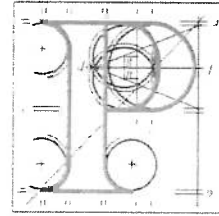


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Norman & Angela Fullam
56 Carrickbrack Road
Howth
Dublin 13

Date: 18 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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Baile Átha Cliath 1
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64 Marlborough Street
Dublin 1
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The Secretary,
An Bord Pleanála,
Marlborough St., Dublin
Dublin 1

56, Carrickbrack Road,
Howth,
Dublin 13

15th October 2024

AN BORD PLEANÁLA

LDG- 075604-24

ABP- _____

17 OCT 2024

Fee: € 50.00 Type: CARD

Time: 11.42 By: HAND

Re: **ABP Case Reference ~~NA28N.320164~~ - Dart and Coastal North Railway Order 2024**
- **Submission of Norman and Angela Fullam** -

Dear Secretary,

Introduction:

As long time residents and rate payers in Howth and regular DART users, we wish to make the following observations on the above. We have paid the required fee.

While we welcome any positive developments to the national rail infrastructure, the proposal to remove the 177 year old direct rail service along the Howth Branch Line to Dublin and beyond gives rise to very serious concern. We wish to object to the proposal in the strongest possible terms.

The downgrading of our long established rail service will have a particularly negative effect on those of us within the prevalent older age profile in Howth/Sutton/Bayside.

Rather than tinkering with a rail network established in early Victorian times, the 2024 Rail Order should be made conditional on the introduction of a modern 21st century rail system. It should be fit for purpose in these post-pandemic and economically buoyant times.

It is blindingly obvious that the DART and Coastal North solution lies in the construction of additional track/s alongside the main line from Connolly Station to Drogheda.

This was done very successfully in recent years to cater for increasing demand along the old Great Southern route towards Cork out of Heuston Station through counties Dublin, Kildare and Laois.

If it worked well on the south side of Dublin, it should do the same for the north side.

Reasons:

It is our service since 1852:

We took it over from private enterprise last century and paid for it, improved it and sustained it with our fares and taxes and we want to see it maintained as is. The Applicant's claim about an increased frequency does not stack up. There is no desire for an increase in frequency of services to a place where no-one wants to go, i.e. Howth Junction.

Security at Howth Junction:

Howth Junction is a notorious and dangerous location for changing trains. Look what happened recently to a fit young girl when she was thrown under a train in full public view and under video surveillance. What chance do people of advanced age have in such circumstances.

One of us narrowly escaped serious injury approaching Howth Junction some years ago when a rock was thrown through the carriage window. Fortunately it shattered the window directly behind, where the seats were unoccupied at the time.

No Seats:

There is no earthly possibility of anyone on the Howth Branch getting a seat at Howth Junction on packed southbound trains on the main line. Even the prospect of trying to get aboard one of them seems extremely unlikely at busy times. It will become even worse for passengers closer to Dublin trying to board at Kilbarrack, Raheny, Harmonstown etc.

No Trains - August 2024 timetabling debacle:

The timetabling debacle on the north side of Dublin over recent months is instructive.

Irish Rail attempted to integrate some additional fully autonomous diesel train services on the Dublin/Belfast route. The results were chaotic. Irish Rail was forced to abandon this simple objective and revert to the original timetable.

Irish Rail issued a statement stating:

“ We got this timetable change wrong..... We recognise the enormous disruption this has caused our customers’ work, education, childcare and other requirements, and how critical the punctuality and reliability of our services are to the daily lives of our commuting customers. “

The statement accepted that trains terminating at Connolly Station was the cause and the resolution was:

“ to continue those services further south to Pearse, Grand Canal Dock and Bray.

It is self evident to everyone on the north side of Dublin that the main problem lies with track access and platform availability at Connolly Station and not with the long established Branch Line to Howth.

Oireachtas Committee on Transport and Communications 9th October 2024

The Chief Executive of Irish Rail told the Oireachtas on 9th October 2024 that:

“The conflicts which arise from shared train types on a twin-track railway will remain with us until we increase that track capacity. We are undertaking a study of the requirements to deliver a four track section and believe this critical infrastructure should be accelerated to enable continuing service expansion and significant Enterprise journey time improvement.”

It is worrying to hear that such a study is only now being undertaken.

No Escalators:

Every journey to and from Dublin and beyond along the Howth Branch Line will require an overhead crossing of the main or branch lines. Existing lifts are dirty, unsanitary and dangerous. No escalators are planned.

