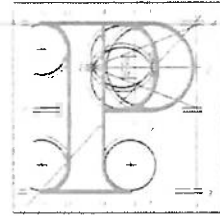


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Howth and District Active Retired Association
c/o Eugene Fox
c/o 5 Dunbo Hill
Howth
Co. Dublin
D13 YP71

Date: 08 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 submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.


The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

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 the meantime 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

RA05

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19 September 2024

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

AN BORD PLEANÁLA	
LDG-	<u>074982-24</u>
ABP-	_____
19 SEP 2024	
Fee: €	<u>50</u> Type: <u>cheque</u>
Time: <u>12.25</u>	By: <u>hand</u>

Dear Sir / Madam,

DART+ Coastal North Railway Order 2024
Case 320164

On behalf of the 32 members of the Howth and District Active Retired Association we wish to make to following observations regarding the proposals of the Railway under their DART+ Coastal North scheme that has been submitted to An Bord Pleanála.

In common with many parts of Ireland, the population of Howth, Sutton and Baldoyle Electoral Divisions are both increasing and aging and this important fact must be taken into account when considering the proposals that are submitted by Iannród Éireann.

Howth is a peninsula and has limited road access with all road traffic having to come via Sutton Cross.

The people of Howth have over the years had their access to public transport reduced, the plans being planned by the Railway will only further have a severe negative impact and degrade the DART service that would remain.

The losses of our public transport is summarised in the schedule below:-

- Closure of Dublin tram service in 1941

- Reduction to around 50% of our DART service in 2000
- Loss of dedicated (87 and) 88 bus service which replaced the Hill of Howth tram, when it was in turn replaced by bus H3 and bus 6
- Reduction in the bus service to Dublin when the 31 and 31A were replaced by the bus H3 and bus 6

Overall the availability and our accessibility to public transport has already been degraded, coupled with the fact that journey times are longer because of route changes, less frequent services and traffic congestion. It is a common occurrence for scheduled services to be cancelled without advance warning.

It is accepted and appreciated that bus lanes have been or are being provided, but in many cases cycle lanes have also been provided, which effectively has narrowed the road space available for the buses. This means that when a bus stops at a bus stop to pick up or set down passengers the road traffic is held up.

Coupled with this the buses are now driver only and usually has to remain at the bus stop until the passengers' fares are collected or their travel facilities validated.

Over the years there has also been an increase in the number of traffic lights and pedestrian crossings lights, and while it is accepted that they are provided for reasons of safety they are a cause of additional delays to road traffic.

It would appear that each set of traffic lights operations in isolation rather than being interlinked so that road traffic does not encounter a series of red lights. The phasing of traffic lights can also cause issues although some improvements have been carried out to alleviate this. In recent years the permissible speed for traffic has also been reduced which increases journey times.

It is against this background our Group observations are presented in the following pages. In fact, the level of disappointment, dis-satisfaction, disgust, anxiety, upset and anger among the residents of the peninsula and adjoining areas is palpable.

Passengers on the Howth branch DART services chose to use the current service because it is generally dependable and convenient, however, under the proposed new arrangements passengers using DART services to and from the Howth branch to or from Dublin will be seriously discommoded and delayed resulting in longer journey times.

These same passengers seem to have no option but to change trains at Howth Junction which is perceived to be a location with a bad reputation due of unfortunate incidents in the past.

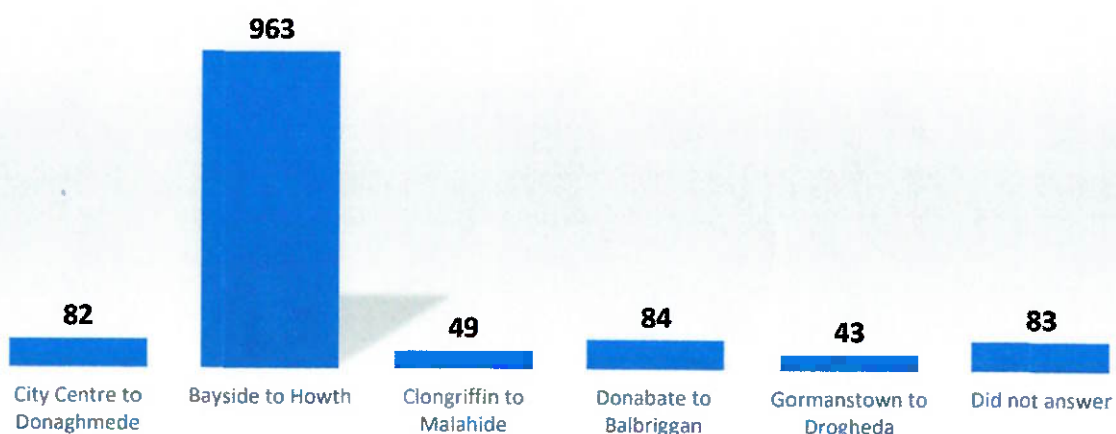
It is also felt that the Railways proposals will have a severe negative impact on businesses, employers, residents, workers, tourists and visitors to the Howth Peninsula and the surrounding areas.

The graph below clearly shows that 77% of people who took part in the 2nd public consultation said they would not be encouraged to use the DART over their cars. (*Appendix A3.2 PC2 Findings Report page 21*)

2nd Public Consultation

Irish Rail received **1,748** submissions

Geographical location to the project



Also, an information meeting was held at the Marine Hotel, Sutton on 2nd September 2024 regarding the DART+ Coastal North Proposals and hosted by local TD Cian O'Callaghan and Councillor Joan Hopkins.

Councillors Cathal Haughey, Aoibhinn Tormey and David Green were also in attendance.

The picture that follows was taken at the information meeting regarding the DART+ Coastal North Proposals clearly shows the levels of dis-satisfaction that there is as approximately 550-600 people were in attendance and all were agreed that the proposals would be a very retrograde step for the locality.



The DART+ Coastal North Proposals also propose that the four level crossings on the Howth branch will be closed more often due to additional trains and this will have make the already bad road traffic chaos and congestion in the area a lot worse there by causing delay and frustration to road users.

It is Government policy to encourage the use of public transport and also for people to cycle more. In essence the current proposals from Railway will only serve to encourage the current Howth branch DART users to switch to using their car thereby only exacerbating the traffic chaos.

Existing and prospective cyclists will also be frustrated by the Railways proposals.

