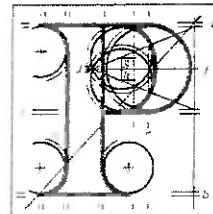


Our Case Number: ABP-320164-24
Planning Authority Reference Number:



**An
Bord
Pleanála**

Roger Stalley
4 Burrow Road

D13 K8H1

Date: 19 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,

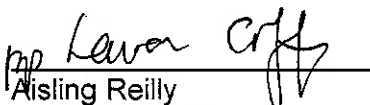
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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Observations on a Strategic Infrastructure Application, Dart Coastal North.

Roger Stalley FTCD, MRIA, FRIAI (Hon), MAE (Academia Europaea)

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Introduction

This submission considers a series of major issues, highlighting areas

- where alternative options have not been adequately explored;
- where the methodology employed is open to question; and
- where the environmental impact has not been adequately considered.

One of the major failures highlighted in the observations laid out below is the emphasis placed on frequency and capacity, at the expense of journey speeds and passenger convenience.

Projections about the passenger growth are based on assumptions about population growth that remain unproven, along with the faulty assumption that an increase in population will automatically lead to a proportionate increase in the use of railways. One gets the impression that some of the demand modelling employed was derived from countries abroad and were not well suited or adjusted to an Irish context.

It is clear that the extension of the Dart to Drogheda has taken priority over all other forms of traffic – the Howth branch, the express service to Belfast and the carriage of freight. The demands of the Howth branch and the Enterprise have effectively been treated as unavoidable collateral damage.

1. Population growth and travel by rail

Part of the basic premise for Dart Coastal North are assumptions that have been made about the increase in population along the coast north of Dublin. No timelines for such growth are included in the documentation and the projections are not specified in any detail.

Optimistic assumptions have been made about the percentage of regular travellers that will opt for rail travel over road. Moreover, the forecasts employed appear to take no account of working practices in the post Covid era. It has been reported that suburban travel by rail between Dublin and Drogheda is the main route that has shown the least recovery in terms of the percentage of passenger numbers since the end of Covid.

Similarly, no consideration has been paid to the accessibility of stations from both existing and proposed centres of population:

- The 'Drogheda Northern Environs' scheme, effectively a new town with 7,600 houses and a projected population of 21,000, lies to the north of the existing town on the opposite side of the river Boyne to the station. Once access time is loaded into any modelling, it is obvious that direct bus journeys to Dublin via the M1 will provide a better travel option in terms of both time and convenience.
- At Rush and Lusk the station is not conveniently located; future residents may likewise opt for alternatives to rail.

2. Operational Practice.

Irish Rail admits that operational detail has 'not been worked through'. Theoretical assumptions have been included about the numbers of trains that can be handled per hour, but they remain just that, theoretical projections. To run the services that have been suggested in a consistent manner would require precise timing, way beyond anything that Irish Rail has managed in the past. No allowance appears to have been made for even minor delays. While allowing for the improvements laid out in the Rail Order, a successful combination of Darts, suburban trains, along with an express service to Belfast, appears to be wishful thinking. In the case of the hourly service to and from Belfast, the operation does not lie wholly in the control of Irish Rail; this service has the capacity to disrupt even the best designed timetables.

There is no mention of freight and the extent to which this can, or will, be integrated into the timetables on the northern line. Shifting more freight from road to rail is recognised as a desirable objective of the Irish government, not least for environmental reasons. The All-Ireland Rail Review, published on July 31st 2024, stresses the need for enhancements of rail freight to support economic growth and sustainability.

In summary, there is no certainty that the infrastructure changes will allow the successful implementation of the projected services in day-to-day operation.

3. Journey times and passenger convenience

Throughout the documentation accompanying the Rail Order there is repeated emphasis on **frequency and capacity**. There is almost no reference to **journey times or passenger convenience**. Nowhere is there any evidence of an input from the behavioural sciences, a point most obvious in the handling of the Howth branch.

The argument in this case suggests that the increased journey times and the inconvenience of changing trains at Howth will be compensated by greater frequency and capacity.

While all travellers will be grateful for a frequent service, there is no evidence that passengers on the Howth branch have expressed major dissatisfaction with the current interval service of 20 minutes; punctuality and reliability not frequency are the major issues.

The physical effort of changing trains at Howth Junction and Donaghmede and the time taken to do so, especially on the return journey from Dublin, will be a major deterrent to potential passengers, especially to the young and the elderly, a point made vigorously during the public consultations.

The interchange process has not been adequately thought through from a passenger point of view. It appears that 'waiting times' and 'walking times' have not been given their due weight in calculations of overall generalised journey times (GJT). No models have been provided for the arrival of a train on platform 4 and the timing of shuttle departures on platform 2. In this instance passengers will be required to walk along platforms 4, followed by a climb over the footbridge and then followed by a significant walk along the extended platform. In assessing the options at Howth Junction and Donaghmore, no weighting was given to the disruption that the interchange involved for passengers, an indication that passenger ease and convenience was given a low priority (in fact not assessed at all). If a shuttle is waiting to leave, few will risk waiting for a lift. The time interval here typically will amount to a minimum of 5 minutes, depending on the energy levels of the individual concerned.

