

235 Delwood Grove
Dublin 15

28 October 2022

Re: Railway Order Application Statutory Consultation

Dear Sir

This is my submission in relation to one aspect of the proposed Dart West project, namely the proposed closure of Coolmine road to through traffic.

1. The proposed closure of Coolmine road to through traffic would be an irrational and arbitrary measure that does not achieve a proper planning balance between impact on community and proposed rail development, both in terms of actual engineering proposals and the impact it will have on people and the institutions in the community. As outlined in greater detail below, the splitting of a highly populated and integrated community represents an unprecedented imposition of 'brutal' engineering solutions to divide a mature residential community, business networks and social family networks. There is no other closely integrated community in Ireland that is to be severed in such a manner. As government policy states:

*"Planning is about creating communities and further developing existing communities in a sustainable manner by securing high quality urban design through the design, delivery and co-ordination of new development providing a good quality of life for all existing and future users of land and buildings."*¹

2. The options considered and the criteria used do not include all relevant local factors and is clearly at variance with the criteria being adopted in many other similar situations on the Dart rail network in greater Dublin area. In particular the Howth to Bray line that has numerous level crossings and where no such measure as closing an established community-based activities movements in an urban area has been implemented in the life-time of the Dart despite much more frequent train services, and no such proposals have been published in respect of existing Dart line..

¹ <https://www.opr.ie/wp-content/uploads/2022/01/Planning-Policy-Statement-2015.pdf>

3. It's important to understand a high level what is being proposed – that is to close three existing crossings in a highly populated urban area and route all the displaced traffic into one crossing. The existing road network is already inadequate with frequent traffic jams, so the results will be inevitable. The proposed closure will have a massive negative impact in a highly integrated community with no turning back if Irish rail get it wrong. e.g. the preferred option results in a 70% increase in traffic on roads that are already blocked with traffic, so motorists will divert to alternative residential roads in large numbers. The community will pay a high price, for ever !
4. It is proposed to construct monstrous concrete structures to provide pedestrian/cycle crossings. Structures of the size and scale proposed are total inappropriate in an urban setting which contravenes all local planning guidelines. Is it proposed to construct such structures on the south city Bray Dart line ? On the Howth to Bray line (e.g. the stations between Lansdowne and Merrion Road) the measures being proposed for Dart West crossings would never be considered and, in fact, are incapable of implementation, not least due to space constraints which would never accommodate the pedestrian/cycle bridge proposed for Coolmine.
5. In the original proposal Irish Rail recognized the need for a bridge crossing adjacent to Coolmine station crossing. If the need for such a traffic crossing was recognized at outset, what has changed now that makes the elimination of such a crossing acceptable? What is being proposed would be the same as closing traffic crossings and building similar concrete structures at Lansdowne, Sandymount and Sydney Parade stations in the south city. Is that the approach being proposed for those stations ?
6. Crucially there are feasible options/alternatives not advanced in current Irish Rail proposals which ought to be considered if the balance in planning objectives is to be achieved on an objective basis that takes account of community considerations. In particular where there is a materially adverse impact on established communities and local networks e.g. shopping, schools, commercial, healthcare, access to healthcare, fire and ambulance services and family networks will be severely adversely impacted by the implementation of such a road closure.
7. Of critical concern is the level of community based inter-generational and family support that will be required in the future, especially with regard to (i) the role older generations are playing in the provision of home care and family supports for younger generations and (ii) mobility of elderly people in the community. These services are enabled at local level by short-distance journeys within the community (intra community). Any proposal that puts barriers in place to restrict these local services is a

retrograde step that will disadvantage vulnerable groups in our community, especially in context of aging population.

8. As stated in by Irish Rail representatives in public Consultation session (on-line) the proposed approach is part of a 'policy' to remove cars from the road – and that is a highly laudable policy objective and Dart west will take many cars off the road in its catchment area for decades to come. However, it is essential to differentiate between (i) 'point to point' commuter traffic which will be provided by Dart West and (ii) community-based or intra-community traffic i.e. within the local communities that are impacted by proposed development.
9. The selection of preferred option is fundamentally and methodologically flawed as it based on incomplete information, in particular no Local Area traffic study has been completed in the areas affected by proposed road closure (as stated in report and in public consultation meetings). This renders the whole process illogical, invalid and probably illegal. If a decision has already been made on preferred route, what is purpose of a Local Area traffic study. Any additional local traffic study will be tainted with bias (to justify prior decision) and will be nothing more than a tick-box exercise.

