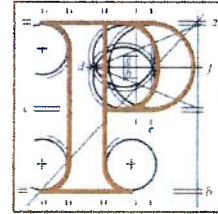


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Louise Whelan
Calypso
28 Main Street
Howth
D13 A3V7

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.

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.

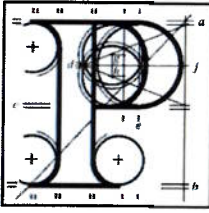
Yours faithfully,


Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA03

Teil	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



Observation on a Strategic Infrastructure Development Application

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Louise Whelan

(b) Observer's
postal address

Calypso, 28 Main Street, Howth, Co. Dublin,
D13 A3V7

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's postal
address

Not applicable

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

Not available online

- (b) **Name or description of proposed development**

DART+ Coastal North Railway Order 2024

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

DART+ Coastal North Railway

Observation details

5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

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.

This service for local residents should not be sacrificed in favour of Drogheda residents. The loss of a direct service will considerably extend journey times, make life very difficult for the elderly and disabled having to change trains at Howth Junction and thus will push people back into their cars at a time when traffic in the area is already heavily congested

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.

For example, the crossing at Sutton Station could be closed for more than 32 minutes 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).

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. Traffic is already too congested in the area.

4. Sustainable travel

It is National Policy to encourage people to use sustainable transport instead of their cars.

5. Grounds

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. Health and Safety

The proposed longer closures of the level crossings in addition to increased traffic brought about by people being pushed back into their cars will raise serious safety issues. Emergency Services will not have clear access in potentially life threatening situations.

6. 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.

7. Local businesses

The loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth.

Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers.

8. Lack of proper public consultation on this project

Irish Rail state that there have previously been two rounds of non-statutory public consultation on this project, with revisions to the proposals arising from feedback received. Most local residents did not receive any information in the first round so were not provided with the opportunity to object. A local politician advised that information was only sent to people within 100m of each DART station for the first consultation. That is not a proper public consultation as people from all over Howth, Sutton and Bayside use the DART, & not just those who live within 100m of the DART stations. Unlike the extensive radio and poster publicity around the Bus Connects proposals, there was little or no publicity about this DART proposal, so most people knew nothing about it. It appears that this was deliberately done so that people would not know about it and could not object.

5. Grounds

9. Significant new builds in Howth to dramatically increase population

There are currently hundreds of new apartments being built in Howth. This will bring with it an increase in demand for DART services which should be addressed by Irish Rail, as opposed to a downgrading of the existing service. The Howth DART is often full by the time it gets to Killester at rush hour, so with increased population in Howth, expecting masses of people to disembark at Howth Junction and be able to fit on a DART coming all the way from Drogheda is not a viable option.

10. Alternative solution

Irish Rail have recently announced plans to provide four tracks between Connolly Station and Malahide to facilitate the separation of commuter and intercity services

These plans provide a viable alternative to removing direct DART services from Howth, Sutton and Bayside. Increasing infrastructure capacity by adding new lines should be prioritised over any proposals to reduce the level of existing services.

Please see article <https://www.irishtimes.com/transport/2024/10/09/irish-rail-to-unveil-plans-for-new-tracks-through-north-dublin/>

11. Anger of local residents

Hundreds of local residents attended a meeting about this held in the Marine Hotel on 2.9.24 hosted by Cian O'Callaghan and there was palpable anger in the room over this decision. Over 4,000 people have signed an online petition to get this stopped. Many people purchased their homes and selected their job locations based on the direct DART route into the city.

12. Anti-social behaviour at Howth Junction

Howth Junction is one of the most dangerous DART stations. Irish Rail have said that they are addressing this by increasing lighting and improving the design of the station. This is not going to stop the gangs and anti-social behaviour. Many people will be too afraid to take the DART if they have to disembark at Howth Junction especially late at night or on dark winter evenings. Certainly, people will not allow their children or elderly parents to take the DART if they have to disembark at Howth Junction. The girl who was pushed onto the railway track at Howth Junction in April 2021 is a prime example of this and could have had fatal consequences.

13. Increased tourism to Howth

The number of tourists to Howth has increased dramatically over the last few years and the current public transport system cannot support this. Buses and DARTs are jam packed at the weekends. Tourists are very important to local businesses so the DART service should be improving to support this as opposed to being downgraded. Loss of a direct service will endanger tourism to the area.

5. Grounds

14. Travel Disruption caused by recent timetable changes

Please note the quote from Irish Rail spokesman Barry Kenny in the Irish Times article on 3.10.24 apologising to commuters for longer journey times due to the recent timetable changes and who acknowledged the company got it wrong. "We are genuinely very, very sorry to our customers, it's been very disruptive in recent weeks for customers. People build their work, their education, their childcare around their travel with us and we have let them down." Please see article <https://www.irishtimes.com/transport/2024/10/03/irish-rail-to-revert-to-old-timetable-because-of-train-punctuality-issues/>

This proposal is going to cause far longer commute times and be very disruptive for commuters in Bayside, Sutton and Howth who have already built their lives around their existing travel with Irish Rail. Irish Rail are going to get it very wrong again if they go ahead with this plan and will seriously let down commuters in these areas.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to request the Board to hold an oral hearing, please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.