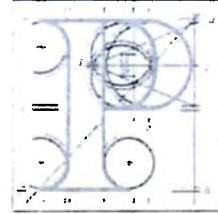


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Donal Hughes
19 Offington Court
Sutton
D13V2V6

Date: 30 October 2024

Re: DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch
Dublin City Centre and Drogheda, located in counties Dublin, Meath and Louth

Dear Sir / Madam,

An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: www.pleanala.ie.

If you have any queries in relation to the matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,



Aisling Reilly
Executive Officer
Direct Line: 01-8737131

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**Donal Hughes,
19 Offington Court,
Sutton,
Dublin 13.
D13V2V6**

Observation on Application by Iarnród Éireann for Railway Order.

Ref. NA29N.320164

DART+ Coastal North

Introduction

This observation concerns the application by Iarnród Éireann for a Railway Order to electrify the line between Malahide and Drogheda and make changes to the service between Connolly Station and Howth.

Under the DART+Coastal North project plan for which approval is sought, Iarnród Éireann plan to extend the DART service from Malahide to Drogheda, serving all intermediate stations. Under this plan the DART services from Howth, Sutton and Bayside to and from Connolly Station and beyond will cease operating at least during the morning and evening peak periods. Instead, a shuttle service will run between Howth and Howth Junction/Donaghmede to link with the DART from Drogheda and intermediate stations.

Passengers will alight from the shuttle at Howth Junction and wait for a DART train which has originated in Drogheda, Malahide or Clongriffin. Many of these trains will be full before reaching Howth Junction and passengers travelling from Howth, Sutton or Bayside may have to wait a length of time for a train with capacity to accommodate them.

It has been suggested by Iarnród Éireann that the revised service would only run during morning and evening peaks. This is precisely the period when most people travel and when disruption to the service will cause maximum trouble, both to passengers travelling by DART and to car and bus traffic in the vicinity of Sutton Cross

I wish to express my strong objection to this proposal as set out below.

The DART Service

The DART service between Howth and the city is used by many different groups.

- a. People travelling to work in the city in the morning and returning in the evening. Many others travel in the opposite direction to and from Howth to work.
All require on time, fast and reliable service.

- b. School students, some travelling into the city to school, others travelling in the opposite direction to schools in the Howth/Sutton/Baldoyle area.
All require on time, fast and reliable service.
- c. University students travelling to and from the city attending universities and colleges.
All require on time, fast and reliable service.
- d. People with physical disabilities, many of whom require special assistance to board and alight from DART trains.
Intending travellers who require assistance must give notice of their intended travel arrangements. They will be seriously discommoded by the break in their journeys. Two of the principal organisations in the country dealing with the physically disabled, the Irish Wheelchair Association and the Central Remedial Clinic are located close to Killester DART station, and many use the station to travel on the train to and from Howth line. People with intellectual disabilities and neuro-divergent disabilities will have severe difficulty coping with change such as that required to change platforms at Howth Junction/Donaghmede.
- e. Tourists travelling to and from Howth.
Howth is now a major tourist destination in the country. It is estimated that 1.5 million tourists visit the town annually, many using the DART. This represents a significant source of revenue for small businesses in the area.
The proposal will cause extra complexity to tourists travelling by DART and may be seen as a deterrent from making the trip to Howth with potential knock-on impacts on local businesses and on tourism in the area.

All the above groups require a speedy, safe, reliable service. The prospect of a delay while changing and waiting for a connecting train is not acceptable. Many trains travelling from the Drogheda/Malahide direction will be overcrowded on reaching Howth Junction extending the wait. Iarnród Éireann cannot give an indication of the new journey time Howth to Connolly, saying it is an operational matter.

I object to this proposal which seriously reduces the level of DART service to and from Howth, running for the past 40 years and before that with non electric trains.

The most recent difficulties caused by timetable changes is surely an excellent indicator of what will happen when the Dart + Coastal North plan is implemented.

Changeover at Howth Junction

Shuttle trains arriving from Howth, Sutton and Bayside will arrive at platform 2, Howth Junction, having changed tracks from platform 1 before entering the station. Passengers will alight and cross directly to the adjacent platform 3 without the need to cross tracks to await the connecting train to the city. Having large numbers of people alighting from the incoming train and crossing quickly to the adjacent platform will in itself present a serious safety issue.

Travelling from the city, passengers will alight at platform 4 and cross to platform 2 using either the stairway or elevators to board the shuttle to Bayside, Sutton and Howth.

There will be large numbers of passengers changing trains at Howth Junction in each direction. For the elderly and disabled this cross over from platforms 4 to 2 presents a serious difficulty.

The issue of non-working elevators compounds the problem. There is evidence of poor maintenance throughout the existing Iarnród Éireann network. Those using the proposed Howth to Connolly service will have to wait on the platform at Howth Junction to catch the train from the Drogheda/Malahide direction. On the return journey they will be dropped at Howth Junction to wait for the shuttle towards Howth.

Lifts throughout the current DART system are unreliable and frequently out of action. The issue of lift maintenance has been an ongoing problem on the DART system for many years.

The following is an extract from an Irish Independent article dated Dec 2023.

“Lifts at Irish Rail stations were left out of service more than 800 times over just 18 months by vandals, homeless people sleeping in them, doors getting kicked while passengers were inside and technical issues.

Lifts were sometimes left out of action for over a week, posing major difficulties for people with mobility issues. However, many breakdowns were quickly fixed within a day or two, sometimes on the same day.”

