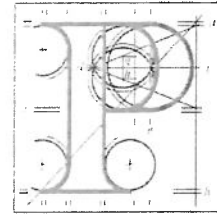


**Our Case Number:** ABP-320164-24

**Planning Authority Reference Number:**



**An  
Bord  
Pleanála**

Cllr David Healy  
54 Páirc Éabhóra  
Beann Éadair  
Dublin 13  
D13 DY28

**Date:** 06 November 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](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

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[www.davidhealy.com](http://www.davidhealy.com)  
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+353 87 6178852  
23<sup>rd</sup> October 2024

An Bord Pleanála,  
64, Marlborough Street  
Dublin 1

**Re: Dart + Coastal North Railway Order Application**

A chairde,

I refer to the above application and wish to make the following observations.

**1. Overall support for the additional railway electrification**

I strongly welcome the electrification of the railway to Drogheda.

**2. Infrastructure for transfer at Howth Junction**

I am concerned by proposals for infrastructure changes at Howth Junction to facilitate the operation of an enforced transfer at that station for passengers to/from Bayside, Sutton and Howth.

An enforced transfer at Howth Junction is not required for the electrification of the line from Malahide to Drogheda and does not increase the capacity of the line between Howth Junction and Connolly.

The European Investment Bank's analysis unit, JASPERS, have looked at an operating model with enforced transfer in the morning peak hour at Howth Junction for passengers from/to Bayside, Sutton and Howth, with 6 departures from Howth. They have compared this to not implementing the transfer and running 3 trains southwards through Howth Junction, which is the current operating model. They predict a 50% reduction in passenger numbers due to the enforced transfer.

In consequence, they recommended:

“Further analysis and public consultations should be made on the ideal operating model for DART+CN, in particular whether or not to enforce transfer at Howth Junction for Howth route trains (with the overall operational consequences this implies).”

The Minister for Transport has asked his Department to follow up with NTA and Iarnród Éireann in relation to the implementation of this recommendation. I attach a copy of his letter to me in this regard.

The only potential operating model which has been presented for the Howth Junction transfer infrastructure shows only disbenefits. In the absence of an operating model which shows benefits, this element of the project cannot constitute proper planning and sustainable development.

As it stands, inclusion of this element is likely to constitute a risk to the entire project. The overall project should be approved without this infrastructure at Howth Junction. If a case is made for the transfer infrastructure at any time in the future, it can be applied for then.

### **3. Walking and wheeling access to stations**

Iarnród Éireann needs to improve walking and wheeling access to stations, especially where it would enable more direct routes for public transport interchange or to/from local destinations.

For example, it should be possible to access the platforms at Killester station directly from Collins Avenue, to facilitate interchange from the N4 bus.

Significant work is planned to provide a fourth platform at Clongriffin Station as part of Dart+ Coastal North. Unfortunately access to the station from the east is still via a “temporary” stairs and lift. The plaza and ramp down from the overbridge at Clongriffin Station for which permission was granted under F16A/0412 should have been built by now. However, the developer has broken the phasing condition which required that this element of the infrastructure be built first. The file has been subject of a warning letter by Fingal County Council.

At Sutton station, Fingal County Council is planning to improve the active travel infrastructure as part of the Sutton to Malahide scheme. These two projects need to be integrated and made complementary; in discussing them with the Council and Iarnród Éireann, neither seems to have a good understanding of the other’s project.

#### **4. Bicycle parking at stations**

The Fingal Development Plan includes the following objective:

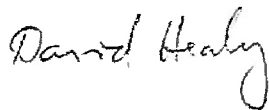
Objective DMSO110– Provision of Bicycle Parking at Public Transport Stations / Stops

Ensure that all new and renovated public transport stations/stops provide appropriate levels of cycle parking provision based on the existing and proposed passenger levels, surrounding environments and future transportation infrastructure.

The opportunity which Dart+ Coastal North presents to provide high quality additional bicycle parking to meet future needs should be taken.

Thank you for your consideration of the above observations.

Best regards,

A handwritten signature in black ink that reads "David Healy". The signature is written in a cursive style with a large, looping 'y' at the end.

Cllr. David Healy

Green Party/ Comhaontas Glas, Howth/ Malahide



02/09/2024

By email to [David.healy@cllr.fingal.ie](mailto:David.healy@cllr.fingal.ie)

Dear David,

Thank you for discussing the Dart + Coastal North project with me, in particular the provision of infrastructure to enable transfers at Howth Junction. I understand the concerns of the communities which rely on Howth, Sutton and Bayside stations, as well as of the tourism interests in Howth, all emphasising the importance of the direct rail service.

The review of the DART+ Coastal North project by JASPERS (EIB) recommended as follows:

"Further analysis and public consultations should be made on the ideal operating model for DART+CN, in particular whether or not to enforce transfer at Howth Junction for Howth route trains (with the overall operational consequences this implies). The latter may depend on the potential to ensure an attractive, secure transfer environment at this location. In relation to this, we recommend to seek an independent external design opinion for the Howth Junction upgrade project, and to address residual public and other stakeholder concerns regarding the reduction or elimination of direct services on the Howth branch."

I have asked my Department to follow up to ensure the implementation of this recommendation by NTA and Iarnród Éireann.

Yours sincerely,

---

Eamon Ryan T.D.  
Minister for Transport