

Luttrellpark Lawn,
Carpenterstown,
Castleknock,
Dublin 15
6 October 2021

An Bord Pleanála
64 Marlborough St,
Rotunda,
Dublin 1,
D01 V902

Public Consultation Part Two on Maynooth DART Extension

Dear An Bord Pleanála

I am writing to you in relation to the Railway Order that Irish Rail have submitted regarding the DART West project.

Whilst the extension of the DART to Maynooth is welcomed there are several areas of concern in relation to elements of the Railway Order that I think has not been appropriately considered by Irish Rail. The concerns are specifically associated with the proposed closure of the Coolmine Level Crossing.

This submission lists a number of concerns that exist with the current Railway Order and requests a number of conditions be written into any approval that ABP might grant in relation to the Railway Order.

We appreciate ABP were not involved in the prior consultation phases with Irish Rail but these consultations were extremely poor. Irish Rail made little to meaningfully engage with local residents, and when they did, Irish Rail controlled the online discussions to effectively prevent any meaningful dialogue. Paragraph 4 and 5 of the attached submission to Irish Rail (dated 6 October 2021) shows the complaints made at the time about the lack of any meaningful consultation by Irish Rail. Hopefully ABP will ensure the concerns of citizens are heeded and incorporated into any future plans for DART West such that all of the communities can fully support it.

Attached to this submission is a copy of both of the previous submissions to Irish Rail during the public consultation period, which should be considered as part of this submission to An Bord Pleanála. Photos that were attached to the original public consultation submission to Irish Rail are omitted for brevity but can be provided if considered necessary.

Concerns with the Current Railway Order

The level crossing at Coolmine does not need to close in order to extend the DART to Maynooth.

- Irish Rail should upgrade the line and level crossings to DART standards, and revisit the topic of the level crossings following a capacity assessment of the line after the upgrade. **The level crossing does not need to close permanently now to permit the line upgrade.** This could be revisited if supported by evidence, rather than just being based on Irish Rail's self-serving projections. There are major unexamined planning impacts associated with the closing of level crossings that Irish Rail are not the competent authority to assess. We look to ABP to make that assessment based on evidence, consultation with the receiving communities and the exercise of competent independent planning judgement.
- **Closing the level crossing at Coolmine will provide NO improvement to the DART frequency.** DART trains do not have to wait for level crossing barriers to close. The barriers close in advance of the DART to stop traffic so that the DART can travel unimpeded. It is quite frankly none of Irish Rail's business how long barriers are closed for, once the DART is not delayed or inconvenienced as a result.
- Irish rail data in their initial proposal to permanently close the level crossings suggested that the level crossing needed to close for around five to six minutes per train. From personal experience as a daily

user of the train, this closure time has been reduced since the completion of the public consultation period to three minutes per train during peak morning hours. This may seem like a small figure, but it represents a 50% reduction in barrier closure time per train.

- Upgrading the level crossing should be considered instead of permanent **closure**. Automatic DART standard level crossings operate faster, and offer even shorter closing times, allowing for increased train frequency on the DART West line. There is scant evidence presented by Irish Rail to explain why these particular level crossings must be closed when several successful examples of automated crossings on DART lines are in service elsewhere in the Dublin area. The catastrophic planning impact of these closures on the cohesion of long established communities, their services and their amenity needs to be justified in planning terms, not on the basis of relative operational convenience for Irish Rail.
- Irish Rail have attempted to argue that the level crossings are a source of risk due to vehicles hitting the barriers. Irish Rail have at no time considered improving the siting of the existing barriers, the location and type of existing signage, or the layout of the level crossings to improve the overall warning to road drivers in an attempt to mitigate risk. For example, a double barrier system would prevent the strikes that Irish Rail are claiming to be a risk to their trains. The level crossing at Coolmine has remained unchanged in design and layout for the past fifteen years or more. Irish Rail have taken NO additional measures at the level crossing at Coolmine in that time to reduce the risk to the level crossing barriers, and yet Irish Rail are attempting to claim (with little empirical evidence) that this is a historic risk that they now can only mitigate by closing the crossing.
- 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). Again it is important to reiterate that how often, and for how long, the level crossing is closed to cars has NO BEARING on the capacity of the rail line.
- 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. Whilst projections for modal shift from road to rail travel and associated increased services are being planned, the length of trains has actually been reduced on this line in the last 5 years. A doubling of train capacity is achievable without any increase in the number of level crossing opening/closure events by increasing the length of trains which would have the added benefit of increasing passenger comfort, particularly at peak travel times, This is achievable without any extension to existing platform lengths, all of which were extended to accept longer trains more than a decade ago.
- According to Google Mobility data for Dublin up to mid-October 2022 (<https://www.google.com/covid19/mobility/> - accessed 25/10/2022) attendance at workplaces is down over 26% on average, with hybrid working concentrated to a greater extent on certain weekdays. Peak day workplace attendance appears to be almost 9% lower than pre-covid levels. This is despite 11% higher employment in Q2-2022 versus Q2-2019, or 8% employment growth in Dublin.
- The closure of the level crossing curtails local journeys and impacts multiple daily journeys to access local services to schools, and for work, emergency services, family and retail purposes. Many of these trips are currently carried out using sustainable travel modes like walking and cycling. In several cases walking/cycling access to these services will be effectively eliminated by the imposition of over- or underpasses, forcing a modal shift to car transport and away from sustainable transport modes, particularly for vulnerable users. This impact is unexamined as it is outside of the operational remit of Irish Rail. It is not, thankfully, outside of the remit of ABP. Indeed it is crucial that the relative cost benefit in carbon terms be examined to assess the sustainability of these modal shifts. Significant work is required to determine the impacts of these unintended (and unexamined) consequences and their long-term carbon emission impacts.

