

This submission is being made by H. Harold Secretary of the Castlefield Park Residents Association on behalf of the Castlefield Park Residents Association (address c/o 29 Castlefield Park, Clonsilla D15.).

The Castlefield Park Residents Association would like to make the following submission on the Railway Order that Irish Rail have submitted for the DARTWest project (Reference 314232).

Castlefield Park is situated in Clonsilla Village off the Clonsilla Road.

We also wish to request an oral hearing as part of this process

While we welcome the upgrade of the train line, there are several areas of concern in relation to elements of the Railway Order that we wish to highlight.

Our main concerns are the impact of the proposed plan to close the level crossings at Coolmine Station, Porterstown Road and Clonsilla Station, as well as the building of unsightly bridges at Porterstown and Clonsilla Station which are situated in Clonsilla Village.

Please find below our concerns with the Railway Order and our request for a number of conditions to be written into any approval that An Bord Pleanála might grant in relation to the Railway Order.

We urge An Bord Pleanála to compel Irish Rail to consider the upgrading of the level crossings instead of permanent closure.

Concerns With Current Railway Order

- Irish Rail have not demonstrated that the level crossings need to close in order to extend the DART to Maynooth. The upgrading of the level crossings needs to be considered instead of permanent closure. Installation of automatic level crossings, in conjunction with accompanying road safety and traffic calming measures in the vicinity of level crossings, must be the priority to ensure that the local population are not cut off from local amenities & resources, that the Clonsilla Road does not become clogged with heavy traffic and that there is a safe environment for local residents. The closing of the level crossings will have a detrimental impact on the character and viability of Clonsilla Village.
- The investigation of the alternative options in the Rail Order is not complete as all the “Do Something” options only consider built options they do not consider the upgrade of the level crossing. 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 were 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.
- The Public Consultation process has not extensively explored alternative infrastructure upgrades, such as tunnels. It has also not fully engaged with the local population in Clonsilla. A proposed tunnel is being included in the railway order for Ashtown, which has far less traffic movements than Coolmine. This was included for Ashtown after they were granted a separate meeting with Irish Rail in relation to their specific concerns.

- As well as operational simplicity, Irish Rail site safety as a reason for closing the level crossings. However, in 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. Obviously, safety is of the utmost importance. However, it cannot be ignored that the long length of time that the manually operated level crossings are closed for each train and the lack of informational signage as to how long the crossing will be closed for leads to dangerous behaviour by pedestrians, cyclists and drivers. 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. The permanent closure of the level crossings might not deter dangerous behaviour by some road users, if the design of the access bridges results in a significant increase in the time for a pedestrian to cross the railway.
- Significant concerns exist regarding the increased traffic load that will be forced onto the roads in Clonsilla Village, particularly the Clonsilla Road due to the proposed closing of Clonsilla, Porterstown and Coolmine level crossings.
- 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. While changes to nearby junctions are proposed the Dr Troy bridge which is already congested at peak times will still be a limiting factor. The proposed traffic junction alterations will not be sufficient to handle the additional traffic volumes, with a knock-on impact on road congestion and traffic movement across the wider Dublin 15 area.
- The extra congestion on Dr Troy Bridge due to Level Crossing closures, will also impact Public Transport in the area as there is no Bus Lane on Dr Troy Bridge. Specifically, this will severely impact the travel times for the 37 Bus Route, with the knock-on congestion also impacting the L52, 39, 139 and 39X routes.
- At a time when people are being encouraged to cycle the proposals from Irish Rail will in fact discourage people from cycling due to the traffic volume increase in Clonsilla and resultant safety concerns.
- 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 closing of the level crossing blocks both existing residents and future residents in these developments from access to local amenities & resources and has a detrimental impact on the character and viability of Clonsilla Village
- 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 proposed bridge west of Barberstown will not serve residents of Clonsilla or the rest of Dublin 15. It will 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 bridge. This will force traffic to use an already congested Dr Troy Bridge.
- The proposed access bridges at Clonsilla and Porterstown are unsightly and will dominate the view in these areas. 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 immediately adjacent to four protected structures; Callaghan Bridge, Clonsilla Signal Box, Clonsilla Overbridge and St Marys Church. There are more suitable locations for any bridge further to the west of these protected structures. 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.
- The proposed access bridges at Clonsilla and Porterstown are located at the site of the proposed Greenway and in a proposed Natural 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 Natural Heritage Area.
- The additional expense of the access bridges at Clonsilla, Porterstown and Coolmine are an unnecessary cost to the taxpayer

Given the previous points we submit 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

- Clonsilla should be granted meetings to address their specific concerns.
- A revised capacity assessment and traffic analysis should take place to assess capacity requirements, the impact of the Covid pandemic and new working from home legislation as well as the impact of proposed new developments such as Kellystown. Traffic analysis needs to consider both peak and off-peak times as many of the local journeys for which the level crossings are used occur in off-peak times.
- 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 Natural Heritage area along the canal.

- Irish Rail have not demonstrated that the level crossings at Coolmine, Porterstown and Clonsilla should be closed and that the resulting access bridges are required. An independent review of Irish Rails justification for closing the level crossings should be carried out 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.
- The analysis of alternative options carried out should be updated to include the upgrade and automation of the existing level crossings so that they may remain open. This updated analysis should also include the investigation of the use of the existing bridges at Clonsilla Station as an alternative prior to the building of a new bridge. It should also include revised less unsightly access bridges. The alternatives evaluated should not be limited to bridges. This updated analysis should be public and transparent and freely available to the public.
- 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.
- Consideration of level crossing closures should be done under a separate process only where the actual frequency of trains requires it.
- If (through detailed study and trials) it is deemed there is no alternative to closing a Level Crossing. A grade-separated alternative should be provided close to the Level Crossing location.
- Proposed road infrastructure upgrades should proceed even with the level crossings remaining open
- All traffic junction modifications and the building of the new road west of Barberstown need to be completed, trialled and monitored before any changes to the level crossings are permanently made. Any 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.
- 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.

- 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.
- 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

Whilst the upgrade of the line to DART standards is welcome, Irish Rail have not demonstrated that the level crossings need to be permanently closed to enable this. 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.

The permanent closure of the level crossings in the Clonsilla area should not be undertaken purely for reasons of operational simplicity. It is imperative that Irish Rail do not needlessly divide Clonsilla, destroy its unique character & built heritage and gridlock its road network.