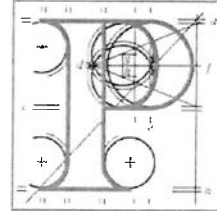


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Nashville Residents Alliance
c/o John Beckett
5 Nashville Park
Howth

D13 W898

Date: 17 September 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,

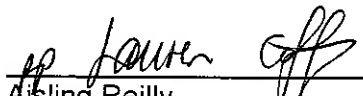
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

c/o 5 Nashville Park
Howth
Co Dublin D13 W898

The Secretary
An Bord Pleanála
64 Marlborough St
Dublin 1

16th September 2024

Re: Planning Case Reference 320164: DART+ Coastal North Railway Order 2024 – Northern Line between Dublin City Centre and Drogheda including Howth Branch

Dear Sir/Madam,

We, the Nashville Residents Alliance, write as an extremely concerned group of residents in Howth, to raise a strong objection to the proposed changes to the DART service to/from Howth, which are included in the above referenced railway order application.

Our objection is outlined under three main headings:

1. Downgraded shuttle DART service at a time of unprecedented population growth
2. Inconvenience for vulnerable transport service users and antisocial behaviour
3. Traffic congestion, parking & carbon emissions

1. Downgraded shuttle DART service at a time of unprecedented population growth

Over the past number of years, Howth and Sutton have seen huge population growth, with further significant growth imminent as new apartment developments are completed. The growth in apartment numbers, including what is widely believed to be the overdevelopment of the Techrete site, Howth Castle, Santa Sabina and Baily Court in Howth Village, will result in an increase in the population of the Howth area by c. 24% and Howth/Sutton by c. 16%, all while little to no new infrastructure has been provided or is planned.

It is completely illogical to downgrade the vital DART service in this context, particularly when the lack of road space means the option to install dedicated bus lanes to facilitate other public transport services such as Dublin Bus is not viable.

2. Inconvenience for vulnerable transport service users and antisocial behaviour

Passengers using the proposed shuttle service between Howth and Howth Junction would be required to wait on the platform at Howth Junction to board the train arriving from the Malahide direction. On the return journey, they would disembark and wait again for the shuttle back to Howth.

The proposal suggests that passengers would be able to transfer from the shuttle to the incoming DART towards the city centre without the need to cross the tracks. However, on the return leg, passengers would be required to use the station's stairs or lifts.

The unreliability of lifts across the DART system is well-documented, with frequent outages leaving passengers with mobility issues stranded. This is clearly unacceptable in the context of this proposal, and represents not just a downgrade to services but a material risk to wellbeing and safety.

It is noted that Irish Rail's proposal includes some refurbishment plans for Howth Junction, which is welcome. The proposal is however, completely insufficient to address the station's long-standing issues with significant antisocial behaviour. Over the years, Howth Junction has been the site of numerous incidents of serious antisocial and criminal activity, and previous refurbishments and upgrades have had minimal effect in mitigating these problems.

The proposed shuttle service would result in a substantial increase in the number of vulnerable passengers using the station. Even with increased security in place, it is highly likely that criminal and antisocial activity would rise. CCTV and lighting systems are inadequate and would do little to discourage those engaged in such behaviour, putting students, the elderly, and vulnerable passengers at greater risk, especially during the darker winter months.

3. Traffic Congestion, Parking & Carbon Emissions

There are four level crossings along the trainline between Howth Junction and Howth. Irish Rail's proposed plan would introduce six shuttle trains per hour in each direction, with DART services running every ten minutes in both directions. This would result in significantly longer closure times at the level crossings.

The extended closure times at the Baldoyle Road and Sutton Station crossings are particularly concerning. Traffic congestion, already an issue, would worsen dramatically, with queues potentially extending much further than they do currently. Irish Rail has acknowledged this risk. There is a serious concern that traffic could regularly back up through Sutton Cross during closures at the Station Road crossing. This scenario already sometimes occurs during peak times, and the additional closures are highly likely to exacerbate the issue. There is also a high likelihood of traffic extending from Baldoyle Road onto the seafront, which could lead to gridlock in the surrounding area.

Furthermore, frequent closures at the Lauders Lane and Howth Lodge crossings would create significant difficulties for local users. Residents of Howth Lodge, in particular, would be heavily impacted as they have no alternative access to their homes. Sutton Golf Club users, who rely on the crossing twice during every nine holes of play, would also face substantial inconvenience.

Parking provision in the recently approved apartment developments is woefully inadequate and when all are fully occupied it is certain to exacerbate existing parking pressures in the area. At the time of their planning applications, the developers of the new apartment schemes such as Techrete pointed to the strong nearby public transport links as part of their successful application. Now, having approved these developments it is proposed to materially downgrade those same services. This is obviously unacceptable.

The lack of other vital services, or existing services already being over capacity due to the increase in population (schools, healthcare providers, etc.) inevitably means that residents would be forced to use cars to travel further afield, which would lead to further, permanent increases to already extremely high traffic levels, with the knock on effect of increased air pollution and carbon emissions. These issues do not appear to have been given due consideration in the proposed plan.

The realistic prospect of traffic and parking chaos becoming a daily reality for local residents, with the very real danger to life such gridlock would present due to emergency services being unable to gain access along the recently narrowed roads (due to bike lane bollard installation) should be reason alone to reject the misguided concept of a shuttle between Howth Junction and Howth, but taken collectively with the other negative aspects of the proposal outlined above, should warrant a complete rejection of the proposed shuttle service.

We respectfully request that An Bord Pleanála refuse this application, reject the ill-judged concept of a shuttle train service to Howth, and to ensure that the full timetable serving Bayside, Sutton and Howth is, at an absolute minimum, maintained at the current level.

Yours sincerely,

The Nashville Residents Alliance:

JOHN BECKETT	CLAIRE ANNE AHERN
CATHERINE BECKETT	MAURICE AHERN
OLIVIA BECKETT	WILLIAM AHERN
ROBYN BECKETT	LUCA AHERN
SARAH ROBERTSON	TAIS AHERN
DEREK ROBERTSON	INGRID DOYLE
CHARLIE ROBERTSON	SALLY DOYLE
MAX ROBERTSON	GERRY DOYLE
HOLLY ROBERTSON	JOSHUE DOYLE
SEAMUS MURPHY	ELLEN DOYLE
ORLA MURPHY	RITA O'CARROLL
VIVIENNE SHIELS	ANNALISA O'CARROLL
RICHARD SHIELS	LEN O'CARROLL
LLOYD SHIELS	DAVE KEOGH
JEANNETTE BRAZEL	TRISH KEOGH
PATRICK BRAZEL	IAN BECKETT
LIZ SKEHAN	SHEILA BECKETT
DERMOT SKEHAN	STEPHEN BECKETT
MARY TYRELL	ALAN BECKETT
BRIAN TYRELL	MAX BECKETT
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