- The closure of the level crossing is likely to increase local traffic on and around the already congested road routes due to the modal shift away from existing sustainable modes and into private cars. People will use their cars due to the concerns around anti-social activity and the added walking distance inflicted on local residents. It should be noted that in the Draft Railway Order (Part Two, Article 5(2)) it states: *“elimination of level crossings and provision of alternatives such as new bridges for pedestrians; cyclists and vehicles”*. This is a factually incorrect statement in relation to Coolmine Level Crossing. Irish Rail are providing NO alternative for vehicles, and are solely relying on the existing road network (which was originally designed with the inclusion of the additional capacity provided by an open level crossing at Coolmine).
- The consequential increased traffic flows impacting schools close to the rail line such as St Mochtas, Scoil Cholm and Luttrellstown Community College is unexamined.
- Irish Rail continue to quote statistics that purport to demonstrate the increase in train frequency that would necessitate closure of the level crossing. These figures are only representative of peak hours in the morning and evening. When requested, Irish Rail did not produce a frequency of DART trains at weekends or other off-peak times. It is unnecessary for Irish Rail to close Coolmine Level Crossing 24/7/365 for the sake of 90 minutes in the morning peak and an hour in the evening peak on weekdays only. It is an entirely disproportionate measure to satisfy Irish Rail’s perceived need of upgraded capacity.
- The additional expense of the access bridge at Coolmine is an unnecessary cost to the taxpayer. It is a visual intrusion of brutalist dimensions likely to attract graffiti and anti-social behaviour and will cause the kind of traffic engineering predicated planning blight not seen since the 1960s. Whilst other countries are removing these ill-considered engineering responses in the interest of re-establishing communities, we are revisiting these discredited solutions, led by rail engineers with no town planning expertise and no remit to serve any higher goal than rail service operational efficiency.
- There is an almost certain likelihood for an increase in antisocial behaviour in areas such as where dead-end roads are being proposed, underpasses and bridges.
- It will cause a physical divide between long established communities. This is detrimental to the social cohesion of the local community, and at a time when the surrounding demographic is leaning towards an aging population, this is highly undesirable.
- The local community has expressed their belief that the proposed closure of level crossings will affect their ability to feel safe in their own communities. 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). In every case, community cohesion and safety is sacrificed in favour of relatively marginal operational efficiency in these proposed developments.
- The need for pedestrians or cyclists to enter a long tunnel or use a long, isolated walkway will deter people from using it and potentially increase the use of cars. Furthermore, the added distance to be walked via these overpasses (up to one kilometre) by elderly residents who need to get to and from Roselawn shopping centre for their shopping from Carpenterstown will be a deterrent to their usage.
- The materials and 24/7 lighting needed to build the proposed underpass and access bridges would have a detrimental impact on the Royal canal and its wildlife - a proposed Natural Heritage Area.

- The considerable engineering works proposed both in facilitating the works and as a legacy of the works, will damage the surrounding environment which is rich in biodiversity.
- The proposed bridges will darken areas of the Royal canal.

Given the previous points I 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

- The level crossings to remain open and be fitted with automatic level crossing gates, fitted with advanced signalling system to ensure short closure times and operational reliability.
- Access bridges should not be built.
- 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.
- Introduction of revised safety measures at all level crossings, 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.
- A frequency, in real terms, of 1 train every 2 minutes should be set as the actual frequency that would require the consideration of level crossing closures (not theoretical or predicted frequencies as proposed by Irish Rail).
- In such circumstances level crossings should only close during peak hours when the frequency of trains actually requires it
- Level crossings should never be fully closed at off peak hours.
- Proposed road infrastructure upgrades should proceed even with the level crossings remaining open.
- 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 communities must not be left in limbo between Irish Rail and various County Councils.
- 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.

Whilst the upgrade of the line to DART standards is welcome, the upgrading of the level crossings must be considered instead of permanent closure. Irish Rail should upgrade the line to DART standards, retain the level crossings, and revisit their potential closure pending a capacity assessment of the line after the upgrade. The level crossings do not need to permanently close for the Maynooth line to be upgraded to DART standards.

Yours sincerely,

Kevin O'Ceallaigh

8 Luttrellpark Lawn,

Carpenterstown,
Dublin D15X9DE

Attached documents:

Public Consultation Part Two on Maynooth DART Extension, submitted to Irish Rail 6 October 2021.

Public Consultation on Maynooth DART Extension submitted to Irish Rail 20 October 2020.

Luttrellpark Lawn,
Carpenterstown,
Castleknock,
Dublin 15
6 October 2021

DART+ Maynooth Line
Iarnród Éireann
Inchicore Works
Inchicore Parade
Dublin 8
D08K6Y3

Public Consultation Part Two on Maynooth DART Extension

Dear Sir / Madam,

1. I am writing to you regarding the DART West project and the second public consultation period that is currently in progress. I wish this letter to be considered as my submission to Irish Rail.

2. I think that it is important to state that there is widespread agreement within the local residential communities that the upgrade of the Maynooth line to a DART system is a welcome improvement, both for commuters and for the environment. However, I am deeply concerned about the methods and process used by Irish Rail to progress this project, particularly in relation to the proposed ancillary works for the Coolmine area which includes closing the level crossing.

3. I am writing to you as a resident of Carpenterstown who will be directly affected adversely by this proposed plan. However, and in the interests of full disclosure, I wish to point out that I hold a qualification in Transport Safety Management from the University of Southern California, a qualification in Operational Risk Management from the Southern California Safety Institute, and a qualification in Transport Accident Investigation from Cranfield University in the UK. I am employed as a civil servant in the Department of Transport.