No Toilets:

Presumably because of drug threats. But what about standing around waiting for connections with no available seats on cold winter mornings perhaps an hour after breakfast. Human biological functions kick in. The station is located in a very isolated area.

Traffic Logjams and Access for the Emergency Services.

The current proposal will introduce and sustain serious traffic paralysis at the 4 level crossings along the Howth Branch Line.

The knock-on results will make it even more difficult for everyone, including the Emergency Services, to access the Howth Peninsula via Sutton Cross which is the only way in and out.

Howth Lodge apartments and parts of Claremont Road will become a virtual prison due to the extended closures of their level crossing.

Existing Howth/Sutton residents already try not to leave the Peninsula at weekends due to the difficulty in getting back in because of severe traffic congestion.



Picture shows the bottleneck entrance to the Howth Peninsula at Sutton Cross.
(Looking northwest over Sutton from the Hill of Howth.)

This single very narrow entrance point to the Howth Peninsula at Sutton carries:

- The main road from Dublin to the southwest.
- The main road to Baldoyle/ Portmarnock and Dublin Airport to the northwest.
- The Howth Branch twin-track railway line
- Two cycle lanes on the Dublin Road
- One cycle lane on the Baldoyle/Portmarnock Road.

There are 4 level crossings on the Howth Branch Line.
The urban population of Howth and Sutton was approx 15,000 in 2022.

Planning Shortfalls:

The Applicant, Iarnród Éireann/Irish Rail, came up with a preferred option to remove the long standing direct connection to Dublin and beyond without measuring road traffic flows across the affected level crossings. Monitoring equipment to measure road traffic was only put in place after residents pointed out this very elementary omission.

The Applicant's subsequent table of the level crossings' closure time per hour is presumably based on trains running at optimum precision on their timetables. Any regular DART user will know that this rarely happens. Therefore the actual amount of already forecast closure time at the level crossings is set to increase drastically.

It is not clear whether the Applicant's proposals take account of the post-pandemic environment of working-from-home and consequent major reduction in commuter journeys.

The recent rail chaos on the north side of Dublin mentioned on Page 2 above, is further evidence of very short-sighted planning on the part of Applicant.

Multi Storey Residential Developments:

Large scale multi storey residential blocks amounting to more than a thousand homes are currently under construction inside the Howth Peninsula. More are planned. These fast-track developments were granted planning permission, **specifically** because of the availability of the direct DART into Dublin and beyond.

Like everyone else on the Peninsula, these new arrivals will be pressured to switch to their cars on the road by the proposal to remove the direct rail link to Dublin and beyond.

A thousand homes amounts to a good sized Irish town of about 4,000 people. Such mass development inside a small area with limited access is unsustainable. The current proposal will choke the life out of our locality.

Physical and Mental Health:

Many hundreds of thousands of people from all over Dublin and beyond come to Howth to enjoy the benefits of open spaces, the sea and spectacular scenery. The proposal to downgrade the direct rail link will choke off access for many, with a consequent adverse affect on physical and mental health.

Tourism:

The necessity to change trains at Howth Junction will decimate the tourist business. News travels quickly on social media. The attraction of foreign visitors to Howth jumped exponentially in the past 25 years due to social media. Horror stories from Howth Junction, whether about security, discomfort or inconvenience will soon put paid to that.

The Howth Tram:

CIE discontinued the GNR Howth Tram back in 1959. They too ignored the wishes of local people and local business at the time. Everyone can now see what a catastrophic mistake that was.

Conclusion:

- We respectfully request that the Board make it a condition of any planning approval in this matter, that the long established and very necessary direct rail link from Howth/Sutton/Bayside to Dublin and beyond be retained in full.
- Necessary improvements to the existing rail infrastructure lie in the provision of additional track along the existing Dublin-Drogheda main line. The precedent for this is already well established along the Dublin-Portlaoise main line to the Southwest.
- The recent time-tabling debacle underpins the need for additional track on the north side of Dublin. That need is publicly acknowledged by the Chief Executive of Irish Rail.
- We are very fortunate that the current economic situation in our country can provide for such infrastructural improvement. Also, the Victorian railway planners retained a substantial margin of land on either side of the north-running lines which can now be put to good use.
- We look forward to the Board giving our very legitimate concerns serious and positive consideration with a view to sustaining the long standing amenity value of our direct rail connection to Dublin and beyond.
- It's current benefits are enjoyed, not just by the population of North Dublin, but by hundreds of thousands of visitors annually from the rest of Dublin and Ireland and tourists from all over the world.

Yours sincerely,



Norman and Angela Fullam,

Howth