Total journey times, in particular generalised journey times, will increase quite markedly. Once Dart + Coastal North is in operation. The time spent on a train from Dublin (Tara street) to Howth is likely to be 19 + 11 minutes, to which must be added a 'transfer time' of at least 5 minutes¹, plus 'waiting time' before the shuttle departs, giving a total journey time of approximately 35-40 minutes – this for a journey of less than 9 miles (14 km), at a speed of 16 mph (26 kph).

In this scenario the time spent waiting and walking is excessive in relation to the overall journey time. If the value of passenger time is properly assessed, with 'waiting and walking' typically given twice the weighting of 'in-train' time, the attractiveness of making a journey on the Howth branch is further diminished. In addition to the inconvenience of switching trains, there is the added disadvantage for morning commuters of joining a train on which all seats have already been taken.

There is a real danger that the shuttle arrangements are likely to increase the number car journeys, not reduce them. In public responses to the proposals, 75% of the observations

¹ Survey carried out on September 17th between 14.30 and 15.00 by adult male walking at a brisk pace on a sunny day. The figures allowed for the extra 60 metres proposed for platform 2. Transferring from platform 4 to platform 2 currently involves 33/34 steps up and down. Use of the lift added 20 seconds; there were very few passengers on the platform; wait times for a lift at busy times will add further minutes.

submitted related to the Howth branch were overwhelmingly negative. The summary concluded: 'There was clear indication that people were more likely to make a move back to private car use as a result of the proposal to introduce a DART shuttle service'.

Despite the best efforts of Irish Rail to argue the contrary, the proposed changes to the Howth branch represent a major degradation of a service that has run successfully for over 150 years. In the light of both public and political opposition, there is doubt over whether the proposals have a long-term future. The developments envisaged at Howth Junction and Donaghmede represent a significant element of the infrastructure costs. In time these may be seen as a poor application of state resources.

4. Services north Drogheda

As with other aspects of the proposals, speed is being sacrificed in the name of frequency and capacity. The introduction of the Dart service to Drogheda and the resulting congestion on the northern route from Connolly will inevitably lead to an increase in journey times, making rail less competitive than it is today. This will have implications for travellers from Dundalk and the hinterland of County Louth, as well as from Newry and Belfast. The decline in speed is likely to encourage a shift from rail to road, an impact that is NOT considered in the Rail Order. The decline in speed is both ironic and disappointing, especially since the new trains specified and procured for entry into service around 2029 have the capacity to run at far higher speeds than those envisaged in the timetables.

There is a real danger that the increased frequency planned for later this year will NOT realise the potential growth in passenger numbers. Over one million cross border journeys are currently made by rail, equivalent, in terms of passenger kilometres, to five or six million journeys by inner suburban rail and Dart (this due to the former's much longer average journey distance). Any failure to increase or indeed maximise cross border journeys by rail, in preference to road, has obvious implications, not least in the context of transport related carbon emissions.

The proposed journey times between Dublin and Belfast will take us back to 1947 levels, despite government support for high-speed rail connections between major cities of the country, as laid out in the recent All-Ireland Rail Review (2024). In fact, the proposals encapsulated in the Rail Order are not consistent with those expressed in the Review or indeed with many similar objectives laid down by the EU (in this context section 143 of The Planning and Development Act, 2000, as amended by virtue of section 43.91 of the 2001 act, is relevant).

A key proposal contained in the All-Ireland Rail Review is the need to raise the maximum speed on core intercity networks to 200kph (125mph). In the context of Dart + Coastal North, however, Belfast trains will be able to sustain an average speed of only 55-65kph (34-41mph) between Dublin and Drogheda. This at variance with what is proposed for Dublin- Cork route,

where there are plans to upgrade the line speed to 160kph (100 mph). The irony here is that future journeys to Cork will take much the same time as those to Belfast, even though the distance to Cork is some 85 kilometres greater. Indeed, the average speed of services from Drogheda to Dublin Connolly fell to less than 80kph (50mph) in August 2024. This followed the introduction of the new 'improved' suburban timetable for services between Drogheda and Dublin Connolly - a graphic illustration of the challenges involved in implementing DART + Coastal North.

Despite the implications for the Enterprise service to Belfast, no consultation was offered to the half million or so passengers who are resident in Northern Ireland. Nor has there been any attempt to outline the consequences of Dart + Coastal North for potential passengers residing in the Republic of Ireland north of Drogheda.

The need for a fast and efficient rail connection linking the cities of Dublin and Belfast has long been an aspiration of Irish governments, one that is a key component of the Peace Process. This admirable objective will be sacrificed in the interests of the northern commuter service. Moreover, the increase in journey times, coupled with the prospect of delays on the congested route south of Drogheda, will not make rail travel between the two cities competitive with car and bus.