4. Firstly, I note that the first non-statutory Public Consultation for this project was commenced on 26th August 2020. It was clear from an early stage that this time of year was a poor choice in respect to public consultation. There were no in-person meetings due to the pandemic, and it was during the peak of the summer holiday period. After much lobbying, the closing date was eventually extended to 21st October 2020. Given the lessons that could have been learned by Irish Rail regarding public consultation from the first round, it is disappointing that Irish Rail chose to commence the second round of public consultation at the same time as the first round; during summer holidays (28th July) and during a pandemic. Furthermore, having dumped over three hundred documents onto the internet, Irish Rail then chose to close the consultation period on 30th August. Eventually this was increased to 29th September and then 6th October 2021. It is not a sufficient period to evaluate the multitude of documents that were released, especially when to opportunity for discussion among community groups and residents are still restricted by COVID measures.

5. It has also been noted that, in keeping with other facets of Irish Rail's approach to this process, they adopted a policy of 'divide and conquer' when dealing with residents' concerns. This was achieved by limiting webinars or online meetings to individual geographic areas, which limited the opportunity to identify the wider implications on the West Dublin area rather than at the micro level. It was also noted that during online meetings, members of the public were 'muted' during consultations so that they could not be heard. This was a wholly inappropriate way to conduct public meetings. The excuse that time was limited does not justify this behavior by Irish Rail. The appropriate response is to hold more meetings until all residents have been heard and if necessary to extend the deadline until this is completed. This was not done, and therefore cannot be considered to be a meaningful public consultation.

6. Following the first public consultation, and in light of the extensive public objections, Irish Rail dropped the preferred option to build a large road bridge through Riverwood Court and Station Court Estate. It is curious that Irish rail insisted during the First Consultation that this road bridge was essential to maintain vehicular traffic flows once the level crossings were closed. However, the preferred option for

the second consultation removes the bridge and closes the level crossings while at the same time claiming that there will be no appreciable effect on vehicular traffic. It is clear that this concession was an attempt to dilute the substantial community and political support that opposed the Dart West plan for Coolmine during the first consultation period, and is further evidence of Irish Rail's 'divide and conquer' policy for Dart West.

7. I would now like to address the substantive content of Irish Rail's preferred options for Coolmine, which can be found in the OPTION SELECTION REPORT VOLUME 2: TECHNICAL REPORT July 2021 ('the Technical report'), and in particular Section 8: Level Crossings. Especially Section 8.4 Coolmine Level Crossing Closure.

8. The Technical Report examines a number of options for the level crossing at Coolmine. The Report includes a 'Do nothing' scenario, which is to leave the crossing in its current form with no upgrade to signalling or infrastructure. This scenario was considered and rejected in the First Consultation period, as has been reproduced here again. Everybody has accepted that to upgrade from Commuter to DART services, then 'something' has to be done, whether it be electrification, improved signalling, station upgrades etc. The 'Do Nothing' option was the only one that retained the level crossing in some form. ALL the other options required the permanent closure of the crossing. Therefore including the 'Do Nothing' option is disingenuous and merely provides the illusion of choice. In effect, the public are provided with NO OPTION but to close the level crossing.

9. Since the preferred option (Option 9 from the Technical Report) includes closing the Coolmine Crossing, it is worth considering the criteria under which this choice was made by Irish Rail. Irish Rail state (DART-West-PC2-Information-Leaflet page 2) that it is intended to increase passenger numbers from 5,000 to 13,200 per hour, and increasing services from the existing 6 trains to a proposed 12 trains per hour. The reason for selecting these figures is not explained.

10. In a recent publication, the National Transport Authority provided data on usage of the Commuter rail network. It indicates that in 2019, 9,322 passengers travelled into Dublin by Commuter train per day. Even doubling this figure to assume a return trip each day, 18,644 passengers PER DAY is considerably less than the 13,000 passengers PER HOUR that Irish Rail have decided to use for justifying the closure of level crossings. It should be further noted that these NTA statistics also show that the figures using commuter trains has been falling year on year since 2017. This fact has been omitted by Irish Rail in their calculations.

11. During the first public consultation, it was pointed out to Irish Rail that they did not take sufficient account of Bus Connects in terms of the increased number of passengers that would use this form of Public transport. Irish Rail did not heed this public advice, and have once again disregarded the effect of Bus Connects on the available passenger base for the DART West service. I believe that this is an unfortunate consequence of maintaining public transport bodies as semi-state or private entities, as they are effectively competing against each other for business, rather than supporting the travelling public as an integrated service.

12. Since the completion of the first consultation process, it has become clear that COVID is NOT the temporary situation that Irish Rail claimed it to be at the time. The concept of 'working from home' or a modular work practice of sharing time between home and office is now accepted across both the public service and private business as the new normal in work/life balance. The benefits of switching to a four day week are also becoming widely accepted. It is clear that the planning assumptions made by Irish Rail for long-term passenger numbers on the DART West line are hugely over-estimated. It should also be recognized that when more people are working from home, we should be trying to keep communities together rather than splitting them apart as proposed by Irish Rail.

13. Regarding the number of trains per hour, it was requested that Irish Rail provide details of the amount by which peak trains per hour and off peak trains per hour would differ. Irish Rail have not been definitive on this because they know that the proposed off peak frequency will not justify permanent closure of the crossings. Irish Rail have used a figure of 6 trains per hour for the existing Commuter Network as a baseline figure, and have claimed that they will use "up to" 12 trains per hour with DART West. Hidden in one of their many technical documents (Annex 8.1 Technical note on level crossings

to support PC), Irish Rail quantified the usage of Coolmine Crossing. It confirmed that the current situation had a Train frequency of 6-9 trains per hour, and that in the future situation that would be 12 per hour in peak hours. However, it also states that there will be 6 trains per hour during future off peak travel. This would indicate that the Coolmine Crossing would not have to close outside peak hours, even without improvements to the existing signaling systems.

