

Richard Boyd Barrett T.D.,
People Before Profit,
Leinster House,
Kildare Street,
Dublin 2,

28 October 2022

Re *DART* West Planning Application

Ref: 314232

Dear Madam or Sir,

I wish to make an observation regarding the planning application for the *DART West* project, planning application no.

Please find the €50 fee attached.

The proposal to electrify all Irish Rail lines in the Dublin region and upgrade to *DART* standard is very welcome in principle – and arguably long overdue. This development should build on progress over the last decade that include re-opening the Phoenix Park tunnel to passenger services, and improved signaling along the loop-line bridge – which can now accommodate trains every two minutes.

However the current application proposes that on the day of opening, *DARTs* would pass by without stopping at the most populated areas along the route to Maynooth, including Croke Park, and Cross Guns Bridge beside Phibsborough Shopping Centre, and stop short of Kilcock beyond Maynooth. The current proposal is also related to the other project of *DART Southwest*, which proposes that the Irish Rail line from Sallins to Dublin is to be electrified so as to link in with the *DART West* scheme via the Phoenix Park tunnel.

Accordingly I wish to raise the following issues:

1. Absence of stations in populated areas along the *DART West* route – including 1A Connolly, 1B Croke Park, 1C Phibsborough, 1D Kilcock, 1E Docklands, 1F Dublin Ferry Port, and 1G Spencer Dock. Please find a map outlining these as the last page.

2. The relationship of the *DART West* project to *DART Southwest*, and the lack of stations along the *DART Southwest* route – including 2A Cabra, 2B Dublin Zoo, 2C Heuston, 2D Inchicore, and 2E Ballyfermot.

3. Summary and Conclusion

Please note that where population estimates are provided in this document, these are generally based on calculations using actual distances with ArcGIS – rather than the

inaccurate Euclidean method that tends to overestimate by not factoring in barriers.

1. Absence of stations in populated areas along the *DART West* route – Overview

The application proposes that two railways in Dublin's north inner city are to be electrified; the line from Connolly to Broombridge and onto Maynooth, and the line from Docklands to Broombridge, which runs parallel by the Royal Canal.

On the line between Connolly and Broombridge, the current proposal would result in only one stop at the existing Drumcondra Station – a distance of five kilometres – as it is understood that the proposed station at Cross Guns Bridge will only be opened when the airport metro is opened.

On the line between Docklands and Broombridge, the current proposal would result in no stops in a distance of five kilometres, through the most densely populated neighbourhoods in the state. By contrast, in Dublin 2 and Dublin 4, there are six stations in four kilometres between Tara Street and Sydney Parade, despite there being lower population density.

1A Connolly Station

The *DART West* proposal envisages that a new pedestrian entrance may be opened onto Preston Street, which would greatly reduce walking distance to the trains for the community around Seán MacDermott Street and Summerhill, by around 400 metres. This seems very logical and needs to be a condition to any consent granted.

A Preston Street entrance would replace the route that used to be through the *DART* Suburban Station entrance, that opened across from Buckingham Street until around a dozen years ago. It is not known why that was closed, as closure cut the population catchment of the station – and greatly contrasts with the new short cut provided into affluent Docklands on the other side of the station around the same time.

In the event of the proposal for the entrance onto Preston Street running into difficulties, it is strongly recommended that the former route be reopened so as to reinstate logical provision. Using ArcGIS and the National Census, it has been calculated that with access being reinstated, the total population catchment of Connolly Station within one kilometre walk would be over 24,000.

1B Croke Park

Croke Park is Europe's third largest stadium with capacity for 82,300 spectators. It is sited between two railways located at either end of the stadium – yet has no station, despite this being state policy as far back as 'Platform for Change' by the Dublin Transport Office in 2001. Since then, both local residential population and stadium usage has increased, while the need to adapt to climate change has become more apparent – with the state having undertaken further commitments by the Paris Agreement.

Under the current proposal, both lines around Croke Park are to be electrified, with the railway along the Royal Canal to carry *DARTs* without stopping for five kilometres between Docklands and Broombridge stations. Using ArcGIS and the census it is evident that there are 16,000 local residents within one kilometre walk of the south-east corner of Croke stadium, where the Royal Canal railway passes and where there is also space suiting the development of a station. Hence opening a station at this site would benefit both Croke Park attendees and the local community, and would be in line with state policy on both social inclusion and climate adaption.