Our Group together with the attendees at the information meeting conclude that the proposals as presented by the Railway will not only have a negative impact on the rail users, but will also impact on residents, workers, tourists, visitors and businesses in the Howth, Sutton and Baldoyle Electoral Division.

It is reasonable for the older population to expect things to become easier and more convenient in their twilight years, the current proposals only introduce hardship, delay, frustration, anxiety, anger and inconvenience which is the reason to the resistance to the current proposals.

The biggest problem the railway needs to address is the lack of capacity and track availability to accommodate the increased volume of railway traffic which will need to be provided to serve customers north of Malahide.

This aspiration accords with Government policy which aims to reduce carbon emissions, encourage the use of public transport, however, in reality for Howth branch passengers and residents the affect will be negative and the outcome will in all likely hood be contrary to Government policy.

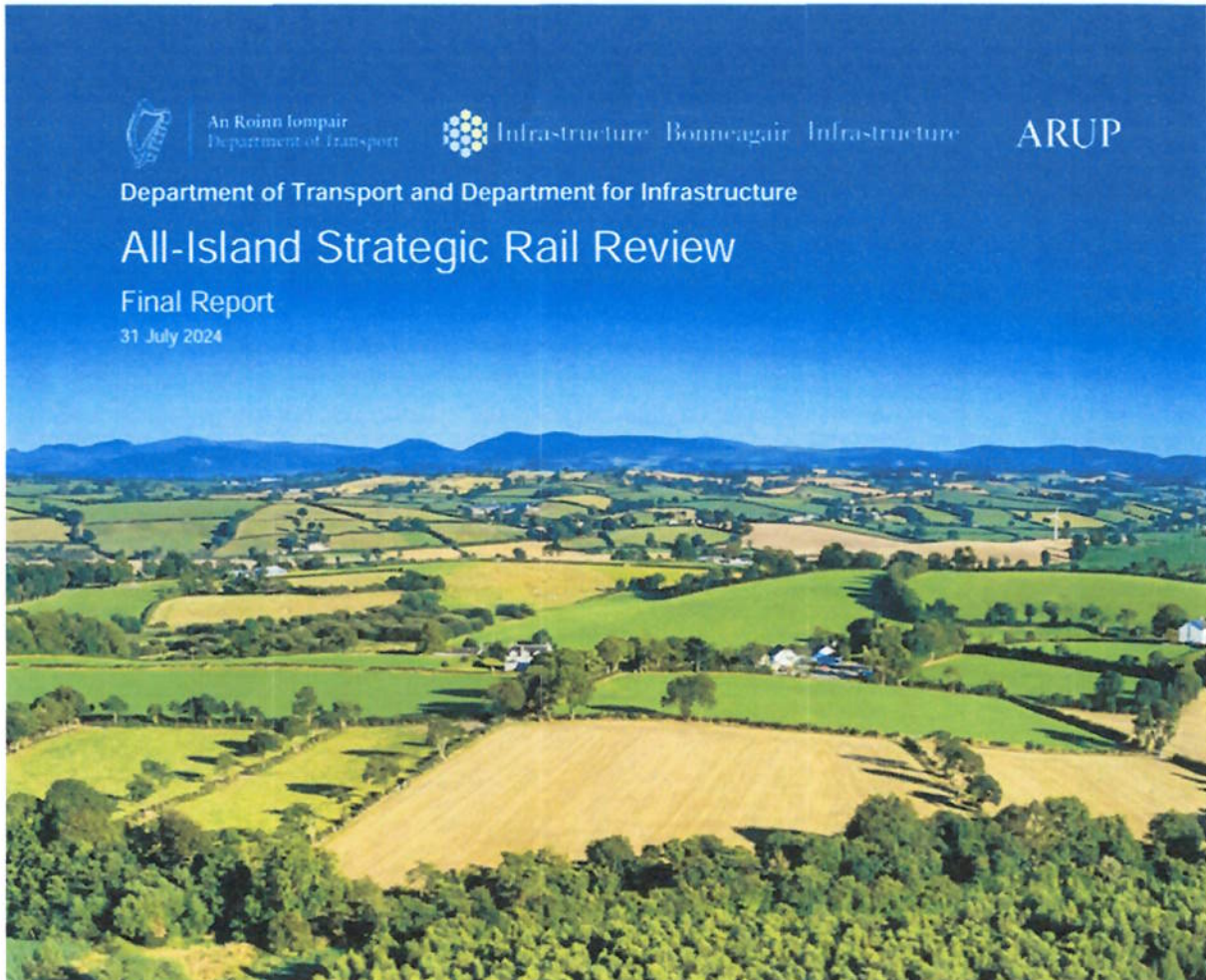
1. All-Island Strategic Rail Review

In July 2024 the Department of Transport and the Department of Infrastructure jointly issued their final report "All-Island Strategic Rail Review".

The Rail Review envisages constructing new sections and re-opening sections of dismantled railways to improve rail capacity and connectivity throughout the island of Ireland.

The All Island Rail Review also envisages increased line speeds for trains and contains plans to reinstate dismantled railway routes, open new routes and increase capacity by providing double track where there is currently only a single line.

After more than four years in construction a new Grand Central Station was opened in September 2024 in Belfast at a cost around £340 million.



To members of our Group and everyone on the Howth peninsula and adjoining areas served by the Howth branch services, the proposals to stop the direct train services to Dublin and beyond and add traffic congestion at the public road level crossings is totally at variance with and contrary to the aspirations clearly set down in the Strategic Rail Review.

By way of example, it is proposed to install a series of curves into the existing straight main line railway north of Malahide which could have an adverse and severe impact on the operational speed of the hourly Enterprise train service by restricting their speeds in the Malahide area.

2. Observations submitted by the Howth and District Active Retired Association Group.

We are aware that recently a new timetable was introduced for the railway on 26th August 2024 which was intended to bring significant improvements and additional services, particularly for Dublin based commuters.

These changes were aimed at and intended to enhance connectivity, punctuality, and overall service frequency.

In reality, there were issues with the new timetable including congestion in the Connolly station area necessitating further changes to be made with effect from 16th September 2024. The purpose of these new additional changes was to improve punctuality for customers.