The proposal is not supported by a full and proper traffic analysis/study arising from proposed road closure, especially with regard differentiating of road use/types, impact on residential roads, environment, accident statistics, etc in the area. As your report states (extract copied below for your convenience) your analysis is based on “initial assessment” of out-of-date data and as noted above no Local Area traffic study has been completed in the areas affected by proposed road closure.

As can be seen from the above the most significant increase in traffic is expected to occur along Porterstown Road with an increase in traffic flows of 69% and the next biggest increase occurs at Castleknock Road, with an increase of 36%.

The above model / report was prepared to consider the relative pros and cons of the various options being considered. However, it is not sufficiently detailed to consider the junction capacity and determine any associated upgrades that might be required. This model was also prepared using the NTA Eastern Regional Model (ERM) 2011 and the updated 2016 ERM is now available.

An updated Local Area Model, which is based on the latest ERM, is being prepared for the detailed design and assessment of the proposed development, however this model is not sufficiently developed at this stage for junction analysis.

Pending the completion of this updated Local Area Model, a traffic modelling exercise has been undertaken that is based on a combination of the initial model runs from the ERM 2016 and supplementing this with 2019 traffic survey data and the 2019 LAM, and the critical junctions on the road network have been assessed. The results of this initial assessment are outlined below.

For example In particular the traffic impact analysis does not address the environmental and safety aspects from proposed road closure on roads through surrounding residential areas which will be directly impacted re-routed traffic, for example,

the traffic analysis does not even mention the local residential Delwood, Glenville, Laurel Lodge, Roselawn and Sycamore estates which contain a number of alternative routes (as shown in map/photo from report below) and which facilitate large numbers of family and school journeys (including local national schools and crèches).

It is not clear the extent to which the latest traffic analysis has been extended to take account of these factors - there has been only limited additional traffic counts during 2022 and the traffic count has not been updated on all the roads that are relevant to proposed solution.

10. Improvements at the major junctions have been proposed as the sole remedy to the traffic diversion problem. However this plan fails to take account of the fact that no matter what car traffic capacity created, pedestrians will, rightfully, have priority. In this highly-residential area and highly integrated area, any junction improvements for increase traffic volumes will be severely constrained by pedestrian priority, especially at peak times when both traffic and pedestrians will be at their maximum. This is the reality on the ground at the moment.



Figure 8-44 Coolmine Option 9 – Traffic Routes (Copyright Ordnance Survey Ireland – 0039720)

11. The closure of Coolmine road would have a major impact on the effectiveness of the Fire and Ambulance service from the near-by Coolmine station in reaching a significant segment of the affected area. This does not appear to have been addressed in the proposal.

12. The proposals are based on fundamentally flawed assumptions as they are based on current and historical technologies and operating procedures as well as selective use of isolated survey data. No attempt has been made to incorporate new innovative approaches which can include enhanced safety measures while putting the community and its people and their local life patterns at the core of the solution.

The level crossings are closed for up to 41.5 minutes every hour (Coolmine). With the proposal to increase the number of trains to 30 it is clear that these level crossings would not be able to operate as an efficient crossing point for pedestrians, cyclists and motorists.

For example, the extract (see extract from report above) asserting that the 'level crossing would not be able to operate' in report is fundamentally flawed for the following reasons:

- It is based on current signaling technology and work practices, it takes no account of new technologies to increase safety and minimize barrier down time. These technologies are available and used extensively in Europe and USA. These alternatives have not been evaluated. Even applying existing DART gate times would be a start.
- The option of moving the South platform to the West of Coolmine road has not been evaluated (i.e. thereby reducing need to keep barrier down while train is stopped at station).
- The proposal makes no provision for the large percentage of time that the crossing would be free for traffic (as percentage of 24 hour time base). The proposals simply rely on one set of historical statistics.