Moreover while the state continues to charge for public transport, the lack of a station on this line excludes the many paying customers. Thus the current proposal denies access to both the local community and GAA fans while also failing to collect payment at a busy location. Development of the application in the absence of a station would be a silly state investment. Hence it is urged that An Bord Pleanála require Irish Rail to develop a station at this location as a condition to any consent granting upgrading of the Royal Canal line to *DART* standard.

1C Phibsborough / Cross Guns Bridge (Glasnevin)

As with Croke Park, it is also a long standing objective of state policy that a railway station should be opened at Cross Guns Bridge, being included in the Dublin City Development since 2008. It is somewhat confusing that Irish Rail are now referring to this location as ‘Glasnevin’ when it is right beside Phibsborough Shopping Centre.

A station at this location would serve two really useful purposes:

- Firstly, according to national census, there are 16,500 inhabitants within a one kilometre walk, as has been identified using ArcGIS.
- Secondly, this location is a unique nodal point on the Dublin rail network, from which four lines lead away – to Connolly, the ferry port, and the south-east; to Docklands; to Maynooth; and to Sallins via the Phoenix Park Tunnel.

Hence it is logical that a station should be operable on the opening day that the *DART* passes through the area. Given the metro was publicly first mooted fifty years ago but has never yet been delivered, the prospect that a station at Cross Guns Bridge should be further delayed until the Airport Metro is untenable. Service delayed is service denied. As with Croke Park, there is an obvious need to open a station without delay for social inclusion, systemic benefit, and to maximise return on state investment.

1D Kilcock

The current plan proposes that passenger services should terminate at Maynooth, with a vehicle depot being sited further west along the line close to Kilcock. Once a small village, in 2016 the population of Kilcock was over 6,000 – and is growing year on year. Hence it seems reasonable that provision would occur to accommodate these people, and those in the wider hinterland. It is strongly recommended that a station be opened in the town to serve this population – or failing that, a public passenger station should be opened at the depot nearby.

1E Docklands

Opened in 2007 at significant cost to the state, this station has only peak time weekday services to and from Dunboyne via the Royal Canal railway and the line to Maynooth. As noted already in relation to Croke Park, the Royal Canal line has no stations in the five kilometres to Broombridge – and is being totally underused, with only 1,500 passengers typically per day as of 2018, and despite the Red Luas Spencer Dock station being only 300 metres nearby.

It seems logical this station would be much more used if there were frequent services, and if there were stations opened along the line, as already suggested, at Croke Park and Cross Guns Bridge. It is also reasonable that a pedestrian bridge and new entrance into the station should be opened onto Malachi Place so as to provide access to the community at East Wall, which it has been calculated would bring the population catchment area to over 5,000 residents. The new route could also improve access from East Wall to the Red Luas.

Docklands Station is also of strategic importance as an alternative terminus to Connolly Station for trains coming from the Maynooth and Sligo line. As such it could be used more so as to free up congestion at Connolly, and allow more services.

Finally, it is understood that around €2 million was spent in 2015 on removing 200 metres of track that linked the Royal Canal line into the freight area at Docklands. It is not understood why money was spent on reducing the Irish Rail network, when expansion and interconnection should be the way forward. The removal of that link means that traffic from the Sligo line destined for the port must use the line via Drumcondra, which is busy with Maynooth and Phoenix Park tunnel passenger traffic. It seems logical that the short connecting link should be re-instated.

1F Dublin Ferry Port

Until 2015 passengers were able to go by *DART* to ferry services to the Britain, which operated out of Dun Laoghaire. However since closure of that ferry route, passengers must travel in and out of Dublin Port, where all ferry services now operate, and where circa 2 million passengers board on and off each year.

Given there are railway lines linking into the port, which directly connect onto lines leading towards every end destination other than Rosslare, it seems logical that a station should be opened as close as possible to the ferry terminal. Although there may be up to nine services each way per day, this does not seem sufficient to justify expansion of a regular *DART* service. Instead, it is recommended consideration is given to extending Intercity services so as to directly connect with the ferry at specific times. Thus trains could travel from direct from Westport, Kerry, or Sligo etc.

1G Spencer Dock / New Docklands Station

According to media reports €100 million may be needed for the plan by Irish Rail to develop a new underground station at Spencer Dock. This is an enormous cost, from which there seems to be very little immediate benefit. Ultimately the station may be useful if the *DART Underground* tunnel is built – yet that is not currently happening.

As this development would be underground it costs many times more than a station built overground – and is also exposed to a lot more risk in terms of the project encountering unforeseen difficulties that are then more expensive to resolve.