14. It is particularly important to note the assumptions that have been made in order to achieve the desired preferred option for Irish Rail. In "Appendix A. Optimisation of Coolmine Level Crossing" it states (A.4.4.2.1 Scenario 1) that although the future situation above identifies 6 trains per hour off peak, 12 trains per hour would be used regardless of the actual figures. Another planning assumption for calculating closure times of Coolmine crossing was that the same figure for closure times would be used for off peak times (6 trains per hour) as peak times (12 trains per hour), as described in the same section of Appendix A (see below). This cannot be justified as being in any way objective in application of unbiased criteria. Furthermore, the traffic assessments used to quantify the barrier closure times per day used three time periods: morning rush hour, lunchtime (the busiest off peak period each day) and the evening rush hour. All the other off peak hours of the day were disregarded to give a skewed measurement of how often, and for how long, Coolmine crossing closed each day.

15. It is clear that the planning assumptions used by Irish Rail to justify the permanent closure of Coolmine level crossing are flawed and unrealistic, and designed to provide the appearance of necessity.

16. In summary, the only consideration given in all the options for Coolmine crossing required the permanent closure of the crossing. It should not be a case where a vital link within a community is closed throughout every day, all night, and over every weekend for the sake of four hours each weekday. An obvious option would be the closure of the crossing for peak time periods in the morning and evening, and then opening the crossing to normal usage throughout the rest of the day. This acknowledges Irish Rail's desire to maximize the benefit to work commuters during these periods. It also recognizes the need for community cohesion by maintaining access during off peak times, night times and at weekends.

17. I would now like to briefly examine Irish Rail's methodology for assessing the criteria for selection of the preferred option of closing Coolmine crossing when compared to closing Porterstown crossing.

a. In the Technical Report for the Porterstown crossing, the assessment in Section 8.5.3.3.4 Accessibility and Social Inclusion (on page 185), when referring to community facilities, states "All other options [including the preferred option 9] are rated Significant Disadvantage as they effectively sever this access." The facilities listed as having access severed include St. Mochtas football grounds south of the railway, Scoil Choilm and Luttrellstown Community College and Centre south of the railway.

b. However, for the Coolmine crossing, the assessment in Section 8.4.4.4 Accessibility and Social Inclusion (on page 175), when referring to community facilities, states "there is no comparative advantage or disadvantage between all the options." This description conveniently neglects to characterize all the options as being equally disadvantageous in severing access to community facilities. As a result, Irish Rail conveniently omits the list of amenities and facilities that will have access severed. These include Luttrellstown Community College, Scoil Thomais Laurel Lodge, Tir Na nOg training pitches for Castleknock GAA Club, Somerton pitches, Castleknock College, Castleknock Community College, St Patricks National School Diswellstown, the Park's Medical Centre, Roselawn Shopping Centre, and the HSE Health Centre on Roselawn Road to name but a few.

18. This begs the question of why would Irish Rail apply such obviously different results to what are, by any objective measure, the same disadvantages in both cases. The only reasonable conclusion is that when examined in total, the adverse finding about Social Inclusion in closing the Porterstown crossing would not over-ride the final calculation in the assessment matrix that this is an acceptable option, whereas an adverse finding of loss of Social Inclusion in the Coolmine crossing matrix would result in the closure not being justified. It becomes a 'heads I win, tails you lose' analogy.

19. Next, I would like to consider the implications on the road network surrounding Coolmine crossing, and the changes proposed by Irish Rail to justify the closure of the crossing.

20. Option 9 is the preferred option. It suggests the following upgrading:

- Diswellstown Road/Porterstown Road Junction to the South West of the level crossing
- Porterstown Road Junction to the South West of the level crossing
- Diswellstown Road/Clonsilla Road junction to the North West of the level crossing
- Castleknock Road/Park Lodge junction to the west of the level crossing.

21. The proposed Diswellstown Road/Porterstown Road Junction to the South West of the level crossing is shown below. A number of photo references (A, B, C, D) have been added for clarity.

22. There are a number of changes to the junction. The first consists of adding a second right turn lane from Carpenterstown towards the Dr. Troy Bridge. These two lanes then merge back into a single lane once the turn towards the bridge is complete. Photos B and C below were taken on 6th October 2021 at this junction and represent a normal weekday morning at 8.45am.

It is clear from these photos that the queue of cars extends beyond the roundabout at Fernleigh Estate, and that the measures proposed by Irish Rail would not improve the length of this queue once the additional traffic introduced by closing Coolmine crossing is considered.

23. The second change is to the left filter lane turning from the Dr. Troy Bridge southbound into Carpenterstown. . Photo D below were taken on 6th October 2021 at this junction and represent a normal weekday morning at 8.45am.

It can be clearly seen that the queue of traffic from Clonsilla extends over the top of the Dr. Troy Bridge and would exceed the traffic accommodated by Irish Rail's proposed filter lane. This does not even consider the added traffic from closing Coolmine crossing, which would in all likelihood extend the traffic back to Clonsilla Roundabout on the north side of the bridge.

24. It should also be noted (see photo A below) that this junction is at a school, where hundreds of both primary and post-primary children cross the road every day. There is no evidence that a Safety Case or Risk Assessment of the changes that Irish Rail propose to make here.

