

Observation on a Strategic Infrastructure Development Application**Re : Dart+ West Railway Order application****Observer's details:**

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Name of proposed development:

Dart+ West Railway Order application

Case reference: NA29S.314232

Description: DART+ West Railway Order - Dublin City to Maynooth and M3 Parkway

Observation details:

I wish to make a submission / observations regarding the Dart+ West Railway Order application and object to the draft railway order in its current form.

Like most residents in the Carpenterstown/Coolmine area, I welcome the electrification of the Dart line to Maynooth. However, like most residents, I object to Irish Rail's completely unnecessary proposed permanent closure of level crossings at Coolmine, Clonsilla, Porterstown, and Ashtown. The reasons for this are as follows:

- **Effect on Emergency services:** The permanent closure of the level crossings would have a detrimental effect on the ability of emergency services to reach those in need and would certainly result in the loss of life as a result of delays in response times. The emergency services regularly use the roads that would now be closed.
- **Environmental impact:** These closures would not only nullify any environmental benefits that this whole electrification process would bring, but would introduce even more hazards and destroy a whole community in the process. The amount of proposed roadworks and bridge builds is a huge amount of extra concrete and steel as well as knocking down trees and reducing green areas. There would also be an unnecessary environmental impact from the machinery and the transport of materials for all of the proposed bridge and road works.
- **Traffic effects:** The closure of the level crossings would curtail local journeys and impact multiple daily journeys for school, work, emergency services, family and retail purposes. It would also result in an increase traffic on and around the already congested road routes and result in even more pollution due to tailbacks. The proposed measures of getting all Coolmine and Clonsilla traffic to divert via the Diswellstown Road (Dr. Troy) Bridge are grossly inadequate. This bridge is already completely congested at many times during the day. The development of Kellystown will only add to this problem. While the original Irish

Rail proposal to build a new vehicular bridge through a quiet residential estate is rightly no longer part of this Rail Order proposal, following outcry from the communities and support from public representatives, the traffic effect from the proposed permanent closure of the level crossings may result in this problem raising its ugly head again at a later stage. However, if the level crossings are not closed, then this will not be a potential future issue.

- Contradictive to the Fingal Development plan:
<https://www.fingal.ie/sites/default/files/2019-03/Fingal%20Development%20Plan%202017-2023%20-%20Written%20Statement%20Appendices.pdf>
 - The proposal of permanently closing Coolmine crossing to vehicular traffic completely contradicts Map Objective 142 of the Fingal Development Plan 2017-2023 Appendix 6: Map Based Local Objectives “Preserve the existing pedestrian and vehicular right of way at the Coolmine Level Crossing”.
 - Similarly, the closure of the route at Porterstown goes against Map Objective 137 of Fingal County’s Development Plan 2017–2023 Appendix 6: Map Based Local Objectives “Preserve the existing pedestrian and vehicular right of way at the level crossing at Porterstown”.
 - And as a follow on from the comment above regarding the correct removal of a new vehicular bridge in accordance with Map Objective 141 of the Fingal Development Plan 2017-2023 Appendix 6: Map Based Local Objectives states “Prohibit any road bridge at this location”, I would just like to re-iterate this so that it does not become a future planning issue as a result of this Rail Order proposal to close level crossings.
- Disconnecting Communities: People on both sides of the level crossing will be cut off from each other and from services on either side of the level crossing, requiring long diversions via heavily congested routes to circumvent the blockage. Irish Rail’s proposed closure of Clonsilla, Porterstown and Coolmine level crossings and the connecting roads would not facilitate any arterial flow of traffic through existing roads around which existing communities and amenities have been built. Therefore gaining access to essential childcare facilities, medical facilities (and even simple, yet essential day-to-day activities such as grocery shopping) would become much more complicated for countless residents in the greater community.
- Community Safety: All communities believe the proposed closure of level crossings and the proposed alternative of pedestrian/cycle bridges over the tracks, will affect their ability to feel safe in their own community. There is credible potential for an increase in antisocial behaviour in areas such as where dead-end roads, underpasses and long elevated pedestrian bridges which have been proposed by Irish Rail as replacements for level crossings. The Minister for Justice, Helen McEntee stated in a Dail debate: “Community safety is a much broader concept than crime or fear of crime. It is about people being safe and feeling safe in their communities. It can include the responsiveness of emergency services, mental health issues, education, drug abuse prevention, alcohol and substance abuse, domestic violence, youth crime, antisocial behaviour (our bold), hate crime and the built environment (our bold). This is reflected in the key principle in the programme for Government, Our Shared Future, to build stronger and safer communities. The well-being of communities is among our highest priorities and we want members of the public to feel confident and secure in going about their lives” (ref: <https://www.oireachtas.ie/en/debates/debate/dail/2020-11-18/22/>.) Therefore the proposal goes against these priorities.
- Societal impact: 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

members of our communities. The bridges make what are currently a short crossing into a long arduous route.

