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23rd October 2024

An Bord Pleanála,
64, Marlborough Street
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Re: Dart + Coastal North Railway Order Application

A chairde,

I refer to the above application and wish to make the following observations.

1. Overall support for the additional railway electrification

I strongly welcome the electrification of the railway to Drogheda.

2. Infrastructure for transfer at Howth Junction

I am concerned by proposals for infrastructure changes at Howth Junction to facilitate the operation of an enforced transfer at that station for passengers to/from Bayside, Sutton and Howth.

An enforced transfer at Howth Junction is not required for the electrification of the line from Malahide to Drogheda and does not increase the capacity of the line between Howth Junction and Connolly.

The European Investment Bank's analysis unit, JASPERS, have looked at an operating model with enforced transfer in the morning peak hour at Howth Junction for passengers from/to Bayside, Sutton and Howth, with 6 departures from Howth. They have compared this to not implementing the transfer and running 3 trains southwards through Howth Junction, which is the current operating model. They predict a 50% reduction in passenger numbers due to the enforced transfer.

In consequence, they recommended:

“Further analysis and public consultations should be made on the ideal operating model for DART+CN, in particular whether or not to enforce transfer at Howth Junction for Howth route trains (with the overall operational consequences this implies).”

The Minister for Transport has asked his Department to follow up with NTA and Iarnród Éireann in relation to the implementation of this recommendation. I attach a copy of his letter to me in this regard.

The only potential operating model which has been presented for the Howth Junction transfer infrastructure shows only disbenefits. In the absence of an operating model which shows benefits, this element of the project cannot constitute proper planning and sustainable development.

As it stands, inclusion of this element is likely to constitute a risk to the entire project. The overall project should be approved without this infrastructure at Howth Junction. If a case is made for the transfer infrastructure at any time in the future, it can be applied for then.

3. Walking and wheeling access to stations

Iarnród Éireann needs to improve walking and wheeling access to stations, especially where it would enable more direct routes for public transport interchange or to/from local destinations.

For example, it should be possible to access the platforms at Killester station directly from Collins Avenue, to facilitate interchange from the N4 bus.

Significant work is planned to provide a fourth platform at Clongriffin Station as part of Dart+ Coastal North. Unfortunately access to the station from the east is still via a “temporary” stairs and lift. The plaza and ramp down from the overbridge at Clongriffin Station for which permission was granted under F16A/0412 should have been built by now. However, the developer has broken the phasing condition which required that this element of the infrastructure be built first. The file has been subject of a warning letter by Fingal County Council.

At Sutton station, Fingal County Council is planning to improve the active travel infrastructure as part of the Sutton to Malahide scheme. These two projects need to be integrated and made complementary; in discussing them with the Council and Iarnród Éireann, neither seems to have a good understanding of the other’s project.

4. Bicycle parking at stations

The Fingal Development Plan includes the following objective:

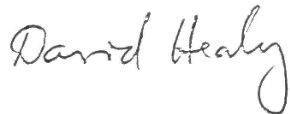
Objective DMSO110– Provision of Bicycle Parking at Public Transport Stations / Stops

Ensure that all new and renovated public transport stations/stops provide appropriate levels of cycle parking provision based on the existing and proposed passenger levels, surrounding environments and future transportation infrastructure.

The opportunity which Dart+ Coastal North presents to provide high quality additional bicycle parking to meet future needs should be taken.

Thank you for your consideration of the above observations.

Best regards,

A handwritten signature in black ink that reads "David Healy". The signature is written in a cursive style with a large, looped 'y' at the end.

Cllr. David Healy

Green Party/ Comhaontas Glas, Howth/ Malahide