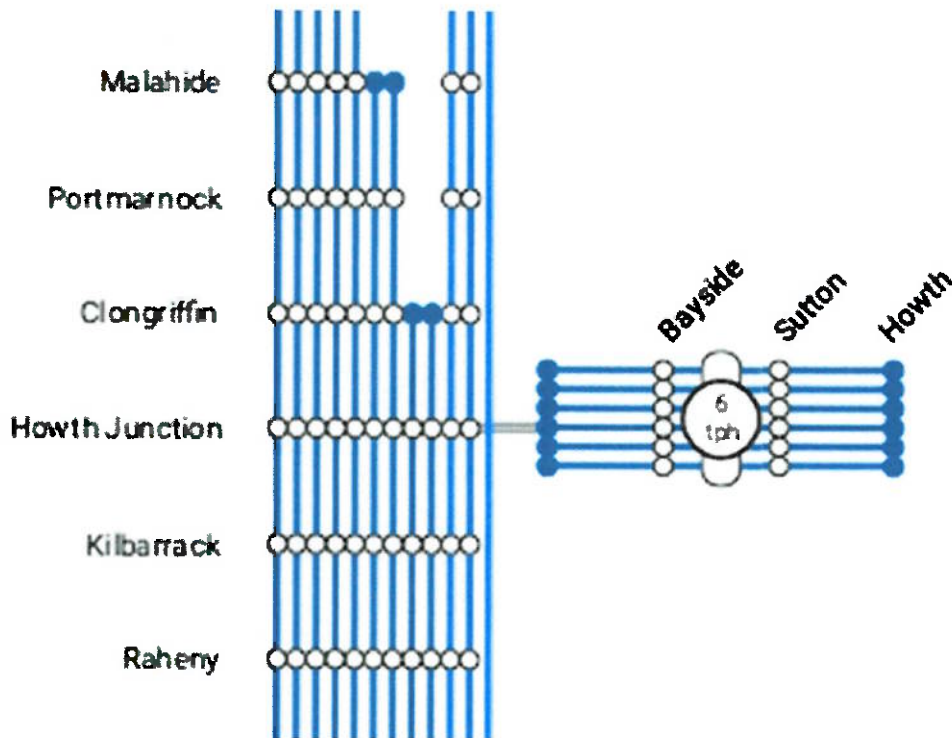
Our Group believe that if the proposed changes were tested on a computer simulation programme containing the details of the topography, gradients and locations of Iarnród Éireann stations, together with details of the permissible operational speeds, together with the characteristics of rolling stock intended to be operated to the new timetable then any conflicts should have become evident and saved embarrassment as well as the costs of having to make subsequent changes and printing of all the timetables required for internal and public use.

It would be beneficial if the current changes as proposed by Railway were also tested to confirm their validity and workability.

The observations being submitted by our Group are limited to how the proposals impact us and the people on the peninsula and are respectively intended to avoid any similar embarrassment and controversy by hopefully pointing out deficiencies which, in our opinion could be addressed and rectified for the benefit of both the Railway and our community.

3. Confusing and Conflicting Information being issued by the Railway Regarding the Details of the Proposed DART Service on the Howth Branch

Public Consultation No. 2 Leaflet states that the DART service on the Howth Branch will be a Shuttle Service and this agrees with a diagram (shown below) which was contained in the Railways proposals.



[Please note that references to Howth Junction contained within these observations actually refers to Howth Junction Donaghmede station.]

On the other hand, information posters on display at Connolly Station, suggests that the service will in fact be a shuttle service together with some direct trains to the Dublin and beyond.

The fact that there is confusion on the Railway side regarding this matter is unsettling to our Group and only further causes irritation and anxiety to our members.

4. Changes in Work and Pass Time Habits

The Covid pandemic changed many aspects of our lives and also changed the way we work and socialise. The following are examples of how things have changed:-

- The working week has shortened in some cases to four days
- Some workers can now work from home for a portion of their working week
- Against this background passenger numbers using the railway and DART are increasing

The Railway anticipates that total passenger numbers nationally will probably continue to increase and are likely to reach 50 million per annum by 2030 which suggests that the issue of available capacity especially at the Dublin end of the Dublin to Belfast line will become an issue again very soon.

4. Available Line Capacity

The Dublin to Belfast railway line is double line track to the border with Northern Ireland except for a short section of single track across the Boyne Viaduct at Drogheda.

The tracks from Dublin to Howth Junction are fully signalled so that trains can be run on either track in either direction. This facility is only generally used^{to} allow faster trains to overtake slower ones for example to assist in recovery of the service after disruption caused by an incident.

The railway also has to cater for rail traffic with different operating characteristics and operational speeds such as express through trains, and stopping trains as well as regular passenger traffic such as the Enterprise, Suburban, Commuter and DART.

Also empty stock movements and engineering trains need to be catered for.

The Tara Mines special mineral trains (three per day) ceased to operate in 2023 due to the current price of these concentrates. This service has been in operation for 46 years between Tara

Mines and North Wall and will hopefully resume in the future when the prices of lead and zinc rise.

The Railway has also plans to grow its Freight as this is in keeping with Government policy to reduce our carbon emissions.

Since the introduction of DART between Howth and Bray in 1984, the system has been extended to Malahide and Greystones in 2000. Additional DART trains purchased to cater for the increased passengers numbers.

Station platforms were extended to cater for eight car trains and the signalling system was enhanced and the overhead power supply system was upgraded to cater for the greater electric power demand.

Additional DART stations have also been also added since 1984 and this adds travel time to stopping trains thereby increasing track occupancy and further reducing available capacity.

Ideally, additional tracks are needed at least from Clongriffin to Dublin to increase the line capacity and afford greater flexibility. This is a major task and whilst the Railways proposals might address the capacity issue it is only ~~be~~ a short term solution. In the future, there will be a requirement for additional capacity and it will be even more difficult, expensive and disruptive to undertake the engineering works required that if the works are started now rather than waiting until in the future.

5. Available Train Capacity

The current DART and Commuter trains are up to eight cars long and it is not possible to increase these train lengths as the station platforms are provided for this length of train. Further extensions are impracticable due to existing signal positions or track layouts or bridges.

For example, Tara street station platforms cannot be increased in length as there are significant steel bridges at each end of the platforms which prohibits any further extensions.

In Europe there are double decker trains which can provide additional passenger capacity without the necessity of increasing the length of the train.

This is not possible adopt this solution on DART as the available loading gauge for rolling stock is smaller and more restricted.

