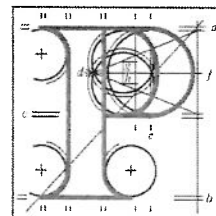


Our Case Number: ABP-320164-24

Your Reference: SID-OBS-002318



**An
Bord
Pleanála**

Cian O'Callaghan T.D.
Leinster House
Kildare Street
Dublin 2

Date: 17 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 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.

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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
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64 Sráid Maoilbhríde Baile Átha Cliath 1 D01 V902	64 Marlborough Street Dublin 1 D01 V902
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Leinster House
Kildare Street
Dublin 2
11th October 2024

An Bord Pleanála
64 Marlborough St,
Dublin 1,
D01 V902

A chara,

I'm writing to make a submission as part of An Bord Pleanála's statutory consultation for DART+ Coastal North.

Firstly, I'd like to make it clear that I support the overall objective to improve DART services and the proposed extension of DART services to Drogheda.

A key condition of granting the Railway Order should be the retention of direct services for commuters using Howth, Sutton and Bayside, including at key peak morning and evening times.

I am strongly opposed to the detrimental effect these changes will have on existing direct DART services from Howth, Sutton and Bayside to the city centre and beyond. Given the very strong feedback from the local community during public consultation 1 and 2, it is disappointing to see that Irish Rail has not sought to amend their proposals before lodging their application for planning permission.

A significant number of residents and regular DART users have been in touch with me to voice their concerns about these proposed changes.

A number of people were also in contact to express their strong disappointment that Irish Rail did not make the relevant documents that form part of this Railway Order application available in hard copy in either the Baldoyle or Howth Libraries despite requests from myself and others in the local community.

In this submission I will outline some of the key concerns raised by the local community.

1. The loss of direct DART services to the city centre

There is strong opposition to the proposed removal of direct DART services from Howth, Sutton and Bayside.

Many people are supportive of an extension of DART services to Drogheda, which is an important step in expanding our public transport networks. However, this should not come at the expense of direct train services to Howth, Sutton and Bayside. There has been a direct train service to Howth since 1847.

The ongoing population growth in the area also needs to be considered. The development at Santa Sabina, the former Techrete site and the Bailey Court site will lead to a very significant increase in population in the local area.

These services are a vital link for our growing local community.

2. Level Crossings

Irish Rail have proposed that a shuttle DART service could run every 10 minutes (6 every hour) in each direction from Howth Station to Howth Junction. The updated modelling provided in Irish Rail's planning application shows that some of the level crossings could be closed for up to 30 minutes each hour during peak times.

Appendix A6.1 DART+ Coastal North Level Crossing Assessment, page 11, shows that where 6 trains are running in each direction the maximum closure times in any one place could be as follows:

- 30m 50s of every hour at Baldoyle Road
- 32m 19s of every hour at Sutton Station
- 30m 47s of every hour at Lauders Lane
- 31m 34s of every hour at Howth Lodge

This will dramatically increase queuing times at level crossings. Critically, this will have an impact on other forms of sustainable transport including cycling, walking and buses.

3. Traffic

The traffic assessments carried out as part of this application show that increased closures at level crossings will directly lead to increased traffic congestion.

The data in the assessment identifies increased delays at the Baldoyle Road level crossing as having the greatest potential to cause traffic delays on the wider road network. This could result in traffic queues increased by up to 59% during peak morning and evening times (Appendix A6.1, tables 4.16 and 4.17, pages 28 and 29).

This will result in large traffic build ups and congestion on other parts of the road network including the Dublin Road, impacting road users who are not crossing at the level crossings. This will result for example in delays to the Dublin Bus services to Howth, even though this service does not use any level crossing.

These results directly breach traffic management standards for projects of this nature. It is not viable for other road users and commuters including bus passengers on other key routes to be impacted by these lengthy closures.

There will undoubtedly be an impact on the response times for emergency services where level crossings are closed for extended periods of time. Any delay to emergency services can have critical consequences.

The data displayed in Appendix A6.1, Table 4-1, page 15, shows that traffic has largely returned to pre-covid levels, if not exceeded them. There are a number of new housing developments being built in Howth and Sutton which will create a further increase in traffic and the numbers of DART users. This includes development at Santa Sabina, the former Techrete site and the Bailey Court site.

The Level Crossings report that forms part of this application (page 15) states that the traffic assessments have been carried out with the assumption that traffic levels will remain the same – this has been labelled as a worst case scenario i.e. there is no drop in traffic levels. This approach is based on Government policy which encourages a modal shift away from car dependency. However, it is clear that car usage is increasing year on year. It is also clear from the public consultation that many people will revert back to using their cars as opposed to using public transport should the direct services be removed (Please see my comments under Sustainable travel for more on this).

Irish Rail's assessment of a 'worst case scenario' for traffic is therefore not an accurate projection of future traffic levels.

