



C/O 9 Kirkpatrick Avenue

Clonsilla

Dublin 15

26<sup>th</sup> October 2022

An Bord Pleanála

Marlborough Street

Dublin 1

**Re: KRCRA Submission DART West + Railway Order Ref No 314232**

To whom it may concern

We are writing to you on behalf of the Kirkpatrick Rockfield Coolmine residents association (KRCRA).

The association was set up in the 1970's and includes residences on both sides of the Coolmine Road from Coolmine station to the Clonsilla road. There are 189 properties in the association. We are an active association which take a keen interest in all issues regarding our area and its environs, particularly those that will impact the quality of life and wellbeing of our residents.

We would like to say that we welcome electrification of the Maynooth Line and acknowledge the need to improve the public transport in the Dublin 15 area. We particularly welcome the move to a more environmentally friendly mode of transport as we live in an area where the rail line runs adjacent to a potential national heritage area (the

Royal Canal) and are committed to ensuring any developments or infrastructural improvements protect this important natural heritage area.

We wish to request that an oral hearing is held on this Railway Order. We also make the following observations on the current Railway Order proposals:

### **Capacity Assessment**

One of the reasons given, in the various reports, for closing the level crossings is that there would be a huge increase in the number of passengers, resulting in a huge number of trains required, which would mean the level crossings would be permanently closed anyway (at least at peak times). We dispute the assumptions made and request that before any of the level crossings are closed the following actions are taken:

1. A revised capacity assessment be carried out which reflects the recent post Covid shift to blended/ remote office working and also the prolonged delay in commencement of developments (figures available in the Draft Fingal Development Plan 2023 -2029). There are many areas in where planning permissions have been granted but nothing built, sometimes for years. The estimated passenger numbers from such “developments” should only be used in estimating figures in the distant future and not for estimating figures in the foreseeable future. The revised assessment should be independently reviewed and the level crossings should not be closed until there’s detailed justification for doing so.
2. Historically a Railway Order granted in 2008 from Clonsilla to Pace was based on the premise *“It is intended to run a total 44 trains between Clonsilla and Pace increasing to 88 trains over subsequent years leading to a peak service of one train every 15 minutes. Total passenger demands are predicted from rail feasibility studies to be in the region of 2 million passenger trips by 2016 (ABP Inspectors Report p.7).* Currently, 15 years post the granting of this order, trains run every 30 mins peak hour and hourly outside peak hours.

As a result of these grossly inaccurate projections, it would be reasonable to question the estimated passenger numbers and consequently trains required as laid out in the reports included as part of this Railway Order. Therefore, we request that an independent body carry out a more realistic assessment of potential passenger numbers which would demonstrate, in detail, expected passenger numbers and consequently trains required along this line in 5 years, 10 years, 15years and 20 years time.

It is important to ensure that the extensive disruption which will be caused by the level crossing closures will not occur unless the closures are justified using accurate & realistic figures.

3. The Non-Technical Summary Report states “*The proposed development aims to increase train frequency from the current 10-minute frequency to a 5-minute all-day frequency and to increase trains from four to eight carriages. This will be achieved by increasing services from the current 6 trains per hour per direction to 12 trains per hour per direction by 2027, in certain locations subject to passenger demand*” (p.49).

Firstly, we do not have a 10-minute frequency at Coolmine or any other station along the line.

Secondly, if they are going to provide a 5-minute frequency service this would mean 432 trains per day (excluding inter city services and presuming the service will only operate from 6.00am to 12 midnight) on the Maynooth line. This seems totally unrealistic and we have to question how Connolly will cope with this. Even if we leave aside the fact that Connolly would be unlikely to cope with this number of trains Irish Rail would have to justify the requirement for this level of service when the current DART service in Dublin operates on far fewer trains than this.

If we assume the service will emulate the current DART service (every 10 mins between 6.50am and 8pm and every 15 to 20 minutes outside of that), this would amount to 196 trains per day. Currently there are 210 scheduled services through Merrion Gate and all level crossings between Pearse & Bray. These level crossings operate successfully and do not appear to cause major problems to traffic or the DART service. Irish Rail should have to explain why the level crossings on the Maynooth line need to close when there is no need to do so elsewhere. Simply saying “we will be closing the level crossings elsewhere too” is not an explanation. As mentioned already, the level crossing closures will be very disruptive to many communities so they should only be closed when there is clear and detailed information, for everyone to see, that closure is essential not simply desirable.

