

**Senior Executive Officer,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin**

24th July 2019

Re: Kellystown Local Area Plan – Issues Paper

Dear Sir/Madam,

Introduction

Thank you for the opportunity to respond to the Kellystown Issues Paper in relation to the forming of the new Draft Local Area Plan for the area. Whilst we acknowledge that the Issues Paper represents an early stage in the development of the Local Area Plan, the information gathered from the public consultation of the Issues Paper does contribute to the scoping of the Environmental Report and the Appropriate Assessment Screening. Therefore, as well as commenting on the specifics of the Kellystown Issues Paper, we wish to also provide details of Iarnród Éireann's DART Expansion Programme which will significantly upgrade rail capacity on the Maynooth Line.

Firstly, we very much welcome the preparation of a Local Area Plan for planned development of the Kellystown area. In general we strongly support development along railway corridors that is appropriate, sustainable and consistent with National, Regional and Local Policy (i.e. mixed use, higher density and public transport orientated). Rail is also one of the most environmentally sustainable forms of land transport. Iarnród Éireann is committed to reducing energy consumption and lowering CO₂ emissions from the overall transport sector, in accordance with the National Climate Mitigation Plan and the Government's recent Climate Action Plan. Iarnród Éireann's energy reductions are significantly ahead of our EU targets and our future ambitions to transition commuter rail to electrical traction power will assist in achieving Ireland's future CO₂ emission targets and positively impact on climate change objectives.

The Kellystown site is immediately adjacent to the Maynooth railway line, which provides Intercity and Commuter services. The railway forms the northern border of the Kellystown site over an approximate linear frontage of 1.4km. Clonsilla Station is located to the northwest of the site.

Rail Improvements Delivered

Iarnród Éireann has delivered several key commuter rail improvements on the Maynooth Line to provide additional passenger capacity:

- 2001: Maynooth line capacity increased by double tracking from Clonsilla to Maynooth;
- 2002-2005: Deployment of new rolling stock onto Maynooth Line to provide additional Commuter Services;
- 2007: Opening of Docklands Station, to provide increased city centre capacity;
- 2010: Opening of M3 Parkway to Clonsilla Line, which currently operates M3-Parkway to Docklands Station passenger services; and
- 2015: Completion of a new bridge on the Ratoath Road to eliminating Reilly's level crossing, which was previously one of the busiest manually operated rail crossings on the rail network.

Strong passenger growth in recent years for commuter rail services has resulted in demand exceeding available capacity in the peak periods on the Maynooth rail line. Improvements and modifications of the rail network and additional rolling stock are required to increase rail capacity in line with current growth and projected passenger demand.

Rail Improvements Planned – DART Expansion

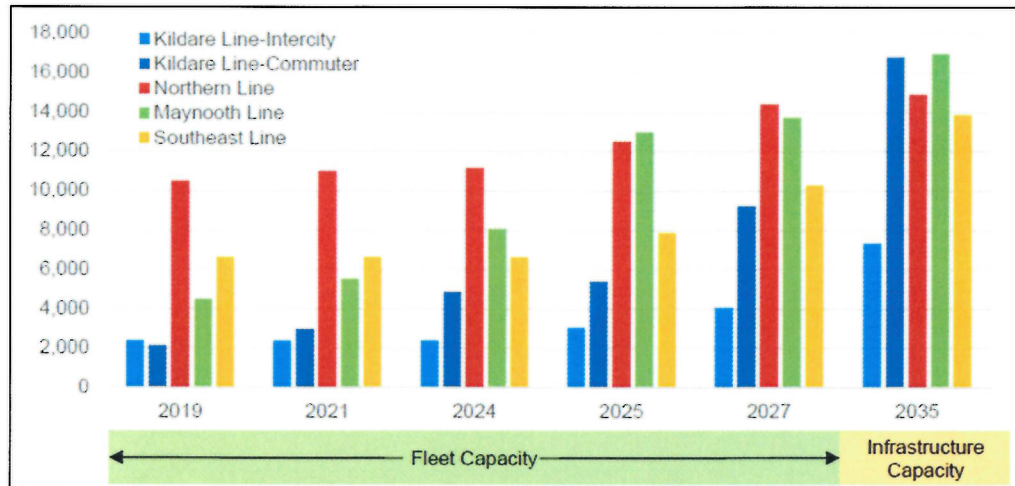
Iarnród Éireann, in conjunction with the NTA, are working on a major network improvement programme within the Greater Dublin Area, commonly known as the DART Expansion Programme, which when completed, will provide a step-change in the wider Dublin commuter rail network to meet passenger demand requirements for the foreseeable future.