13. The proposed road closure is an 'all or nothing' approach. It seems that other intermediate options have not been considered (or if they have they have not been offered for public consultation). For example, the closure of Coolmine road during peak times only e.g. 6 hours out of 24 has not been considered in public proposals or advance double gating for enhanced safety. The use of 'low height' tunnels under railway should be re-evaluated, i.e. under railway and over canal. (as used nearby successfully under motorway at Mulhuddart for decades). This option was previously considered but needs to be looked again.

14. As noted above, the proposed solution will have a massive negative impact on local community, is final and not capable of modification. If Irish Rail is satisfied with its projections, then it should conduct a trial and close the Coolmine road on a trial basis for 3-6 months to assess impact for real, even on an incremental daily / weekly basis .

This will enable Irish Rail to get real experimental/scientific feedback on their proposal. It's a low impact way to assess an investment for the next 100 years !

15. The multi criteria analysis is subjective, vague, incomplete and, most importantly, does not take account or give adequate weighting to local factors and has not been adopted for a residential community. For example, cost factors and do-ability are given the same weight as community-based factors. Cost and do-ability factors are time-bound factors, community impact factors are forever.

Overall, the matrix lacks rigor and integrity (as further evidence there are a number of errors on the matrix, seems cut/paste was used). There is no evidence to show that any of the assertions are based on comparative objective and auditable measurements, statistics and figures. As a result the multi criteria analysis is fundamentally flawed and cannot be used as the basis for any decision of this magnitude.

16. The proposed large scale pedestrian and footbridge contravenes the Fingal Development plan under at least three headings:

- To preserve the existing pedestrian and vehicular right of way at the Coolmine Level Crossing',
- To prohibit any road bridge' across the train line and canal at Riverwood/Station Court

The zoning objectives for the green open spaces affected by the proposed bridge are to 'Preserve and provide for open space and recreational amenities', with a view to providing 'recreational and amenity resources for urban and rural populations subject to strict development controls.

The bulk and scale of proposed bridge would be in contravention of all planning guidelines and the proposed bridge will have very significant landscape and visual impact on open space zoned lands between St. Mochta's/Rockfield, Stationcourt Way/Kirkpatrick and through Riverwood. There would be very significant visual impact for residential properties at St. Mochta's, Rockfield, Stationcourt Way/Hall, Kirkpatrick and Riverwood. In addition there would be tree and vegetation loss and significant visual impact in crossing the Royal Canal and hence for Objective CH43 of Fingal Development Plan."

Two High Court cases have clearly indicated that any developments must comply with current development plans and guidelines (*Spencer Place Development Company Ltd - v- Dublin City Council and O'Neill & anor -v- An Bord Pleanala*)

17. The revised selection report lacks objectivity and rigor. It seems largely to be a re-statement of the initial proposals, which have been ‘cobbled’ together to justify a pre-determined outcome. This is further evidenced by the fact that Irish Rail had already stated its position in letter to Fingal Council 24 July 2019 (re Kellystown Local Action Plan). This is extract from that letter:

In order to provide the train services envisaged by DART Expansion, it will not be possible to retain Coolmine level crossing. A new vehicular bridge is proposed to allow vehicles, cyclists and pedestrian to connect north and south of the railway corridor. The traffic counts undertaken as part of the transport assessment (2019) indicate that there were 297 northbound and 221 southbound vehicle passes through Coolmine Level Crossing in the AM peak hour.

The above letter from Irish Rail to Fingal County Council is striking in its pre-determination of a position before any planning and consultation on how it proposed to address the “297 northbound and 221 southbound vehicle (sic)” that pass through Coolmine Level Crossing.

18. In conclusion, it is clear that the proposals are pre-determined, based on historical ‘heavy handed’ engineering thinking. No real consideration of other intermediate options that takes account of the real-life living experiences of the people in the community has been demonstrated in current proposals.

I trust you will take on board the above observations in arriving at your decision, one of the most important decisions to be made, that will have significant impact of many people’s lives in Dublin 15 for ever.

Signed

Brendan O’Brien