4. In the reports, reference is made to the fact that Coolmine Level crossing is closed for as much as 40 minutes during peak hours and the proposed increase train frequency will mean total closure. We were unable to find any details relating to the operating of the proposed increased service based on upgrading the signalling system and leaving the crossings open. In September this year a survey was undertaken on the time the Coolmine Level crossing was closed for outbound trains. This was carried out during peak hours on 2 dates. The average time that the gates at Coolmine are closed before an outgoing suburban train reaches them is in excess of 4 minutes. Given that the time, according to the I.R. timetable, between Castleknock and Coolmine is 2 minutes this makes no sense. If the system was upgraded to ensure a much shorter closure time (similar to the current DART service) there may not be a need for level crossing closure. As mentioned before there must be a need to close the crossings and not simply a desire to do so.
5. The “*subject to passenger demand*” comment in the Non-Technical report summary (p.49) is concerning. There are promises of huge increases in the number of trains

and claims this can only be done if the level crossings close but for some unknown reason Irish Rail feel the need to put in a get out clause. If the passenger demand is not as they predicted, what service will they be providing? Keeping the level crossings open until they have a better idea of the demand appears to be a more sensible option.

6. The questions as to whether Connolly station can cope with the proposed increased service needs to be looked at in more detail. The final stages of the Dart City Centre Re-signalling project started in November 2020 and appears to have been completed in August 2021. The proposal was to increase train capacity through the vital city centre corridor from 12 trains to 20 trains per hour. Despite the works done to date, there are still daily capacity issues on the DART line and frequently, the Maynooth line trains have to wait outside Connolly for significant amounts of time before getting onto the loop line. In addition, when you do get into Connolly between 08:30 and 08:45, there is more usually than not, delays to DART services who struggle to get into Platform 5 due to congestion on the line. Dramatically increasing trains on the Maynooth Line appears to be an impossibility. Irish Rail should provide a detailed and satisfactory explanation as to how this issue will be resolved

One cannot justify the current plan to close the level crossings based on spurious assumptions.

## **Pedestrian Bridges**

While we are pleased to see the revised design at Coolmine Railway Station we still have several concerns

1. It is extremely difficult to find appropriate photomontages in the documents provided. The only photomontage for the proposed pedestrian bridge at Coolmine is from the south side of the level crossing. This does not provide any information or indeed even assist in trying to visualise what the bridge will look like from the north side of the level crossing. At the third pre application consultation meeting with An Bord Pleanála on the 8<sup>th</sup> October 2020 a discussion was had regarding the provision of photomontages.

*“The Board queried the proposed use of photomontages for the proposals at the different level crossing and considered some would be very useful particularly from public open spaces or sensitive locations in terms of visual/residential amenity. The prospective applicant outlined that the proposal is currently at early design stage and is evolving with ongoing public consultation with the provision of photomontages not considered necessary at this stage”. (Meeting minutes accessed on line)*

The photomontage methodology was outlined at the meeting of the 21/01/2021 and ABP were informed that they would be included in volume 4 of EIAR.

It is quite clear that ABP find the photomontages a very useful tool for the public. It is however difficult to find them. There is no indication on the website that they are included in the EIAR. To render the website more user friendly we requested they put the Photomontages on a separate, more prominent tab. We requested additional photomontages from Irish Rail and whilst we would accept it is not possible to provide photomontages of every element of the project due to the significant impact of this development on the North side of Coolmine station we would expect to have at least one photo from the North side. This has further compounded the abysmal public consultation process conducted online during a pandemic & excluding a significant element of our citizens who have no online access. I.R should not be allowed to do this in future.

