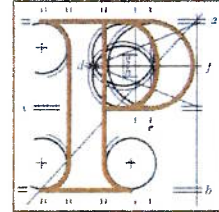


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Brendan Clifford
76 Balglass Road
Howth
D13 XK00

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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Brendan Clifford
76 Balglass Road
Howth
Dublin 13XKOO
21st Oct 2024

Re DART+ Coastal North Infrastructure changes at Howth Junction

ABP Ref: ABP-320164-24

I wish to make a submission on behalf of myself and two others, namely Siobhan Clifford and Christine Moore about the infrastructure changes proposed to be made to Howth Junction railway station to facilitate the Dart + Coastal North project.

All of us are residents of Howth and are greatly concerned with the loss of a direct train service to Howth and the prospect of endless traffic jams given the many new closures per hour to the 3 level crossings coming into Howth and in Howth itself. The infrastructure changes proposed to be made to Howth Junction railway station will facilitate the Dart + Coastal North project.

We would like the Bord to consider the wider aspects and consequences of these infrastructure changes at Howth Junction as they will impact the local communities of Bayside, Sutton, Howth and beyond.

1. Loss of direct DART services

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond 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.

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 32 minutes 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)
Increased closures will limit access to the popular Burrow Road Beach where access for Emergency Vehicles is vital in good weather. The Residents of Claremont Apartments will similarly be affected but in this instance, it is access to and from their own homes that will be seriously discommoded.

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)

This has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings.

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. Accessibility

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

As the trains will be travelling from as far as Drogheda-it is not a certainty that, at peak hours, these trains will not be full by the time they arrive at Howth Junction.

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.

6. Change Over at Howth Junction

During Public Consultation Number 1, one of the major concerns was safety at Howth Junction. Many people had either witnessed or experienced directly anti-social behaviour at this station and on the Dart itself. The promise of many upgrades of the Station will not stop anti-social behaviour. To stop anti-social behaviour Irish Rail would need 1 staff present in the office and 2 Security Guards on each platform.

The return journey in the evening will necessitate passengers crossing the overhead bridge. Many people including the elderly, those with disabilities, parents of school & college going children will consider this very unsafe at this station.

7. 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.

8. Oral Hearing

We ask that An Bord Pleanála hold an Oral Hearing for the DART+ planning application. An Oral Hearing will allow further discussion about the project and the negative impacts these changes will have and would be an ideal forum to gauge the depth of feeling in the community opposed to these changes to the Dart service and to the infrastructure changes that would facilitate this negative chain of events.

Yours Sincerely,

Brendan Clifford

Siobhan Clifford

Christine Moore