Hence this element of the scheme should be deferred – and that this capital instead be spent on stations that need to be opened, such as at Croke Park, Phibsborough etc.

2. Relationship of the *DART West* project to *DART Southwest*, and the lack of stations along the *DART Southwest* route – Overview

The *DART West* application follows the recent application for *DART Southwest*. These two applications essentially relate to contiguous infrastructure belonging to the same company where services are to meet and will possibly overlap. Hence it is not understood why the proposal to electrify all Irish Rail lines in the Dublin region was split into two separate project applications.

Unfortunately, as with *DART West* element of this project, *DART Southwest* also fails to provide service access at the most populated areas along the route. As the two schemes are part of the same project, I request that consideration be given to including stations at the following locations as conditional to any consent granted.

2A Cabra

According to census and ArcGIS it is estimated that 16,000 local residents would be served if a station is opened at the site of the former agricultural sidings.

2B Dublin Zoo

Attracting over a million visitors per annum, Dublin Zoo is the city's busiest attraction. If a *DART* station were to be opened at the entrance to the Phoenix Park by the junction of North Circular and Infirmary Roads, it is estimated that about 9,000 local residents would also be served.

2C Heuston

As Dublin terminus for six intercity services, and also having a Luas stop, Heuston is a major trip generator. It is not understood why services through the Phoenix Park tunnel do not stop here, given platform 10 is disused with space for a corresponding platform on the opposite side, for the other direction. Such a stop would enable passengers travel direct between Connolly and Heuston termini by train.

It is also not understood why there is not pedestrian access at the west end of the station into the former Clancy Barracks, as was proposed when redevelopment there occurred. In the event of such access being opened with a stop for suburban trains to Connolly, the population catchment within one kilometre would be over 12,000.

2D Inchicore

As with Croke Park and Phibsborough, it has long been policy that a station should open near the bridge over Sarsfield Road. Unlike the other population estimates, it has not yet been possible to apply ArcGIS in this instance. Nonetheless, based on the surrounding urban morphology and experience elsewhere, it seems reasonable that a station at Inchicore could serve between 12,000 – 18,000 local residents.

2E Ballyfermot

At Ballyfermot, previously there was a suburban station that was accessible for local residents. About a decade ago the railway line from Heuston to Hazlehead was widened from two to four tracks, so that suburban services are separated from faster Intercity trains, and was budgeted at €350 million. Although a new station was opened a kilometre west at the Park West business area beside the M50, the station serving Ballyfermot was closed and not replaced. It is crucial that a station should be reopened to serve both the local population and so that the state can maximise the return on the substantial investment put into the line. After all, what is the point of a second set of tracks dedicated to suburban services if people cannot get on board?

Accordingly, I want to support the local community who have been requesting that a station should be opened beside Kylesmore Road. This sensible proposal has also been adopted as part of the Edge City development scheme being proposed for the area – however one should not be dependent on the other, and there is no obvious reason why development of a station at this location should be further delayed.

As with Inchicore, it has not yet been possible to apply ArcGIS in this instance to determine a precise figure for the population catchment within a kilometre. Nonetheless, based on the surrounding morphology and experience elsewhere, it seems plausible that a station could serve between 14,000 – 20,000 local residents.

Summary and Conclusion

Irish Rail's network in the Dublin area is a tremendous resource that must be better used. It is therefore critical that passengers should be able to access such services. Upgrading Irish Rail's lines through the city provides the only real opportunity for stations to be opened, as if not, based on experience, it is unlikely any will ever open.

A new station at Croke would serve 16,000 residents; likewise at Phibsborough – and 6,000 at Kilcock. If stations were opened on the connecting line to Sallins, at Cabra and the Zoo, 25,000 would be facilitated – a stop at Heuston could facilitate 12,000 – while at Inchicore and Ballyfermot, around 32,000 could be served. With better access at Docklands and Connolly, catchments could be raised to 29,000 residents.

Hence over 100,000 Dublin residents would be served by *DART* services if access is provided at logical locations. This already occurs in Dublin 2 and 4, where there are 6 stations in 4 kilometres between Sydney Parade and Tara Street. Why then do current plans exclude so many along the railway lines through the north and west sides?

Yet ultimately it would be all of Ireland that would benefit, as there would be direct connection to the mega trip-generators of Croke Park, Dublin Zoo, the ferry port, and better links with Heuston Station.

