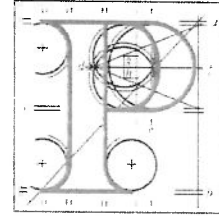


Our Case Number: ABP-320164-24

Your Reference: SID-OBS-002315



**An
Bord
Pleanála**

James and Margaret Lillis
10 Offington Drive
Sutton
Dublin 13

Date: 17 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

Tel	Tel	(01) 858 8100
Glaó 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

10 Offington Drive

Sutton

Dublin 13

9 October 2024

An Bord Pleanála,
64 Marlboro Street
Dublin 1
DO1V9020

OBSERVATION RE: APPLICATION FOR RAILWAY ORDER-DART + COASTAL NORTH RAILWAY ORDER 2024-NORTHERN LINE BETWEEN DUBLIN CITY CENTRE AND DROGHEDA INCLUDING THE HOWTH BRANCH BY CORAS IOMPAR EIREANN.

Dear Sir/Madam,

We wish to make the following observations on the proposed development as set out above.

While we can appreciate the benefits of extending the Dart service to Drogheda, we consider that the plan to achieve this objective by replacing the direct Howth to Dublin city centre service with a shuttle service to Howth Junction to be a retrograde step for our community. It will replace a safe, trusted and fast service with a potentially unsafe erratic service through one of the most feared train stations in the country. It is a serious downgrading of the service we have enjoyed for years.

The core problem with the north Dublin rail system is the lack of investment in expanding the rail infrastructure into Connolly station. 2 lines servicing a growing commuter belt plus an express train to Belfast is not feasible. Curtailing the service to one area in order to expand services to another area is not the answer.

We understand that an objective of Dart North is to provide a 5-10 minute service from Drogheda. We have no issue with the Drogheda area getting a better service. But a reasonable compromise is required. Taking from one community to give to another is not a reasonable solution. This is not what Minister Ryan has promised when he spoke about better public services. Nor is it consistent with stated policies of the NTA. It is also likely to face serious legal challenges from many sources.

CIE maintain that they have conducted extensive public consultations about this scheme and that they have listened to the public's concerns. This is not credible. At all the public meetings attended by over 1,000 people, the strongest possible objections have been voiced to ending the direct service---unanimously. CIE has not responded with any alternatives. Their case has been presented as a fait accompli.

We ask that the Bord insist that CIE revise their plans and continue our direct service.

Our Observations are as follows.

1. ROAD TRAFFIC CHAOS

This plan, providing up to 6 shuttles per hour is guaranteed to cause traffic chaos at the level crossings at Sutton Station, Lauders Lane, Howth Lodge and on the Baldoyle Road. CIE have estimated that crossings could be closed for up to 32 minutes per hour. Traffic is already a nightmare. Howth and part of Sutton are on a peninsula with a major and infamous bottleneck at Sutton Cross. CIE are ignoring the reality for the car, business, bus, tourist etc travellers wishing to go about their daily lives in the area. They have admitted that their traffic projections are based on out of date traffic data and have not taken the projected increase in the local population into account.

At present the traffic tailbacks on both the Baldoyle Road and Station Road at peak times can reach Sutton Cross or into Baldoyle village and create gridlock.

The No 6 and H3 Bus Connect services schedules were revised to accommodate the needs of the peninsula population and provide a good reliable service. This plan is likely to seriously delay this service at peak times. We need integrated thinking by the NTA.

We suggest that there should be a limit placed on the amount of time that the level crossing may be closed taking into account the needs of people to pass through these crossing in a timely manner.

2. PLANNED INCREASE IN POPULATION AND TOURISTS BEING IGNORED

CIE have admitted that they have based their plans on current population figures and have not taken into account the projected increase caused by all the new developments in the area. These are expected to increase the population by approx. 20%.

A large apartment complex (Former Techrete site with over 500 units) is near completion in Howth. Another has been completed at Santa Sabina in Sutton. Further large developments have been approved for Howth village. These will total approx. 1,000 apartments increasing the Peninsula population to approx. 12,000 people in the near future. Eliminating the direct service when the demand from the local population will be increasing is appalling planning.

Furthermore, the tourist numbers to Howth have grown substantially in recent years and the area is now one of the most visited in the country. Sutton Beach and the Cliff Walk in Howth are important recreation areas for many people in the Dublin northeast area, esp. those with children and living in apartments. The availability of a direct service to Sutton and Howth is very important for them.

Hundreds of young people use Sutton Dart station to access the Burrow Road and onto Sutton Beach. Returning home means they will be blocked by the ever-increasing level crossing closings at Lauders Lane and are quite likely to attempt to climb over the gates to get to the departing Darts on time. A horrendous safety prospect.

We suggest that CIE revise their plans taking into account the current and long term expected population on the peninsula and the increasing number of tourists and then determine the need for a direct service for these customers.

3. CHANGING TRAINS AT HOWTH JUNCTION

Howth Junction station is renowned as an unsafe place due to antisocial behaviour, bicycles being ridden on platforms and passengers being terrified, as evidenced by Garda arrests and prosecutions.

According to CIE's own report of the public consultations, respondents expressed strong concern over safety at Howth Junction esp. for women, children, vulnerable and older members of our community. There was a strong request for security personnel to be located at the station. CIE's response was that they would modify the entrances and provide more lighting and better signage! No mention of security personnel. CIE are obliged to provide a safe service, and this plan manifestly fails to do so.

Expecting that passengers, especially the vulnerable, returning from town in dark winter afternoons, will cross over to a shuttle line is unrealistic. This return journey cross over will require disabled people to use stairs and lifts. The lifts are consistently out of action.

The elderly, the disabled, school children and others will be forced to find safer means of getting home. What parent will take a chance that their child will be safe 100% of the time.

We suggest that CIE radically upgrade their security arrangements at Howth Junction and guaranteed passengers a safe passage.

Also, if Howth Junction is the big bottleneck on the line then CIE should look at a major infrastructural investment here taking into account the long term needs of both the north county and Louth traffic and that of the Howth peninsula. The present plan is robbing the Howth, Sutton, Bayside areas to service the community north of Malahide and the Belfast Express.

4. LOCAL BUSINESSES DAMAGED

The direct service at present means that workers in the various employment centres in Howth, Sutton and Bayside can get to work expeditiously and with reasonable certainty. Changing that as per the new plan will put serious encumbrances in their way. Timeliness, safety, weather will all become serious negatives making the Peninsula an unattractive place in which to work. These changes will force people into cars to avoid disruptions, a serious outcome not envisaged in the proposed plans.

In addition, deliveries will become a nightmare. We have seen how bad planning has hollowed other parts of Dublin and caused long term damage. Will Howth be another unfortunate example?

5. THE SAFETY OF STUDENTS BEING IGNORED.

Many young people attend first level, second level and third level colleges in town. Many commuters travel to the south side. Many retirees enjoy the free travel to connect with mainline stations. The present Dart services facilitate these needs. It allows people to connect within assured timetables.

Replacing this service with a shuttle involving 2 changes and 4 trains will be a nightmare.

6. ORAL HEARING.

Because of the significant downgrading of the Dart service available to a very large population area in Howth, Sutton, Bayside and Kilbarrack and also effecting neighbouring areas like Raheny and Clontarf we believe that an Oral Hearing is needed to get a comprehensive picture of the impact of the loss of our Dart service. We request that you call such a meeting.

We also believe that this plan is contradictory to all the ideas outlined for improved public transport, the Green Agenda and safe travel.

I enclose the Submission Fee of €50.

Yours sincerely

James Lillis

Margaret Lillis