6. Historic Plans to Increase the Line Capacity

In the late 1940s / early 1950s the then Great Northern Railway (Ireland) GNR(I) started preparing for additional tracks and when the new Road at Collins Avenue East was being constructed provision was made for the future addition of an additional pair of railway tracks one on either side of the existing tracks to cater for future increased rail capacity. ^{of}

7. Strategy to Increase the Line Capacity

During our examination of the proposals submitted by the Railway our Group noticed that East Wall Road and Tolka River Railway Bridge is the southern limit of the DART+ Coastal North Works.

This Railway Bridge were reconstructed in the early 1950s following its collapse as a result of being washed away by flood waters.

In the 2000s the new bridge was constructed as the existing structure was structurally compromised as a result of repeatedly being struck by Lorries heading to the North Wall area.

The bridge reconstruction was costly and was designed to increase the available headroom for Lorries.

However, the opening of the Dublin Port Tunnel and the Alfie Byrne Road (R834) together with objections and lobbying from the residents of the area in the vicinity of the bridge has resulted in a situation where cars only are permitted to pass under the new East Wall Road and Tolka River Railway Bridge.

It is interesting to note that this bridge was constructed with a capability of accommodating four railway tracks.

Consideration should be given to the publication of an agreed Policy Document which can be made available to all Planning Authorities, Developers and all other interested parties to ensure any future developments adjacent to or above or under the railway are carried out so as to make provision for the future installation of additional tracks in order to afford increased capacity.

Such a Policy Document to include the sterilisation of land immediately adjacent to the railway property to facilitate the provision of additional railway tracks in the future.

Part of the Dublin to Cork railway line was quadrupled some years ago and if similar works were undertaken on the Belfast line it would be very beneficial to the railway.

Later in our observations we will make a few suggestions that may be helpful towards paving the way to tackle the question of lack of capacity on this route.

8. Sustainable travel

It is National Policy to encourage people to use sustainable transport instead of their cars.

As already shown some 77% of people who took part in the 2nd public consultation said they would not be encouraged to use the proposed shuttle DART service over their cars.

Removing direct DART services for Howth branch users does not align with our national transport and climate policy.

In fact, what is being proposed by the Railway will persuade current DART passengers to change to using their private cars or adopt a "park and ride" or a "kiss and ride" strategy for their own convenience and safety.

9. Loss of the direct DART service and impact of Longer closure times of Level Crossing Barriers for residents of Howth, Sutton, Baldoyle, Sutton Park and Bayside – General Observations

Our Group members will have to endure:-

- Longer journey times each way each day they travel by DART
- Residents who are not regular DART users will also be negatively impacted by the traffic chaos that the longer closure times of the four public road level crossings will cause
- The proposals will also have a negative impact on workers, students, visitors and tourists to the area with a possible loss of trade and business to the locality
- The proposals increased journey and travel times, leave passengers frustrated and exposed to the elements while waiting at Howth Junction hopeful of being able to board a Dublin bound connecting train.
- Such customers, tourists and workers will be frustrated by these impediments and may choose to shop and work elsewhere or seek an alternative means of travelling rather than the train which is contrary to the Governments stated objectives of encouraging the use of public transport and reducing the use of carbon.
- The loss of the direct DART service to Dublin and beyond only serves as an incentive for existing Howth branch passengers to go by car which is contrary to the Government proposals.
- Furthermore, if the existing DART train users were to choose to use their cars, they would only be adding road traffic to an already saturated system thereby causing further delay and frustration to all concerned
- Additionally, other passengers resident in the Howth area may choose to ask their spouses to drop them to say Clongriffin or Portmarnock to catch a Dublin bound DART and avoid the chaos at Howth Junction these additional cars would doubly add to the traffic at the public road level crossings at Sutton station and Baldoyle road as they could be crossing at least twice and maybe up to four times a day
- A further important consideration is that both Sutton and Howth DART stations have associated bus services as shown in the table below:-

DART Station	Terminus for	Served by
Howth	Bus 6	
Howth		Bus H3
Sutton	Bus 102	

- Also there are other bus services on the Howth road that provide a services to Bayside station.
- Regular commuters on these services whose journeys originate or terminate outside the environs of the Howth branch will also be adversely affected by the introduction of the proposed shuttle service which will result in longer journey times and exposure to the elements at Howth Junction whilst awaiting for a connecting service as well as all the previously mentioned issues of safety, security and the series of steps to be encountered and negotiated.
- Bus 102 crosses over Sutton Station public road level crossing in order to reach its terminus. Its journey times and those of its passengers will be increased due to the longer closures of Sutton level crossing barriers.
- Passengers who currently use Sutton station may in future opt to choose instead to travel on Bus 102 to Portmarnock station where they possibly will have a better opportunity of finding space on a Dublin bound train. While this would increase their overall time they could avoid the chaos that will be at Howth Junction.

10. Loss of the direct DART service on the Howth branch with particular reference to Passengers coming from the Malahide direction and going towards Howth – Specific Issues

Our Group believes that there would not be large numbers of passengers expected to be availing of this option.

These are possibly the only passengers that might see a small some benefit from the Railway's proposed new arrangement as they will most likely be guaranteed that there will be a shuttle train for Howth waiting for them on their arrival at Howth Junction!

11. Loss of the direct DART service on the Howth branch with particular reference to passengers arriving at Platform 2 at Howth Junction and intending to travel to Dublin and beyond – Specific Issues

Passengers arrival at Howth Junction on a shuttle train from the Howth Branch will be required to leave their train – where they most likely had a seat – and walk the lengthened platform 2 to platform 3. They have to wait on a southbound train and then try and board that train if they wish to continue their journey to Dublin and beyond. The issues our Group envisage with this proposal are as follows:-

- While waiting for a train members will be exposed to the elements – there is only limited shelter provided and so many passengers waiting everyone would be exposed to the elements particularly during winter months
- Members are fearful of a lack of security or being assaulted or molested – there have been incidents in the past.
- Members are concerned regarding the lack of toilet facilities on platform 3 especially if they have a prolonged waiting period due to lack of space on Dublin bound trains
- There have been people assaulted in the environs of Howth Junction in the past which makes members of our Group fearful for their personal safety and security
- A girl was pushed under a train at Howth Junction.
- Members are concerned that if they time at Howth Junction is not an absolute minimum it would cause frustration and anxiety levels to be raised
- In the case of wheel chair users, assistance will need to be provided to assist with the ramps for both getting off the Howth branch train and boarding the Dublin bound train
- If it were to happen that there were a number of wheel chair users present at the station at the same time Iarnród Éireann has a duty of care to provide assistance preferably the station staff should assist in order to minimise delay – if the train driver were to become involved it would only cause delay resulting in back up in the trains

- Wheel chair users are obliged to notify Iarnród Éireann in advance of their intention to travel and having to change trains at Howth Junction will prove difficult for them especially if there is no room available on the connecting train
- If members were to have a bad / poor experience while changing trains at Howth Junction it would strongly influence them to seek an alternative route for future journeys

12. Loss of the direct DART service on the Howth branch with particular reference to passengers coming from Dublin and continuing their journey on the Howth Branch – Specific Issues

Our Group believes that these passengers are also faced with the additional challenges as they will have to cross the footbridge from platform 4 to platform 2 in order to join the Howth branch shuttle service.

