To: An Bord Pleanála, 64 Marlborough St. Dublin 1

From: Delwood Residents Association

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Re: Irish Rail's DART+West Railway Order Application. Case Reference 314232

Dear An Bord Pleanála,

Please accept this as the Delwood Residents Association's Submission on Irish Rail's DART+West Railway Order Application.

Some background on Delwood Estate:

Delwood Estate was built in the early 1970s and consists of 259 houses with approximately 1,000 residents including adults and children. It lies in very close proximity to the Maynooth rail line.

Our Association was founded in 1980. It is registered with Fingal County Council and is a member of Fingal County Council's Public Participation Network.

You will see from our website that our Association it is very much community focused.

Introduction

While the extension of the DART to Maynooth is welcome, there are several areas of concern in relation to elements of the Railway Order that we, as a Residents Association, wish to highlight. We also wish to request that an oral hearing be part of this process.

We appreciate that An Bord Pleanála (ABP) was not involved in the prior consultation phases with Irish Rail. The two rounds of Public Consultation with Irish Rail and the various Zoom meetings held were very unsatisfactory to say the least. The engagement from Irish Rail was extremely poor. In the Zoom meetings they held all the aces in that they controlled them via the mute button and only allowed text questions from which they selected the ones that they wanted to answer – ignoring all other questions. We hope that ABP will ensure that the concerns of citizens are heeded and incorporated into any future plans for DART West in such a way that all of the communities affected can fully support it.

It is important to note that all these Zoom meetings were held online during the Covid Pandemic and no Public Meetings ever took place. This resulted in a significant number of the affected population unable to participate.

A very significant survey carried out in 2020 by Tilda (The Irish Longitudinal Study on Ageing) at Trinity College Dublin bears this out. See the press release on their findings.

https://tilda.tcd.ie/news-events/2020/2016-%20covid19-techhabits/2016-1.pdf

Here is one quotation from their press release:

Professor Rose Anne Kenny, Principal Investigator of TILDA said: "The impact of this information goes beyond the current pandemic. More and more financial and commercial institutions rely on the internet and allied technologies to interact with customers. *This leaves a significant number of citizens marginalised and disenfranchised* (Our Bold). It is incumbent on Government and other organisations to ensure that all citizens can engage fully with organisations."

To view the full report, please visit: https://www.doi.org/10.38018/TildaRe.2020-06

Our Concerns with The Railway Order

We contend that the level crossings do not need to close in order to extend the DART to Maynooth. For the following reasons we are in favour of retaining the level crossings open and, in particular the level crossing at Coolmine.

- Irish Rail have taken a very lazy approach by opting for permanent closure of level crossings.
 They did not give due attention and consideration to upgrading their signalling systems. Irish
 Rail can and should upgrade the line to DART standards. Upgrade them to automated level
 crossings and revisit the topic of the level crossings pending a revised capacity assessment
 of the line after the upgrade. Automatic level crossings operate faster, and offer shorter
 closing times, allowing for increased train frequency on the DART West line.
- Passenger demand is cited by Irish Rail as the reason to more than triple capacity on the line, yet the most recent figures available from the NTA (National Rail Census 2019) actually show a decrease in total daily demand on the Maynooth line from 2017 (9778) to 2019 (9322)
- The decrease in daily demand (according to the NTA), coupled with the recent transformation
 to blended office/remote working give legitimate reasons to question Irish Rail's capacity
 demand projections. Consideration to the permanent closure of level crossings should only
 arise when passenger capacity demand actually exists, it cannot be simply based on I.R.'s
 current projections which are now well out of date.
- We, in Delwood, have a particular concern with the proposed permanent closure of the Coolmine Level Crossing. This will have the effect of disconnecting communities that have had social, cultural and economic interactions on both sides of the crossing over centuries. It would effectively create a barrier between these communities. The Kirkpatrick Bridge, built in the 1790s, which predates the Railway, built in the 1860s, by many decades, connects, inter alia, Coolmine and Carpenterstown. The closure of this level crossing would curtail local journeys and impact multiple daily journeys for school, work, emergency services, family and retail purposes between these and other communities. Of particular concern here is a fire brigade, attempting to get to the scene of a house fire or a major accident on the south side of the railway line at Carpenterstown, having to come from its station at Coolmine on the north side of the line and having to make a major time-consuming detour to arrive at the scene.
- The closure of the level crossing would increase traffic on and around the already congested road routes. Delwood itself would become a car park as drivers will park their cars in and around our roads rather than take a big detour either via Castleknock Bridge (Granard Bridge) or Diswellstown Road (Dr Troy) Bridge to avail of the car park on the south side of the line.
- There is a huge potential for an increase in antisocial behaviour and drug dealing in our area where a dead-end road and a bridge are being proposed.
- All local communities believe that the proposed closure of level crossings will affect their ability to feel safe in their own community to quote Minister for Justice, Helen McEntee: "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, anti-social 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" (https://www.oireachtas.ie/en/debates/debate/dail/2020-11-18/22/ accessed 24/10/2022)
- Lighting becomes a big issue also where 24/7 lighting will be needed for the proposed bridge at Coolmine. This would have a detrimental impact on the Royal canal and its wildlife a proposed Natural Heritage Area and it could potentially damage the surrounding environment which is rich in biodiversity. The shadow of the proposed bridge will darken areas of the Royal canal affecting the flora and fauna within the canal and on its banks.

Conclusion

Based on the arguments above we believe that Irish Rail's Rail Order Application should be set aside by ABP and that Irish Rail should be sent back to the drawing board to come up with a realistic, viable and technological solution, that we believe is possible in this technological 21st century, that allows all the level crossings in question to remain open.

Our Submission is respectfully submitted to you for your consideration. We thank you for giving it your attention and we trust that you will be convinced by our arguments to duly turn Irish Rail's Railway Order Application down as it currently stands.

Yours sincerely,

Mary Ronayne, Secretary, Delwood Residents Association. 28/10/2022

