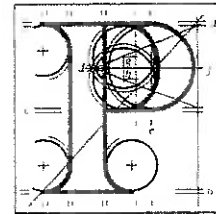


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

John Towers
Ballough
Thormanby Road
Howth
Dublin 13
D13 F956

Date: 13 September 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.

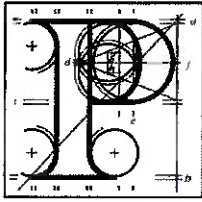
Yours faithfully,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA03

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

John Towers

(b) Observer's
postal address

'Ballough' Thormanby Road, Howth, Dublin 13,
D13 F956

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

320164

- (b) **Name or description of proposed development**

DART + Coastal North Railway Order 2024

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

Northern Line between Dublin City Centre and Drogheda including in particular the Howth Branch

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

I, John Towers 'the observer', make these observation to An Bord Pleanála in the context of the Planning and Development (Strategic Infrastructure) Act 2006 and the Strategic Infrastructure Development Leaflet 14 published the Office of the Planning Regulator.

I am a resident of Howth and am a regular user of DART services from Howth to Dublin and beyond. I am a Senior Citizen who frequently has to use the lifts at DART stations.

Overall, I welcome the proposed Railway Order application by Irish Rail (IR) but make observations under the following headings that take issue with details of developments that IR in their documentation under the proposed Railway Order intend to apply to the Howth Branch and its train services:

- 1. Replace through services from Howth to Dublin with a shuttle service between Howth and Howth Junction Donaghmede at peak hours (if not at all hours) that the DART operates.**
- 2. Extend Platform 2 at Howth Junction Donaghmede Station and provide a relocated crossover between the up and down lines on the Howth Branch apparently to technically facilitate the operation of such a shuttle service.**
- 3. The redevelopment of Howth Junction Donaghmede Station but without adequately addressing the issue of the safety and security of the passengers who use it.**

5. Grounds

Here following are the observations that I make under the aforementioned headings:

1. Replace through services from Howth to Dublin with a shuttle service between Howth and Howth Junction Donaghmede at peak hours (if not at all hours) that the DART operates.

- a. Howth on the Howth Peninsula shares with Cobh on Great Island, Co. Cork the distinction of being the only urbanised peninsula or island communities that are closely connected to a nearby significant city (Dublin and Cork) in the State.
- b. Both Howth and Cobh suffer restricted road access by the nature of their Geography but have long enjoyed frequent through commuter train services to the cities of which they form a residential hinterland.
- c. Both have developed a significant tourist footfall and in the case of Howth, it seems that a day out in Howth has become '*de rigour*' part of a short break by overseas visitors to Dublin, year-round.
- d. Through trains from Howth to Dublin City have been a continuous unbroken service since the branch line to Howth was opened in 1846.
- e. Cobh's rail service to/from Cork began in 1862 as a branch at Cobh Junction from the Cork and Youghal line (now cut back to Middleton).
- f. While IR has been increasing the frequency of direct trains from Cobh to Cork and Middleton to Cork, it proposes to replace through trains for most services from Howth to Dublin with a shuttle service from Howth to Howth Junction

5. Grounds

Donaghmede involving a change of trains for Dublin bound passengers.

- g. The current frequency of South bound DART trains from Howth between 06:55 and 18:55 (Mon to Fri) is 3 trains per hour. Before 06:55 and after 18:55 it is 2 trains per hour. The pattern is similar for North bound trains to Howth.
- h. In its submission to IR under DART + Coastal North Railway Order 2024, IR states that it plans to increase the frequency to 6 trains each way on the Howth Branch during 'peak' periods but all will be (or are likely to be services that terminate at Howth Junction Donaghmede requiring Dublin bound passengers to change platforms there and board a DART service from Drogheda or perhaps Malahide that is already likely to be crowded before reaching Howth Junction during peak hours.
- i. At a very well attended public meeting held in the Marine Hotel, Sutton, Dublin 13 on 02/09/2024 strong opposition was expressed to IR's proposal to cease through services from Howth to Dublin (as above). Grounds mentioned included:
 - i. The proposed train frequency increase notwithstanding, the enforced changing of trains and platforms at Howth Junction Donaghmede represents a material degradation of the service currently enjoyed.
 - ii. The negative impact of changing trains at Howth Junction and Donaghmede was said to include:
 - 1. Trying to find a seat on already crowded trains from Drogheda and Malahide.