Alternative solutions have not been adequately investigated, notably four tracking the route at least at the Dublin end, which remains the only effective way of accommodating DART, outer suburban and Enterprise services between Connolly and Drogheda. While four tracking may be difficult between Connolly and Howth Junction, three tracks may not be out of the question. Irish Rail should plan for this before attempting interim solutions.

If Irish Rail succeeds in its scheme of incorporating Dart and suburban commuter trains, along with expresses to Belfast as well as freight, all on the existing two track railway, it will become the envy of railways operators throughout the world.

5. The station at Howth Junction and Donaghmede

If the shuttle service is introduced, Howth Junction will become one of the major interchanges on the Irish railway system. To cope with this, the Rail Order outlines a number of infrastructure improvements. These fall well short of what is required.

- Passengers returning to stations on the Howth branch will be required to walk considerable distances in the open air, regardless of the weather, without any appropriate shelter.
- Platform 2 and 3 will be completely devoid of platform canopies
- The proposed steps leading to the footbridge are likewise not designed with overhead protection.
- The shelters provided on platforms 2 and 3 are derisory in scale.

An obvious comparison is to be found Mallow where trains from Tralee connect with the Cork expresses. Here passengers have the convenience of arriving and leaving on opposite faces of the same platform, and a large section of the platform is covered. Nonetheless Mallow station is a bleak place in winter. It is, however, luxurious compared with what is envisaged for Howth Junction.

Many criticisms were made of the proposed arrangements at Howth Junction and Donaghmede station during the public consultations. The responses from Dart Coastal North were unconvincing, offering no assurance to prospective passengers. While it may not be a matter of concern for An Bord Pleanála, Howth Junction and Donaghmore station has an unenviable reputation from a security point of view. No amount of security staff is likely to change this perception. It will undoubtedly have a negative impact on the use of the proposed shuttle.

Moreover, the quality of the architecture outlined in the proposals compares woefully with that encountered in many European cities, falling well short of the aspirations envisaged in the All Ireland Rail Review. If the Howth shuttle remains a serious proposition, the station will require far greater investment.

6. The level crossings.

As acknowledged in the Rail Order documentation, the shuttle proposals will have major repercussions at the level crossing, with six trains travelling each way per hour.

The Order contains a somewhat cavalier and concerning statement about the level crossings:

‘Detailed assessment of the four existing level crossings along the Howth Branch Line has concluded that these level crossings can continue to operate and provide *an appropriate* level of cross connectivity and accessibility whilst still meeting the increased DART service frequency requirement’.

There is no indication of what is meant by ‘appropriate’ and for whom the level of operation might be ‘appropriate’.

There is an admission that human factors were not taken into consideration during the modelling, a serious omission in the context of environmental impact.

The solutions derived from the modelling attempt to minimise the potential problems at Sutton by ensuring that trains are timetabled to pass at this point. If this is rigorously carried out, a conflict will arise with passenger connections at Howth junction. Assuming the shuttle trains follow the timetable as required by the level crossing, even a small delay on an incoming Dart at Howth Junction will mean that the connecting service is missed, adding up to 10 minutes to journey times. The documentation does not indicate which of these conflicting priorities will take precedence.

The Rail Order repeatedly stresses that timetables are operating matters that will go through a separate consultation process. Time tabling changes, however, are fundamental to Dart Coastal North, the very premise on which some of the infrastructure proposals are based. At other level crossings the gates are liable to be down for at least 30 minutes in any one hour. It is hard to accept that this is 'appropriate' or acceptable to local residents.

The impact of the gate closures is assessed largely in terms of stationary traffic queues; other potential impacts are left without adequate consideration:

- the impact, both environmental and social, on those living in houses fronting the road, or indeed on pedestrians using the road.
- the fact that, when the gates are lifted, a solid mass of traffic moves (in the case of Sutton) to either Baldoyle or Sutton Cross, both serious pinch points, especially during the morning rush hour.
Even with current services, congestion at the Sutton level crossing can lead to major problems at Sutton Cross, the only route between Sutton / Howth and the city centre.
- The possibility of accidents, resulting from human impatience. The longer and more frequently the level crossing gates are down, the more likely younger pedestrians are tempted to vault the gates – as happens in the summer months at the Cush crossing.

It has been argued that the level crossings serve as a useful deterrent for road users, providing an incentive to make use of public transport. However, both the Sutton and Baldoyle road crossing are transverse to the railway and the Dart does not offer an alternative route for those using the crossings.

Alternative options. The impact of more frequent services at the level crossings on the Howth branch is both obvious and demonstrable. The only alternative option for Irish Rail (not mentioned) will be to reduce the number of shuttle journeys per hour from six to three. This option may well be forced on Irish Rail, so the increased frequency of trains, which has been heralded as one of the great benefit to travellers on the Howth branch, will not exist at all.

A postscript. Railways should be run for the convenience of passengers, not for the convenience of the operators.