

**Cllr John Walsh**  
**Labour Party – Dublin West**

**Submission to An Bord Pleanála**  
**Railway Order for DART+WEST**

The Secretary  
An Bord Pleanála  
64 Marlborough St  
Dublin 1

Dear Secretary,

I wish to support electrification of the Maynooth line, which will transform public transport in west Dublin: it is a long-awaited development for many train commuters and residents in our area and an essential investment in green transport.

Electrification of the rail line must be achieved while protecting the local environment, conserving the heritage of Dublin 15, managing local traffic flows in a sustainable way and protecting the quality of life of communities living along the route.

I wish to request that an oral hearing be held on this important public project and as an elected local representative, I would like to request to be heard at the oral hearing.

I wish to raise the following concerns about the current plans for the Railway Order as presented by Irish Rail and am asking the Board to address these by amending the plans or issuing conditions to the Railway Order.

**Accessibility**

There are no plans for lifts in stations along the Maynooth line, even where stations such as Coolmine and Ashtown are being fully reconstructed. Irish Rail included lifts for Ashtown and Coolmine in the initial design in Public Consultation 1 but removed this in more recent versions of its plans. This is not in line with the results of successive public consultations, where residents pointed out that lifts by themselves were not sufficient for accessibility but did not seek the removal of lifts. Instead the concerns raised by community groups and residents' associations were in relation to lifts breaking down and lack of maintenance.

For example, the new pedestrian-cycle bridge at Ashtown station is necessary but does not achieve universal access for wheelchair users or people with mobility issues. The Access for All group highlighted the difficulties presented by such a bridge at the relatively new Pelletstown stations. The proposed bridge at Coolmine appears extremely long and will be effectively inaccessible for many pedestrians, particularly those with mobility issues.

The removal of lifts from Coolmine and Ashtown stations is a mistake which creates a barrier to access for wheelchair users and people with mobility difficulties. A lift must be included in any final design for reconstruction of Ashtown and Coolmine stations,

in addition to an accessible bridge. Everything possible should be done to achieve universal access and ensure that the works proceed in line with principles of universal design.

- An Bord Pleanála should impose a condition that lifts be provided in all stations along the route where existing crossings are being closed or replaced.
- It should also be a condition of any approval that lifts are provided in tandem with a 24-hour maintenance contract to ensure prompt repairs to facilitate mobility impaired residents and commuters who cannot use the bridges or steps.

### **Visual impact**

Extensive feedback was received in both previous rounds of public consultation about the significant visual impact of the bridges: large-scale concrete structures are inappropriate in relation to the Royal Canal, a protected structure and proposed Natural Heritage Area and are very damaging to residential amenity. Some efforts have been made in the current proposal to mitigate this impact at Coolmine and Ashtown through a more slender steel bridge than the previously proposed concrete bridges. But it is impossible to understand why this is not done for the other proposed bridges as well, including Clonsilla and Porterstown. It is extremely disappointing that there is no standardisation of the type of pedestrian cycle bridges at all of the stations, given the location of the bridges along the Royal Canal and the proposed Royal Canal Greenway. The bridges at Porterstown and Clonsilla should be redesigned to reduce their footprint as much as possible, by restricting the construction and reducing the impact on the Royal Canal and surrounding residential estates.

Large-scale concrete structures are visually intrusive and inappropriate close to mature residential estates in Coolmine, Lambourn, the Village Porterstown and Portersgate, as well as detracting significantly from the Royal Canal.

- The Board should impose a condition that all of these concrete structures should be replaced by slender, minimalist structures in keeping with the sensitive ecological area and protected landscape of the Royal Canal.
- Residents have raised legitimate concerns about graffiti on the proposed new bridges which would severely detract from their appearance and undermine visual amenity in the area. It should be a condition of the Railway Order that the proposed pedestrian/cycle bridges be treated with anti-graffiti coating and maintenance of these bridges must be the responsibility of Irish Rail.

### **Ashtown tunnel**

The original proposal for an underbridge to replace Ashtown level crossing involved the destruction of Ashtown stables. While it is welcome that Irish Rail has sought to reduce the impact on the stables by re-routing the underbridge, this proposal still threatens the ongoing viability of Ashtown stables.