25. In fact, according to Irish Rail's Technical Report (Para 8.4.4.4.5 Safety on Page 175), the addition of all the vehicular traffic and additional lanes at the Luttrellstown School provides "no comparative disadvantage in terms of safety". As a safety professional, I strongly refute this unsubstantiated opinion. Irish Rail has provided no safety case, or risk assessment of the hazard to children of increasing both traffic flow and junction complexity outside a school. This is reckless behavior by Irish Rail, and this option should be rejected on the grounds of safety alone.

26. I also note that Irish RAILS reference to safety for the closure of the Clonsilla crossing (para 8.6.3.3.5 Safety on page 205) states that "The Do Nothing option is rated Significant Disadvantage as it does not secure removal of the level crossing from the railway network." There is no consideration of the increased hazard to pedestrians resulting from the increased traffic volumes and more hazardous road crossing points. It is clear that Irish Rail only considers safety when it relates to supporting the closure of level crossings, but has disregarded the safety of commuters and pedestrians in the Coolmine and Clonsilla areas due to hazards created by Irish Rail as part of that plan.

27. The proposed Porterstown Road Junction to the South West of the level crossing is shown below. It adds a cycle lane, which arguably will reduce the efficiency of vehicles at the junction. There is NO improvement for vehicles over the existing junction.

28. The Diswellstown Road/Clonsilla Road junction to the North West of the level crossing is shown below. This is known locally as the Clonsilla Roundabout. The main change includes filter lanes to improve the flow of traffic southbound onto Dr. Troy Bridge. The difficulty with this strategy is that (as seen in photo D) traffic backs up to the Clonsilla Roundabout at peak times, and speeding up the flow into this area with increase the queue of cars. If additional traffic is introduced by closing Coolmine crossing, then the queue of traffic will reach from Diswellstown to the Clonsilla Roundabout causing gridlock.

29. Finally, Castleknock Road/Park Lodge junction to the west of the level crossing is shown below. As before, it provides cycle lane improvements and pedestrian crossings. It does not provide additional capacity for vehicles. The increased traffic in both directions due to the closure of Coolmine crossing will make this junction unusable for extended periods of the day.

30. Overall, the proposed enhancements to the local road network would not even address the increasing traffic volumes as it stands now. The idea that this would accommodate the traffic that would otherwise use the Coolmine crossing is not grounded in fact or common sense. It would appear to me that Irish Rail have decided to make this proposal in order to divest themselves of the need to address the traffic chaos they will cause, and transfer the responsibility and costs associated with the original Road Bridge through Riverwood to Station Court from the first Public Consultation process across to Fingal County Council and the National Transport Authority.

31. The analysis of the various junctions conducted by Irish Rail to justify their decision was completed using different software packages. For example, the Porterstown/Luttrellstown Junction used Linsig software, while the Clonsilla roundabout analysis used Transyt software. This is the equivalent of comparing apples and oranges.

32. There is no assessment of knock on effects; for example, the report examines the Clonsilla roundabout, but does not consider the knock on effect of traffic backing up to the roundabout from the Dr. Troy Bridge during peak times. Traffic already backs up to north of the bridge during peak times. This has been ignored.

33. According to IRs own figures, traffic at the Porterstown Rd/ Diswellstown Rd junction will increase by 423 vehicles (from 3774 to 4197 as per Table 8-12), and at Castleknock bridge will increase by 460 vehicles (from 6,361 to 6,821 as per Table 8-17) by 2028. If according to Irish Rail, closing the 3 level crossings (Coolmine, Clonsilla, Barberstown) will displace 4,420 vehicles per weekday (technical report page 28), where have all the other 3,528 vehicles disappeared to?

34. Volume 2 Technical Report page 24, 447 vehicles per hour at coolmine crossroads. No consideration if existing roads can handle that demand, in addition to the 59 at porterstown, 331 at Clonsilla crossing. 1265 at Castleknock will also receive additional traffic with NO substantial increase in capacity.

35. Irish Rail has also disregarded the anti-social behavior that would be associated with an isolated footbridge over Coolmine crossing. It is assessed in Section 9.4.3.1.1, and regarding Safety, it states that "All options are comparable from a Safety point of view". At no place in the assessment of Coolmine Station works, is anti-social behavior addressed in connection with such an extended footbridge. The bridge would be over 300m long and I do not consider that to be a safe or appropriate route to force schoolgirls or young women to walk across in the dark of a winter's evening. It will become a no-go area after dark.

36. Furthermore, Irish Rail is attempting to introduce a footbridge as supporting criteria for removing the level crossing. They appear to have either disregarded or been unaware of the fact that a pedestrian footbridge is being built at Delwood as part of Royal Canal Urban Greenway (see below).

37. I note that Irish Rail have claimed that the introduction of DART West will significantly contribute to the environment by switching from Diesel engine trains to electric trains. Irish Rail have disregarded the thousands of additional kilometers of road trips being made daily due to the closure of Coolmine level crossing with the added travel distances for local residents to school, shops, amenities etc.

38. Access and response times to the Carpenterstown and Laurel Lodge area by the Fire and ambulance Service at Coolmine Station will be significantly compromised.

39. Overall, I am deeply disappointed in the approach that has been taken by Irish Rail throughout this process. The reduced timelines for the second consultation period has left me with very limited time to construct a comprehensive reply that addresses the other issues involving social inclusion and human factors. I object to the closing of the level crossing at Coolmine. It is not justified by the data, which has been misrepresented throughout this process. I also believe that Irish Rail are attempting to force Final

County Council to build a bridge that Irish Rail knows they cannot do by proposing an “improved road network” that could never accommodate the traffic created by closing Coolmine crossing.

40. I still believe that the most suitable option for all concerned was not considered by Irish Rail: the closure of level crossings during peak times ONLY, and normal operation of level crossings to the benefit of the local communities and residents who would otherwise be separated by this plan.