Our Group has serious concerns and reservations regarding the following matters:-

- The current proposals run contrary to what most railways try to provide for their passengers / customers which is a hassle free travel experience e.g., the new Elizabeth line in London has gone to great efforts to make the passenger experience as easy as possible
- The lifts being out of order – there is a history of lifts being out of order in Iarnród Éireann.
- As previously stated, in 2023 the Irish Independent reported that lifts at Irish Rail were out of service over 800 times in eighteen months. It can take days or even weeks for lifts to be put back in service.
- Recently on a visit to Howth Junction and Donaghmede one of our members found that two lifts did not respond to their call buttons in one case at platform level and in the other case at footbridge deck level
- Passengers with mobility issues are concerned that in the event of a lift outage they would have to negotiate a

series of flights of up steps followed by a series of flights of down steps in order to change to the Howth Branch shuttle

- Passengers are concerned that they may be accidentally knocked over on the deck of the footbridge by people rushing to catch the shuttle service
- If someone were to be knocked over on the deck of the footbridge it would present a serious challenge for an ambulance crew to access and provide assistance
- If the an ambulance crew had to stretcher a patient to the ambulance at street level with the lifts out of order it would pose quite a challenge
- Parents with toddlers in buggies and maybe also a small child as well would have to similarly problems in the event of a lift outage
- Passengers with bicycles or packages would also have issues if the lifts were out of service
- The lifts at Howth Junction Platforms 1 and 4 also serve street level as well as platform and bridge deck level whereas the lifts on platforms 2 and 3 serve platform and bridge deck level. The lifts on platforms 1 and 4 - when operational - will have less availability for passengers changing trains. It is not clear if the capacity of these lifts is sufficient to cater for passengers changing trains as they were provided prior to the proposed shuttle service being introduced
- It would not be acceptable for passengers who now have to change trains at Howth Junction were prevented from making their on-going connections due to having to negotiate a series of steps in the event of lift outages.

13. Loss of the direct DART service on the Howth branch with particular reference to passengers arriving at Platform 1 at Howth Junction and intending to travel to Dublin and beyond– Specific Issues

These unfortunate passengers would be faced with the worst possible scenario. Their shuttle ~~arrival~~ arrival at Howth Junction platform 1 would be faced with all the issues set out in paragraph 12 above and in addition they would have np option

but to use the footbridge to cross to platform 3 for their connecting train.

Our Group believes this is an unreasonable expectation on the part of the Railway and will effectively lead to our members giving up and abandoning the use of the DART service because of all the difficulties that would face compared to the current arrangements.

The Railway proposal is that the DART shuttle will have a frequency of 6 trains per hour which will most likely necessitate the use of both platforms 1 and 2 at Howth Junction.

If the lift on platform 1 is out of service, able bodied passengers would have to climb the several flights of steps to the footbridge and then descend more flights of steps to platform 3.

In 2023 the Irish Independent reported that lifts at Irish Rail were out of service over 800 times in eighteen months.

It can take days or even weeks for lifts to be put back in service.

It is not clear if this aspect has been considered by the railway but it could happen that there are two shuttle trains at Howth Junction at the same time

It could be that a broken down train has to be removed from the main line and put onto the Howth branch so that main line services can be resumed.

It could happen that the DART shuttle on proposed extension to platform 2 has broken down.

In this scenario wheel chair users or parents with young children / toddlers and buggies would be in a serious dilemma.

Our Group feel that passengers reasonably expect the Railway to provide a "duty of care" which would be absent in in the foregoing scenario.

14. Serious Concerns of Residents and Visitors to the Bayside, Sutton Park, Baldoyle, Sutton and Howth Areas regarding the Proposed Changes to the Public Road Level Crossings at Baldoyle Road, Station Road, Sutton, Cosh / Lauder’s Lane and Claremont / Howth Lodge

Our Group are given to understand that the proposed new shuttle DART service operating in each direction would cause the four level crossings to be closed for up to 30 minutes of every hour.

Level Crossings

6 trains per hour, each direction		
	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 diagram above is based on information supplied by the Railway.

The traffic assessment submitted by the Railway shows that longer closures of the level crossings will result in more traffic congestion.

The traffic study states that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. (*Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29*)

This has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings.

There is also a serious concern that emergency vehicles may be delayed in their responses due to having to wait for the level crossing barriers to re-open. This could pose an additional danger to both life and property.

Our Groups concern is that longer delays to road traffic will lead to impatience and frustration among road users which will in turn lead to road users trying to beat the descending level crossing barriers against the flashing beacons or for road traffic to start moving while the level crossing barriers are being raised also against the red flashing beacons.

In such an event a high sided vehicle may strike the barriers and push them into the overhead line live wire causing the wires to burn through and the power to trip out with resultant loss of rail service.

If the level crossing barriers are damaged the road traffic may have to be stopped for safety reasons until the situation can be inspected and accessed. In such cases the road traffic congestion that would result would have far reaching impacts.

Furthermore, if the shuttle service is also disrupted and rail passengers are trying to find alternative ways to work or to go home they would be further discommoded by the road chaos.

15. Planning Developments along the route of / and in the vicinity of the Howth branch

There are a number of developments currently under construction and one of their attractions would be their proximity to the DART service.

Planning permits more intensive development when the works are adjacent to a railway which serves as an encouragement to Developers to proceed with their works.

Everyone is aware of the current shortage of housing so all development is thereby welcomed.

