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Iarnród Éireann

By email: [DARTCoastalNorth@irishrail.ie](mailto:DARTCoastalNorth@irishrail.ie)

**Re: consultation on Dart+ North**

A chairde,

Thank you for the opportunity to engage with this consultation. I am impressed with the way you have put so much documentation online. It really enables us to look into the considerations which have been taken into account so far and to engage meaningfully with the decision-making process. I am also impressed by your constructive, informative, and respectful engagement with the public in online meetings.

The core of this submission is about the following:

- The proposal for a shuttle service on the Howth line and the pros and cons of this proposal
- Howth Junction station
- Sutton Station level crossing and the cycle route through it

**The pros and cons of a shuttle service to Howth**

The reports are very clear about the selection of options as Iarnród Éireann has moved through this process, and show the criteria taken into account. Looking through the reports, especially the “Dart Expansion Options Assessment” there doesn’t seem to have been an analysis of this type for the proposal to develop infrastructure for a shuttle service to Howth. (The Dart Expansion Options Assessment compares a ‘do minimum’ bundle with four other bundles, each of which includes the Howth shuttle proposal. What about those bundles without the Howth shuttle?)

I appreciate that the exact operational form of a shuttle service remains to be determined. However, there’s no point in developing infrastructure for such a service unless there are credible scenarios in which that infrastructure would be useful. Therefore there should be some sort of analysis of such likely operational scenarios.

**Would a shuttle be of benefit?**

The assumption in the documentation seems to be that to switch from a direct service to Howth every 20 minutes to a connecting service every 10 minutes would be of itself an improvement. The details of this operational mode haven’t been provided. In particular, this trip would take longer. How much longer? Say it takes 5 minutes longer. Certainly for many residents in the area, and especially for those less mobile, a switch from 20 minute to 10 minute frequency would not be a sufficient improvement to compensate the delay and inconvenience of having to change. (It’s not

necessary to rely on my conjecture; if the exact operational parameters were specified, it would be possible to survey passengers and potential passengers.)

Furthermore, it isn't clear that the current frequency is the maximum possible without a shuttle. If it is possible operationally, to increase the Howth frequency to run a Howth service every 15 minutes, I can't see how switching to a shuttle every 10 minutes would be seen as an improvement by anyone.

### **Need to distinguish AM and PM peaks**

The operation of a shuttle in the morning peak, with a dominant flow southbound, is a different matter to a shuttle in the evening peak, which would involve crossing tracks. The selected option, as well as the runner-up options for Howth Junction, involve a transfer to an adjacent platform for southbound passengers, but a transfer across the tracks for northbound passengers. Therefore a shuttle operation would perform much worse if used outside the morning peak.

### **Full examination of alternatives to a shuttle**

There doesn't seem to have been any analysis of alternatives to a shuttle. Two alternatives raised at the public meetings were some sort of grade separated solution to the junction, and an increase in to 3 or 4 in the number of tracks on the line south of Howth Junction (for whatever length appropriate.) These would need to be examined.

### **Howth Junction Station**

The above considerations are all without any reference to the station at which the interchange would take place. Unfortunately, Iarnród Éireann appears not to understand how terrible Howth Junction Station is. A very poor experience is offered to rail passengers seeking to access the service at the station, to passengers transferring between Howth and Malahide lines at the station and to members of the public seeking to move between the areas severed by the two railway lines (i.e. Kilbarrack Industrial Estate/Kilbarrack Road, Baldoyle Industrial Estate and Donaghmede.)

The station was built without planning permission in the territory of two local authorities. I complained to both.

Dublin City Council required Iarnród Éireann to apply for retention permission (application 3156/06). I objected, raising in particular the failure to provide for disabled access. Condition 2 of the grant required Iarnród Éireann to show on drawings "all access/egress from and to the station and through the site including public right of way through the site and to demonstrate accessibility to mobility impaired persons..." There's no information on the online planning file in relation to compliance with this condition.