The DART Expansion Programme is fully consistent with, and will assist in achieving the land-use and transportation targets of the NTA's Transport Strategy for the Greater Dublin Area (2016-2035), Project Ireland 2040, including the National Development Plan 2018-2027 and the Fingal County Development Plan. The National Development Plan allocates a funding investment priority of €2billion to advance priority elements of the programme by 2027. DART Expansion will deliver key infrastructure improvements to support a significant increase in the capacity of the Maynooth/M3 Parkway to City Centre line.

The Fingal County Development Plan 2017-2023 supports the development of a high quality public transport system, with improvements to railway infrastructure including DART Expansion (Strategic Policy No. 11, Objective MT01, Objective MT02, Objective MT30 and Objective MT31).

As regards the Maynooth line, DART Expansion will increase the capacity of the line from 7 trains per hour per direction up to a possible 15 trains per hour per direction in line with emerging future demand requirements. DART Expansion will also significantly improve public transport options for future residents and workers within the Kellystown LAP and the wider Dublin 15 area which has seen very significant increases in population.

The planned capacity expansion for the Maynooth line is shown in Figure 1 which shows very significant capacity increases planned for the line, as well as the other key commuter rail routes.

Figure 1. Planned Passenger Capacity into Dublin City Centre (AM Peak Hour/ line)

The Maynooth Commuter rail service is a proven public transport success in terms of attracting passengers from car based travel. Peak hour (AM 0800-0900) rail passenger numbers into the city centre have increased steadily by approximately 30% over the last decade. The transport of such a higher number of commuters by rail is very significant in reducing road congestion and minimising greenhouse gas emissions.

Once the infrastructure is improved in line with the DART Expansion Programme, new rolling stock will be deployed to introduce electrified, high capacity and regular frequency trains to the Maynooth line to cater for increasing passenger demand.

Whilst acknowledging that the Issues Paper relates to a specific area of land at Kellystown, the assessment of traffic and transport is an issue that needs to be considered at both local and regional scale.

Closure of Level Crossings

A critical element of DART Expansion on the Maynooth Line, necessary to achieve the planned increase in service capacity, is the requirement to permanently close all existing level crossings (Ashtown, Coolmine, Porterstown, Clonsilla, Barberstown and Blakestown). Retaining crossings with the increased frequency for DART Expansion is not sustainable in the future and would have significant negative impacts on traffic flows. Elimination of level crossings on the Maynooth Line has been a longstanding requirement for improving passenger capacity and has been under discussion over a number of years with Fingal County Council and is supported by the National Transport Authority.

The closure of all level crossings on the Maynooth Line, without provision of any replacement bridges, would have an extremely negative impact on the road network. Therefore, DART Expansion will deliver relief infrastructure, in the form of railway bridge crossings to ensure traffic movement is sufficiently catered for based on future projections.

Iarnród Éireann and the NTA have recently completed a Transportation Assessment of the traffic impacts of closing all level crossings on the Maynooth line. The objective of the Transport Assessment was to recommend the appropriate level of bridge crossings for pedestrian, cyclist and vehicles, necessary to maintain appropriate traffic flows into the future, whilst releasing the public transport capacity of DART Expansion for rail passengers.

This transportation assessment considered the origin and destination of current and future traffic (including the developments at Kellystown).

The L3036 (Diswellstown Road and Dr. Troy Bridge) provides a recent and significant grade separated bridge crossing of the railway corridor for pedestrians, cyclists and vehicles. This currently alleviates delays at Porterstown and Coolmine level crossings;

The transportation assessment concludes that the following infrastructure should be provided by DART Expansion works:

- New vehicular bridges (with pedestrian and cyclist facilities) in the environs of Barberstown and Coolmine and Ashtown, subject to development of appropriate designs; and
- New pedestrian/cyclist bridges at Clonsilla and Porterstown, subject to development of appropriate designs; and
- Separate new pedestrian/cyclist bridges at Barberstown, Coolmine and Ashtown, should they be required, if there is a separation of the pedestrian / cyclist desire line from the new vehicular bridge crossings.