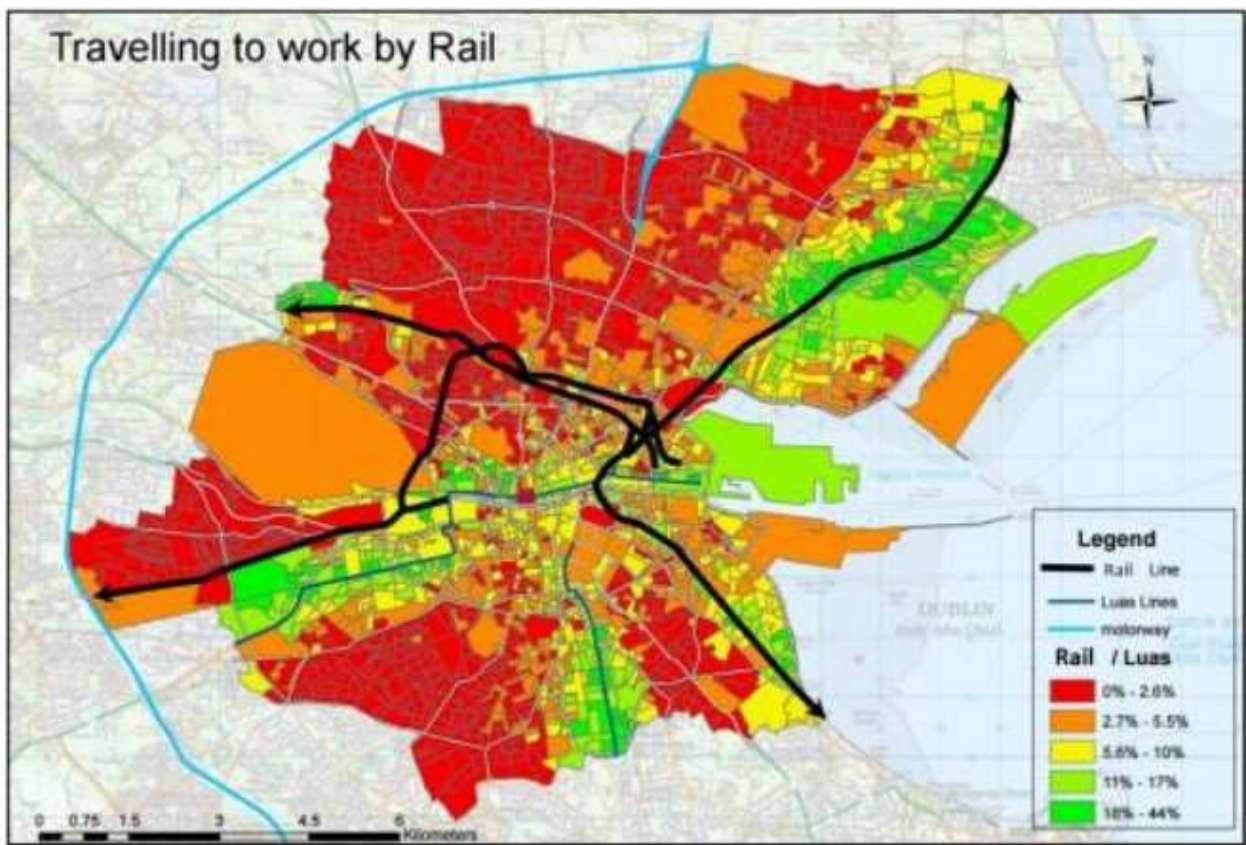
Given Ireland's commitments to EU and international environmental treaties, it is crucial that new *DART* services be accessible in the most populated areas en-route.

Finally, the charge of €50 to make an observation is excessive, and is likely excluding citizens who cannot afford such a cost. As this state purports to be a democracy, and as this is a large infrastructural project being promoted by state bodies, I am calling for such fees to be removed in future cases so that ordinary citizens are not excluded from participation, as is in line with Ireland's commitments under E.U. law.