In the area from Howth to say Sutton DART station the following is an example of the bigger are new developments in progress or awaiting approval such as:-

- Bailey Court / Royal Hotel / Tower Hill, Howth
- Large Development off Thornmanby Road, Howth
- Techrete site at Howth
- Deer Park, Howth

The residents of these developments will further increase the prospective number of passengers using the DART service on the Howth branch.

16. Howth Maritime & Seafood Festival

Over the weekend of Saturday 7th and Sunday 8th September 2024 the Howth Maritime & Seafood Festival took place. The volume of people that visited Howth was very large and most people came by DART. The volume of people at and in the vicinity of Howth DART station made it very difficult for people arriving at Howth to exit the station due to the volume of people that were trying to gain access to the station to get a train. Access to the station was restricted in order to prevent conflict, however, this may have proved to be counterproductive. The available capacity of the DART trains was overwhelmed by the numbers of people trying to travel.

There were similar issues with road traffic in spite of the fact that additional car parking was provided at Deer Park. The volume of road traffic was such that traffic movement was reduced to a crawl. The bus schedules was badly impacted as buses were delayed in the traffic chaos and this further exasperated the DART passenger numbers as bus passengers switched to trying to go by DART.

There was a traffic management plan in place for the event and additional Gardai and staff from Fingal County Council were on duty to assist. Barriers were erected on each side of the Howth roughly from the DART station to the Court House. These barriers in fact worked very as they prevented people form suddenly deciding to cross the road into the dense traffic. The

traffic management system also catered for people to cross the road at designated location(s).

Had the suggested proposals from Iarnród Éireann regarding the shuttle service being in place there would no doubt have been a similar crowd problem at Howth Junction station which would also require intervention and a management plan in order to mitigate against any accidents or incidents. That said, the onus would be on Iarnród Éireann to prepare an appropriate safety management plan and provide the necessary staff to ensure that the volume of passengers changing trains on the railway property were not exposed to any safety issues or concerns.

17. Iarnród Éireann has a Duty of Care to both customers and staff

The following points are set out to ensure all aspects have been fully considered. Some observations are meant to be helpful and constructive while others intended to set out the reasons why the current suggested proposals from Iarnród Éireann are deemed to be unacceptable to the residents, students and workers in the Howth, Sutton and Baldoyle Electoral Division.

- Under the new arrangements as currently proposed by Iarnród Éireann all passengers coming from or going to the Howth Branch will in future be required to change trains at Howth Junction. Iarnród Éireann will therefore have to make regular and distinct passenger information announcements for the guidance of these passengers as there will no doubt be confusion until they become familiar with the proposed new arrangements
- In the case of tourists and visitors they will in particular need guidance as they are infrequent visitors
- It is common for visitors from other countries to get confused by the way the junctions stations at the start of a branch or connecting line are named such as Howth Junction or Limerick Junction as foreign travellers are often misled into thinking that they have actually arrived at their destination rather than where the line to their destination commences

- Passenger will need audible announcements advising them of the approach of a non-stopping train and to keep behind the yellow line in order to avoid the turbulence that such a train may cause which could in turn compromise the stability of passengers standing on the platform
- The type of announcements referred to above are particularly relevant if there are many passengers waiting due to lack of room on previous trains as passenger numbers may inhibit those nearest the platform edge from moving back from the edge
- The presence of railway staff is necessary to ensure there are no safety issue due to passenger volumes on the platform
- The Howth branch serves a number of primary and secondary schools and is thereby regularly used by students travelling to and from school. The introduction of the proposed shuttle service will have little or no impact on students whose journeys are limited to the Howth branch. However, for students who need to travel further their journey will become fragmented and will take longer thereby exposing them to the elements and also possibly risk to their personal safety and security
- Under the new arrangements as currently proposed by Iarnród Éireann, passengers volumes at Howth Junction will increase, however, it would seem that no provision has been made to provide toilet facilities for these passengers
- As already stated, under the new arrangements as currently proposed by Iarnród Éireann, passengers volumes at Howth Junction will increase so it would be reasonable to expect that the staffing and security levels would also be increased to cater for the changed situation
- Staffing and security levels would need to be available throughout the hours of operation of the service and they would need to be seen on all the platforms and the bridge deck in order to counteract the uneasy feeling among passengers regarding their personal safety and security

- As already stated, staffing and security levels would need to be available throughout the hours of operation of the service to cater for the needs of passengers with wheel chairs or buggies, passengers with hearing or vision difficulties or mobility issues
- As stated above, under the new arrangements as currently proposed by Iarnród Éireann, passenger volumes at Howth Junction will increase, the lifts that are currently installed were provided to cater for passenger numbers prior to the plans to introduce a shuttle service. Passengers using shuttle trains travelling from the Howth branch would need access from platform 2 to platform 3 (if going south) and platform 4 (if going north). Transfer from platform 2 to 3 is at the same level but to access platform 4 passengers must use the footbridge. Similarly, passengers accessing the shuttle trains travelling from the Howth branch having come off a north bound train would need to transfer from platform 4 and use the footbridge to gain access to platform 2. It may be that it will be necessary to install new up and down escalators on platform 3 and 4 to cater for the volumes of passengers
- Escalators are favoured by railway administrations as they are more dependable and are much more effective and efficient than lifts. Lifts are limited in their capacity and must go to and fro whereas escalators are constantly in motion only slowing down to conserve energy when not required
- Welfare facilities would need to be provided for the driver(s) of the proposed shuttle service so that they have access to toilet facilities and a way to make tea etc.
- If the shuttle service is in operation for say 18 hours per day plus additional travel time for the first train to come from its Depot and return at the end of the day it could require up to five drivers to cover meal breaks and shift changes
- DART Drivers are based at Fairview or Bray and there are no facilities for booking on for duty elsewhere. Drivers must be fully rested and fit for duty and must

be observed by a superior to ensure this is the case. Lack of rest, or if they have drugs and / or alcohol in their system could compromise the safety in operations of the railway and thereby pose a risk to passengers

- The drivers shift includes booking on, collection of published traffic notices, reading of the regular and perhaps emergency notices relating to the sections of railway over which they are to drive

18. Sea Level Changes and Increasing Rain Fall

Global sea level increased by approximately 0.20m between 1901 and 2018, and the rate of global sea level rise is accelerating.

Satellite observations indicate that sea level around Ireland has risen by approximately 2-3mm per year since the early 1990s.

