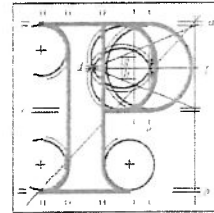


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Gerald Langford
38 Offington Lawn
Sutton

Date: 31 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 (01) 858 8100
Glao Áitiúil LoCall 1800 275 175
Facs Fax (01) 872 2684
Láithreán Gréasáin Website www.pleanala.ie
Ríomhphost Email bord@pleanala.ie

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

AN BORD PLEANÁLA

LDG- 075620-24

ABP- _____

22 OCT 2024

Fee: € 50.00 Type: CO

Time: 16.01 By: HAWD

38 Offington Lawn
Sutton
Dublin 13 E9W9

22 October 2024

An Bord Pleanála
64 Marlborough Street
Dublin D01 V902

**Submission on proposed shuttle service for Howth/Dublin City
as part of DART + Coastal North Railway Order 2024**

I am making this submission to **strongly oppose the proposal to introduce a shuttle DART service between Howth and Howth Junction.**

I have no issue with the objectives to deliver

- a higher frequency, higher capacity, reliable, electrified DART service;
- a sustainable, low carbon and climate resilient design solution including making use of existing infrastructure where possible.

A direct rail link between Howth and Dublin City has operated satisfactorily since 1848, over 175 years. The introduction of a shuttle to split this service at Howth Junction for Howth, Sutton and Bayside passengers would constitute a downgrade in the current service and create problems for many of the passengers.

Data from the NTA in 2019 indicates that daily passenger numbers from Howth, Sutton and Bayside constitute circa 20% of the total passenger numbers from stations on the Northern Line. This number will shortly increase with the completion of approved housing developments with new bed capacity of over 1,400. This does not include the large number of tourists that commute to Howth by DART.

1. Problems at level crossings with increased shuttle DART services

The suggestion that the number of DART services between Howth and Howth Junction is increased will create major problems for road traffic at the 4 level crossings, Baldoye Road, Sutton Station, Lauders Lane and Howth Lodge. Today, there are regular traffic jams at these crossings – backing through the acknowledged busy Sutton Cross. Allowing for 6 DARTs per hour each way, the closure time per hour is likely to be up to 32 minutes. This will present major traffic delays and also delay the progress of emergency vehicles – ambulances, fire brigades.

It will also seriously delay the H3 and No 6 Bus Connect services introduced over the past few years. It is unconscionable that the NTA would jeopardise their own new bus services.

2. Problems for passengers transferring at Howth Junction

Those travelling from the Howth/Sutton/Bayside stations to Dublin City and beyond – and similarly for those travelling from Dublin City northwards - will be required to exit the DART at Howth Junction, transfer to another platform and await a second DART for the remainder of their journey. At rush hours - 7:00 to 10:00 and 16:00 to 19:00 - the DART is normally full and transferring passengers may have to wait for a later service.

- On the most optimistic basis this will increase the journey time and the inconvenience and is likely to encourage more car use which is contrary to the object of the exercise.
- The platform transfer and the wait for the second DART would be a major problem for those who are disabled and senior citizens and persons with infants in buggys. Lifts are frequently out of order and the heavier daily use is likely to increase breakdowns. There are potential legal issues here for Irish Rail.

3. Problems for students

Many students attending the schools and colleges on the Peninsula travel by DART from the greater catchment area such as from Clontarf, Killester, Harmonstown, Kilbarrack, Raheny and elsewhere. In addition, the DART is used by many students who attend colleges and universities in the city centre and in the southern suburbs of the city.

Parents and guardians of these students have been satisfied with the safety of their children who board at one point and alight at their destination station. The proposed changes would necessitate four separate train journeys each day, two of which will be at the peak periods when time is of the essence to attend classes punctually.

In addition, there is great concern expressed at the prospect for vulnerable school children, young women and young men having to change en route at an unsupervised and unattended DART station, where school students are often targets of verbal and physical assault. If the shuttle service is implemented, many families may take the decision to revert to car transport, which would defeat the purpose of the project. The safety of all children, including school going children, must be a legal and moral priority for Irish Rail. There are potential legal issues here.

4. Adverse impact on tourism

Howth is a major attraction for tourists and, indeed, for visits by residents of the wider Dublin region. Current plans for Howth include the restoration of Howth Castle, an event centre and restaurant, facilities for children and a new golf course. The traffic congestion at Sutton Cross and the lack of parking in Howth makes the DART service the preferred mode of transport to Howth. A DART shuttle will seriously degrade this service and deter some tourists travelling to Howth with the resultant loss of business to the local businesses. It will also encourage Dublin resident visitors to use cars which is definitely contrary to the object of the exercise.

Conclusion

From soundings around the Howth, Sutton, Bayside area, there is major opposition to the proposed downgrading of the DART service. **I strongly urge the Bord to arrange an oral hearing** and to reconsider the current proposals with a view to maintaining the direct Howth/Dublin DART link for the very large number of passengers who rely on the DART service today, particularly those who would face major problems if the present proposals go ahead.

The submission fee of €50 is enclosed herewith.

Yours faithfully



Gerald Langford