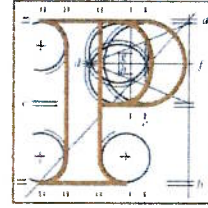


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Adéle Sleator
16A Binn Eadair View
Sutton
Dublin 13

Date: 24 October 2024

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

Dear Sir / Madam,

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

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

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

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

Yours faithfully,

Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA03

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ABP Case 320164 Dart+ Coastal Plus Railway Order 2024

I am making an observation on this railway order.

Under the proposed project, the plan is that there would be no direct DART services from Howth, Sutton or Bayside during the 3 hour morning and evening rush. Instead there would be a shuttle service from Howth to Howth junction and a change of train at Howth junction.

There are many issues with this for the population of Howth, Sutton and Bayside.

Changing at Howth Junction / Donaghmede Station

The proposal involves waiting at Howth Junction / Donaghmede for a train from the Drogheda/Malahide direction to go into town. Many of these trains will be full reaching Howth Junction having already serviced 10 stations. It is very likely that passengers from Howth, Sutton and Bayside will have to wait some time to get a train to accommodate them. At Howth Junction there will be travellers from 4 stations (Howth, Sutton, Bayside and Howth Junction) all trying to get on at one station at the same time. This is not a reliable adequate service.

In the return direction this would involve having to cross over the railway line to change trains. For people with mobility issues their access would be reliant on lifts. Irish Rail do not have a good record of maintaining lifts in working order. Therefore it is a barrier to people with mobility issues travelling. Changing track adds delays and in addition is not very suitable for people with autism or other special needs.

Recent changes introduced by Irish Rail to the Northern Commuter line which reduced direct links through the city and forced changes of trains caused such disruption and delays to the travelling passengers that they had to be largely reversed. The impact to the customer of trains being full and journeys being longer was not properly understood or addressed. This proposal falls into the same space. Have Irish Rail properly designed it from a customer perspective?

Howth Junction / Donaghmede is an exposed station. The plans do not include shelter improvements for passengers waiting on this middle platform. If it is raining people will be soaked.

Howth Junction / Donaghmede has experienced incidents of serious anti-social and criminal behaviour in recent years. This proposal subjects passengers from Howth, Sutton and Bayside to increased risk of harm.

Traffic Chaos in the Howth Sutton area and Increased Emissions

There are four level crossings between Howth Junction and Howth Stations. Under these proposals each of these level crossings could be closed for 30 minutes an hour. This would cause chaos and is dangerous. It would also significantly increase emissions in the local areas and reduce air quality.

As it is there are long tailbacks at the Baldoyle Road junction which are dangerous. There is a knock on effect back to Sutton Cross because cars cannot turn right at the seafront on to the Baldoyle Road. People get frustrated with the delays and can take risks. The delays can be very long (typically 5-7 minutes) for a road closure. Drivers can take chances to try to get through the barriers before they go down.

The assessment itself is flawed. Appendix A6.1 page 15 says that 'in the interest of a reasonable worst case robust assessment on road operations, it was assumed the same volume of car traffic that currently arrives at the level crossings would continue to arrive in future'. If there is not a reliable Dart service into town more people will take to their cars in the area. This is clearly not a worst case scenario and they have seriously underestimated the effect of the closures on traffic and the local area.

There was absolute chaos recently (Sunday 23 June) when Irish Rail closed Station Road to do works at Sutton Station. Traffic was at a standstill and backed up in every direction. It was impossible to go anywhere by public transport. The Dart was not running and buses couldn't get in or out of the area. Traffic fumes were very high. People had no option but to take to their cars.

Opportunity for Reducing Road Closures

This project could deliver improvements in signalling and reduce impact on road users. The approach by Irish Rail to signalling seems somewhat antiquated. I would propose that improved signalling to reduce road closures in the Howth / Sutton is included in the project.

It is not just cars that are affected by the road closures. Buses, pedestrians, dog walkers and cyclists are also impacted. The road closures are a big impediment to locals enjoying the amenities in their area.

Impact on local businesses, tourism and the increased population in Howth/Sutton

The proposed changes will have a detrimental impact on local businesses and on golfers at Sutton golf club who cross the railway line between parts of the course.

Many apartment blocks have been built or are in progress in the Howth / Sutton area. These will increase the population of Howth by 24% and the population of Howth/Sutton by 16%. The associated car parking spaces are limited because of the proximity to "strong" transport links. This proposal degrades the public transport in the area and is not consistent with the planning permissions.

Howth is a major tourist attraction and gets a lot of visitors. This is vital to the local economy. It is estimated that up to 1.5m tourists visit Howth annually. Many of these use the DART. This proposal could deter tourists or force them into cars instead of public transport and does not facilitate any increase.

Against public policy

Public policy is to encourage a reduction in car dependency. This proposal does the opposite in the Howth/ Sutton area as the degradation of service will force people into their cars.

A reliable direct service from from Howth to the city centre is required at all times of the day.

Adèle Sleator
16A Binn Eadair View
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