Yours sincerely,

Kevin O’Ceallaigh

Luttrellpark Lawn

Dublin 15

8 Luttrellpark Lawn,
Carpenterstown,
Castleknock,
Dublin 15
20 October 2020

DART+ Maynooth Line
Iarnród Éireann
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Public Consultation on Maynooth DART Extension

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1. I am writing to you regarding the DART West project and the public consultation period that is in progress. I wish this letter to be considered as my submission to Irish Rail.

2. I think that it is important to state that there is widespread agreement within the local residential communities that the upgrade of the Maynooth line to a DART system is a welcome improvement, both for commuters and for the environment. However, I am deeply concerned about the methods and process used by Irish Rail to progress this project, particularly in relation to the proposed ancillary works for the Coolmine area which includes closing the level crossing and constructing a 14 metre high vehicle flyover through the residential housing estates of Riverwood, Luttrellpark and Stationcourt in Dublin 15.

3. It is important to note that in June 2014, the Minister for Transport, Tourism and Sport, Mr. Leo Varadkar, wrote to the Kirkpatrick residents and stated:

"...it has been decided to suspend any further work of closing or by-passing the level crossings until the end of 2018. At that point, consultations with local residents will take place long before any plans are put on public display."

This Ministerial commitment (attached) was accepted at the time by Mr. Gerry Murphy, then Chief Executive of the NTA. The original commitment by Mr. Varadkar was confirmed in writing by the subsequent Minister for Transport Tourism and Sport, Mr. Paschal O'Donohoe, in a number of letters to Councillor (now TD) Roderic O'Gorman (Ref PD/14/4427) on 9th October (attached) and 19th December 2014.

It would appear that Irish Rail, on 26 August 2020¹, arranged for the current Minister for Environment, Climate and Communications and Transport, Mr. Eamon Ryan, to assist in putting the DART West project on public display via widespread media events without informing him of the previous commitment of two Transport Ministers and the CEO of the NTA. No consultations took place with local residents prior to putting the DART West plans on display.

1 The publication date of the Irish Rail document, 'Preliminary Options Selection Report', which identified the six options and the 'emerging preferred option' following an MCA process, is 18 August 2020. The decision on what Irish rail considered to be the emerging preferred option was taken prior to any public display of potential options.

Irish Rail claim to have circulated brochures to residents about the DART West plan and consultation process. Many houses did not receive these brochures. Although Irish Rail became quite strident in denying the experience of residents in Dublin 15 when raised during a webinar in late September 2020, in Luttrellpark Lawn three houses received a brochure, the remaining six households did not. This is a statement of fact.

Having obtained a copy of the brochure that was circulated by Irish Rail to residents, it is a remarkable piece of misdirection and creative writing. There are many such examples of this, some of which are provided in Table No. 1.

ACTUAL EVENT BEING PROPOSED BY IRISH RAIL

BROCHURE DESCRIPTION (copied from Brochure)

- Permanent Closure of ALL Level Crossings from Ashtown to Maynooth; no replacement.
- Build a 14m high flyover through a residential estate.
- Permanent Closure of ALL Level Crossings from Ashtown to Maynooth; no replacement.
- Table No. 1: Comparison of actual planned actions by Irish Rail, and the associated description in Irish Rail's DART West Brochure provided to residents.

There was also a map provided in the Brochure that indicated the locations of all the level crossings on the Maynooth line (Photo No. 1). They were indicated by an orange cross. While Irish Rail may claim that this indicates planned closures, the map legend indicates that the cross simply represents an existing level crossing. No indication is provided on the map that these crossings are being permanently closed without any replacement level crossing.

Photo No. 1: The DART+ Maynooth line map from the Irish rail Brochure

Nowhere in the brochure is there a statement that all the level crossings will close. In fact, it does not explicitly state that any level crossings will be closed permanently, nor does it state anywhere in the brochure that a 14m high flyover is part of the plan. Assuming that these numerous examples of misdirection were unintentional, combining these with Irish Rail's enforced restrictions on public consultation, it does not provide confidence that Irish Rail had any intention of ensuring that residents were fully informed, or that Irish Rail has the intention of constructively listening to the concerns of residents. I would contend that it appears that this brochure was created with the intention of downplaying controversial parts of the plan to limit public opposition.

4. The current public consultation process is happening after the plans were put on public display. Notwithstanding the seriousness of potentially misleading a Government Minister by omission, even inadvertently, there is an important distinction between consulting with residents in advance of public display, and a general public consultation process for the following reasons;

- a. Irish Rail was aware that there was previous widespread upset and anger within the Coolmine area to the proposal of a large flyover through residential estates. This flyover was first mooted in 2011, and again in 2013/14. Both times this bridge was refused permission, to the point that Fingal County Council included 'Preserve the existing pedestrian and vehicular right of way at the Coolmine Level Crossing', and 'Prohibit any road bridge' across the train line and canal at Riverwood/Station Court' in the Fingal Development Plan 2017-2023 (Objective Points No. 141 and 142).
- b. Irish Rail has been aware of the existing preference of local residents and public representatives to retain the Coolmine level crossing. The MCA process created by Irish Rail ensured that the selection process removed the option to upgrade the signaling and infrastructure of the level crossing at Coolmine.
- c. During webinar discussions, Irish Rail confirmed that they want all level crossings eliminated from the DART West line, and from the subsequent DART improvements to the North-South DART lines. Consequently, there is no existing option to retain a level crossing that Irish Rail would accept or offer as an option.
- d. Irish Rail conducted an MCA process which was substantially and demonstrably flawed to the point that if the existing marking scheme was correctly applied, Irish Rail's emerging preferred option would not come first in the selection process. These flaws and errors have been highlighted to Irish Rail during a number of webinars with residents.
- e. To be completely clear with what Irish Rail's 'preferred option' looks like: It is proposed to replace the residential green space in Photo No. 2 at Riverwood Court with a 14m high flyover similar to that shown in Photo No. 3. Anybody with an interest in promoting environmental responsibility can see the number of green space, mature deciduous trees and wildlife habitats that will be destroyed by this process.