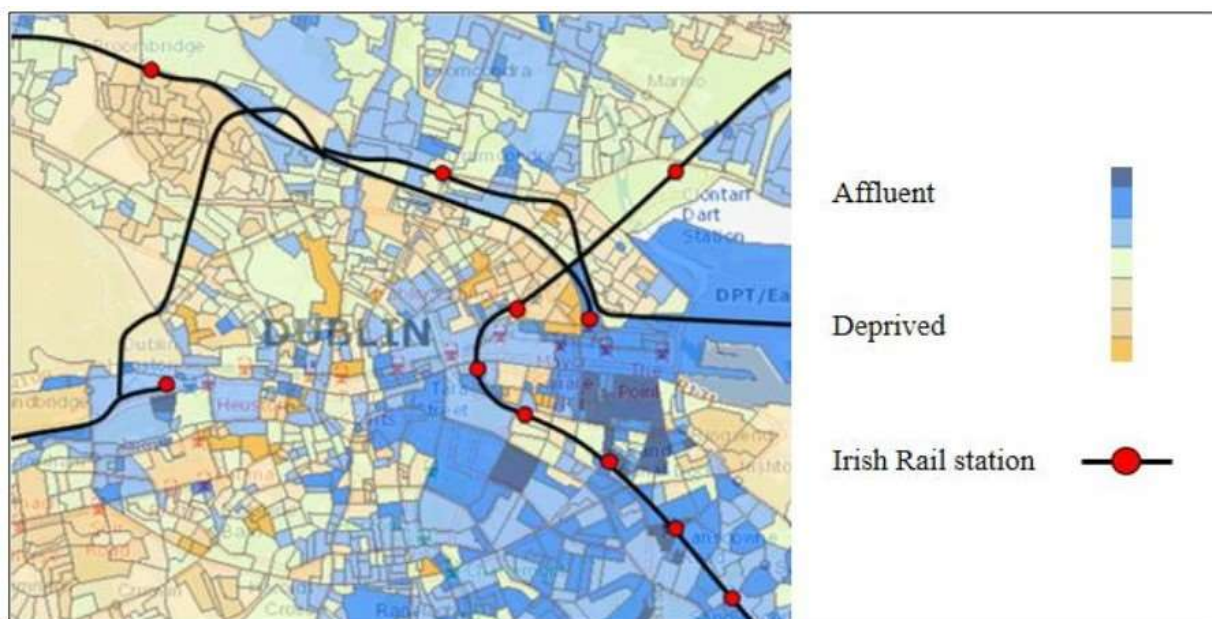
The *DART* expansion programme needs to be value for money and value for the people. Until now *DART* stood for 'Dublin Area Rapid Transit'. Yet if the current scheme proceeds, without equitable access, it may yet get known as 'Dublin Apartheid Rapid Transit'. The authorities need to use this opportunity to ensure it becomes 'Dublin Accessible Rapid Transit'.