Recent studies have highlighted higher rates of sea level rise since the late 20th century in Cork and Dublin than the global average.

Our Group are surprised and concerned that this does not seem to have been a factor considered in the Railways proposals.

When the original works for DART were undertaken in the early 1980s track levels were raised up to around 0.5 m in areas where it was felt the railway service might be vulnerable.

Flood defence works were also undertaken at Merrion level crossing to mitigate against flooding from the sea.

There have been incidents in the past where the DART service had to be suspended due to flooding. Susceptible areas are along the coast when tides are high and the wind is easterly.

In times of exceptionally heavy rainfall the drainage systems can be overwhelmed leading to water being diverted to storm

overflows which in turn can cause water being discharged onto the railway when the tracks are in cuttings.

19. Impact on Local Businesses

Our Group is concerned that the loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth.

Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers.

These businesses provide employment for locals and also people from the surrounding areas and if they were to lose customers they may have no option but to cease trading with resultant job losses.

20. Oral Hearing

Our Group feels that there may be beneficial if An Bord Pleanála arranged to hold an Oral Hearing for the DART+ planning application.

An Oral Hearing will allow further discussion about the project and the negative impacts these changes will have.

An oral hearing can be attended by members of the public.

21. Actions of frustrated and disgruntled DART Passengers

Our Group are concerned that in the event of a delay or disruption to the DART service or if passengers were left waiting on platforms because they are unable to board connecting trains that their patience and tolerance levels would be tested to such a level that they might be forced to take actions that would lead to safety in operations of the railway being compromised and thereby causing even further disruption and chaos to the train timetable.

There was an incident in Bray during the Air Show in 2023 when it seems that the DART service was overwhelmed by passenger numbers on a hot day. The trains were stopped

between stations effectively trapping passengers on board who because of the crowds became dehydrated and very anxious and opted to force open the doors and get off and walk along the track to the station.

The incident was the subject of an investigation by the Railway Accident Investigation Unit Ireland as shown in the illustration below.



**Railway Accident
Investigation Unit
Ireland**



INVESTIGATION REPORT

Self-detrainment of passengers between Shankill & Bray,

24th July 2022

RAIU Investigation Report No: 2023-R005

Published: 22nd December 2023

22. **Summary**

Following detailed examination of the Railways proposals members of our Group do not see any benefit, in fact the proposals are going to cause interruption and delay to rail and road users in our locality.

We have tried to set out our heartfelt concerns and respectively hope they are considered by An Bord Pleanála when arriving at their decision.

Our Group having discussed and thought about the Railways proposals would like to offer some suggestions that we feel would address our concerns and would also provide solutions that the Railway could develop into viable alternative and workable options.

23. **Suggested Viable Alternative Solutions**

a) To address the lack of Track Capacity

The current Railway proposals serve to confirm that the existing section of railway between Howth Junction and Dublin is already operating at full capacity and if the extension of the DART service north of Malahide is to be accommodated than the direct service from the Howth Branch has to be terminated.

That said, there are other possible solutions that should be considered and implemented. Details of these possible solutions will be set out later.

To date, all the improvements have only catered for the immediate and short term future and as soon as the density and intensity of the train service increases another solution has to be found.

If the issue of the line capacity has to again be addressed in the near future it will cost additional money and cause disruption and further disruption to the service while yet more improvements and alterations are carried out.

It would therefore make more sense to make any proposed changes "future proof", rather than having to spend additional money with additional disruption to services.

In an ideal world, additional railway tracks would be installed to provide the required increased capacity and flexibility, there is no doubt that this would be a challenge to actually deliver, but it is the correct and only long term and viable solution.

When the original DART was being constructed, the existing railway embankments were widened using Reinforced Earth Technology thereby the works could be retained within the railway footprint.

Similarly sections of the railway that are in cutting could be also widened by installing piles along the railway boundaries and excavation of the slopes thereby optimising the use of the available railway property.

The section of railway between Clontarf Road and the Howth Road is also embankment and could be similarly be widened using the same or similar technology.

The provision of additional capacity would be very valuable not only for the current proposals but would serve to future proof the railway.

b) Increasing the DART Speed Bands

The existing DART trains operate at range of specified speed bands which were selected to suit the permissible maximum operational speeds as permitted by plain line and complex track geometry.

Consideration to be given to increasing the existing speed bands in order to ease the track capacity issue.

c) Changes to Train Operations

In order to ease the strain on track capacity, skip – stopping services could be introduced. For example, a train originating in Dundalk or Drogheda would stop at Malahide and say Raheny and Dublin Connolly only in order to free up line capacity and

minimise delay and frustration. More than likely these trains would be already full and therefore have no capacity for additional passengers.

The stop at Malahide and Raheny affords an opportunity for passengers who wish to get to intermediate stations a change to join a DART service. The stop at Raheny provides access to bus services such as H1, H2 and H3 on the Howth road and Station road as well as access to a Taxi rank and Raheny also has convenient access to shops, banks, restaurants' and other businesses.

The resultant freed up line capacity could be very useful in affording an opportunity to accommodate four trains per direction per hour from both Howth and Malahide.

It may also be possible to arrange for north bound DART services to split at Kilbarrack with the front four cars serving all station to Malahide and the rear four cars serving all stations to Howth.

On the return service the two halves could be re-joined at Kilbarrack and run as a single train serving all stations to Dublin Connolly and beyond.

It may also be possible to reduce the number of trains per hour during off peak times to further ease the line capacity problem

This would also further free up addition capacity on the line.

Splitting and re-joining of trains is regularly carried out by other railway administrations, and as the DART trains are already equipped with Scharfenberg couplers and these are commonly used for this purpose as all necessary connections – mechanical and electrical are automatically made and there is no requirement for railway staff to be on the tracks for the coupling and re-coupling operation this procedure should be introduced without complication.

d) Making Bayside a Turn Back Station where Branch passengers can change trains

The Iarnród Éireann Project Team also advised that as part of the Preferred Option turn back facilities were being provided at Clongriffin station and Malahide station to provide additional capacity and this appears to be confirmed by the diagram illustrating the proposed number of trains that are to be operated each hour per track.