I believe this is the wrong option for Ashtown due to its significant, negative impact on heritage, local business and residential amenity. In particular I disagree with the proposal to continue with a tunnel/underbridge at a different location rather than

adopting a more radical redesign of the plan, involving either a lowering of the rail line or an overbridge at a slightly greater distance from Ashtown level crossing and the nearby heritage and protected structures. I would like to raise the following concerns about the proposals:

- The continuing development of an underbridge/tunnel increases the risk of anti-social behaviour and criminality, as such underbridges or underpasses in suburban Dublin have had a long history of anti-social behaviour and frequently more serious criminal activity.
- Ashtown stables are operating on the bare minimum footprint for their activity and Irish Rail's current plans would turn an unnecessarily large area around the Stables into a construction site. This would render Ashtown Stables inoperable and force the stables to close. It should not be acceptable to allow the loss of such a valuable community and recreational amenity which serves young people across the Dublin 15 area.
- An Táisce has argued that the 'proposed Ashtown tunnel is disproportionate in terms of the advantages of carrying out such a massive civil engineering project in a lightly trafficked suburb of Dublin.'
- The proposed route is likely to have a damaging impact on neighbouring estates such as Martin Savage Park where the removal of trees is disappointing and should be avoided.
- The works will also have a very damaging impact on commercial properties, particularly Burke Brothers whose business will effectively be unable to operate for the duration of the project.
- The proposed underpass and associated works would have a significant visual impact on heritage and protected structures in the Ashtown area (such as Ashtown Mill) and the works also impinge on the curtilage of Ashton House – this kind of impact on demesne lands should be avoided.

### **Traffic and access to strategic infrastructure in Dublin 15**

The closure of level crossings at Coolmine and Clonsilla without replacement significantly reduces the number of crossing points along the rail line and the Royal Canal. The six viable crossing points within Dublin 15 (Castleknock, Coolmine, Clonsilla, Porterstown, Dr Troy Bridge, Barberstown) will be reduced to three – Dr Troy Bridge, Castleknock Bridge and Barberstown: of these Barberstown is too remote from the heart of Dublin 15 to offer a viable alternative for many residents.

I welcome the decision not to proceed with the massive overbridge from Stationcourt to Riverwood Court, which was very damaging to the local environment and destructive of green spaces used by residents as a recreational amenity. This proposal is contrary to the Fingal Development Plan 2017-23 and should not be revived at any stage. Fingal Councillors on 18<sup>th</sup> October in considering the draft Development Plan voted to reinstate the existing Local Objective (141) 'to prohibit any road bridge at this location.'

The current proposal involving the permanent closure of Coolmine level crossing without replacement is very problematic. Coolmine is currently the second most heavily used level crossing in Dublin 15 (after Dr Troy Bridge), with 518 vehicles in the AM peak hour and 447 in the pm peak hour based on studies undertaken by Irish Rail.

This vehicular traffic will have to be redirected to Porterstown/Dr Troy Bridge or Castleknock Bridge. Irish Rail indicated in a written response to queries from members of the public that at least in the short term traffic congestion will increase as a result of the closure of Coolmine level crossing without replacement:

‘Traffic volumes will increase on some roads in the vicinity of the proposed level crossing closures, where alternative routes will now be required. The modification proposed at the junctions are to facilitate the increased traffic volumes, however queue lengths on some of these junctions will increase.’

This option will have a very damaging impact on traffic congestion and integration of transport in the local area based on Irish Rail’s own projections. Notwithstanding any modal shift that may occur over time, Irish Rail’s analysis in Public Consultation 2, which is essentially identical to the proposal in the Railway Order, envisages a 36% increase in traffic on Castleknock Road. More recently, Irish Rail estimated that traffic on Castleknock/Granard Bridge is anticipated to increase by 40% in the AM peak for the opening year of 2028, with an increase of 10% for PM Traffic (EIAR Appendix A6.1). This involves a dramatic increase in traffic congestion, diverting traffic along Delwood Road, Roselawn Road and Clonsilla Road towards Castleknock bridge – all are local or estate roads which were never designed for this volume of traffic.

The Laurel Lodge junction sees an increase in traffic of up to 15% and is being upgraded, while the Castleknock Road/Roselawn Road Junction sees an increase in traffic of up to 17% but cannot be upgraded due to the nature of the junction itself. This junction is right beside the Castleknock bridge and will see intensified traffic congestion with traffic backed up on Roselawn Road and along Castleknock Road into Blanchardstown village.

