the Deep Sinking, a particularly beautiful stretch of the Royal Canal, in Dublin 15.

Having regard to the previous points we urge that any approval of the application as outlined in the Railway Order should be subject to a number of conditions.

Conditions For Approval of Railway Order

1. The level crossings at Coolmine, Porterstown and Clonsilla should not be closed.
2. An independent review of Irish Rails justification for closing the level crossings should be carried and it should utilise data from upgraded and automated level crossings not the current manual ones. It should also consider whether every level crossing needs to be closed and if it is possible for some to be automated and left in operation. The driver for closing the level crossings should not be operational simplicity when their closure has such a detrimental impact on the local community. This independent review should be public and transparent and freely available to the public.
3. In place of level crossing closures at Coolmine and Clonsilla alternatives must be considered such as a tunnel at Stationcourt/Riverwood and a road bridge just west of Clonsilla Station.
4. The analysis of alternative options carried out should also include the upgrade and automation of the existing level crossings so that they may remain open and measures such as only closing the level crossings during peak times.
5. This updated analysis should be public and transparent and freely available to the public.

6. Any bridge put in place, should be in keeping with the goal of protecting and enhancing the local historical heritage. Specifically, any bridge at Clonsilla should be west of current station, at a greater distance from the canal and from the 4 local protected heritage structures in Clonsilla and ideally be combined with bridge for Cars/Buses and not limited to pedestrians so as to mitigate the safety risks aforementioned as well as the traffic gridlock implications of it being pedestrian only.
7. Clonsilla Village were not offered a meeting to address their specific concerns, as was the case with Ashtown and Coolmine. We urge that a public meeting is held to allow us speak to our concerns.
8. A revised capacity assessment and traffic analysis should take place to assess capacity requirements and the impact of the Covid pandemic and new working from home legislation.
9. A more detailed environmental assessment should be carried out on the impact of the Clonsilla and Porterstown Access bridges on the ecology and biodiversity of the proposed Greenway and the proposed National Heritage area along the canal.
10. Automatic level crossing gates to be installed and the signalling system upgraded to enable short closure times. Revised safety measures should be introduced at all level crossings e.g., road signage, engineering changes of roads around current level crossings, traffic calming measures e.g., cars to be stopped further from the actual crossing when gates down etc.
11. Consideration of level crossing closures should be done under a separate process only where the actual frequency of trains requires it.
12. All traffic junction modifications and the building of the new road at Barberstown need to be completed, trialled and monitored before any changes to the level crossings are permanently made. Any time based or permanent closure of the level crossings should be trialled prior to being permanently implemented and this trial should be monitored and reviewed before any changes are implemented permanently. The results of any such trials and monitoring should be publicly available and open to public consultation.
13. Ongoing traffic surveys and analysis of traffic in Clonsilla Village should be carried out before and after road modifications are made and prior to any permanent changes to the level crossings. This should also be done after any permanent changes to the level crossings and all results and data from these surveys and analysis should be publicly available.
14. Planning Permission should not be granted to any new developments in Clonsilla Village or the surrounding area until a complete and comprehensive study is carried out as to the impact the changes to the level crossings will have on the traffic

volumes in Clonsilla Village as it currently is and what excess capacity above this can be handled by the road network in Clonsilla Village. If permission is granted to further developments without this being carried out traffic congestion and the associated pollution, danger and negative impact on people's lives will become a major issue for Clonsilla Village and the surrounding areas.

15. A condition should be added explicitly making Irish Rail responsible for the future remediation of traffic issues that may result from the DART West project, and the Clonsilla community must not be left in limbo between Irish Rail and Fingal County Council.

Conclusion

To reiterate, we welcome the upgrade of the line to DART standards however, not at the cost of our standard of living and physical and mental health.

We believe that the level crossings do not need to permanently close to facilitate upgrading and should not be granted based on operational simplicity. The implications are too grave. The upgrading of the signalling system, which should include the installation of automatic gates at level crossings, would allow for faster open and close times thus accommodating the proposed frequency increases that Irish Rail are predicting. Further, alternatives such as tunnels needs to be explored and subject to public consultation.

It is imperative that Irish Rail are not permitted to reduce our community to prisoners in their own homes due to the inability to access any local amenities due to traffic gridlock or to take journeys that simply cannot be taken by public transport.

The unsightly nature of the proposed bridges are eyesores in the extreme and would destroy the historic character of our village, which, as acknowledged by FCC must be protected.

Furthermore, the bridges would lead to unsafe, antisocial behaviour and will deter pedestrians and cyclists from using them, leading to severance of communities.

We trust your decision will be in the best interests of current and future Dublin 15 residences, the heritage of Clonsilla Village, and the strategic development of the Dublin 15 area.