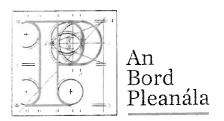
### Our Case Number: ABP-320164-24 Planning Authority Reference Number:



Patrick Leahy 17 Bayside Walk Sutton Dublin 13

Date: 06 November 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,

**Wisling Reilly Executive Officer** Direct Line: 01-8737131

**RA03** 

Teil Glao Áitiúil Facs Láithreán Gréasáin Ríomhphost

LoCall Website Email

Tel

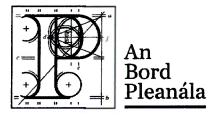
Fax

(01) 858 8100 1890 275 175 (01) 872 2684 www.pleanala.ie bord@pleanala.ie

64 Sráid Maoilbhríde 64 Marlborough Street Baile Átha Cliath 1 D01 V902

Dublin 1 D01 V902



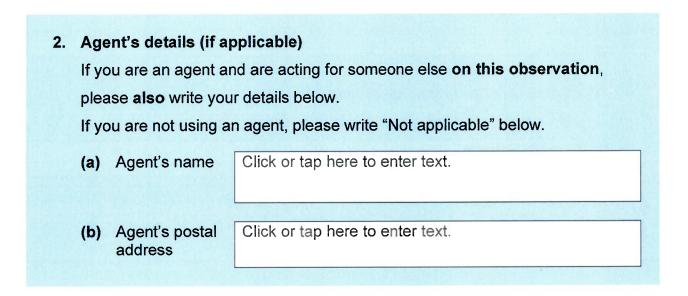


Observation on a Strategic Infrastructure Development Application

### **Observer's details**

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
 Patrick Leahy
 (b) Observer's postal address
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# Agent's details



## **Postal address for letters**

 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

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

DART+Coastal North

(c) Location of proposed development

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

## **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).

I oppose the intention to follow through with the DART + Coastal Route plan for the following reasons:

This will result in the end of direct DART services to the city from Howth and other stations reducing connectivity for all affected communities to the city and beyond.

It will add to existing high local traffic volumes due to closure of level crossings and making the DART unattractive and difficult to use due to the need to change at Howth Junction to access the city. The project is likely to add to local pollution and noise from additional vehicle traffic. The proposed additional traffic will reduce road safety and impact negatively on cyclists and pedestrians.

The State has an obligation under climate change legislation to support sustainable travel options. The end of direct access to the city undermines this option. Current bus services are inadequate and do not integrate with the train system. While Irish Rail claim that sustainable travel is improved by their proposal overall, it is not clear that Irish Rail have considered the impact on sustainable travel in the affected area.

#### 5. Grounds

The need to change at Howth Junction-Donaghmede will cause difficulties for older people, for individuals with disabilities, wheelchair users and those with infants and children. There are some but no detailed plans to deal with this issue as Howth Junction-Donaghmede was never designed as an interchange station.

Despite specific remediation plans e.g. "Big Lift" many stations lifts are out of order regularly. It is not obvious that Irish Rail's approach to maintaining lifts is in line with the requirement to have lifts operating all the time and in particular in respect of Howth Junction. While changes are proposed to Howth Junction, more significant changes would be needed in order to facilitate the proposed interchange proposal and these are not planned. The proposed change will not therefore enhance the passenger experience and reduce the potential for use of the DART.

The loss of direct services between the city and Howth will have a significant impact on local businesses including local shops, bars, restaurants reducing the amenity value of the area.

The proposal to end direct services from Howth means that all passengers from the impacted communities will only be able to use services from Drogheda/Dundalk to the city.

Irish Rail claim that train frequency from 11 to 24 passenger capacity from 12,500 to 26,600 per 3-hour peak period between Drogheda and Dublin City Centre. It is not clear that there will be sufficient new services to deal with current and expanding population in the affected area and that there will be capacity at Howth Junction to accommodate existing and future

#### 5. Grounds

DART users from Howth, Sutton, Kilbarrack and Bayside on these direct services from Dundalk/Drogheda. Service provision is likely to be diminished from these areas resulting in a loss of sustainable travel options. The existing operation of the services with constant delays does not suggest that Irish Rail can deliver this level of service set out in their plan for DART+ in a timely and competent manner.

Irish Rail have recently publicly suggested a four track arrangement between Connolly and Malahide and this should be pursued in order to retain direct services. Direct services should not be reduced or abandoned before this project comes to fruition.

If this proposed ending of a direct service was to go ahead there is no indication of the type or level of services that Irish Rail would run between Howth and Howth Junction. The proposal suggests there would be an improvement with extra timetabling and services. An increased level of service on the line between Howth and Howth Junction will add to traffic problems at particular points on the route – in particular at Baldoyle. While opposing the current proposal there would need to be a level of service legally enforceable on Irish Rail if the Howth-Howth Junction reverts to branch line status.

5.	Grounds
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# **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.