

Submitted by H. Harold Co-Chair of the St Mochta's National School Parents Association on behalf of the St Mochta's National School Board of Management and the St Mochta's National School Parents Association.

St. Mochta's National School, Porterstown Road, Clonsilla, Dublin 15

Dear Bord Pleanála,

We write to you on behalf of the St. Mochta's National School Board of Management and Parents Association.

St. Mochta's National School is located on the Porterstown Road, in Clonsilla, Dublin 15.

We write to you in relation to the Railway Order that Irish Rail have submitted regarding the DART West project (Reference 314232).

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 we wish to highlight.

We also wish to request an oral hearing as part of this process.

We wish to express our extreme concern in relation to the impact of the proposed plan to close all level crossings on the Maynooth line.

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.

Whilst the upgrade of the line to DART standards is welcome, the upgrading of the level crossings must be considered instead of permanent closure. Installation of automatic level crossings, in conjunction with accompanying road safety and traffic calming measures in the vicinity of level crossings, must be the priority to ensure that the safety of the school going population in the area is not jeopardised.

Concerns With Current Railway Order

- The level crossings do not need to close in order to extend the DART to Maynooth
- Significant concerns exist regarding the increased traffic load that will be forced onto the roads surrounding St. Mochta's National School due to the proposed closing of Clonsilla, Porterstown and Coolmine level crossings in particular. In addition to the increased traffic volumes, the closing of the level crossings will also impact on the ability of families within the St. Mochta's National School catchment area to access the school by vehicular means, as approximately 69% of the areas composing the St.Mochta's School catchment area are located on the other side of the railway to St. Mochta's National School.

- The proposed level crossing closures would result in a significant increase in traffic volumes on the Dr. Troy bridge, which is already congested at peak times. St. Mochta's National School, Scoil Choilm Community National School and Luttrellstown Community College all share close proximity to each other, a number of level crossings and Dr. Troy Bridge yet the schools are not mentioned at all in the Railway Order
- The proposed traffic junction alterations will not be sufficient to handle the additional traffic volumes
- The closure of the Porterstown crossing will mean the set down area of St. Mochta's school will only be accessible via the Clonsilla Road end of Porterstown Road. This will create significant disruption with the potential for total gridlock where parents will be unable to exit the set down area due to traffic volumes on the Clonsilla Road and others will not be able to enter. The traffic warden's at strategic locations coordinating the traffic will be put under increasing pressure as they become, in the case of Porterstown Road, the sole arbiter of access to the school set down area and Porterstown Road in general during this time period
- At a time when more students are being encouraged to cycle to school the proposals from Irish Rail will in fact discourage students from cycling due to safety concerns caused by the traffic volume increase in the direct vicinity of St. Mochta's National School, Scoil Choilm Community National School and Luttrellstown Community College
- The current proposal will redirect additional traffic volumes to the direct vicinity of St Mochta's National School with scant regard for the pupils, teachers and parents of these schools
- Porterstown Road
 - Porterstown Road provides the only vehicular ingress and egress to the school for parents during drop off and collection times (the Clonsilla Road entrance is exclusively for staff use only). Permanent closure of the Porterstown crossing will make Porterstown Road a cul de sac and the only exit for parents will be back onto the Clonsilla Road. This will lead to an untenable traffic congestion loop where cars cannot exit the school grounds due to build up on the Porterstown Road and others will not be able to enter. There is a school traffic warden present at the top of Porterstown Road, for a period of time around school opening and closing time, to ensure the safety of school children and others crossing during this period. By closing Porterstown level crossing this effectively makes the School Traffic Warden at the junction of Porterstown Road and Clonsilla Road the sole arbiter of access to the school set down area and Porterstown Road in general during this time period. This will undoubtedly have a knock on effect on traffic congestion on Clonsilla Road which has not been addressed anywhere within the Irish rail proposal.

