

## **An Bord Pleanála Observation**

**Case reference: NA29S.314232**

### **DART + West Railway Order - Dublin City to Maynooth**

#### **Submission made by:**

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#### **This submission is also made on behalf of:**

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We welcome the proposal of Irish Rail to electrify the Maynooth line. However, we request that approval only be granted **subject to the conditions** outlined below.

Firstly, we wish to outline the following points of information about our experience of the 'consultative' process as well as Irish Rail's proposal and our concerns.

#### **Public Consultation Process**

1) We would like to highlight our concerns about the undemocratic nature of the two 'public' consultation processes, prior to the Railway Order. They took place online during the pandemic. The didactic, authoritarian nature of these online presentations inhibited serious discussion and debate. These were held during holiday periods when many people were likely to be away and unaware of the process. Only after intense public pressure was agreement reached to extend the consultation period.

2) No posters were ever displayed at any point of the entire process at our local Coolmine train Station and no leaflets were distributed to local households. As a result, most people **are** still unaware of the impact of this proposed major initiative on their area.

3) People who find digital literacy challenging (Research from the Department of Higher and Further Education 2021 found 50% of Irish adults lack basic digital skills) have been disenfranchised during this process due to the exclusively online nature of the communication. In a mature area it is reasonable to assume that this is likely to be a considerable number of people.

4) Online zoom meetings organised by Irish Rail were very didactic and controlling in nature. This minimised the opportunity for questioning and debate. There was a requirement that all questions be submitted in advance of each meeting. These were obviously screened as not all were 'selected' by Irish Rail. In addition, residents were muted, time was limited and there was no opportunity to follow up if answers were unclear or went unanswered. The process was extremely frustrating and disrespectful. It is indeed deeply worrying that concerned citizens of this state were treated in such an undemocratic manner. Many people felt censored.

5) The information presented on the Irish Rail website was poorly organised and it was difficult to locate items of importance for future referral. Hundreds of pages of documents relating to this issue were uploaded to the Irish Rail website and to add further to residents' confusion, information at various stages was deleted and copied to other areas of the site. At other times pages were removed and new information provided making perusal extremely difficult and confusing. Photomontages were very vague so the accuracy of the actual dimensions given to represent these photomontages may need to be questioned.

6) Given the nature of the issues raised above, we are formally requesting an oral hearing prior to any final decision by An Bord Pleanála.

## **Irish Rail's Current Proposals**

The plan to electrify the Maynooth line was developed in the pre-pandemic period. We all now realise the need for greater flexibility in order to adapt to change and we believe that some of the learning acquired during the pandemic should be applied to Irish Rail's proposals in order to ensure greater efficiency and that all potential consequences are considered. An Bord Pleanála has the opportunity now to embrace the reality of this new world order by adapting their approach to an ever-changing environment.

Consideration of increased housing demands along the line needs to be balanced with remote working and the possibility of working hubs. Research indicates that attendance at the workplace has reduced by over 26% on average, with hybrid working concentrated to a greater extent on specific weekdays. Peak day workplace attendance appears to be almost 9% lower than pre-pandemic levels. This is despite 11% higher employment in Q2-2022 versus Q2-2019, or 8% employment growth in Dublin.

The fact that so few people in Dublin 15 use the train at present needs to be explored. Future trends are difficult to predict but the service will need to be flexible. However, it appears to us at this time that the current Irish Rail proposal is very inflexible and fixed and there is little consideration given to the impact on the area (that is, the immediate vicinity around the stations) and the knock-on effects across greater Dublin 15.

We believe unfortunately that this essential project is too focussed on the narrow goals of Irish Rail and that it does not give enough consideration to the full impact on the communities of Dublin 15.

### **1) Commuters:**

It has been suggested that the 8 trains per hour currently operating in each direction be increased to 15 trains per direction at peak times.

More capacity is indeed required as some trains at peak times are extremely packed. Rather than increasing frequency, as proposed by Irish Rail, why not increase the capacity of each train? DART carriages hold more passengers than diesel ones so a direct change to DART carriages would make sense. DART trains can also be significantly longer than diesel ones which would further increase capacity. By simply moving from shorter diesel trains to longer DART ones, Irish Rail could resolve the current issue of capacity without increasing frequency. It remains unclear to us why increasing capacity in this way is not being considered.

Passenger demand is cited by Irish Rail as the reason to triple capacity on the line, yet the most recent figures available from the NTA (National Rail Census 2019) show a reduction in total daily demand on the Maynooth line from 2017 (9778) to 2019 (9322).

