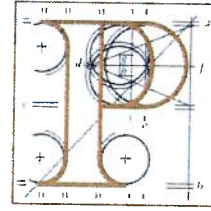


**Our Case Number: ABP-320164-24**



**An  
Bord  
Pleanála**

Jennifer Hughes  
33 The Crescent  
Binn Eadair View  
Sutton

**Date:** 24 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](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

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22<sup>nd</sup> October 2024

**Re: DART+ Coastal North Railway Order 2024/ REF No. NA29N. 320164**

Dear Sir/ Madam,

I wish to object to the **DART+ Coastal North Railway Order Application**. I submitted my views twice previously and remain dismayed, as are many in the Howth/ Sutton/ Bayside area, at the abject failure to listen to the views of citizens living in this area.

Firstly, I understand the need to provide good, sustainable public transport for those living in North County Dublin and in County Louth. This, however, cannot be achieved by removing good, sustainable public transport to Howth/ Sutton/ Bayside and creating a detrimental impact for rail users and for people living in the area.

1. The proposal lacks clarity and transparency in the submitted details. In Irish Rail's documents submitted as part of this railway order application, it is stated that: "the project is seeking to deliver the infrastructure at Howth Junction and Donaghmede Station that will enable the operation of both a DART shuttle service and/or a direct through service (as existing) on the Howth Branch line to/from Dublin City Centre, allowing for the capacity and frequency of DART+ services on both the Northern and Howth Branch lines to be maximised and to help future-proof the network". (page 9).

However, Irish Rail's submitted documents note that:

- "The proposed infrastructure will not prevent the operation of a direct through service and it is envisaged that direct services would continue to run during off peak times and during weekends. Final operational decisions relating to the operation of a DART shuttle service will be made at a later stage and are subject to future passenger demand on the Northern Line and Howth Branch Line."  
"It is also important to note that a DART shuttle service is not something that will come into effect immediately upon the delivery of the DART+ Coastal North project. There will be different phases of timetable development that will be gradually introduced as the project builds towards that maximum level of service. The operational detail behind each of these phases has not been worked through at this early stage in the project planning and development. Any substantial timetable change will go through a Public Consultation process of its own organised by the NTA known as the Timetable Customer Consultation Process. If a DART shuttle service ultimately forms part of a future timetable proposal, it will be flagged well in advance and the community will be asked again for their feedback and input, through that consultation process." (Appendix A3.1 PC Findings Report, page 33).
- "At what point a DART shuttle service may actually be introduced is essentially an operational decision and would be considered after the project is delivered in direct response to future passenger demand. An introduction of any timetable that may include the operation of a DART shuttle service would be subject to a public consultation process of its own run by the National Transport Authority (NTA). The overall increase in service frequency and capacity provided by the DART+ Programme will result in an overall better

service for many train users. It should also be noted that in the absence of any measures (such as those proposed in DART+ Coastal North), the capacity of the current network will remain the same, resulting in the increased demand from all areas along the Northern Line catchment, inclusive of the Howth Branch Line, not being met and inevitable impacts on the service as a result of existing constraints not being addressed.” (Appendix A3.1 PC Findings Report, page 35).

Whilst the application refers to the changes required at Howth Junction and Donaghmede to enable the changes, I believe these physical changes cannot be looked at in isolation of the public transport services which Irish Rail provides to citizens.

Effectively permission is being sought to alter the service **without** detailed descriptions of how this will operate. Irish Rail is not responsible solely for the provision of additional platforms or an interchange in Howth Junction but **is** responsible for the provision of a public transport service to citizens. This application fails to address this point and requests permission for service alterations that it has not yet defined.

2. Removal of direct train access from Howth to the city centre and beyond. There has been a direct train from Howth since the 1840s, and a direct DART since the inception of the DART in 1984. It makes no sense at a time when sustainable transport is so critical to remove a good quality service. It makes no sense to have a journey made so much longer, with potentially 1 – 2 changes, which takes 20-25 minutes from Sutton today. If policymakers want people to use cars less, this proposal seems totally counterproductive. It was suggested by Irish Rail representatives at an information evening that local people use cycle paths instead of the DART. This is clearly not a serious alternative.
3. The need to transfer trains at Howth Junction is very problematic. Much has been reported about the anti-social behaviour in Howth Junction. There have been well-publicised issues of anti-social behaviour and crime in Howth Junction. Irish Rail has provided little or no details on how these issues will be appropriately managed when all evidence in the local area suggests that this will not be the case. Many people are very fearful of experiencing intimidating behaviour for adults, young people and children if they need to change and wait at Howth Junction.
4. Accessibility for those with additional needs for transfers at Howth Junction. It is not evident what impact and risk assessment has been undertaken on the basis of equality legislation and Irish Rail’s commitments to the UN SDG goals in this regard. It has been reported that lifts at Irish Rail stations were out of service more than 800 times over just 18 months (Irish Independent, Sunday 10 December 2023). If the lifts are out of order or vandalised, it will render the service inaccessible for many people.
5. Capacity for those transferring at Howth Junction is also not evident. If trains are at capacity coming from Drogheda/ Malahide etc, those trying to transfer at Howth Junction may not be able to do so in a timely manner. This does not include the additional time it will take to travel from Howth/ Sutton/ Bayside to other parts of the city because of this proposed change.
6. The closure of the train barriers at Baldoyle Road, Sutton Station, Lauders Lane and Howth Lodge is extremely problematic. Based on the information provided, in the case of Baldoyle Road, Lauders Lane and Howth Lodge, these barriers will be closed for ca. 50% of the time per hour. The traffic in the area is exceptionally heavy at certain periods of the day. As those planning this project must be aware, there are limited routes for people to get to and from Sutton and Howth. If the barriers are closed for prolonged