4. Howth Junction and Donaghmede

There is very strong concern among residents in the Donaghmede area about the failure of Irish Rail to consult and engage with the local community about proposed changes at Howth Junction and Donaghmede Station.

The Donaghmede Estate Residents Association (DERA) asked Irish Rail to provide a model display of the proposed changes so that the local community could be informed about these changes. DERA sought and received permission from Donaghmede Shopping Centre to host this display.

Unfortunately, Irish Rail did not take up this offer and made no alternative arrangements to engage with the local community. As a result, residents in the area that live close to the Station are not clear about how exactly the proposed changes will impact on them both as neighbours and as users of the Station.

There is also significant concern of many DART users that use Howth, Sutton and Bayside about Howth Junction becoming a transfer station. There have been no guarantees from Irish Rail that the station will be permanently staffed or provided with sufficient security to address safety concerns.

I am urging for that staffing and security is provided at the Station and that Irish Rail engage with the local community about the proposed changes.

5. Sustainable travel

The transition to public transport and active travel has never been more important to help tackle climate change. A key concern raised by the local community is the negative impact a loss of direct services will have on how people commute.

For public transport to be effective, it needs to be accessible and easy. The second public consultation showed that 77% of people would not be encouraged to start using the DART for their commute (Appendix A3.2 page 21).

This would lead to further traffic congestion at peak times which will compound the problem at level crossings. A move from public transport to car usage is directly contrary to our national transport and climate policy, which seeks to encourage and promote a shift from individual cars to sustainable transport.

The report on the second public consultation states 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)

6. Accessibility

The proposed introduction of a shuttle DART service will have a significant impact on people with disabilities including people with limited mobility and wheelchair users.

The transfer system will require people to use the lifts and footbridge at Howth Junction to transfer onto the Howth platform when coming from the city centre.

An article written in the Irish Independent in December 2023 stated that over 800 lifts had been marked as out of service by Irish Rail in the preceding 18 months. People who require the use of the lifts to transfer platforms at Howth Junction could easily be left with no way to get home where the lifts require repair or are out of use.

It is also worth noting the impact this transfer system will have on people with intellectual disabilities. I have heard from several local community groups just how detrimental these changes will be for some people with intellectual disabilities, who travel independently on the direct DART service. For a number of people it has taken years for this independence to be established and there is a very real fear that these proposed changes could reverse this progress that has been made.

The National Disability Authority (NDA) originally made a submission to Irish Rail in 2022 in relation to the project. They specifically reference the infrastructural considerations including transfers and interchanges as being key criteria for a universally designed transport system.

The NDA's submission also notes that they are happy to consult further with Irish Rail, as consultation with disabled persons organisations and people with disabilities on major infrastructural projects is required as defined under the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD).

The NDA have confirmed to me that they have had no further consultation or engagement from Irish Rail on the project since their submission in 2022. This lack of consultation should be considered.

7. Lessons from the New Timetable

A key rationale for the DART+ project is making the most out of existing infrastructure without investing in additional lines to allow express train services bypass DARTs. The recent implementation of a new timetable to facilitate the Enterprise service operating on an hourly basis has not worked, causing delays, overcrowding and congestion on existing services. Irish Rail has admitted that they got this wrong.

This experience indicates that a much more radical addition of extra services without sufficient investment in additional infrastructure and rail lines simply will not work.

8. Online Petition

There has been clear opposition towards these proposed changes in the local community. To show the extent of this opposition, I started an online petition which has now accumulated over 4,000 signatures. The petition can be found here: <https://chng.it/rVKCn2J4NQ>. In addition to this online petition, other online petitions with similar concerns have gathered thousands of signatures and 951 signatures were collected in person by the Howth Sutton Community Council.

These petitions should be considered when An Bord Pleanála makes their decision as the cost associated with the Statutory Consultation process can act as a barrier for some people making submissions.

9. Four Track Proposal from Irish Rail

Irish Rail has recently announced their plans to provide four tracks between Connolly Station and Malahide to facilitate the separation of commuter and intercity services. This additional track capacity negates any rationale for removing direct DART services from Howth, Sutton and Bayside. These plans to increase infrastructure capacity should be prioritised over any proposals to reduce the level of existing services.

Conclusion

The improvement and extension of DART services is welcome and is a positive investment that should be pursued. However, this extension should not result in the loss of direct DART services to Howth, Sutton, and Bayside DART Stations. These proposals will have undeniably negative consequences for residents and other road users along with a clear risk of increased numbers of cars on the roads.

For this reason, and the points listed above, I am requesting that An Bord Pleanála holds an Oral Hearing on this application.

I am also strongly requesting that An Bord Pleanála condition the retention of direct DART services to Howth, Sutton and Bayside including at key peak morning and evening times as part of any decision to grant this Railway Order.

Sincerely,

Cian O'Callaghan T.D.