Given the fact that during the preparation of the plan by Irish Rail it appears that the number of passengers was decreasing, we would like to know why an increase in frequency was planned? Common-sense would show that an annual census of passenger numbers is required to form the basis for planning future services. This should also allow a margin for incremental increase so that congestion in carriages would not occur especially at peak times. It would also seem logical to consider optimising the current service capacity before increasing the frequency. Even with the current capacity it appears that Connolly station cannot cope with the service from Maynooth as the trains on the line often have to wait for long periods outside the station to facilitate the DART and other commuter services. Radical changes would be required to facilitate a smooth integration of any increased service frequency. Off-peak trains are rarely half full at present so a requirement for any increase in this service would be uncalled for unless need is demonstrated.

The length of time that the traffic barrier at the crossings is lowered (causing traffic congestion) is worth examining. At present, the barriers are not automatic and are controlled manually from a central point. The average time that the barriers remain down is well over four minutes and is certainly much longer than the barriers controlling the DART. This is human decision making.

We seriously wonder is the use of extended closure times being used to frustrate drivers and to argue for the permanent closure of the barriers. This point needs further clarification by Irish Rail and investigation by An Bord Pleanála.

## 2) Energy and the Environment

1) We ask that Irish Rail make the change from diesel to electric as sustainable as possible by examining the proposals we suggest in this observation.

2) There must be some consideration given to how the electricity (proposed to run the trains) is generated as we have not yet extricated our electricity generation from greenhouse gases.

3) It would be a waste of energy for Irish Rail to run trains that are not occupied fully i.e. if frequency was increased before maximising capacity. It is also important to note that these trains will be running at peak time usage i.e. 5-7pm in the evening (the time when all consumers have been requested to minimise their usage). Irish Rail have a responsibility to do likewise by planning an evidence-based strategy to minimise their use to appropriate levels. Running half empty trains is wasteful and indeed unconscionable in the current climate.

4) There may be other uses of carbon within the project that needs consideration too. To build steel and/or concrete bridges (especially if the actual need has not yet been measured) will also be a significant source of carbon generation.

5) If barriers remain permanently closed then longer car journeys and traffic jams will also increase carbon emissions. Indeed, 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. However, the electricity to charge the cars will also have a carbon footprint, particularly with much longer road trips.

6) It is easy to categorize moving from diesel trains as a green initiative but true responsibility lies in accepting the implications of all aspects of carbon generation not just for the construction of the project but the potential for numerous unintended negative consequences e.g. permanently increasing car journeys. This could be mitigated to a significant degree by continuing to allow rail and road traffic to share the line. Trains are always given priority and right of way so it is hard to comprehend why the crossing must remain closed when not in use.

## Our Concerns

- During the pandemic local services and retail outlets became invaluable. Unnecessary travel was reduced. The current proposed plan will disrupt this aspect of community life because a significant number of permanent closures over a small area will present obstacles to local access.
- Most people who live in Dublin 15 also work, travel to school, shops, access healthcare, socialise, go to the sports clubs in the local area. While the need for national rail access to the centre of Dublin is acknowledged and welcomed, any disruption to the lives of our very large community should not be disproportionately adversely affected. We consider Irish Rail's proposals, given the impact of these closures on the cohesion of long-established communities, need to be justified in planning terms and not based on operational convenience for Irish Rail.
- Bus Connects (the bus service is used more frequently as its routes are more flexible) needs to apply the same flexibility to developing their routes to meet the future needs of the community in order to reduce the need to use personal transport and increase the use of public transport. Will this capacity to evolve be limited by the many proposed road closures?
- There are five roads passing through the railway line from the bridge at Castleknock to the bridge at Clonsilla. As Dublin 15 is already congested, how will this area cope when crossings are reduced from five to two? How will the remaining two bridges facilitate extra lanes? One of these bridges has a protection order prohibiting interference in its structure. A 60% reduction in access is untenable. Apart from local traffic, Dublin 15 handles a large volume of traffic accessing the Blanchardstown Shopping Centre. Many drivers also avoid tolls on the M50 by travelling via Chapelizod. This has a major impact on local traffic.
- The current plan indicates that access and response times to Carpenterstown and Laurel Lodge by the Fire and ambulance Service at Snugborough Road Station will be significantly compromised. Increased traffic on other bridges is likely to be a delaying factor too. This is a serious health and safety concern.
- Drivers north of the line will have no access to the car park at Coolmine train station when the road is closed. This could exacerbate the existing difficulty of drivers parking in local estates to avoid the charges for the station car park (which is regularly underutilised).
- Those south of the line will have reduced mobile access to all major supermarkets i.e. Dunnes in the Blanchardstown Shopping Centre, Tesco in Roselawn and SuperValu in Blanchardstown village.
- Those south of the line will not have access to the newly revamped Shackleton Gardens.
- It also appears that access to the Royal Canal amenity area will be difficult due to the proposed construction of railings in the vicinity of the stations.
- This area of Dublin 15 is a residential, mature community with many older people. Community cohesion will be sundered by this development.
- The building of bridges for non-vehicular access has been proposed. These will have ramps as Irish Rail have insisted that there will be no lifts. Walking up ramps can be difficult for those with health issues and disabilities. We believe it is ageist and discriminatory not to provide lifts.
- When the **actual** dimensions are considered rather than the misleading photomontages, we can see that these proposed bridges are a significant eyesore in a mature and residential area.