periods of time, this significantly impedes our ability to get to other areas of the city, to the M50, the airport.

7. Based on Irish Rail's own assessment, it would appear that Irish Rail recognises the risk that traffic on the Baldoyle Road in particular will potentially back up onto the Dublin Road. This is not an acceptable situation. If there is a significant detrimental impact on traffic flows in the area resulting from these barrier closures, there is no detail on how will emergency services manoeuvre around the area – clearly the barriers can be lifted in the event of an emergency, but if the roads are blocked, there are limited opportunities to deal with this – bearing in mind that many of the roads in the area (e.g. Station Road in Baldoyle, Dublin Road in Sutton/ Bayside) have the sea on one side, so there are limited options to manoeuvre. Irish Rail's documentation notes that "Consultation with all emergency services is ongoing and all feedback will be fully considered in the development of the final design for the DART+ Coastal North project." (Appendix A3.1 PC Findings Report, page 49). Surely this consultation must be completed as a key input into this planning process.
8. In previous summers, there was a traffic management plan in place at the weekends, which implemented a one-way traffic flow for Claremont Road/ Burrow Road, using Corr Bridge/ Claremont Road to approach the beach on Burrow Road/ Claremont Road and exit on Lauders Lane. This type of traffic management measures would not be possible if Irish Rail implement the suggested barrier closures.
9. Howth and Sutton are tourist destinations, with many people visiting the peninsula. It was noted at a meeting with a local representative that 1.5 million tourists come to the Howth Peninsula each year. Many of these people travel via DART. It is not evident from the proposal how these visitors can be accommodated. Furthermore, it is not evident that there has been any consideration of the potential impact on the local economy and local businesses who are dependent on visitors if this proposal negatively impacts visitors to the area.
10. There are plans for a significant number of new homes, in particular apartments, to be built in the area. This means there will likely be more users of the DART service. Planning permission for the Claremont Development - (Techrete) (ABP-306102-19) cites the following reason and consideration of planning permission: *K) the availability in the area of a wide range of social and transport infrastructure including a railway station.*

Planning permission for the Bailey Court Development – (ABP 313133) cites the following reason and consideration of planning permission: *(i) the nature, scale and design of the proposed development and the availability in the area of public transport and water services infrastructure.*

Planning permission for the Seafield - ABP (ABP 306872) cites the following reason and consideration of planning permission: *(j) the nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure.* In this application, the developer submitted documentation as part of their planning application, which noted that "the DART system (Dublin Area Rapid Transit) is ideally located to facilitate commuters from Sutton to the City Centre, and vice versa. Approximately 8 trains per hour currently serve Sutton DART Station during peak periods. The journey time to the City Centre from Sutton by DART is approximately 20 minutes. Sutton DART Station is located approximately 1km from the site along Station Road, which equates to a short 10 – 15min walk from the respective

site". (Santa Sabina SHD – Proposed Alterations to Reg Ref: F17A / 0615 Traffic and Transport Assessment).

These developments are completely or partially constructed, with permission granted on the basis of pre-existing public transport. No impact assessment is included in Irish Rail's request in the event that services are reduced in the area, either on traffic or alternative options for the new homes which have been constructed or are under construction in the area.

11. Any material increase in traffic volumes in this area will make what is already challenging traffic volumes for local people worse. It may force more people back into their cars. Again, this is counter-productive in achieving climate target reductions.
12. It was recently reported that Irish Rail proposes to expand the service on the Northern Line to four lines between Dublin's Connolly Station and Malahide to separate commuter and intercity services. (Irish Times, Wed October 09, 2024). If this project is delivered, it will meet the requirement to provide additional capacity on the Northern line, therefore the proposal to remove direct DART services from Howth/ Sutton/ Bayside to the city centre and beyond are entirely unnecessary.
13. It is also noteworthy that the JASPERS review of "Electrification and Upgrade of TEN-T Network in Greater Dublin Area" is ongoing. This review should form an important part of the decision-making process. It has the goal of reviewing "the project material as reported in the DART Expansion Programme Business Case and other background material and provide independent technical commentary on the project development". ([jaspers.eib.org/assignments/projects/13741](https://jaspers.eib.org/assignments/projects/13741)) It is difficult to understand how a decision has been taken to proceed and request permission when this review is not complete.

On this basis, I object to this application. I would also like to request an oral hearing into this application.

Yours sincerely,

Jennifer Hughes