Photo No. 2: Existing Riverwood Court Photo No. 3: Proposed Riverwood Court flyover

For the residents of Stationcourt, and in particular Stationcourt Way on the north side of the Royal Canal, the new flyover means the loss of the only area of recreational greenspace that they have (Photo No. 4) in front of their property.

Photo No. 4: Existing Greenspace (in yellow) with proposed flyover route.

Construction of a flyover on the Royal Canal Greenway between Castleknock and Porterstown (Photo No. 5) will result in what happened at the nearby Dr. Troy Bridge, as seen in Photo No. 6. This has become an area prone to significant antisocial behavior.

Photo No. 5: Royal Canal Greenway Photo No. 6: Dr. Troy Bridge at Porterstown

5. Irish Rail has provided data about the closure of Coolmine level crossing as evidence of the need to remove the crossing. A number of points are crucial in understanding the fallacy of this argument;

a. Firstly, Irish Rail has argued that “Level crossings present a major constraint to railway operation...” (Main Report, Chapter 9). This is simply not true. Level crossings are by their very nature designed to constrain road traffic from interfering with trains. Otherwise the barriers would straddle the rails and not the road. The amount to which road traffic is constrained by a level crossing is outside of Irish Rail’s remit and part of the infrastructural road transport network.

b. Irish Rail have provided data (Annex 3-1, Table No. 2) on the time that the Coolmine barriers are closed as follows:

Table No.2: Irish Rail Traffic Data for Level Crossings

c. During the morning from 08.00hrs-09.00hrs, Coolmine is closed three more times than Ashtown, Barberstown and Blakestown, and twice more than Porterstown and Clonsilla. This would indicate that trains more frequently pass each other at other level crossings rather than Coolmine. It is obvious then (using the old school maths question about trains leaving stations in opposite directions) that adjusting train schedules by a small amount would yield up to a 22% improvement in closures at Coolmine level crossing for no financial cost. When this was put to Irish Rail during a recent webinar, it was claimed that this would not necessarily produce time savings. If changes to schedules would not change the number of closures of level crossings, then these figures presented by Irish Rail as evidence for closure of the crossings cannot be considered sufficiently reliable for deciding on options.

d. Irish Rail has used the existing level crossing closure times in Annex 3-1 (Table No. 2 above) to reach a determination that the level crossings should be closed. In this instance, Irish Rail is conducting a disingenuous comparison as the new DART trains will not cause the crossing to be closed for as long as the old diesel electric engines. No attempt appears to have been made by Irish Rail to use the existing DART network to establish the improvements that could be achieved through upgraded signaling.

e. Irish Rail has produced figures for passenger capacity on the line. The quoted figure in their brochure is 13,750 passengers. This figure is impressive, but in effect it has no basis in reality. It is a notional maximum figure based on 15 trains per hour combined with the carrying capacity of new rolling stock. It may as well say one million passengers. There is no accurate statistical data for actual passenger capacity requirements for the Maynooth line over the period. The figure of 15 trains per hour is designed to ensure that no argument can be made against closing the level crossings. If Irish Rail’s capacity numbers were reduced to something approaching actual real-world figures, then there would be ample opportunity to retain the level crossing at Coolmine through upgrading the signaling system. It is worth noting again, that nobody in the area has complained about waiting for trains to pass at the level crossing in Coolmine.

f. The accuracy of any of Irish Rail’s statistical data on passenger numbers fails at the point that their data in Annex 3-1 did not factor the Bus Connects Project, which is expected to increase

passenger carrying capacity by up to 23%. The only reference to Bus Connects in Annex 3-1 is based on the interference with existing infrastructure as follows “As part of the Bus Connects network redesign, it is proposed that the 239 will be replaced by Route 252. It is envisaged that the 252 will follow a similar route to the 239 via Clonsilla level crossing.” This data did not consider the closure of the level crossing at Clonsilla.

However, the capacity efficiencies provided by the new Bus Connects Plan has not been accounted for in the DART West plan. Irish Rail’s “Future Patronage Modeling Report” makes no mention of the effect of Bus Connects.

g. The absence of any consideration or interaction with Bus Connects is demonstrated by the fact that the new Bus Connects plan (Photo No. 7), launched on 24th September 2020, states that the Bus Connects L52 route from Adamstown to the Blanchardstown Centre crosses over the Clonsilla level crossing that Irish Rail say is being closed.

Photo No. 7: Bus Connects crosses the level crossing to be removed by Irish Rail

When asked about this matter during the public consultation webinar, Irish Rail personnel claimed that they did consult with Bus Connects. When pressed about the Bus Connect routings which they were unaware of, this claim was changed to a statement that Irish Rail made “a submission” to Bus Connects. It should be noted that there were in excess of 50,000 submissions to Bus Connects.

h. Irish rail claims that the “Level crossings are a major constraint to railway operation and surrounding road networks, causing congestion and increased journey times for all modes of transport” (Main Report Section 3.3.5). The following photos (Photo No. 8 and Photo No. 9) were taken at Coolmine Roundabout on 6th October 2020 at 08.45hrs and 08.50hrs respectively looking away from the Coolmine Level Crossing. In both cases, the level crossing barriers were open and NO trains were moving. There was no traffic delay on the road between the Coolmine Roundabout and Coolmine level crossing.