Contributing to Fingal County Development Plan Objectives

The Fingal County Development Plan Map Based Local Objectives along the Maynooth Line include the existing level crossings. The implications of these local objectives are related to the Kellystown Local Area Plan, but are wider than the specific LAP area, as traffic will distribute and converge on the wider road network.

The local objectives, relative to the rail network are addressed individually, (refer below i.e. Local Objectives 130 (Clonsilla), 131 (Barberstown), 137 (Porterstown), 141 (Coolmine) and 142 (Coolmine). These level crossings are not considered beneficial to the development of the DART Expansion Programme. Therefore, Iarnród Éireann respectfully requests that the Local Objectives and the responses provided below are considered by Fingal County Council in the preparation of the Kellystown Local Area Plan.

Objective 130 (Clonsilla): *“Prepare a feasibility study on the location of a road bridge, crossing the Royal Canal and the Dublin – Maynooth railway, connecting north to the Ongar Road. This location shall be determined in advance of, or part of, the adoption of the Local Area Plan for lands at Kellystown.”*

Response: The Transportation Assessment indicates that; with the provision of a new vehicular crossings at Barberstown and Coolmine; the closing of Clonsilla level crossing without provision of a new vehicular bridge provides comparable results in terms of overall vehicular junction delay and journey times. The number of vehicles rerouted from Clonsilla to either the new bridges at Barberstown and Coolmine is relatively minor (circa 680 passenger car equivalents in the AM peak hour). Flow difference plots indicate that vehicle demand can be re-distributed on the road network in a balanced manner without any area becoming heavily overloaded.

Notwithstanding that a vehicular bridge crossing is not proposed, a pedestrian/cyclist bridge is proposed at Clonsilla which will benefit Kellystown LAP and the zoned open space to the west.

Objective 131 (Barberstown): *“Provide for traffic safety measures at this dangerous corner/junction.”*

Response: A new vehicular bridge crossing is proposed at Barberstown. This new bridge crossing, in lieu of a level crossing, will link with other road network upgrades proposed by Fingal County Council in the general area, including the Ongar to Barnhill Distributor Road and the Kellystown Link Road. The design of a new vehicular crossing at Barberstown will take account of junction safety requirements and will significantly contribute to traffic management within the Kellystown development area.

Objective 137 (Porterstown): *“Preserve the existing pedestrian and vehicular right of way at the level crossing at Porterstown.”*

Response: In order to provide the train services envisaged by DART Expansion, it will not be possible to retain Porterstown level crossing. The transport assessment indicates that the recent L3036 (Diswellstown Road and Dr. Troy bridge) addition to the road network has significantly alleviated traffic using the level crossing at Porterstown. The traffic counts undertaken as part of the transport assessment (2019) indicate that there were 26 northbound and 91 southbound vehicle passes through Porterstown Level Crossing in the AM peak hour (level crossing is currently closed for 32 minutes in the AM peak hour), compared to 854 northbound and 719 southbound vehicle passes on Diswellstown Road in the AM peak hour (no rail conflict). Therefore, the transport assessment has concluded that a new vehicular bridge at Porterstown, with Diswellstown Road already open and available, is not required. A new pedestrian/cyclist footbridge is recommended at Porterstown to provide a route between Clonsilla and the educational/sporting centres to the south of the railway corridor.

In 2012/2013, Iarnród Éireann supported Fingal County Council’s proposal to close Porterstown level crossing and extinguish the right of way. In lieu of this, Fingal County Council proposed to provide a footbridge, similar in principle to what is now proposed by Iarnród Éireann. This is considered the most beneficial relief infrastructure to enable improvements to the wider road network, traffic/pedestrian/cyclist management and increases in rail services.

Objective 141 (Coolmine): *“Prohibit any road bridge at this location.”*

Objective 142 (Coolmine): *“Preserve the existing pedestrian and vehicular right of way at the Coolmine level crossing.”*

Response:

In order to provide the train services envisaged by DART Expansion, it will not be possible to retain Coolmine level crossing. A new vehicular bridge is proposed to allow vehicles, cyclists and pedestrian to connect north and south of the railway corridor. The traffic counts undertaken as part of the transport assessment (2019) indicate that there were 297 northbound and 221 southbound vehicle passes through Coolmine Level Crossing in the AM peak hour.