- Effect on other public transport: Bus routes would also be greatly affected by this closure. The 37 bus route will be directly affected by this at all times. Additional redirected traffic on Dr Troy Bridge would cause longer tailbacks which would have a knock on effect on the 39 bus route. The 38 and 70D routes would be directly affected by changes to Castleknock Bridge and the additional traffic caused by the closure of the level crossing at Coolmine. None of these glaringly obvious effects were included in Irish Rail's flawed report on the effects of closing Coolmine level crossing.
- Irish Rail's Flawed Assumptions: Irish Rail's revised proposals for the closure of Coolmine level crossing are based on one or more of the following flawed assumptions:
 - 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. A large number of people have continued to work from home following the lifting of covid restrictions and in order to attract and retain staff, companies are realising they need to offer remote working. Also the Right to Flexible Work Bill 2022 is currently before the Seanad and this will provide employees with a right to flexible work. Therefore the number of passengers is likely to be grossly overstated by Irish Rail as it is completely out of date and is therefore not an applicable assumption.
 - Irish Rail's basis for closing level crossings are based on potential peak time volumes of trains, but there would be far fewer trains or no trains at all at off peak times as well as Sundays, Bank Holidays and night time. Therefore there is no need to keep level crossings closed permanently and instead following the introduction of increased trains at peak times, the possibility of closing the level crossings for a short period at peak times could be considered instead.
 - Irish rail say that level crossings are dangerous, but yet to date, few road safety/level crossing safety measures have been proposed or installed at the approach to Coolmine level crossing. This is in spite of the fact that there is enough distance between junctions and the crossing/Kirkpatrick bridge to lawfully erect speed ramps within 30 metres of the crossing. There are no other traffic calming measures on the approach to the junction such as rumble strips or radar speed signs. The speed limit on the level crossing approach is the same for other connecting roads in the area when a 30 kph speed limit would be more appropriate. In addition, other than CCTV on the crossing for use by Irish Rail, there is no highly-visible road safety/detection camera at the junction to deter, detect and prosecute motorists passing red lights at the level crossing. 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 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. A recent study showed that improved signalling would greatly improve the amount of time that level crossings are closed. If new platforms were constructed on the approach side of level-crossings, at each station and the Signalling System was upgraded, trains could stop at a safe distance back from each Level-Crossing before the gates would close to traffic. Commuters could

get off and others could get on and then the train could move towards the Level Crossing. When the train has crossed the level crossing the gates could be opened up after a minimum duration. For the short durations while the trains are passing over the level crossing there would be no need to close the level crossings fulltime to traffic, even at peak times. The same would apply to suburban trains going in the opposite direction.

- Existing Dart level crossings: There are numerous level crossings along the current Dart route that work absolutely fine. Irish Rail and An Bord Pleanála need to understand that there are communities of people living along Dart and Dart+ West rail lines that rely on the roads that have these level crossings and the residents of these communities are well used to waiting for trains to go by and have no issue with that fact of life. Closing roads and building pedestrian bridges is unnecessary and short-sighted and completely ignores the human aspect of these proposals. This is where we live, our opinions matter.

Recommendations:

Given these observations, I recommend that any approval of the application as outlined in the Railway Order should be subject to a number of conditions. I propose that a rail order should only be granted if the following terms are met:

- All level crossings and related roads to remain open. Consideration of closure of level crossings for prolonged periods during peak times may be considered after services are in place and only if required.
- Upgrading of the level crossings be implemented instead of permanent closure. Automatic level crossings operate faster, and offer shorter closing times, allowing for increased train frequency on the DART West line.
- Increased road safety measures be introduced on approach to level crossings.
- 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. Ongoing traffic analysis surveys should be completed along the Dart West route at 3 month intervals for 5 years after the completion of the DART West project.
- No requirement for access bridges to be built (as not closing the level crossings).

In addition, I would like to point out that these proposed terms (e.g. signalling and level crossing upgrades) are a more cost effective option than the current Rail Order proposals.

There is nothing in what I have recommended that would stop the work going ahead on the electrification of the Maynooth train line. The alternative (being the Rail Order proposal) is to increase emergency-service response times to Castleknock, disconnect two major suburban population centres, increase road congestion and air pollution and to potentially deny thousands of local residents with mobility issues road access to local amenities.

Oral hearing request:

I wish to request the Board to hold an oral hearing on this matter.

Your sincerely,

Ciara O'Neill, Riverwood Court, Castleknock, Dublin 15