- The Porterstown Old Schoolhouse site and the site on the opposite side of the Porterstown Road have previously been the subject of planning applications that proposed for up to 221 apartments and 99 apartments respectively on the Clonsilla side of the railway. Closing the level crossings would mean that the only access to these developments (and existing development “The Village”) will have to pass directly by the school gate (<http://www.pleanala.ie/casenum/307464.htm> and <http://www.pleanala.ie/casenum/312190.htm>) Any development will further exacerbate the traffic challenges that closing the Porterstown level crossing will bring.
- Clonsilla Road
 - The Clonsilla Road is a long established and vital artery for local and through traffic. It is also the primary road for approaching the school (the current proposals would actually make it the only road if Porterstown Road is blocked off). The Clonsilla Road is already congested at peak times and the current proposals would further compound this. There is a pedestrian crossing on the Clonsilla Road, adjacent to the school, controlled by a school traffic warden for a period of time around school opening and closing time, to ensure the safety of school children and others crossing during this period. Irish Rail has not addressed the traffic volume increase and undoubted tailbacks that will present on the Clonsilla Road if the level crossings are closed.
- Dr. Troy Bridge
 - St. Mochta’s National School, Scoil Choilm Community National School and Luttrellstown Community College all share close proximity to several level crossings on the Maynooth line and the impact of permanent closure of these will be to dramatically increase the traffic load on the Dr. Troy Bridge. The proposed junction changes will do little to address the increased traffic volume and will provide no assurances in terms of the health and safety of the school going population. There are school traffic wardens in operation at either end of Dr. Troy Bridge (Clonsilla Road Junction South and Diswellstown Road Junction South) for a period of time around school opening and closing time, to ensure the safety of school children and others crossing during this period. Dr. Troy Bridge is already congested at peak times. Dr. Troy Bridge will not be able to sustain the increased traffic volume. Irish Rail has not addressed the traffic volume increase and its impact on the school going population with regards to Dr. Troy Bridge.
- School Traffic Wardens
 - A team of school traffic wardens (3 from St. Mochta’s and 2 from Scoil Colum) operate daily for a period of time around school opening and closing time, to ensure the safety of school children and others but they are not mentioned anywhere in the Railway Order reports regarding traffic volumes and junction alterations.

- Cycle To School
 - At a time when more students are being encouraged to cycle to school the proposals from Irish Rail will in fact discourage students from cycling due to safety concerns caused by the traffic volume increase in the direct vicinity of the aforementioned schools
- This increased traffic volume and journey times raises serious concerns regarding air quality and pollution levels and the impact on the school going population
- No photo montage of Coolmine Road junction was provided
- The Railway Order acknowledges the Kellystown LAP but fails to anticipate the increase in traffic that will occur due to this proposed development. The Kellystown LAP <https://www.fingal.ie/sites/default/files/2021-02/kellystown-adopted-lap.pdf> (accessed 25/10/2022) states that up to 1,583 residential units may be part of this development.
- The additional expense of the access bridges at Clonsilla, Porterstown and Coolmine are an unnecessary cost to the taxpayer

Given the previous points we 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

- Extension of cycle lanes and path/road widening to the pupil entrance of St. Mochta's National School
- The upgrade of the junction between Porterstown Road and Clonsilla Road to include the introduction of traffic light signals and the relocation of the pedestrian crossing if required. A yellow box should also be included at this junction to avoid traffic congestion.
- Ongoing traffic surveys and analysis to be undertaken by Irish Rail specific to St. Mochta's National School pupils, parents and staff commute patterns at 3 month intervals from 2023 until 5 years after the completion of the DART West project. These must include both pedestrian and vehicular traffic and monitor the crossings controlled by the School Wardens from both a pedestrian and vehicular perspective. It must also include traffic flow through the school set down area at peak collection and drop off times. It must also include monitoring of the right turn from Clonsilla Road onto Porterstown Road. Provision needs to be included by Irish Rail for any works necessary to remedy any issues highlighted by these surveys.
- Installation of aesthetically pleasing protective barriers at the crossings controlled by the school wardens to protect the children who are waiting to cross from the increased levels of traffic.

- Clonsilla, Porterstown and Coolmine level crossings to remain open
- Automatic level crossing gates to be installed and the signalling system upgraded to enable short closure times
- 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, new working from home legislation and proposed new developments such as Kellystown.
- 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
- 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 the St. Mochta's National School community must not be left in limbo between Irish Rail and Fingal County Council

Whilst the upgrade of the line to DART standards is welcome, the level crossings do not need to close to enable this. The upgrading of the signalling system, which could include the installation of automatic gates at level crossings, would allow for faster open and close times thus accommodating the proposed frequency increases that Irish Rail are predicting. As long as the increased train frequency remains a prediction, rather than a reality, the level crossing must remain open. It is imperative that Irish Rail do not needlessly significantly increase the road traffic volume in the vicinity of St. Mochta's National School potentially risking the safety of the school going population.

Regards,

St. Mochta's National School Board of Management and Parents Association.