DART Expansion will result in an increase of a current maximum 14 train passes/hour (i.e. 7 trains per hour per direction) through Coolmine Level Crossing in the AM morning peak to 30 train passes/hour (i.e. 15 trains per hour per direction). In 2019, the Coolmine level crossing gates are closed 9 times in the AM peak hour (08.00-09.00) for a total of 41.5minutes/hour. Therefore, the increased frequency of DART Expansion will effectively curtail all traffic movement through the level crossing and cause significant traffic impacts north and south of the railway corridor.

The transport assessment strongly recommends the provision of a vehicular bridge at Coolmine to maintain appropriate traffic flows and connectivity across the railway corridor. Previous assessment by Iarnród Éireann in 2012 indicated that the appropriate location for a new overbridge was at the location of Objective 141. A separate study by Fingal County Council supported the need for a vehicular crossing in lieu of the closure of Coolmine Level Crossing. Iarnród Éireann will consider the constraints and opportunities at Coolmine for a vehicular bridge crossing. If necessary, the requirements for a separate pedestrian/cyclist bridge on Coolmine Road can then be reviewed based on final design for the vehicular bridge.

It is respectfully submitted that the new vehicular bridge should be situated at the optimal site for traffic management and minimisation of environmental impacts. Therefore, arbitrarily precluding specific sites is not considered beneficial for sustainable land-use and transport planning.

New Railway Station at Porterstown : *“Facilitate the development of a new railway station on the existing Dublin-Maynooth line at Porterstown if required.”*

Response: Whilst not specifically addressed in the Kellystown Issues Paper, we note that the current Fingal County Development Plan supports the provision of a new station on the Dublin-Maynooth line at Porterstown, on the eastern edge of the proposed site, if required. The proposed development of the area could strongly enhance the case for a new station. The feasibility of a new station integrated with improved bus links, cycling, pedestrian access will need to be independently investigated at an appropriate time to assess the business case for linking the development directly to the Maynooth-Dublin rail corridor, including potential delivery timescales and funding. Authorisation for proceeding with any new stations will be made by the National Transport Authority, with funding supplied by Exchequer or through developer levies.

Conclusions & Recommendations

In conclusion Iarnród Éireann has already delivered significant capacity and service improvements on the Maynooth rail corridor since 2001. Strong passenger growth in recent years for rail services has resulted in demand exceeding available capacity in the peak periods. Improvements and modifications of the Maynooth Line, included within DART Expansion, are required to facilitate capacity increases to meet short to long term passenger demand.

Under the National Development Plan Iarnród Éireann will deliver a step-change improvement to commuter rail services under the DART Expansion programme. DART Expansion will see both rail lines electrified as far as Maynooth/M3 Parkway. The project will increase services from the current 7 trains per hour per direction in the peak to 15 trains per hour per direction by 2027, in line with emerging future demand requirements. Services will consist of high capacity DART services on the Maynooth/M3 Parkway line. In order to provide this level of enhanced passenger rail service and capacity on the Maynooth line, it is essential that the existing level crossings are closed and the rail lines are re-signalled and electrified. We have set out in this submission the key mitigation measures required to offset the impact of the proposed closure of the level crossings and we would welcome the support of Fingal County Council in this key objective.

The transport assessment undertaken based on the elimination of level crossings on the Maynooth Line has concluded that solutions exist to maintain traffic flows across the railway corridor and allow the full public transport potential of DART Expansion to be exploited. This will provide long term societal benefits to residents and workers in the Dublin 15 area, by providing a higher level of transport choice. It will also assist in the national ambition of reducing dependence on road based transport in favour of rail based public transport.

We fully support development of the right scale and mix alongside the railway line and we will work closely with the Council and the NTA to deliver new any rail stations required in support of the development and the wider DART Expansion Programme.

We trust the information contained herein is of benefit to Fingal County Council in the preparation of the Kellystown Local Area Plan. We remain available to discuss further any of the issues raised at your convenience.

Yours sincerely,



Peter Muldoon
Director of Capital Investments