5. Grounds

2. Changing platforms particular for passengers from Dublin to Howth who will need to use the footbridge and its lifts.
 3. Limited lift capacity at peak times.
 4. Exposure to the elements while waiting.
 5. The perceived security risk to passengers using Howth Junction that is especially heightened during the hours of darkness.
 6. Extended journey times.
- iii. The likelihood that the resulting discomfort and inconvenience will cause some commuters to cease using the DART and revert to private cars while potential new passengers will be deterred from using it altogether.
 - iv. The overall structure and environment of Howth Junction Donaghmede train station that makes it unsuitable for significant numbers of passengers to change trains and platforms. See Para 3 following for more detail on this aspect of the station.
 - v. There will be a particularly negative impact on the mobility impaired and senior citizen DART passengers to/from Bayside, Sutton and Howth of changing trains and platforms at Howth Junction and trying to secure seats on crowded mainline DART trains.
 - vi. It will be similar for parents with children in buggies and/or toddlers being led by the hand.
 - vii. The lift capacities will be inadequate for the number of passengers likely to need to use them.

5. Grounds

- viii. The increased frequency of the four level crossings on the Howth Branch being closed to road traffic (including in the case of Baldoyle Road and Station Road Sutton) the impact on Bus Services (H1 , H2 and 102) and the impact on and delays caused to pedestrian traffic.
- ix. Data suggests that the level crossing barriers at in particular Baldoyle Road and at Sutton Station may be lowered for ca. 25 to 35 minutes in every hour that peak services are provided (12 closings per hour of ca. 3 mins for each barrier lowering although for some barriers one 3 minute lowering cycle may accommodate 2 x trains passing in opposite directions.
- x. These are also peak times for residents of the Howth branch hinterland commuting to work, undertaking school runs etc.
- xi. The fear that extended closure times of the level crossings on Station Road and Baldoyle Road may result in road traffic backing up on Baldoyle and/or Station Roads onto the R105 Dublin to Howth Road.
 - 1. A specific concern of this observer is that Emergency Services may be impeded by more frequent barrier lowering.
 - 2. Another specific concern is that on barrier re-opening to road traffic vehicles do not observe the no stopping yellow hatch box area at each level crossing which means a risk of a vehicle being trapped on the level crossing when the barrier is next lowered for a train.

5. Grounds

3. The position of bus stops on the R809 Baldoyle and Warehouse Roads and on R106 Strand Road can impede the longer traffic queues that will form for a lowered barrier such that one or two cars may become stopped on the yellow hatched box and be in danger if the barrier is lowered for the next train.
4. The strict enforcement of the driver rules pertaining to such yellow hatched boxes at level crossings i.e. don't enter the box until you can clear it at the far side - will have to be policed to ensure road and rail safety. This itself will further slow down traffic.
5. Such conditions of DART trains running at 10 minute intervals in each direction already exists at 5 level crossings from Lansdowne Road to Merrion Gates on a section of the line where there are 6 trains per hour in each direction.
6. The acute St Vincent's University Hospital is located close to both the Sydney Parade and Merrion level crossings and would know if these level crossing material impact ambulance services.
7. IR could have provided statistical data relative to the impact on road traffic etc. at these 5 level crossings but has chosen not to.

5. Grounds

- xii. The potential negative impact on tourism to Howth and on businesses on the Peninsula in particular the restaurants, cafes and bars has not been assessed.
- xiii. Recognising that the double track of the mainline railway from Dublin to Howth Junction and on to Drogheda has a finite train slot capacity, there is an emerging consensus among Howth and Sutton commuters that they would be satisfied to remain with the current service of 3 x trains per hour provided that they all run through to Dublin.
- xiv. There has been a substantial increase in the number of housing developments in particular SHDs that have been granted Planning Permission by An Bord Pleanála on the Howth Peninsula in the last 5+ years. A particular factor cited in support of such developments has been the existence of quality public transport and especially the DART service.
- xv. This observer believes that An Bord Pleanála's decision on this Railway Order SID needs to be consistent with An Bord Pleanála's decisions of recent years to grant Planning Permission to SHDs on the Peninsula *inter alia* on the grounds that the area enjoys quality public transport services such as the DART.
- xvi. A decision by An Bord Pleanála's on the Railway Order that was perceived to facilitate a degradation of DART services to Howth would create a very negative impression in communities served by the Howth branch.