- Traffic will increase in residential areas as access to limited crossings are sought. This will result in increased risk for children travelling to and from school. It will result in an increase in noise pollution with consequent health implications. Until electric cars become the norm it will also result in a decrease in air quality and an increase in potential health risks.
- Close to the Kirkpatrick bridge at Coolmine, is a unique area of the Royal Canal known as the Deep Sinking. Numerous floodlights at the pedestrian bridge will cause light pollution in this ecosystem which has a large nocturnal activity.
- There is real concern about the likely potential of antisocial behaviour around Coolmine Station as the absence of traffic and creation of cul-de-sacs will be an obvious attraction for such activity. We do not want this to become a no-go area at night. It is interesting that nowhere in the assessment of Coolmine Station works, is anti-social behaviour addressed in connection with the proposed extended footbridge. The bridge would be over 300m long and we consider this to be a serious safety risk for pedestrians particularly during bad weather and after dark. We believe the proposed closure of Coolmine level crossing will reduce the feeling of safety we have in our community. As the Minister for Justice, Helen McEntee says “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).

We are afraid that community cohesion and safety is being sacrificed in favour of relatively marginal operational efficiency in Irish Rail’s proposals.

The need for pedestrians or cyclists to use a long, isolated walkway will deter residents from using it and will potentially increase the use of cars.

- Living close to a train station: Being so close to train access is a real advantage. Delays at the crossings can be a little annoying. However, we the residents accept these delays and understand that rail always has right of way.

## **Costs: Financial and Community**

**Financial Cost:** This costly project is likely to cost much more than proposed as building costs continue to spiral. Taxpayers’ money must be used wisely and even more so if this project is funded by international loans which may incur high interest rates. We believe that our suggestions provide for a cheaper, flexible, and more sustainable solution and are preferable to the unnecessary huge costs facing Fingal County Council and the National Transport Authority in addressing traffic chaos in this area should Irish Rail’s plan to close the level crossings in Dublin 15 succeed.

**Impact on Community:** the assessment in Section 8.4.4.4 Accessibility and Social Inclusion (*page 175, OPTION SELECTION REPORT VOLUME 2: TECHNICAL REPORT July 2021*), states “*there is no comparative advantage or disadvantage between all the options.*” This description conveniently fails to describe the severing of access to community facilities and the impact on the community’s sense of safety, referred to above. Irish Rail fails to include the list of amenities and facilities impacted with access severed if the level crossing is closed permanently. These include among others Castleknock

Community College, Castleknock College, Castleknock Karate Club, Luttrellstown Community College, Castleknock Celtic, Castleknock Golf Club, Metro St. Brigid's Athletics Club, Roselawn Shopping Centre, Scoil Thomáis Laurel Lodge, Somerton pitches, St Patricks National School Diswellstown, the Park's Medical Centre, Tír Na nÓg training pitches for Castleknock GAA Club, and the HSE Health Centre on Roselawn Road.

### **Our Proposed Conditions:**

1. Prior to the commencement of any works, research on the impact on the wider Dublin 15 area and most especially on traffic amelioration not already considered should be undertaken and examined. Only when this is finalised to the satisfaction of Fingal County Council (FCC) and shown to support the management of traffic, should the active development of the project commence.
2. Irish Rail should be explicitly charged with responsibility for the future remediation of traffic issues resulting from the DART West project. Our community must not be left in a state of limbo between Irish Rail, Fingal County Council and the NTA.
3. The proposal to permanently close crossings must be examined in greater detail. No evidence has been provided regarding the capacity of the trains. There has been no data provided regarding the frequency of trains at peak times and/or what will happen at off-peak times. Current detailed passenger data must be the basis for tailoring the frequency to the actual demand and crucially, the rationale for closure of crossings at night time and at weekends should be justified using verifiable data.
4. If the findings indicate that permanent level crossing closures are not required at this time, we request that the proposal to build bridges for non-vehicular access be taken off the agenda.
5. In the interim, electrification of the railway should commence and the upgrading of automated barriers on the level crossings should proceed as per the current DART services. These crossing gates should be fitted with an advanced signalling system to ensure short closure times and operational reliability. In addition, the use of all new innovative technology to ensure precedence of rail services should be introduced to ensure no delays for rail passengers. We wonder if Irish Rail trains benefit from the same priority shown to Luas trains at the various junctions on those routes?