2. We are extremely disappointed that there is not 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 greenway. We want the bridges at Porterstown and Clonsilla be redesigned to reduce their footprint, by restricting the construction (in the case of Clonsilla, to the Railway station) and reducing the impact on the Royal Canal.
3. The proposed bridge at Coolmine appears extremely long and will be inaccessible for many pedestrians, particularly those with mobility issues. In the firstv2 consultations we welcomed the proposal for lifts at the train stations. Appendix A3.2 – Public consultation No 2 Findings Report *“At Coolmine, it is proposed to construct a pedestrian bridge with lifts in the station to accommodate mobility impaired”* We were therefore very disappointed when looking at the documents and maps provided with the Railway Order that there was no evidence of lifts at any of the stations. We contacted Irish Rail who informed us that lifts were removed from Ashtown & Coolmine as people had concerns about them. Having discussed the matter with other community groups in the area we could not find any one who objected to having a lift. The concerns raised were in relation to lifts breaking down and lack of maintenance. It should be a condition of any approval that lifts are provided in tandem with a 24-hour maintenance contract to ensure prompt repairs to facilitate the mobility impaired who cannot use the bridges or steps.
4. Our concerns regarding safety remains, accentuated by the reported & documented anti-social behaviour at the new Pelletstown Railway Station. We request that a condition of the granting of the Railway Order be for Irish Rail to liaise & meet with An Garda Siochana to discuss current best practice in terms of crime prevention with regard to lighting, access and extending the use of CCTV to all stations in the development & the surrounding areas.
5. We request a condition be included that Sheepmoor Lane and any other such secluded areas are well lit and fenced off from the Royal Canal to reduce anti-social behaviour.

6. In the Non-Technical Summary Report under Landscape & Visual it states Landscape mitigation measures propose replacement or additional tree and other planting where possible along the proposed development which will in time ensure best integration of the proposed development into the surrounding townscape and landscape. We request these mitigation measures be made a condition of the Railway Order.
7. We are concerned about graffiti on the proposed new bridges and request that it is a condition of the Railway Order that the proposed pedestrian/cycle bridges be treated with anti-graffiti coating & maintenance of these bridges be the responsibility of Irish Rail. This will ensure the bridges are properly maintained.

## **Parking**

We currently experience problems with cars parking in our estate and surrounding estates caused by commuters parking their cars to use the train. Cars regularly park for an entire weekend. This leads to difficulties for residents with refuse collections and more seriously, access for Emergency services.

Through each Public Consultation Irish Rail have proposed that a passenger drop off area and a provision for safe turn around will be provided on the north side of the Coolmine level crossing. Many residents of the area raised concerns about this. Indeed, Irish Rail refer to it in the Public Consultation 2 Findings Report. In it they state *“respondents raised concerns regarding increased demand for parking due to the severance from the car park and more commuters using the estates in the vicinity to park their cars for free”*, Irish Rail’s response to these concerns was simply to reiterate that they were providing a safe drop off point and vehicle turn area. This is unacceptable.

It is clear from the Development Plan meeting of the 18<sup>th</sup> October 2022 that Fingal County Council have concerns about traffic management. It is imperative that a condition be included that Irish Rail & Fingal in conjunction with residents draw up an agreed parking management plan before any level crossings are closed.

It is unfair that Irish Rail dismiss these concerns by deferring the onus for issues to other departments when they have worked closely with Fingal County Council in drawing up the plan

## **Castleknock Bridge**

Although not directly adjacent to our estate Castleknock Bridge, a protected structure is currently unsafe and not suitable for pedestrians or cyclists. The plan to raise the bridge to facilitate the electric lines does not include a plan to upgrade this bridge and at webinars we were told that Fingal plan to do this. There is currently no provision in the Fingal capital plan

to do this and it is difficult to comprehend when so much work must be completed to raise this bridge that Irish Rail have no plans to upgrade this bridge and render it fit for purpose. This bridge is pedestrian access to Castleknock train station and the closure of the level crossings will increase the traffic on this bridge.

Access to Castleknock Station from the north side of the line is via a dangerous and narrow path where individuals could easily fall into the road. Increasing traffic and pedestrian flow along this bridge will increase the risks. We believe it is incumbent on Irish Rail to ensure access to all their stations is safe and request a condition be imposed which calls on Irish Rail in conjunction with Fingal County Council to make this access safe for pedestrians and cyclists, before any level crossing closures.

Regards,

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Anne Sheridan.

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Angela Rogers

For and behalf of Kirkpatrick Rockfield Coolmine Residents' Association (KRCRA)