5. Grounds

- j. This observer concurs with all of the foregoing points.
- k. This observer further makes the point that if slot capacity for extra DART services on the main line is an issue, then IR in lieu of cutting through services to Howth should consider a shuttle service (say two per hour) from Malahide to Howth Junction Donaghmede that would connect with Howth to Dublin through DART trains.
- l. This (per IR documentation) should provide for adequate DART services through to Dublin on both the main line and the Howth branch that would be fair to all of the communities served.
- m. This observer regards the IR documentation supporting the proposed Railway Order in respect of the Howth branch as having failed to address the economic, social logistical impact on the Howth Peninsula and its communities and businesses in its application for an SID Planning Approval that under Planning and Development (Strategic Infrastructure) Act 2006 is clearly a development that of its very nature will be of strategic economic or social importance to the region in which it would be situate,
- n. It may be suggested that in An Bord Pleanála's function under an SID is essentially to determine if particular strategic infrastructure should be provided or not rather than operational matters such as timetables, passenger numbers etc.
- o. As a precedent, this observer draws attention to the Planning Condition imposed by Fingal County Council when granting permission for the 2nd Runway at Dublin Airport, that limited

5. Grounds

the growth of Dublin Airport to 32m passengers per annum because of the potential negative impact that building the new runway might facilitate on the surrounding environment of the airport and the communities that lie in its footprint if passenger numbers were not so capped.

- p. I make observation that before granting permission for the Railway Order, IR should be requested to commission a transparently independent study of all of the foregoing matters that would specifically include objective measurements and questionnaire data on DART user opinions of the kind of shuttle service that IR proposes for the Howth branch.
- q. I further make observation that before granting any permission for the proposed revision to train services to Howth envisaged by IR under its application for a Railway Order under SID 320164, an oral hearing should be called by An Bord Pleanála to examine the total impact (social, economic and logistical) on the communities of the Howth Peninsula and its hinterland of Baldoyle and Bayside of the proposed changes to DART services to Howth.
- r. Such an oral hearing should take account of the data that IR will be called to submit in the study in Paragraph p above.
- s. In particular, this observer asks if the current IR proposal to cease through services from Howth to Dublin forcing passengers to change trains and platforms at Howth Junction Donaghmede or use other forms of transport, represents discrimination against the residents of the Howth Peninsula and of Bayside as compared with the residents of the communities of Malahide, Portmarnock and Clongriffin?

5. Grounds

- t. Can it also be argued that if introduced, an enforced change of trains and platforms at Howth Junction Donaghmede would represent an undue discriminatory burden not only on the mobility impaired and the aged but also on parents with children in buggies or toddlers lead by the hand? This observer believes that this question should also be teased out at a public hearing.

2. Extension to Platform 2 at Howth Junction Donaghmede Station and the provision of a relocated crossover between the up and down lines on the Howth Branch adjacent thereto.

- a. This observer draws the attention of An Bord Pleanála to the fact that existing signalling on the Platform 2 track at Howth Junction and an existing cross over on the Howth branch already allow a 6 car train of current DART rolling stock to turn back to Howth.
 - i. The new DART trainsets on order are reported to be 5 car units with 2 such units coupled back-to-back able to form a 10 car set that IR says will be the same length as a current 8 car DART rolling stock train set.
 - ii. Signal DN 221 on the Platform 2 line facing towards Howth (see Appendix A; Fig 1; P17) ensures that no (shuttle) train from Howth that has crossed over from the branch upline (Platform 1 line) can encroach on a safe buffer zone on the Platform 2 branch down line between it and the actual mainline junction points.
 - iii. This is understood as preventing such a Howth branch train to unintentionally endanger up main line trains.