Irish Rail has taken a blanket decision to close all level crossings when this is not being done, at least in the short-term, on the Southside DART line. No new analysis has been done of the impact of Covid-19 on remote working at off-peak as distinct from peak times.

The closure of Coolmine level crossing is particularly problematic and creates a wide range of damaging impacts on local communities on each side of the line, including intensified traffic congestion, serious risk to public safety particularly at schools, severe restriction of connections between communities on different sides of the line and an increased risk of on-street parking (legal and illegal) in neighbouring estates. It creates a genuine risk that people living between the Royal Canal and the Liffey Valley will have great difficulty in exiting their estates and accessing strategic infrastructure, such as the N3 and the M50.

- The capacity assessment for the Maynooth line carried out by Irish Rail precedes the Covid-19 pandemic. At the very least, a revised capacity assessment should be carried out which reflects the recent post Covid shift to blended/remote office working and also the prolonged delay in commencement of some developments. Despite the scale of housing demand, there are many areas in where planning permissions have been granted but nothing built – there are currently 19 ‘inactive’ planning permissions for 10 or more houses across Dublin 15. Moreover, a total of 2,016 dwellings (293 houses and 1,723

apartments) have been permitted but have yet to be commenced on a total of 49 non-active sites in the Dublin 15 area.

- The Board should require a revised capacity assessment by Irish Rail in advance of any move to close level crossings at Coolmine and Clonsilla, taking account of the impact of Covid-19 on revised working patterns.

## **Safety**

### **Castleknock/Granard Bridge**

Castleknock bridge, which is in part a protected structure, is completely unsuitable and dangerous as a main artery for traffic diverted from Coolmine. I walk or drive on this bridge every day and it is already very unsafe for pedestrians and cyclists, due to the limited road space, narrow footpaths and bad visibility for motorists approaching the top of the bridge. As things currently stand, the plan would force cars, pedestrians and cyclists together on a narrow bridge with tightly constrained, inadequate footpaths and no space for cyclists at all.

The construction of a separate pedestrian-cycle bridge is desperately needed here, if a serious accident is to be avoided and a rational traffic management approach is to be put in place. It is worth noting that while Fingal Council has a plan to design a cycle track from Blanchardstown village to the Phoenix Park, there is no financial provision for construction of this cycle path or any commitment to a pedestrian-cycle bridge in the Council's Capital programme up to 2023.

- Irish Rail should include a condition within the Railway Order for the construction of separate pedestrian-cycle bridge at this location in advance of the opening of DART+West.

The increased traffic will also move directly past the entrance to St Francis Xavier's National School at am peak times, which presents safety risks to schoolchildren.

### **Porterstown viaduct/Dr Troy Bridge**

Very significant safety issues also arise with diversion of an even higher volume of traffic across the Porterstown viaduct/Dr Troy bridge, which already is the most heavily used crossing point in Dublin 15 with over 1500 vehicles at am peak times. This will lead to increased volumes of vehicles moving directly past the entrances to Scoil Choilm Community National School and Luttrellstown Community College on the Luttrellstown Education Campus. Almost 2,000 students attend the Luttrellstown Education Campus, with many living north of the railway line and commuting south of the line to attend schools. Serious concerns have been flagged by the Parents' Association for Luttrellstown Community College that closure of all the level crossings will force parents to use the sole option of Dr Troy bridge to access Luttrellstown Education Campus.

## **Parking**

Currently there is significant overspill commuter parking in estates such as Luttrell Park, Kirkpatrick and Delwood near Coolmine station. Similarly, Martin Savage Park has suffered badly from commuter parking for Ashtown station. This phenomenon is likely to increase substantially if the Coolmine level crossing is closed. It is simply not

sustainable for Irish Rail to argue that this is solely a matter for Fingal Council as the local authority.

- It is important that a condition be included that Irish Rail and Fingal Council in conjunction with residents in relevant estates draw up an agreed parking management plan before any level crossings are closed.

I fully support the electrification of the Maynooth line which will bring much needed capacity particularly at peak times. But the current proposals for Dublin 15 and Ashtown are flawed and require significant change.

Such an important public transport plan as DART+West should involve not simply avoidance of damaging outcomes, but community gain for residents and communities living along the line.

Thank you for considering this submission.

Kind regards,

A handwritten signature in dark ink, reading "John Walsh", written over a horizontal line.

Cllr John Walsh  
10 Ashleigh Court  
Castleknock  
Dublin 15