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Iarnród Éireann

By email: DARTCoastalNorth@irishrail.ie

Re: Second consultation on Dart+ North

A chairde,

Thank you for the opportunity to engage with this consultation.

Availability of information

Thank you for putting extensive documentation online. I asked for paper copies to be made available in Baldoyle and Howth Libraries, but these requests were firmly rejected. I think it's unreasonable to suggest that the public, most of whom access the internet by phone or tablet or laptop, should try to navigate extensive documentation in electronic format.

Much of what I will say in this submission I have already said in relation to the previous consultation. (<https://davidhealy.com/?p=1432>) Unfortunately the largest issue raised hasn't been addressed.

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, the needed pedestrian crossing of Station Road, and the Sutton to Malahide Greenway

The pros and cons of a shuttle service to Howth

In response to the previous consultation, I wrote

“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.”

I have searched in this documentation for such an analysis and I simply can’t find it.

Would a shuttle be of benefit?

In response to the previous consultation I wrote:

“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 and 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.”

None of this has changed and these issues haven’t been addressed in this second consultation.

Nor can I find any analysis in the documentation which sets out how running some trains to Howth as a shuttle would be of benefit to the service running to Malahide and further north and the extent of that benefit. All that is presented to the public is a general assertion.

Full examination of alternatives to a shuttle

In my previous response I commented:

“There doesn’t seem to have been any analysis of alternatives to a shuttle. Two alternatives raised at the public meetings in the first consultation 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.)”

It has just (22nd June 2023) been announced that Iarnród Éireann is receiving funding from the European Union’s Connecting Europe Facility for “studies which will examine the doubling of track capacity between Dublin’s Connolly and Malahide train stations, where DART and intercity traffic currently share the same tracks.”

This is very welcome indeed given the conflict between local and longer distance services on this route.

Clearly further consideration of infrastructural changes to facilitate a shuttle should await the results of those studies on doubling track capacity.

Howth Junction Station

The redesign of Howth Junction is necessary whatever decisions are made about platform redesign to facilitate shuttle running.

In my last submission I set out the unfortunate history of the illegal rebuilding of Howth Junction Station, commenting that

“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.”

It’s very positive to see that that engagement in relation to the design of Howth Junction Station has led to a proposal for significant improvements to the station.

However, I remain of the view that a more fundamental redesign is needed, based on a well-designed, open passageway under the tracks, with ramp access up to platforms and clear passage in three directions under the station for people not trying to access the platforms.

Howth Junction Station in context

IEÉ 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. In the Fingal County Development Plan 2023-2029 the area between the Kilbarrack Road and the Railway line, including the eastern side of the railway station site, has been zoned for redevelopment with a Metro and Rail Economic Corridor zoning. (This zoning was reworded from a Metro Economic Corridor zoning specifically to enable its application at Howth Junction and Kilbarrack Industrial Estate.)

The objective for the zoning reads:

“Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor.”

This will involve the production of a Masterplan for the area in question.

In addition, the Plan includes the following objective

Local Objective 88 Promote the improvement of access to Howth Junction Rail Station.

I urge Iarnród Éireann to engage with the redevelopment of the station as part of a wider redevelopment of the adjoining area as a transport-oriented employment and residential area

Shuttle conclusion

In summary, the value of switching to a shuttle service has not been demonstrated. This is a profoundly unpopular proposal among your loyal customers in the area.

The proposal is to design infrastructure to facilitate a service change which Iarnród Éireann told us at the consultation event you have no plan to implement and which you said quite possibly might never happen. Clearly there is no basis for investing public money in these changes.

Logically the studies on doubling the Malahide to Connolly tracks for which funding has been allocated should be carried out before any consideration is given to designing infrastructure to facilitate a possible shuttle.

Howth Junction conclusion

Whether the shuttle proposal is progressed, abandoned or deferred, Howth Junction Station needs a major redesign aimed at improving access to and through the station. 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

In response to the last consultation I wrote

“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.”

Unfortunately, this is definitely still the case. Although I have been assured by Fingal engineers that they have been in touch with IÉ in relation to the greenway, when I asked at the drop-in in the Marine Hotel and nobody knew anything about the interaction between these projects nor about the challenge to pedestrians (Iarnród Éireann passengers) leaving the station and trying to cross Station Road. It is frustrating that the right hand doesn’t know what the left hand is doing.

I hope the above comments are of value and would be happy to discuss further at any time.

Le meas,

Cllr. David Healy

Howth/Malahide

Green Party/ Comhaontas Glas