Photo No. 8: Photo No. 9: Looking East at Coolmine Roundabout Looking South at Coolmine Roundabout

It can be clearly seen that the traffic congestion is not due to the level crossing, but due to the school traffic at that hour. The route shown leads to five local schools: St Patricks NS, Castleknock Community College, Luttrellstown Community School, Castleknock College and Mount Sackville Girls School. In fact, the level crossing acts as both a deterrent and a filter for traffic heading south towards these schools. Introducing unfiltered traffic via a flyover from Riverwood Court would create total gridlock as the local residential road network was never designed to cater for the additional traffic using the flyover as a means to avoid Blanchardstown Village or to access the Blanchardstown Centre from Castleknock. This does not account for further additional traffic due to the closing of other level crossings on the Maynooth line, and the completion of the nearby Kellystown housing development which comprises of 700 housing units.

By Irish Rail’s own admission, any congestion at Coolmine level crossing is limited in timing and scope to a maximum of approximately 90 minutes in the morning (7.30-9am) and in the evening (17.00-18.30hrs). At all other times there is insufficient road traffic to warrant a change to the level crossing. To close this level crossing, and access to Delwood, Brompton and Roselawn Shopping Centre for the sake of intermittent congestion for three hours per day, which has no impact on train movements, is excessive and unnecessary.

i. Irish Rail claimed to have evaluated the concept of retaining the existing level crossing at Coolmine. It was called the “Do-Nothing Option”, and considered leaving the current level crossings in place with no added improvements. This Option was proposed and discounted by Irish rail prior to the MCA process. This proposal was an impossible scenario as it uses non-existent criteria (the existing, old signaling). All the signalling along the Maynooth line has to be replaced as part of the DART West project (Photo No. 10), so Irish Rail are required to do

something. Hence, claiming that the “do-nothing” scenario was discounted as a viable option prior to the MCA process is misleading at best.

Photo No. 10: Extract from Page 4 of the Irish rail DART West brochure, listing ‘Key Elements’ of the project.

6. Regarding the proposed flyover, it is perhaps not realized the impact that such a massive structure will have on the local residential area. The flyover will be 14m at the highest point. This height is not mentioned in any of Irish Rail’s documentation, which claims at height of 9m. However, when pressed by a qualified engineer during the public consultation, the true height of the span was admitted by Irish Rail. The housing estates along the proposed route were not designed with this flyover in mind. Consequently, they will be, in many cases, facing the new flyover with vehicles passing at eye level to the upper floors of the houses. The initial diagram by Irish Rail does not give that impression at first glance, but on closer inspection (Photo No. 11) the true scale of this structure can be seen. It is larger than the surrounding houses (roof of house visible in yellow insert) even at the lower portions of the span. (Please note that this drawing is incorrect as the house to be demolished by Irish Rail is on the North side of the canal. The rail line is on the South side of the canal.) The houses at Riverwood Court, which face onto this flyover, were omitted from the original diagram, presumably for clarity; I have inserted them again as a red outline to an approximate scale to permit an appreciation of the size and impact of the flyover on the local residents.

Photo No. 11: Irish Rail’s Flyover diagram with Riverwood Court houses included for clarity

7. As a resident of Luttrellpark Lawn, which is adjacent to the flyover, we are going to lose a portion of the green space that our children play on (Photo No. 12). This will also result in them being exposed to a considerable increase in noise and diesel particulate pollution. Due to the massive increase in traffic, it will no longer be safe for them to meet friends in Riverwood, or walk to the playground and tennis courts at Riverwood. These are the only such amenities of this type nearby. I will also be very worried about how they will get to school at St. Patricks NS safely with the increased traffic along the new main distributor road in front of our house.

Photo No. 12: The effect of the Flyover on access to local amenities.

8. During morning and evening rush-hour, we will effectively become prisoners in our own homes as the huge volume of traffic in front of our estate will prevent access to and from our street. Furthermore, the cars that previously parked along the Luttrellpark Road between Riverwood Court and Coolmine Roundabout (Photo No. 13) which are owned by commuters using the road as a free ‘Park and Ride’ facility for Coolmine Train Station will no longer be able to park here, and so will enter the Luttrellpark residential estate, preventing residents from accessing their own homes in the morning and evening, and indeed for most of the working day until the ‘park and ride’ commuters return in the evening.

Photo No. 13: ‘Park and Ride’ Passengers for Coolmine Train Station

9. There are numerous other arguments that can be made regarding putting a massive flyover through a solely residential neighbourhood, including the absence of an environmental impact assessment (whether legally required at this point or not), the destruction of the Royal Canal amenity and associated flora and fauna, the stress and anxiety this has caused to many elderly residents and those with special needs, and the separation of the communities on either side of the level crossing. However, the fact that Irish Rail have chosen to progress this project in the midst of a pandemic is especially disappointing. It is not possible, within the compressed timelines and during a level 3-5 lockdown, to be able to properly formulate a comprehensive response on behalf of the residents.

10. I am requesting that this overall public consultation be halted until meaningful consultation with the local residents and public representatives as committed to by numerous Ministers for Transport is conducted by Irish Rail. I have attended three of the webinars conducted by Irish Rail to date, and the idea that limiting residents to 25 questions of Irish Rail’s choosing is somehow a public consultation process is farcical. I am further requesting that the entire MCA process be reconsidered to include the option to retain the level crossings with improved signaling which will bring additional capacity on the line, and to re-evaluate the need for the massive capacity proposed by Irish Rail on a phased basis. I

am finally requesting that the concept of building a 14m high flyover through a residential green area be eliminated as an option by Irish Rail, as it previously was removed in 2014, as entirely inappropriate for the locality.

Yours Sincerely,

Kevin OCeallaigh

8 Luttrellpark Lawn.