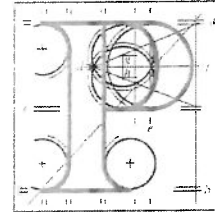


Our Case Number: ABP-320164-24

Planning Authority Reference Number:



**An
Bord
Pleanála**

Eoghan Duffy and Catherine Bannon
1 Offington Park
Sutton
Dublin 13
D13N8P0

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,

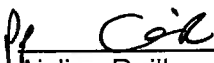
An Bord Pleanála has received your recent letter and oral hearing request in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

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An Bord Pleanála Case No 320164

23 October 2024

We wish to make the following observations on the above application for planning permission.

An Bord Pleanála should only grant permission on condition that the direct Dart service between Howth and Connolly is retained at a minimum 2x trains per hour in each direction daily.

In support of this, we contend that discontinuation of the direct service at this minimum frequency level would see:

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.

This would pose a real threat to the safety and welfare of children who use the service to access their schools either from or going to the Howth, Sutton, Baldoyle wider area.

It would also pose a real threat to the safety and welfare of the vulnerable and old in the affected communities who use the service as their sole method of transport into Dublin and their connection with the rest of Ireland.

2. Level crossings creating more congestion

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)

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. Adversely impact 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 national transport and climate policy.

5. Hinder 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.

6. Damage 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.

Oral Hearing

An Bord Pleanála can 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.

We thank you for your consideration.

Eoghan Duffy and Catherine Bannon

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