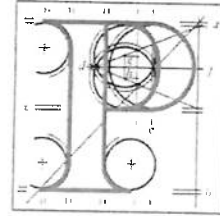


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Eva Kane  
Fionnradharc  
Carrickbrack Road  
Howth  
D13 V656

**Date:** 16 September 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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

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

Eva Kane  
Fionnradharc,  
Carrickbrack Rd  
Howth  
D13 V656

**RE: DART+ Coastal North - Case reference: NA29N.320164**

11th September 2024

Dear Sir/Madam,

I would like to raise an objection to the above case reference on the following grounds:

**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. Tourists flood to Howth all year around via the DART service and without a direct line its no doubt that tourists will choose to visit other Seaside harbour towns Malahide or Dun Laoghaire instead of Howth due to ease of accessibility and direct transport links.

**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. This will be catastrophic for the traffic at Sutton Cross & the Dublin Road/Baldoyle Road intersection. Cars will quickly back up to Sutton Cross blocking access in and out of the peninsula.

For example, the crossing at Sutton Station could be closed for more than 32minutes 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) The Worst-case scenario also doesn't consider the 24% increase to the Sutton/Howth population as a result of all the recent Fingal planning approvals of large apartment complexes.

**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. Sutton Cross will be gridlocked in peak traffic nearly doubling my journey to work in Dublin 17 and as a Howth resident it will take so long to get in and out of the peninsula that we will no longer make an unnecessary trip out of the locality which will negatively affect business in nearby suburbs and the city centre.

#### **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. 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.

In addition, there has been regular anti-social and criminal behaviour at Howth Junction and most locals would have concerns using this station and would not feel comfortable themselves or to allow their children transfer at this station when commuting to the city centre for school, work or recreation.

#### **6. Local businesses**

The loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth. The reduced footfall may cause some establishments to close. Businesses will also have to grapple with delays to their deliveries and longer journey times for staff and customers.

#### **8. Road Safety & Emergency services**

The increased traffic and frequency of the level crossings being closed will inevitably lead to greater traffic accidents putting drivers and pedestrians at risk.

Also, emergency services will be stuck behind level crossings or in the traffic congestion taking them longer to attend incidences in the peninsula and also to return to hospital which will lead to increased mortality rates. This is completely unacceptable.


#### **8. Oral Hearing**

An Bord Pleanála can hold an Oral Hearing for the DART+ planning application in order to allow further discussion about the project and the negative impacts these changes will have. I would like to request that an oral hearing be held to enable members of the public to attend and have their concerns heard.

It is clear from all the above that the implications on the residents of Sutton, Howth, Baldoyle and Bayside have been an afterthought of this plan. While I understand the need to increase capacity on the Northern line its completely unacceptable and onerous to ask commuters to change lines at an unsafe station with poor facilities to facilitate this. Increasing the frequency of the shuttle service to

Howth Junction as an "incentive" to locals does not help it worsens the situation through increased congestion and road closures for 30-40 mins per hour.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Eva Kane", written over a horizontal line.

**Eva Kane**