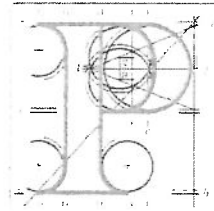


**Our Case Number: ABP-320164-24**



**An  
Bord  
Pleanála**

Alan and Siobhan Brown  
9 Casana View  
Howth  
Dublin 13  
D13 FD34

**Date:** 30 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 and oral hearing request 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](http://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](mailto:laps@pleanala.ie)

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

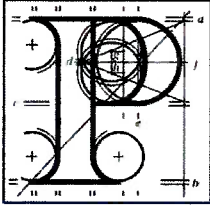
Yours faithfully,

Aisling Reilly  
Executive Officer  
Direct Line: 01-8737131

RA03

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Mairbhride	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

Alan Brown, Siobhan Brown, Anne Thornton, James Rickard

(b) Observer's postal address

9 Casana View, Howth, Co.Dublin D13 FD34

## 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

Not applicable

(b) Agent's postal address

Not applicable



## 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)

ABP-320164-24

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

Dart+Coastal North-Railway Order

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

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

Howth, Sutton, Baldoyle, Howth Junction/Donaghmede to include Dublin North

## 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).

#### 1. Loss of direct DART services

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to our communities. For the residents of Howth and Sutton the H3 bus in particular is not dependable, with frequent cancellations. The number 6 bus only runs once an hour, on average. The Dart is dependable and ensures people get to their destination on time. It is vitally important for all commuters, workers, students, tourists and emergency services that the direct Dart service is maintained.

There are 600 new dwellings nearing completion adjacent to the Howth Dart Station. Another development under construction in Howth Village comprises more than 200 dwellings. The occupants of these dwellings will inevitably take to their cars in the event that direct city centre access by Dart is removed. We consider that upcoming developments in the Howth Sutton area has been ignored in the Irish rail submission and that one way or another a decision to remove or curtail the direct service from Howth to Dublin can only spell disaster for transport in the area.

#### 2. Level crossings

A shuttle DART service operating every 10 minutes in each direction would cause the level crossings to be closed for up to 30 minutes of every hour.

For example, the crossing at Sutton Station could be closed for more than 32minutes of every hour, and the Baldoyle Road crossing could be closed for more than 30 minutes of every hour in a worst case scenario. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11).

#### 3. Increased traffic

The traffic assessment submitted by Irish Rail as part of their application 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)



## 5. Grounds

We already have the situation that at certain times when the level crossings on either Sutton Station or Baldoyle Road are closed traffic approaching either crossing from the Dublin Road/Howth Road/Greenfield Road, backs up and blocks the junction at Dublin Road/Baldoyle Road or at Sutton Cross. When this occurs, from time to time, it causes complete traffic mayhem to occur where all movement comes to a complete standstill.

**The Irish Rail submission accepts that this will occur much more regularly resulting from the railway order's proposals.** These roads are land locked and impossible to extend or improve as they stand so the proposal by Irish Rail seeks to condemn residents of the area to additional traffic chaos while also removing their access by train to the city centre. We find this to be unacceptable and not in accordance with the Minister for Transport's claim within the submission that there will be an improvement in environmental emissions as a result of the proposed scheme.

Further to the above, we have grave concerns that this increased traffic congestion will affect access by emergency vehicles (medical and/or firefighting) to the peninsula area, this eventuality is entirely omitted from the Railway Order's proposals.

This also 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 an enormous amount of local traffic both domestic and commercial that relies on road transport over the railway, i.e. not to the city centre, this is crucially important to the area and its community. This effect is also ignored by the submission.

### 4. Sustainable travel

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

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)

Furthermore, Irish Rail's 2nd public consultation report found that: *"The loss of direct services to Dublin City Centre was regularly cited in submissions as grounds for existing DART users from the Howth Peninsula to revert from DART usage to private car usage."* - Appendix A3.2 PC2 Findings Report page 33

Removing direct DART services does not align with our national transport and climate policy.

## 5. Grounds

### 5. Accessibility

A shuttle DART service will require people to transfer DARTs at Howth Junction Station if they want to continue into the City Centre.

This will cause difficulties for people with disabilities, limited mobility, and wheelchair users where they need to use the lifts in the station.

In 2023 the Irish Independent reported that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months. It can take days, and even weeks for lifts to be repaired.

The particular lifts in Howth Junction/Malahide station are notoriously unreliable whether due to inherent imperfections or to the lack of maintenance. We have little confidence that this will improve with any future installation.

### 6. Local businesses

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.

### 7. Tourism Howth & Sutton

Tourist numbers visiting Howth and Sutton have increased exponentially year on year. Tourism is now a feature seven days a week, not just Friday to Sunday. In addition, large new housing developments in Howth will impact on what is already a major problem, gridlock at Sutton Cross. The best option for commuters, including tourists is the direct Dart service. Removing the direct Dart will leave commuters stranded in Howth Junction/Donaghmede depending on trains going to and from Malahide and Drogheda. These trains will already be packed with commuters to those towns. Because of the poor H3 and 6 bus service, coupled with more frequently closed level crossings causing gridlock this will affect commuters to an unacceptable degree.

### 8. Oral Hearing

In light of the foregoing and our deep reservations that the final outcome will be favourable in any way towards retaining our present direct access to the city centre by Dart we request that An Bord Pleanála calls an oral hearing to allow further discussion about the project and the negative impacts these changes will have.

**5. Grounds**

<b>9.</b>



## 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.