5. Grounds

- b. The undersigned contends that no permission should be granted to construct the proposed extension to Howth Junction Platform 2 and the relocation of its associated crossover (see Appendix A; Fig. 2; P18) on the Howth Branch including signalling system changes on the grounds these works are an unnecessary development even under the IR proposed shuttle service for the Howth Branch.
- c. Indeed, the sole purpose of these works would seem to be to facilitate 10 carriage train sets (new DART rolling stock on order) for IR's proposed shuttle train service to Howth which seems to be unrealistic.
- d. If IR claims that 10 car DART trains will be required to accommodate the volume of traffic to Howth, then surely this substantially demolishes IR's argument that through trains from Dublin to Howth are unnecessary.

3. The redevelopment of Howth Junction Donaghmede Station but without adequately addressing the issue of the safety and security of the passengers who use it.

- a. Howth Junction Donaghmede is the only station on the DART network that features:
 - i. 4 x platforms;
 - ii. 3 passenger levels namely entrance (ground) level, platform level and passenger footbridge level;
 - iii. 2 x ground level passenger entrance halls - East and West - that are linked only via the footbridge across the tracks (two levels above them) including the associated lifts.

5. Grounds

- b. It is currently an interchange station with the N^o N6 Bus Service to Beaumont Hospital and Finglas.
- c. The N6 Bus terminus is located on Kilbarrack Parade near the East side of the station
- d. Despite its current structures, the station offers little protection to passengers at the Platform 2/3 level due to its windswept location on cold winter days and nights.
- e. The station is for all practical purposes unmanned and wide open to public access, in particular to those not travelling by train.
- f. It is widely reputed to be a centre for petty crime, pick pocketing, assaults, drug dealing and occasional 'horse play' where people have even been pushed onto the tracks in risk of their life and limb.
- g. Such risks would appear to be heightened during the hours of darkness.
- h. Both IR and An Garda Síochána should have a record of reports of incidents that have occurred that should be made available to An Bord Pleanála.
- i. The Station's dimly lit staircases and passageways actively encourage and facilitate its improper use.
- j. The Station has 3 lifts from ground to footbridge all 3 of which must be operational to facilitate mobility impaired passengers, the elderly and parents with young children in buggies or toddlers being led by the hand who use the station.
- k. IR's level of station lift serviceability is poor.
- l. IR 's plans to enhance the station's architectural features in terms of improved stairways and overbridge etc under the

5. Grounds

Railway Order are all welcome but in the view of this observer inadequate to secure passenger safety and security unless the open character of the station is properly addressed by appropriate staffing.

- m. Emergency security phones and push buttons are ineffectual if those engaged in inappropriate or criminal behaviour know that security personnel are going to take 15/20 minutes to reach the station following a call.
- n. This observer draws attention to IR's Pearse and Tara Street Stations which are less complex but which are manned at both station entry level (street level) and at platform level at all hours that trains operate.
- o. This observer is unaware of any anecdotal reports of serious misbehaviour at either of these stations such as has been reported for Howth Junction Donaghmede.
- p. This observer suggests that if the Railway Order is approved, a planning condition should be included that Howth Junction Donaghmede Station be manned daily to a level equivalent to that of say Westland Row and Tara Street so long as trains are operating taking into account that Howth Junction has 4 platforms and three levels as compared with the 2 platforms and 2 levels at Pearse and Tara Street.
- q. The existing lifts should be supplemented by escalators to ensure adequate capacity especially for those who have to cross via the footbridge to access the N6 bus.

5. Grounds

I John Towers 'the observer' make these observations to An Bord Pleanála.



John Towers

John Towers

BE, C. Eng, Eur Ing, FIEI.

5. Grounds

APPENDIX A

Fig. 1.

Howth Junction Donaghmede Platform 2 showing turnback Signal DN221



5. Grounds

APPENDIX A (continued)

Fig. 2.

Howth Junction Donaghmede; view showing the existing crossover from the upline to the downline and to Platform 2 on the Howth Branch as it approaches the station.



Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes