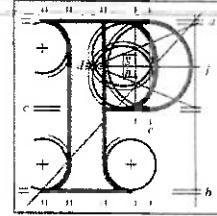


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Baldoyle Library Bookies Book Group
c/o Lee Hogan Kerrigan
39 Georgian Hamlet
Baldoyle
Dublin 13
D13 C1X2

Date: 09 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 proposed railway order and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

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 the meantime 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

RA05

Teil	Tel	(01) 858 8100
Glaio 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

SUBMISSION

To: An Bord Pleanála, 64 Marlborough Street, Dublin 1 D01 V902

Re: **DART+ Coastal North Railway Order [2024]**

Ref: **ABP-320164-24**

Submitted by:

Contact Name: Lee Hogan Kerrigan

Address: 39 Georgian Hamlet, Baldoyle, Dublin 13 D13 C1X2

Email: lee.hogankerrigan@gmail.com

On behalf of:

Baldoyle Library Bookies Book Group

Lee Hogan Kerrigan	39 Georgian Hamlet	Baldoyle, Dublin 13	D13 C1X2
Fiona Tierney	4 Church Road	Sutton, Dublin 13	
Vanessa Pierce	43 St Lawrence Road	Clontarf, Dublin 3	
Sharon Hogan	39 Georgian Hamlet	Baldoyle, Dublin 13	D13 C1X2
Eimear Shanahan	Dunora, Dunbo Hill	Howth, Co Dublin	D13 VY42
Caroline Quinn	107 Bayside Boulevard North	Bayside, Dublin 13	D13 T6P1
Joan Shatwell	50 St Margaret's Avenue	Raheny, Dublin 5	
Aoife Ní Sheaghda	13 Asgard Park	Howth, Co Dublin	
Suzanne O'Connell	12 Dunseverick Road	Clontarf, Dublin 2	D03 FD79

To whom it may concern:

We represent a number of local families and businesses from Howth to Clontarf. We submit below a list of our concerns which we ask An Bord Pleanála to consider in regard to the recent application by Irish Rail regarding its DART+ Coastal North plan.

We wish to state that **we strenuously object to the approval of the Railway Order for DART+ Coastal North [2024] as it currently stands.**

1. Impact of the loss of direct DART services

Howth is a peninsula. Howth has a single road leading in and out of it. The DART rail connection is therefore particularly important, and the **direct DART connection** to Dublin, and from there to anywhere else in Ireland, **must be preserved**. Any downgrading of the service would have a very serious impact on the life and business of the peninsula.

The proposal to downgrade the DART service from direct to shuttle between Howth and Howth Junction, particularly at peak times, leads one to infer that the Irish Rail planners regard Howth and its environs as a community of retirees with few businesses or services. This is far from the truth. The **Howth peninsula community is growing exponentially**, as indicated by the following current examples:

- 512 apartments are coming on-stream this year at Claremont, a few hundred metres from Howth DART Station¹;

¹ <https://marlet.ie/project/claremont-howth/>

- An application for a 135-unit apartment scheme, directly across from the Claremont development, is currently going through the planning appeals process²;
- An application for 113 apartments on the grounds of Deer Park, also within walking distance of Howth DART station, is currently going through the application process,³;
- Planning permission was granted to demolish the Baily Court Hotel in Howth village and replace it with 177 apartments⁴; and
- Planning permission has recently been granted for a 104-apartment development at Grange Road, Baldoyle;⁵

Further large apartment developments are being envisaged for Sutton Cross and elsewhere in the Howth area. Planning permission for these and other new builds in and around Howth and Baldoyle, and elsewhere along Irish Rail's so-called "Howth branch line", were/are being granted, in part, because of the **availability of the direct DART services**. Spaces for parking in these schemes were/are being limited because of the expectation of having a direct DART service nearby. **This expectation needs to be factored into An Bord Pleanála's considerations of Irish Rail's DART+ plan.**

An aspect which appears not to have been considered in Irish Rail's DART+ plan is the **local economy of Howth**, which is **based mainly on tourism**. Howth tourism is not just a stand-alone market, it also features heavily in Dublin City's promotion of its local attractions^{6 7}.

According to data from Fingal County Council, approximately 750,000 visitors/tourists use/visit the area annually.⁸ Attached to this submission is a selection of reviews on Trip Advisor, etc., all referring to the ease of getting to Howth by DART, demonstrating that **the direct DART service is a major selling point** for making the trip to Howth.

Based on the figure above, a conservative estimate of an average spend of only €50 per visitor on tours/meals/coffees, etc., will bring €37.5 million annually into the area. A ten percent **reduction in visitor numbers** because of the non-direct trains and consequential long delays in road transportation (private or public) would mean a **loss to the Howth economy** of up to €4 million. Even a five percent reduction in visitor numbers would mean a loss to the Howth economy of almost €2 million.

There would of course be further knock-on losses, not least the loss of hospitality jobs on the peninsula and the loss of the local spend that would stem from that.

The direct DART services from Howth, Sutton and Bayside to the city centre and the Southside are **vital to keep our communities connected**. DART services have been running to Bayside, Sutton and Howth for 40 years, and a direct train service has been running to Howth Station since 1847. **This service must not be curtailed.**

We ask that **An Bord Pleanála requires that Irish Rail seeks and takes account of any observations and conditions required by Fingal County Council and local community agents in their DART+ plan.**

² <https://www.irishtimes.com/business/2024/09/04/glenveagh-contests-fingals-refusal-of-planning-permission-for-howth-development/>

³ <https://www.thejournal.ie/howth-apartments-planning-permission-deer-park-5561261-Sep2021/>

⁴ <https://www.thejournal.ie/howth-apartments-bailey-court-hotel-marlet-group-5033123-Mar2020/>

⁵ <https://www.rte.ie/news/business/2024/0708/1458760-baldoyle-development-approved/>

⁶ <https://www.visitdublin.com/guides/things-to-do-in-howth;>

⁷ <https://www.visitdublin.com/ireland-s-eye-ferries;>

⁸ <https://www.google.com/url?sa=t&source=web&rct=j&opi=89978449&url=https://www.fingal.ie/sites/default/files/2021-09/saao-operational-plan-2021-2025.pdf&ved=2ahUKewjltr6U-cejAxUTU0EAHVZ2KDEQFn0ECB8QAw&usq=AOvVaw3FaKBx9M28r6Kn6tiSF6DQ>. Page 2.

2. Significant impact of closures at Level Crossings

Under the Irish Rail plan, there is a strong likelihood of significant impact on **closure times for the four level crossings** between Howth and Howth Junction (Claremont, Cush, Sutton, Baldoyle). Closure times for each level crossing would likely fall within the range set out below by Irish Rail. Where one crossing is closed for the minimum time, another crossing might be closed for the maximum time. While it is possible for Irish Rail to optimise the length of a closure time by scheduling two trains to pass in opposite directions at the same time, this can only be done at one crossing per hour.

According to Irish Rail's own plan, in a worst-case scenario, some level crossings could be closed for **up to 30 minutes out of every hour**. And of course, that would be most likely **at peak travel times**.

<i>6 trains per hour, both directions</i>		
	Min closure time per hour	Max closure time per hour
Baldoyle Road	12:50	30:50
Sutton Station	13:06	32:19
Lauders Lane	17:58	30:47
Howth Lodge	17:08	31:34

Table Source: Page 11 - Appendix A6.1 DART+ Coastal North Level Crossing Assessment

3. The impact of increased road traffic

The widest roads on the Howth peninsula are residential roads, single-lane each way, and none have bus corridors. The main road into and out of the peninsula has cycle bollards in place but no room in either direction for a second lane/corridor for buses, taxis, or emergency vehicles.

At times when the closure of a level crossing reaches up to as much as 30 minutes per hour, it is inevitable that **road traffic bottlenecks and tailbacks will follow**, along the entire road network, into Howth, and from Howth and Sutton to Kilbarrack and Blackbanks, even Dollymount and Clontarf, and from Sutton to Portmarnock and on to Malahide.

The Irish Rail plan does not allow for the fact that Warrenhouse Road and Strand Road are the **two main arteries** for road traffic to Portmarnock, Malahide and Baldoyle. Warrenhouse Road in particular is **the main bus route** from the city centre to Portmarnock and Malahide. The inevitable tailbacks on these two main arteries caused by the proposed shuttle service and level crossing closures would **adversely affect people travelling to school, college, work or for personal or domestic reasons, in buses**.

Even more significantly, these long closure times would **impact, possibly catastrophically, the provision of emergency services in the area**, With or without sirens on, **ambulances, Garda cars, fire engines, and other emergency response vehicles will not be able to pass through a closed level crossing** for up to the 30 minutes per hour, or even longer given the also inevitable traffic tailbacks/queues. The following comment from Fingal County Council's *Howth Peninsula Fire Management Strategy*⁹ is particularly relevant with regard to Howth: "Peak incidents occur during the periods of peak visitor numbers."

If permission is granted for the Irish Rail DART+ plan, we ask that **An Bord Pleanála requires Irish Rail to acquire, collate and manage the assessments on this proposal by all the emergency services and Dublin Bus services in the area, and to develop and manage with them a major incident plan** to take into account scenarios up to and including the envisaged worst cases with regard to the level crossing closures.

⁹ <https://www.fingal.ie/sites/default/files/2024-04/howth-fire-management-strategy-.pdf>

We would add as well that **not all emergencies may be visible** or in emergency vehicles (eg, a D-doc car that does not use sirens, or a parent who jumps in the car with a sick child and can't wait for an ambulance, or someone who is rushing to an emergency somewhere else). Examples such as these must also be **taken into consideration when developing the major incident plan**.

If permission is granted, the long delay times at the level crossings will **encourage reckless and dangerous behaviour**, by both drivers and pedestrians. Irish Rail should be concerned that a very **unsafe environment** will be created for users by the delays, as these level crossings do **not have a pathway or cycle lane**. Walkers, joggers, cyclists, parents with buggies, wheelchair users, workers late for work and students late for school, will all be vying with cars to move on when the barriers lift, thus increasing the possibility of a level crossing closure being a **factor in a fatal accident**.

These closures will have a **damaging impact on a wider section of the Northside population** than the immediately local DART users between Howth and Howth Junction. We suggest that **An Bord Pleanála requires Irish Rail to inform and consult with the wider affected populations** in Kilbarrack, Raheny, Killester, Clontarf, Portmarnock, and Malahide, and to **put in place plans to install modifications to increase the safety of all users** when the level crossing booms lift and close.

4. Issues regarding the proposed DART shuttle service

When Irish Rail originally proposed replacing the direct DART service between Howth and Howth Junction with a shuttle service, they offered that, as an improvement¹⁰ on the current DART schedule, it would increase the number of services between Howth and Howth Junction “from 9 to 18 services per peak 3-hour period”¹¹.

Currently, there are three services arriving into Howth per hour, and three services leaving Howth per hour. Thus, over a 3-hour peak period, we can assume 9 services arriving in Howth and 9 service departing. From this we can deduce that Irish Rail's proposal of 18 services indicates the number of services over this period **in a single direction**, and the combined total number of services proposed, in both directions, is 36. Even allowing for reducing turnaround times at endpoints and other speed-up and optimisation measures, this schedule seems barely possible.

It would appear that Irish Rail might be of the same mind. We note that in Irish Rail's current application, there is **less certainty and focus given to the frequency of the proposed shuttle DART service**. It's also unclear whether any direct services would remain at off-peak times.

We ask that **An Bord Pleanála requires Irish Rail to declare clearly the minimum number of services in each direction** it plans to make available for users in Howth, Sutton, Baldoyle and Bayside, and to **guarantee that this minimum level of service would not be curtailed in the future**.

Furthermore, the proposed shuttle DART service from Howth will require users to transfer to a Dublin-bound DART at Howth Junction to enable them to continue into the City Centre for work, study or leisure. At peak times, they will have to wait on a full platform to change to a potentially full peak-time DART. It is very possible, even likely, they might have to **wait for several full trains to pass** before they can board one, and the likelihood of **finding a seat would be close to non-existent**.

We ask that **An Bord Pleanála requires Irish Rail to include, in the minimum level of service above, a minimum number of direct services to and from Howth at both peak times and off-peak times**.

¹⁰ Note that there was no demand from users for additional services to the 9 services each way per peak 3-hour period which we now have.

¹¹ <https://www.dartplus.ie/en-ie/projects/dart-north>

5. Safety of schools-going users

Irish Rail's plan does not take cognisance of fact that a substantial number of primary-, secondary-, and college-going students travel daily by DART to and from schools in the area and in Dublin city, at the peak times of early morning and late afternoon/early evening. If the direct DART service is replaced with the proposed shuttle service, all these **young people will be discharged at Howth Junction in both directions** and will have to **compete for space on the on-going DARTs** with all the other peak-time commuters at the same time, risking vulnerable children and teenagers particularly of being left behind on the platform and/or being late for school or for home. There is also the possibility of **unsupervised pushing and shoving** on the Howth Junction platform.

This is **not providing safe passage for our young population.**

We ask that **An Bord Pleanála requires Irish Rail to develop a plan, either to maintain direct services so that our schoolchildren do not need to disembark and change platforms and trains partway through their journey to and from school, or at least to improve conditions for young people at this location.**

6. Accessibility

For the most part, the residents of Howth and environs must travel away from the peninsula to access work, medical appointments, meetings with friends, theatre outings, trips away, and all the other events and services that are part of daily life. If they do not have a car, or prefer not to use one, they must rely on local DART or bus services.

The downgrading of Howth DART services as proposed by Irish Rail will mean reduced access to those events and services, and represent a significant discouragement for older people, people with disabilities, and people with children, putting them off from staying engaged with the City, and very likely driving them back into cars. It unjustly impacts on people with disabilities or reduced mobility – their journeys will be much **less accessible if they need to change trains at Howth Junction, and must change levels at the station involving many steps up and down, to access a different platform to do so.**

While it is not listed in Irish Rail's Railway Order Documentation, consideration ought to be given to the **duty of care due to our vulnerable seniors.** Irish Rail's plan for a shuttle DART service on the Howth Branch line and a more complex public transport experience will diminish the ability of our vulnerable seniors to access vital services and to have a social life, thus leading to increased loneliness and thoughts of suicide.¹² We ask that **An Bord Pleanála requires Irish Rail to develop a plan to either maintain the direct service that makes movement more accessible to older people, or at least to improve the conditions for older people at this location.**

7. Sustainable travel

Irish Rail's proposed changes will drive an increase in children being driven in cars and dropped off at school gates, in direct conflict with several of the National Transport Authority's own projects, in

¹² https://www.tcd.ie/news_events/articles/2024/tilda-study-reveals-crucial-insights-on-loneliness-and-death-ideation-among-older-adults/

particular the **Green School Initiative** whose aim for decades has been to reduce the congestion caused by students travelling to school in cars.

The proposed changes go directly against a key recommendation made in the OECD and the Irish Climate Change Advisory Council report, "Redesigning Ireland's Transport for Net Zero: towards systems that work for people and the planet",¹³ to "redefine the goal of the transport system as sustainable accessibility in order to challenge ingrained mindsets and shift away from identifying high mobility, in terms of reduced travel time, with well-being."

8. Oral Hearing

We request that **An Bord Pleanála calls an oral hearing for this DART+ planning application** so that the Bord can hear directly from the people who live along the DART line, and others in the wider area who are affected by the proposed changes.

We are available to be contacted at any time to discuss this matter.

9. Final comments

As previously stated, we represent local families and businesses from Howth to Clontarf. We are not experts in transport infrastructure, but, having participated in discussions with neighbours, friends and colleagues over the past months, and having read related commentary and articles, it appears clear to us that **most local residents and businesses consider the DART+ plan as set out by Irish Rail fatally flawed**.

We understand that the DART+ plan will deliver little additional peak capacity on the northern line because it will not alter the maximum number of trains that can run per hour into Connolly. Apparently, the most it will do is displace one set of passengers for another. We ask **An Bord Pleanála to decide that this DART+ plan as it stands must not be allowed to happen**.

There have been many suggestions put forward that could help deal with the demand for increased capacity. A proposed new line, outlined in the All-Island Rail Review¹⁴, to take the fast trains. Grade separation of Howth Junction to increase frequency. More creative scheduling of DARTs and main line trains. Installation of more modern signalling equipment to speed up the closing and opening of level crossings.

None of these does Irish Rail even seem to have considered. The "preferred option" was the first option presented to the public by Irish Rail, and remains the only option they propose to consider now. We recommend that **An Bord Pleanála sends Irish Rail back to the drawing-board to bring back a better-considered, more workable plan for the future of residents and users of the Howth DART line**.

Thank you for your attention to the contents of this submission. If you require further information or elaboration, please contact the undersigned.



¹³ https://www.oecd.org/en/publications/redesigning-ireland-s-transport-for-net-zero_b798a4c1-en.html

¹⁴ <https://www.gov.ie/en/publication/cc8fc-all-island-strategic-rail-review/>

Lee Hogan Kerrigan

Email: lee.hogankerrigan@gmail.com

A selection of reviews by tourists which refer to the ease and accessibility of visiting Howth using direct DART services

Howth Head



1.7k reviews • #2 of 15 things to do in Howth • 1 lookouts

[Write a review](#)

What people are saying



By Prague F Insets

"Howth cliff walk experience"

★★★★★ Oct 2023

The train journey from Dublin city centre to the terminus didn't take long, and then we took a scenic walk along the ...

"Nice visit to Howth"

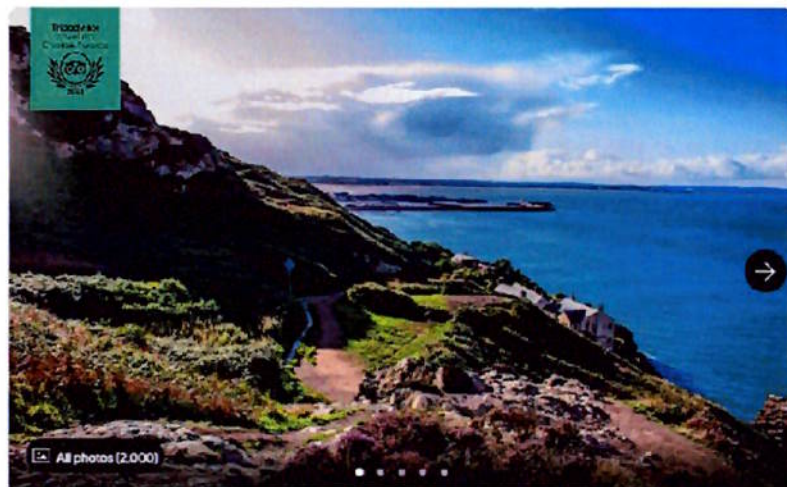
★★★★★ Apr 2024

Go to **Connolly Station** and get a ticket to platform 7. It's the last stop on the train ride so hard to screw up



Suggest edits to improve what we show

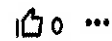
[improve this listing](#)





Karen W

19 contributions



Exquisite views

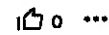
Jul 2023 • Family

Well worth the quick and easy trip from Dublin on the DART. With an active fishing port, a playground for children, numerous shops and restaurants, there is something for everyone in this beautiful village. The hike up to Howth Head can be somewhat challenging depending on one's fitness level, but the views are breathtaking.



Milena G

Sofia, Bulgaria • 35 contributions



Perfect place!

Sept 2022 • Friends

There is convenient public transport to get there. The tour lasts about an hour and incredibly beautiful views are revealed in front of you. I recommend that you start from the highest point, as this way you will descend and the walk will not tire you. Finally you will reach the harbor where I recommend you to eat fish & chips in one of the neat restaurants by the shore.

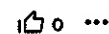
Written 7 April 2023

This review is the subjective opinion of a Tripadvisor member and not of Tripadvisor LLC. Tripadvisor performs checks on reviews as part of our industry leading trust & safety standards. Read our [transparency report](#) to learn more.



kvasir

London, UK • 1,264 contributions



Delightful sea view.

Mar 2023 • Friends

Just a short DART ride from Central Dublin, the sea air, turbulence of the breeze, and a backdrop of the cries of the seabirds following the trawlers provide a refreshingly bracing experience.



Inerese A

Tyreso, Sweden • 91 contributions

👍 0 ...



Simply stunning!

Dec 2022

Went on a spontaneous trip to Howth during our weekend in Dublin. So easy to get to (just take a normal commuter train!) and we had a wonderful day. Very lucky with the weather too. The walk was absolutely stunning, the most breathtaking views! Make sure you wear good shoes as it can be a bit slippery.

Written 21 December 2022

This review is the subjective opinion of a Tripadvisor [member](#) and not of Tripadvisor LLC. Tripadvisor performs checks on reviews as part of our industry leading trust & safety standards. Read our [transparency report](#) to learn more.



brigidmartyr

Berkeley, CA • 39 contributions

👍 0 ...



Lovely coastal town

Dec 2022 • Solo

Took the easy train ride to Howth on a blustery day. Took the hike to the lighthouse which was easy. Be sure to stop for tea at the tiny cafe along the route and say hello to the owner's dogs. I had a chance to buy Christmas cards there which support the local sea rescue teams. Such a good cause. Had a terrific lunch at The Bloody Stream. Atmospheric and lovely staff. Had the local oysters and hake. Memorable and with a roaring fire to keep everyone toasty. Nice mix of locals and visitors.



Ireland travel advice and information



Debra Abston Greenwood · 6 Aug
2022 · 🌐

For those of you looking for smaller places to see, or places that aren't the same high profile tourist attractions that you've already done, may I recommend Howth? It's a lovely port town outside of Dublin. It's the last stop on the Bray-Howth DART line, so accessible on public transport. They have a somewhat well-known castle, the remnants of a 13th century church, a fishing pier, a market place on the weekends, lots of restaurants, seafood of course, and everything is walkable once you're in town. There are cliff walks/hikes, beaches, and golf outside the town area.



Ireland travel advice and information

...

Top contributor Landon Kissell · 1 Mar · 🌐

Have you ever thought of what the BEST day trip from Dublin is? It is definitely Howth. WOW I had such a wonderful time in Howth. Only a 27 minute train from Connolly station, Howth combines the marina, with cliffs, with overall elegance. I truly LOVED my time in Howth. Do you think this is the best day trip from Dublin? Have you been to Howth?



youtube.com

One Day in Howth, Ireland | BEST Day Trip from Dublin



Ireland travel advice and information



◆ Top contributor Jana Thompson
Jape · 22 Sep 2023 · 🌐

Today we took the dart train from Connolly station in Dublin to Howth (2 tickets were 10euro total round trip). It was maybe a 30 minute train ride. Beautiful fishing/coastal town with some fresh delicious seafood. We walked to the light house and also to the Howth Castle (I had read it was public but was closed today they were filming). Lunch at King Sitric for some amazing seafood. Very windy so we had our jackets and hats!! make sure you have good walking shoes. There's a cute little park for kids, many local restaurants, local ice cream and coffee shops, Starbucks etc.

s