Following on from the suggested turning back of a train at Clongriffin station to cater for Howth Branch passenger it would seem more logical to use Bayside station as the turn back location as it would be a very simple cross platform change for passengers travelling in each direction! It is perhaps for this very reason that Clongriffin station is proposed as it would not make any sense for Howth Branch passengers to have to change trains at Bayside station! Imagine having to get of a train to join another instead of the existing train just continuing its journey and also avoiding the drivers of each train having to change ends and lights and destination boards!

Reflecting on this proposal it seems that the solution to provide additional capacity the Railway will provide additional trains on a section of main line that is already saturated with rail traffic!

This proposal just makes absolutely no sense as what is being suggested is to replace the current direct services from the Howth Branch to Dublin and beyond and instead provide effectively two shuttle train services to serve the Howth Branch!

If Bayside were to be a turn back station the following positive outcomes would result:-

- The issue of passengers changing trains becomes very simple just across a single platform
- Passengers could wait on their train until the connecting train arrives thereby these passengers would have no concerns about security and shelter
- There would be no issue for transferring passengers via a vis out of order lifts, climbing steps, security etc.

- It would be a better solution for the Railway and their Duty of Care would be honoured.
- Less Railway and Security staff required
- Wheel Chair users and passengers with mobility issues do not need lifts
- There would be less confusion and much simpler for visitors and tourists who wish to go to Howth peninsula
- Changing over of DART drivers would be simpler.

Our Group would favour if say half of the trains from Howth went through to Dublin and they would choose to use these services. If a mixture of two shuttle and two through services from the Howth branch were to be provided.

The foregoing observation is NOT the preferred option of our Group as far as the users of the Howth branch are concerned, it is presented to demonstrate that other options exist that would address many of the concerns regarding all the issues at Howth Junction as previously set out.

e) Elimination Of Public Road Level Crossings

With respect to other DART+ projects, the Railway have submitted firm proposals for the *"Closure of existing Level Crossings and provision of new Bridge Replacements where required"*

It is difficult to understand why the Railway have not similarly planned to close the four existing level crossings on the Howth branch.

Our Group are at a loss to understand why the Railway have not adopted the same strategy for the Howth branch.

There have been numerous incidents at DART level crossings which have in turn caused significant delays to both rail and road traffic and require an emergency response from Iarnród Éireann specialist teams to carry out repairs so that normal rail operations can resume.

An in depth review should be undertaken and the current proposals should be revised to address all the issues that have been raised and also to apply the same standards as being

applied elsewhere in the DART+ works to the Howth Branch Railway and the people it serves.

Each level crossing will, be dealt with in turn in order to provide some detail regarding the suggestions.

i. The Level Crossing at Claremont / Howth Lodge

A new link road could be constructed parallel to the sea side of the railway to connect Burrow Road / Claremont Road with the road that currently serves the residents who currently use the Claremont / Howth Lodge Level Crossing, in fact there is currently pedestrian access already in existence along this route. This would afford uninhibited access to these residents by means of the road bridge at Corr Bridge.

The alignment of the public road into Howth adjacent to the level crossing could be improved if cross levelling were to be applied on the curved section. It would also mitigate against the threat to the railway posed by increasing water levels. There have been incidents in the past when the operation of the railway was compromised by flooding coming off the Howth road and adversely impacting on the operation of track circuits which in turn impeded the operation of the railway and the level crossing.

The existing Level Crossing at Claremont / Howth Lodge could be replaced with an arrangement that will permit residents, pedestrians and cyclists access over the railway.

ii. The Level Crossing at Lauders Lane / Cosh

iii. The Level Crossing at Sutton station / Station Road

A new overbridge and requisite approach roads could be constructed say half way between the present Sutton station / Station Road and Lauders Lane / Cosh Level Crossing to allow vehicular access over the railway and effectively allow closure of the existing level crossings to vehicular traffic.

Sutton station is currently the terminus of the 102 bus service and this would also need to be accommodated.

Additional car parking spaces could also be provided on the sea side as part of the works thereby enticing additional passengers to use the train service which is in line with Government policy.

The developments on the sea side would be mostly on land that is subject being flooded at times of high tide, these works could also provide protection to protect the railway from the threat of posed increasing water levels

The existing Level Crossing at Lauders Lane / Cosh could be replaced with an arrangement that will permit residents, pedestrians, golfers and cyclists' access over the railway.

The existing Level Crossing at Sutton station / Station Road could be replaced with an arrangement that will permit residents, passengers, pedestrians, and cyclists' access over the railway.

iv. The Level Crossing at Baldoyle Road.

Ideally a new overbridge and requisite approach roads should be constructed over the railway possibly off Railway Avenue.

There is space available on the northern side of the railway to approach ramp etc., to allow vehicular access over the railway and effectively allow closure of the existing level crossings to vehicular traffic.

The existing Level Crossing at Sutton station / Station Road could be replaced with an arrangement that will permit residents, passengers, pedestrians, and cyclists' access over the railway.

It is also noted in the promotional Video for the DART+ Project it is stated that the proposals "*anticipates the transport needs of tomorrow*"

That said, there seems to be a total disregard of the negativity of the Railways proposals as currently being presented will have on businesses, employers, residents, workers, tourists and visitors to the Howth Peninsula and the surrounding areas.

An in depth review should be undertaken and the current proposals should be reconsidered and revised to address all the issues that have been raised.

The same standards and solutions as are being applied elsewhere in the DART+ works should also apply to the Howth branch Railway and the people / customers it serves.

On behalf of our Group we apologise for the length of this document. We are sure that given the depth of feeling that the Railways proposals have caused there is a significant level of annoyance and disgust among our members who each wish to have their concerns raised by way of an observation.

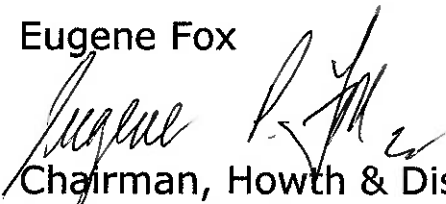
All in all, not one of our members can see anything positive in the Railways proposals, and while our view is not intended to be anti DART or the Railway, our Group believes that the Railways proposals will actually bring hardship, delay, frustration to DART passengers and road users generally at a time in their lives when things should be getting easier, more comfortable and tolerable.

Thank you for taking the time to read this document.

On behalf of the Howth and District Active Retired Association.

Yours faithfully

Eugene Fox



Chairman, Howth & District ARA

Nora Fox



Treasurer, Howth & District ARA

P.S. Cheque in the sum of €50.00 attached as fee.