(<https://www.independent.ie/irish-news/irish-rail-lifts-put-out-of-service-800-times-by-vandals-rough-sleepers-and-chewing-gum/a2100704423.html>)

The change of platforms and trains presents the disabled and elderly with serious difficulties, compounded by the poor state of lifts.

For many physically disabled and elderly people it will be a complete barrier to using the DART.

The proposal violates several national and international charters and national laws, dealing with public transport facilities for the disabled.

I object to the proposal for the above reasons

Security at Howth Junction and Donaghmede Station

All passengers, in particular school students and the elderly, require an assurance that their personal safety will not be compromised by anti-social and criminal behaviour either on trains or in the station

Howth Junction has witnessed incidents of serious anti-social and criminal behaviour over many years. Unless adequate security is always in place, it will continue and may increase with the increased numbers of passengers waiting to transfer at the station. Cameras and extra lighting will not provide the needed security.

School students and elderly passengers standing on platforms awaiting transfers especially in winter months will be an obvious target for those engaged in such behaviour.

The following is an extract from Appendix 3.1, PC1 Findings Report (Page 40) concerning security measures on the DART system

“ There are a range of existing measures in place across the DART and Commuter network designed to help mitigate against anti-social behaviour (ASB):

- A TEXT alert system is in place on trains (51444 TRAIN) for members of the public to report incidents of ASB in real time so assistance can be dispatched as needed.*
- Joint operations with Gardai have proven effective and are planned to continue. The roll out of Garda Hubs around the network to assist on-board staff to deal with problematic passengers have provided much peace of mind to passengers and staff alike. We regularly work closely with An Garda Síochána (AGS) in targeted joint operations to address issues of anti-social behaviour on the network and the issuing of fixed penalty notices where appropriate. Moving forward we will be collocating with (AGS) in the new Operations Control Centre in at Heuston Station.*
- CCTV at all stations, monitored in real time by a team at our security monitoring room at Howth Junction & Donaghmede Station. The security monitoring room actively monitors the DART and Commuter stations CCTV, and the supervisory team coordinates the security response in the Greater Dublin Area as required.*
- Teams of security operatives roam the network throughout the day and into the night*
- Fare evaders are targeted by the Revenue Protection Officers (RPOs) ensuring issue of fare penalty notices.*
- Iarnród Éireann now have a team specifically dedicated to targeting and addressing ASB across a wide range of issues from trespass to vandalism to graffiti etc. Part of their remit is to ensure that those who are engaged in criminal activity are prosecuted for same “*

The above concentrates on on-board train security with little thought of security in stations. Iarnród Éireann includes some refurbishment of Howth Junction station in its application. This is to be welcomed. However, such measures as described will not resolve the security problems in Howth Junction and its surroundings. There needs to be a constant presence of security personnel in the station who are capable of discouraging and responding immediately to anti-social and criminal behaviour.

I object to the proposal on the grounds of risks to the safety of those using the DART service.

Traffic in the Howth, Sutton, Baldoyle areas.

The population of the Howth peninsula will be increased by more than 20% by the new housing developments currently under way. There will be increased need for public transport at a time when Iarnród Éireann's plan will discourage its use.

There are 4 level crossings on the line in the vicinity of Howth, Sutton and Baldoyle. The Iarnród Éireann plan is to run 6 shuttles per hour each way between Howth and Howth Junction. This is roughly double the number of trains passing through the four level crossings at present.

Iarnród Éireann's estimate of level crossing times is as follows.

(Appendix 6.1 Dart + Coastal North Level Crossing Assessment, Page 11)

	Min closure time per hour	Max closure time per hour
Baldoyle Road	12:50	30:50
Sutton Station	13:06	32:19
Lauders Lane	17:58	30:47
Howth Lodge	17:08	31:34

The minimum closure time per hour shown can only be achieved on one of the four crossings by 2 Dart trains travelling in opposite directions and crossing each other at the level crossing simultaneously. In the event of this happening, the other crossings will be closed for the maximum time shown.

Gate closures on the Baldoyle Road and Station Road Sutton together with increased road traffic will cause frequent traffic gridlock at Sutton Cross and the Baldoyle Road/Howth Road Junction. Sutton Cross itself is critical for all traffic coming from the Howth direction and it is accepted that it is already over capacity.

The Lauders Lane and Howth Lodge crossings each serve smaller numbers of people, but the effect of frequent closures of these will be more catastrophic for the people concerned.

There are 6 shuttle trains planned between Howth and Howth Junction, compared to 2/3 DART trains currently running from Howth to the City at peak times. Reducing the number of shuttle trains to the existing train traffic level will alleviate the closure problem but will extend the journey time to and from the City, a wait for a Howth bound shuttle could increase by up to 20 minutes.

Can it be confirmed that Fingal County Council, within whose administrative area these crossings lie, have evaluated the modelling which has been carried out and can it be confirmed that there will be no serious disruption to traffic as a result of these proposals?

I object to the proposal on the grounds that it risks frequent gridlock at junctions adjacent to the 4 level crossings in the area in the vicinity of Sutton Cross.

Summary and Request for Oral Hearing

Each of the grounds cited, reduction in DART service, difficulty in transferring at Howth Junction, personal security and the risk of traffic chaos are grounds not to approve the proposed project as it relates to the Howth to Connolly Station DART service.

I strongly request that an oral hearing be held as part of this planning process.

Donal Hughes BE, M Eng Sc, FIEI, C Eng