Yours sincerely,

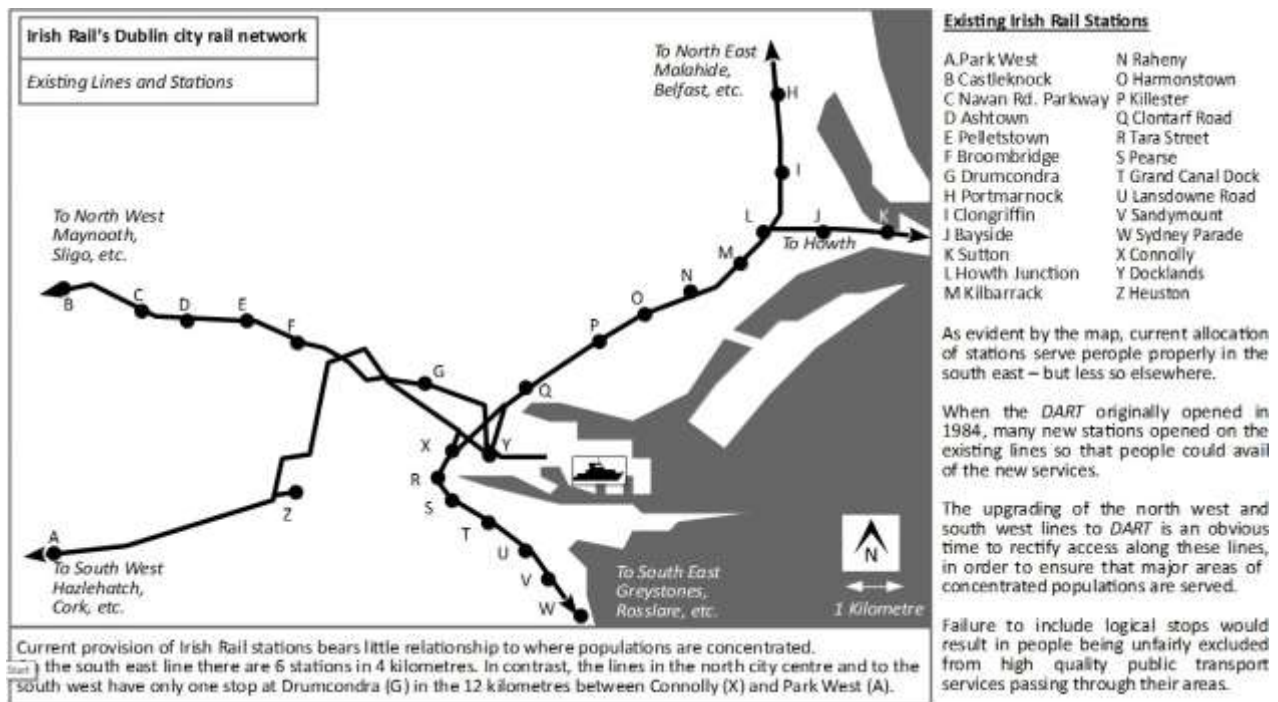
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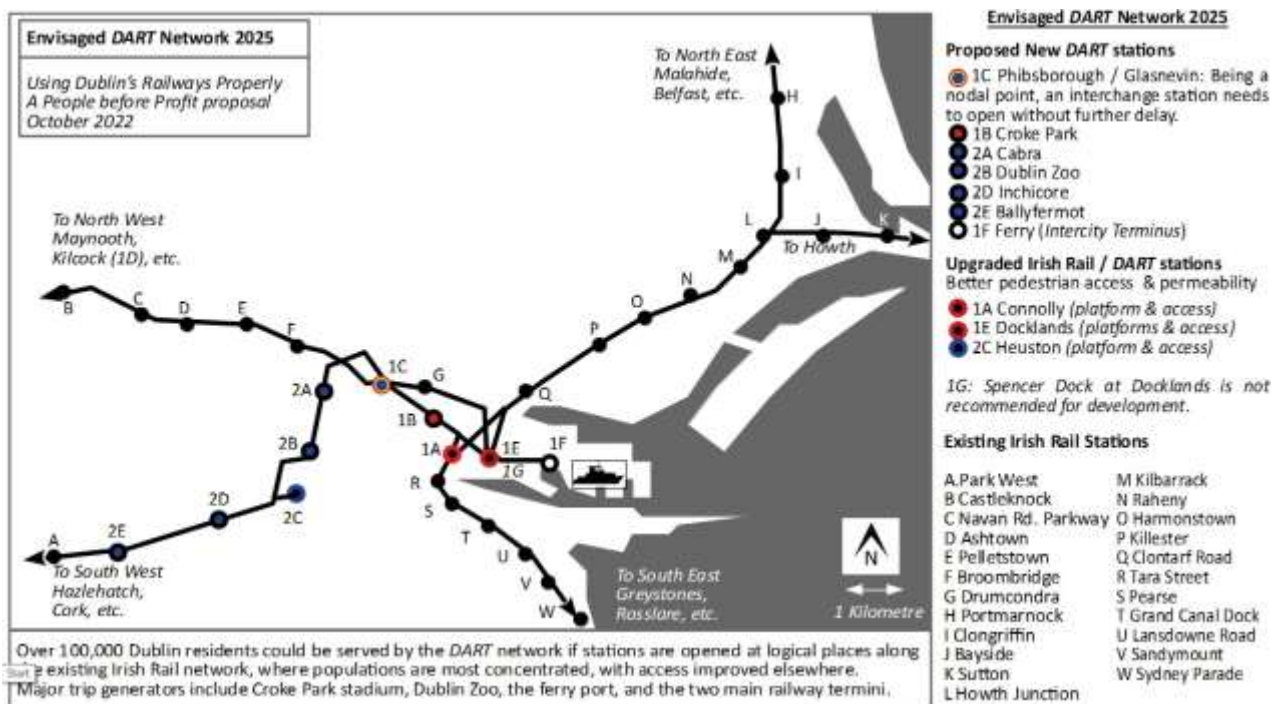
Above: Based on ArcGIS and census data, it is evident that Dublin residents use railways to commute provided access is available, whereas Phibsborough and Cabra have railways but no stations – with car usage significantly greater.



Above: Courtesy of a base map generated by Pobal, it appears there is a correlation between affluence and access to the Irish rail network. (Map dates from 2016).



Above: Irish Rail's existing Dublin City railway network



Above: Envisaged DART Network 2025, with proposed stations shown.

According to ArcGIS and census data, over 100,000 Dublin residents could be served by the proposed DART upgrades to the north west and south west lines provided that stations are opened at logical locations where populations are concentrated, as has long been state policy with Croke Park and Phibsborough / Glasnevin.

Richard Boyd Barrett