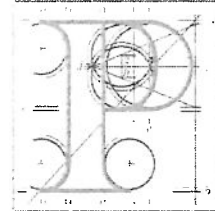


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Francesca Lundstrom
32 Binn Éadair View
Sutton
Dublín 13
D13 H1K7

Date: 30 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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17th October, 2024

Re: Dart + Coastal North Plan

Objection to:

The Proposed Shuttle Dart between Howth Junction/Donghamede and Howth

By Francesca Lundström, Ph.D.

My objection to the proposal of discontinuing the Dart service to and from Howth to Bray/Greystones and replacing it with a Shuttle service from Howth Junction/Donghamede to Howth is primarily about safety which is a fundamental issue. A 2019 Iarnród Éireann Infrastructure document stated:

“Safety is Iarnród Éireann’s number one priority.” (p. 17)

Currently the Dart service to and from the south (Bray or Greystones) is scheduled to provide Howth with four Darts per hour during the working day and less in the evenings and over weekends, which the response of those attending the two meetings about the matter which I attended in Sutton considered the current frequency of Darts adequate.

Should the proposed Shuttle Dart go ahead, there would be six Darts going in both directions – to and from Howth to Howth Junction/Donghamede and all four level crossing gates at Baldoyle Road, Station Road, Sutton, Lauder’s Lane and Howth Lodge would remain closed for between 32.19 and 30.47 minutes every hour. Because of these long closure times, there is a strong possibility that traffic delays and gridlock would increase exponentially, especially at peak traffic times (e.g., the morning rush “hour”, school end of day and evening rush “hour”).

According to the Commission for Railroad Regulation (2022) concerning Automated Open Crossings:

“Road traffic should not be excessive and use in suburban areas or areas of heavy traffic should be avoided. The road layout, profile and traffic conditions should be such that road vehicles are not likely to become grounded ...” (p. 7)

If the Shuttle Dart becomes a reality, then if a medical or house fire emergency were to occur around peak travel times, it may be impossible for ambulances and/or fire engines to gain access to properties, especially in Baldoyle, Sutton and Howth, potentially causing loss of life and/or serious damage to property in the case of fire.

With this in mind I would like to point out that currently when a vehicle hits a closed level crossing gate on the Baldoyle Road or at Station Road, Sutton it can take up to at least 30 minutes (Dublin Live, 2017) for a repair to be completed while the gates remain closed. The result, which I have witnessed (on Station Road, Sutton), even at non-peak times, can cause traffic delays and even gridlock in most areas in the vicinity of Baldoyle, Sutton and Howth.

In the Dart+ Coastal North Level Crossing Assessment (2024) the issue of safety is only mentioned in a paragraph in the Conclusions section of the Appendix and dismissed as follows:

“Access for emergency services is consideration in the assessment of level crossings. In terms of emergency services - the areas to the north and south of the rail line are normally served by the Kilbarrack fire station and the requirement to cross the rail line will therefore be rare. For other services there will be additional queues due to longer closure times, however emergency services are able to bypass a general traffic queue and travel up to the level crossing¹. The likelihood of being delayed at the level crossing will increase due to increased frequency of closures. A number of alternative routes are currently, and will in future, be available to emergency services in case of delays at the level crossing (for example the R104, R107, R139 and R809)”. (p. 58).

I disagree with this conclusion especially given the preceding 66 pages of analysis of the closure times of the four level crossing gates and the nonchalance towards safety concerns which it demonstrates. Additionally, the whole veracity of the Appendix is questionable because it refers to Kilbarrack² (a station one stop south of Howth Junction/Donghamede) as the name of the level crossing on the Baldoyle Road which is confusing and misleading.

Aside from all the other important objections to the proposed Shuttle Dart Service between Howth Junction/Donghamede and Howth, this safety issue highlights a fundamental flaw in the whole design and must be taken extremely seriously.

Additionally, I came across the following statement from Iarnród Éireann Infrastructure (2019) which stated:

“It is the policy of Córas Iompair Éireann (CIE) and Iarnród Éireann (IÉ) to remove all railway crossings where possible and practicable on the Irish Railway Network due to health and safety risks associated with the interface between road users and rail traffic” (p. 3).

Until this policy is implemented, I would like to suggest that the Dart + Coastal North plan as it relates to the Shuttle Dart is scrapped or amended to provide a service for passengers on the Howth line with a full and seamless service to the city centre and beyond with the level crossing gates only closed for as short a time as possible until they are replaced with a less hazardous option.

¹ Thus causing even more safety issues and traffic chaos.

² Baldoyle Road Level Crossing (XQ001) – hereafter referred to as Kilbarrack to match signal diagrams provided by IÉ, numbered 917 on signal diagrams (11 000 AADT).

Finally, it was reported in *The Irish Times* on 9 October, 2024 that Jim Meade, Irish Rail Chief Executive announced that:

“Irish Rail is planning to double the number of tracks on its northern route out of Dublin from two to four between Connolly and Malahide Stations which would separate commuter services from long distance ones.” (2024).

This new initiative should obviate the necessity for a shuttle Dart between Howth Junction/Donghamede and Howth

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Irish Rail to unveil plans for new tracks through north Dublin (2024, October 9). *Irish Times* Retrieved 9 October, 2024 from <https://www.irishtimes.com/transport/2024/10/09/irish-rail-to-unveil-plans-for-new-tracks-through-north-dublin/>.