Fingal County Council didn't require Iarnród Éireann to apply for retention at the same time as Dublin City Council did. In 2010, An Bord Pleanála ruled on a s. 5 referral which the Local Area Committee asked Fingal County Council to submit as to the planning status of the station. An Bord Pleanála confirmed that the station needed planning permission and had been built illegally. To the best of my knowledge, Fingal County Council still took no enforcement action and no retention application was made.

It is maybe not surprising that a station designed and built without any public participation serves its customers and people exercising a public right of way through the station so badly. And it is really good to see from the level of public engagement in relation to the Dart + project infrastructure that Iarnród Éireann now takes a completely different approach.

Moving from the legalities and the process, to the substance, Howth Junction station is a design disaster. It is really surprising that people who are below the railway level have to go above it to cross the tracks on an overbridge, instead of being allowed to remain at ground level pass and given a well-designed, open passageway under the tracks, with ramp access up to platforms and clear passage in three directions under the station if they're not trying to access the platforms.

I don't really see any alternative to this enormous redesign if the station is to be brought to standard for the existing passengers. In the absence of a plan for fundamental redesign it is no surprise at all that passengers for stations to the east are adamant that they do not want to change trains at this station. (Note that many who currently interchange to travel on the Malahide line report that they travel further to do so at stations further south because of their dislike for Howth Junction.

Despite the current poor quality station experience, what is presented is the minimum possible alteration, limited to the platform arrangements. Passengers transferring would, like the current passengers, be offered very little in the way of shelter from the rain. Where they need to cross the tracks they would have to climb the staircases which involve blind u-turns bringing passengers going up and down stairs into each other's paths with no warning.

### **Howth Junction Station in context**

IE owns a significant site at this station. As land very well served by public transport it is underused in planning terms and very valuable in economic terms. Fingal County Council has the following objective in its County Development Plan:

#### **Objective BALDOYLE 2**

Prepare a Masterplan for Baldoyle Industrial Estate and Kilbarrack Industrial Estate to guide and inform future development including improvements to signage and physical appearance, determine appropriate uses, provision for intensification of employment, and facilitate improvements to pedestrian access to and from Howth Junction Station and associated bus stops which can be implemented over the lifetime of the Plan.

This objective hasn't yet been implemented. IE should be looking at the potential to redevelop the station including introducing other uses onto any land not operationally required, or in the space above that being used for railway operations.

### **Options 5 or 7a**

As you can see, I don't believe that this is a question of simply choosing between options for minimal infrastructure changes. However, it is striking that option 7a, identified as the best for passengers particularly those with mobility impairments, is not being chosen, apparently because it is slightly more expensive. As this option adds to the length of time it would take to transfer between trains, it also seems to be inferior for railway operation purposes and may be a case of penny wise and pound foolish.

### **Shuttle conclusion**

In summary, I don't believe that the value of switching to a shuttle service has been demonstrated. Infrastructure is being designed to facilitate a service change which operationally passengers are naturally unhappy with because most of them judge it will be an inferior service. That is even if it did not involve Howth Junction station with its particular problems. Associated minor improvements to Howth Junction station have not been considered, but they would not be sufficient.

Whether the shuttle proposal is progressed, abandoned or deferred, Howth Junction Station needs a major redesign. This should happen within the context of a wider project to increase employment density in the vicinity of and in the general employment zoned land served by the station.

### **Sutton Station level crossing and cycle route**

Fingal County Council is consulting in relation to this cycle route including a redesign of where it crosses the railway at Sutton Station level crossing.

<https://consult.fingal.ie/en/consultation/sutton-malahide-pedestrian-and-cycle-scheme-non-statutory-public-consultation>

From reading the documentation and talking to those involved, it seems that the two processes are occurring in parallel and I'm concerned that they're not being sufficiently considered together.

I hope the above comments are of value and would be happy to discuss further at any time. Thanks again for the public consultation and excellent availability of documentation.

Le meas,

Cllr. David Healy

Howth/Malahide

Green Party/ Comhaontas Glas