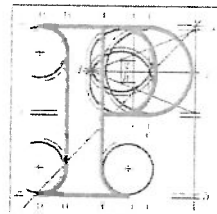


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Monica Lambert
7 Dunbo Hill
Howth
Dublin 13

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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Láithreán Gréasáin www.pleanala.ie
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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

7 Dunbo Hill
Howth
D13
17/10/2024

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re
Railway Order Application: ABP-320164-24

Dear An Bord Pleanála

I object to the application which would have undue and disproportionate adverse effects on commuters who have been using the direct rail service to and from Howth to Dublin City for over 150 years. The Dart service has been running direct since 1984, and direct rail prior to that since approximately 1847.

There has been no demonstrated need for this application. The application is vague and unspecific, without enough information.

Many note that the consultation process was window dressing (Irish Times, 16 May 2023).

The applicant notes a perceived future need. There is no immediate urgency for this application. The applicant spokesperson indicates that the Howth-Dublin direct line is not to be effected until 2029 ((Irish Times, 16 May 2023). The proposal as it affects the Howth direct service should not be granted until the addition of the *two* new lines just announced by Irish Rail chief executive Jim Meade have been completed (Irish Times, 9 October 2024). There is no need for this application.

An important detail like the addition of two new lines should not have been left out of the proposal to discontinue the Howth direct service. It is a material omission.

The applicant should explain the omission and give the public given an opportunity to comment, which was not possible previously.

The applicant seeks a broad, open ended permission to do whatever it may wish to do at any time in the future. This is not in keeping with good planning.

While I object to the proposal, in the alternative, the applicant should not be granted an open ended vague ability to do whatever it wants to. If any current departures are to end at Howth Junction it should be for a defined one hour period, allowing commuter to try and travel direct before that specified hour, or after that specified hour – for safety, convenience, and timeliness.

After the application has been lodged, the applicant changed its comments, from saying only peak hours would be affected, to now, not limiting itself to peak times. The applicant has changed its position post application and wants a rubber stamp for unchecked, ill-planned, discretion.

The application:

- is vague, non-specific, and ever changing;
- does not take on board public concerns;
- does not address significant safety and security concerns;
- does not include full time on-site security;
- does not address the various concerns of the elderly like myself, families, parents with prams and buggies, additional needs users;
- does not account for schoolchildren and teenagers who need to use the trains at peak hours for school, and disruption to school;
- does not account for people going to work and how their schedules will be disrupted;
- does not assess and quantify the impact of delays and additional commuting time;
- does not account for the many additional users who will be using the train from all of the many new developments in Howth, Sutton, Baldoyle/Bayside;
- does not assess the amount of extra time that commuters will have to add to their journeys;
- does not assess how many people will not be able to get on to the first connecting train that arrives at Howth Junction, and will miss connections;
- omits relevant and material information e.g. the newly disclosed two lines (clearly a relevant consideration for consultation and application);
- did not offer people in or visiting Howth, Sutton or Bayside an option to voice support for how many trains would be disrupted at peak times, nor how peak times are to be defined (e.g. 1 hour, 2 hours, 3 hours / in total or morning and evening?);
- does not address the problem of frequent, and extended, lift breakdowns at Howth Junction;
- does not address lack of facilities at platform level (including toilets, food);
- does not address adverse tourist impacts;
- does not assess adverse educational and language school impacts;
- does not assess adverse commercial impacts e.g. restaurants, tours, etc.;
- does not contain adverse impact assessment for the Howth-City Centre direct service, nor any mitigation efforts;
- has been vague, and the specifics have been changed over time. There has been no proper consultation on a clearly defined range of options for people to consider;
- does not address issues at Connolly;
- is one sided and unbalanced contrary to public policy and proper planning;
- leaves too much unilateral discretion to the applicant, contrary to proper planning and public interests.

It is ironic that as Howth is getting more and more commuters and residents year after year, the applicant is seeking to make it harder to get to and from Howth, Sutton, Bayside / Baldoyle. It is also ironic because the direct rail service carries more people than the traffic jammed road. Rail is more important than road at these locations – an important planning consideration. Howth also gets more regular tourists than any individual ROI location on the northern rail line (all transported by direct rail).

In conclusion, I object to the current application relating to the Howth-City direct service. This plan is rushed and ill-planned. There is no reason to presume any better consideration than the timetable change. The applicant should submit a more specific application properly planned, reflecting a variety of options, options available to consultation, and include detailed impact assessments of various options on the Howth-City Centre direct line (including the impact of the two new lines). If permitted, it should only be for a specified time on week days only (one specified one hour period morning and evening) and conditional with a specified end date – until the new two lines are operational. It should also be conditioned on the simultaneous grant of approval for the two specified additional lines. The disruption to the Howth line service direct to Dublin should under no circumstance continue past the opening of the new two lines.

Yours sincerely

Monica Lambert

Transport

Irish Rail to unveil plans for new tracks through north Dublin

Proposal envisages four lines between Dublin's Connolly Station and Malahide to separate commuter and intercity services

Tim O'Brien

Wed Oct 09 2024 - 19:30



Irish Rail is planning to double the number of tracks on its northern route out of Dublin from two to four.

The plan, which Irish Rail chief executive Jim Mcade said he hoped would be published by early next year, involves separating Dart and commuter services from the Dublin to Belfast services, similar to the four-track railway approach to Dublin city from the west.