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21 Glenville Road,  
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23/10/2022

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01V902

Re: DART+ West Electrified Railway Order 2022, case reference:  
NA29S.314232

Dear sir/madam,

The electrification of the Maynooth rail line will be a most welcome addition to the people currently living in the various postcodes and counties along this line. The upgrade of the Maynooth line to DART is long overdue as the current use of diesel trains for commuting short distances is impractical, environmentally damaging, and has resulted in a patchy and infrequent service for the hundreds of thousands of commuters living and working in the fastest growing area in the country. DART+ West is to be welcomed, yet the application made by Córas Iompair Éireann is not without its faults, which shall be outlined below.

Level crossings are expensive to run, inconvenient, and come with significant safety responsibilities for those operating them. They are, however, a necessary component of railways. Córas Iompair Éireann and Iarnród Éireann, however, have decided to use the opportunity of upgrading the Maynooth line to eliminate all level crossings entirely along the line, with detrimental effects. This proposed elimination of level crossings is made under the guise of efficiency. Iarnród Éireann claims incorrectly that the proposed maximum frequency of trains along the line when the DART+ West project is completed would make the existence of level crossings unviable because of waiting times for vehicles. This is false and alternative, economically viable, reasonable solutions will be outlined below, allowing DART+ West to be built, while maintaining the level crossings. Specifically, I am referring to the level crossings at Ashtown, Coolmine, Clonsilla and Porterstown, though there may well be others.

Eliminating the level crossings divides communities and distances people from one another. The language used in the application by Iarnród Éireann, where it claims there will only be a perceived division of communities, is patronising and not based on fact. Closing level crossings makes it more difficult to get around your own area in a car or on foot, where taking public transport may not be feasible. Closing the above-named level crossings will make getting from one side of the canal to the other in Dublin 15 a great challenge. For example, to reach Carpenterstown from Coolmine, one would have to drive quite a distance either over Granard Bridge or Dr Troy Bridge, adding a large amount of time to one's journey. You have heard of the Berlin Wall, soon we could have the Dublin 15 Wall, dividing communities from one another.

The impact of a significant increase in traffic on certain roads as a result of level crossing closure in the Dublin 15 area has not been correctly considered. The traffic management studies were completed by comparing the proposed situation post-closure of the level crossings here with apparent similar situations in the United Kingdom. Irish and British societies are not identical, their commuting, driving and living habits are not identical and their towns, cities and villages are not identical. Strathclyde is not Dublin and Dublin is not Strathclyde. They are not like-for-like comparisons and such comparisons are disingenuous. For traffic studies, simulations and management data to have been conducted and gathered correctly and fairly, data from Irish society ought to have been gathered.

The traffic data collected for roads that will see a significant increase in traffic as a result of level crossing closures like Granard Bridge, Castleknock and Dr Troy Bridge, Clonsilla, was gathered by Iarnród Éireann during the pandemic, when the majority of the workforce was working from home and most of society was limited to moving within five kilometres from home, therefore skewing the data considerably. Of course, the roads were quiet when no one was commuting or travelling.

Granard Bridge and Dr Troy Bridge are already unsafe. The former is narrow, always congested and dangerous for pedestrians with a footpath on either side of about 40cm. It barely accommodates one person. Think how dangerous this will be when the traffic numbers double or triple. Dr Troy Bridge is frequently congested and appears to be sinking. Neither could reasonably shoulder a monumental increase in traffic, despite Iarnród Éireann's claims that the addition of DART will mysteriously reduce or eliminate traffic problems entirely and will not cause an increase in traffic.

Currently, the level crossing at Coolmine closes for an average of four minutes and thirty seconds. This is the time it takes for one train to clear the platform, travelling either in the direction of Dublin or Maynooth. Often, the level crossing closes for longer to accommodate two or three trains. At rush hour, the traffic here is very bad. The level crossing may open for thirty seconds but close again to accommodate another train and one could wait for two, three or four waves of closures before making it over the level crossing. This is Iarnród Éireann's justification for level-crossing closures. Where will this traffic go if the level crossing closes? Iarnród Éireann claims it will go to the two unsuitable bridges named above.

Compare this with level crossings on the continent. In the Netherlands, Germany and Austria, for example, railway lines and level crossings are often found in much more dangerous and condensed places than here in Ireland, yet they rarely cause traffic jams. The Dutch, Germans and Austrians do not split communities by closing roads and level crossings. The difference is the ultra-modern signalling system employed by Nederlandse Spoorwegen, Deutsche Bahn and Österreichische Bundesbahnen. The use of a modern signalling system is safer and allows trains to get much closer to the level crossing before the need for barriers to be lowered. The barriers lower in these countries for no more than one minute, the train clears, and everyone goes on their way. This system is safer because commuters in cars do not become irate waiting for too long and no one risks driving through as the barrier is coming down. Conversely, the signalling system employed on the Maynooth line is, much like the current trains, twenty years out of date, last seeing a proper upgrade in the early years of this millennium.

The upgrade of the signalling system could very easily solve the problem of waiting times at level crossings, which is Iarnród Éireann's main justification for their closure. The data Iarnród Éireann uses to justify level crossing closures assumes no upgrade to the signalling system at all. We are led to believe that commuters in cars will wait for four minutes and thirty seconds each time a train comes through the station. According to this logic, with twelve trains per hour, the level crossings would seldom rise. This is false. The signalling system on the line will be updated, according to Iarnród Éireann's own plan. The use of the most modern signalling system available, like the systems used on the continent, could effectively eliminate any traffic jams at level crossings entirely.

Another possibility to maintain the level crossings and the vital function these roads provide is to construct and upgrade the train stations more intelligently. For example, instead of two platforms, three platforms could be used. To take Coolmine as an example, the two existing platforms could remain but a third could be built to the other side of the level crossing for trains coming from Maynooth going to Dublin. This way, the train could arrive at the station and pick up passengers before the level crossing, the barrier would then go down and the train would clear the crossing. With the new signalling system proposed above, this should not take very long. Similarly, platform two could continue to be used for trains going from Dublin to Maynooth, but the level crossing would not come down until passengers have alighted the train and others have been picked up. Building platforms more intelligently on either side of the level crossings and not facing each other, and upgrading the signalling system, would eliminate wait times, thus removing entirely the false justification that Iarnród Éireann constantly employs for closing the level crossings. If the wait times are eliminated, there is no need to close any level crossings, according to the logic of Iarnród Éireann.

I hope these observations will be taken into account. The granting of the railway order in its current form verbatim, including level crossing closures, would have a very grave effect on the communities and people of Dublin 15 that the DART+ West project is supposed to be serving.

Yours faithfully,

Conor Casey