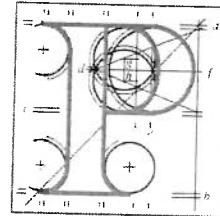


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Paul Lambert
9 Dunbo Hill
Howth

Date: 14 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,

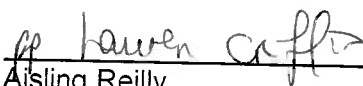
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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	1890 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

9 Dunbo Hill
Howth
D13
13/10/24

An Bord Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re
Railway Order Application: ABP-320164-24

Dear An Bord Pleanála

"We are sorry."

"We got it wrong."

"Irish Rail 'don't seem to know what they are doing.'"

These are just some of the comments and apologies emanating from and in relation to Irish Rail when it rolled out another of its major projects (see Appendix 1).

These are very public and clear examples of the current applicant getting planning and projects wrong – and despite having time to get it right.

The current application has also demonstrated a lack of diligence in its filing. (if this was a normal planning application, it would be refused outright and the applicant would have to reapply).

However, there are more fundamental issues which undermine this current application.

The applicant engaged in an ill-conceived and biased "consultation process." While it had posters, at least some of these did not point to where the public could voice their opinions or objections. It was as if there was an intention to chill public comments or to chill the ability of the public to engage and voice their important opinions.

Even more important, the whole "consultation process" was or appears to have been progressed with a pre-determined outcome. It was not a real or meaningful process.

Many people including this writer did find a means to communicate opinions but more importantly to ask questions as to the impact, nature, and scope of the proposal – particularly any adverse impacts and efforts to minimize any adverse impacts. The applicant did not properly or genuinely engage with these queries nor comments. It again gave the impression of a pre-determined outcome.

For example, some of the official materials issued seemed to suggest that one of the adverse impacts would be that the historic and essential direct Howth to City Centre line would be discontinued or

degraded for 6 hours per day – so called rush hour time. When asked for specifics on the exact times being proposed, the applicant did not respond.

More worryingly, the applicant has more recently become more evasive and appears to be becoming more elusive in its language (a fact which is also commented upon by local political representatives) – now suggesting that the discontinuance of the Howth – City Centre rail line will be permanent and not limited to rush hour times (and howsoever the applicant itself wishes to define that (or event change that from time to time at its own discretion)).

This again appears to demonstrate that the so-called consultation and engagement (or lack of engagement to be more accurate) was a sham and followed a pre-determined outcome. It was window dressing for this instant application.

Many individuals and public representatives have sought details in relation to what alternative proposals were considered by the applicant in the range of potential changes and developments that may impact the Howth-City Centre line. This includes Freedom of Information Requests. It transpires that there was no range of proposals considered. Nor was there an impact analysis of Options 1, 2, 3, 4, 5, etc. and an impact analysis comparing the adverse and positive impacts of each as regards the impact on the Howth-City Centre rail line and the adverse impacts on the many commuters depending on this historic rail line. Nor was there any impact analysis on how to reduce adverse impacts specifically on any preferred options.

Please note that residents and commuters who rely on the Howth-City center rail like were not present with a range of potential options to consider and respond to.

The above points serve to further demonstrate that the current application, application process, and so-called consultation were flawed.

There is a vague, ill-defined suggestion from the applicant that the Howth-City Centre line needs to be diminished/stopped. The elasticity and vagueness should be determinative any application such as this. This vague (and pre-determined) rationale is ill-planned and not established. It does not approach the level of rigorous and diligent planning that would justify the grant of the current application. The required specificity is lacking.

In light of the new development where the above time table change had to be rolled back and apologies issued by the applicant, it is only fair to query the applicant as to why the preparation and exercises grounding this application differ from the above debacle.

In addition, the applicant should be queried in detail as to what is specifically being proposed. Is it to halt the Howth-City Centre direct line service during peak hours? And if so, what are those hours specifically? And will those hours change between weekdays and weekend days?

If the applicant has changed the basis of its intentions, specifically to make significant changes even beyond peak hours, what are those specific proposals? Why were these extended and changed proposals not put to public consultation? When specifically, were these changes (as suggested by the applicant recently) decided upon? A feature creep with unspecified and ill-defined outcomes is not in accord with proper planning and the grant of an application such as this.

At no stage has the applicant addressed what the range of adverse effects may be for residents and commuters using the direct Howth-City Centre line and how it seeks to diminish these, nor to engage with the community on which of the options it prefers.

The vague conceptual justification that stopping the Howth-City Centre line (originally only during peak hours, but more recently even beyond that) makes an unproven supposition that this is necessary. It is not. At no stage has this been backed up.

However, as regards this pre-determined pre-supposition, there is in principle a greater argument for discontinuing direct travel going through Connolly to Pearse. One can make a stronger argument for all trains going south into the city to stop at Connolly; and all trains going north to the city stopping at Pearse. This would be in conjunction with a regular continuous Dart shuttle between Connolly and Pearse.

(Separately, there is technical scope to increase the number of direct lines between Connolly and Pearse – both above ground and below ground. Sometimes a lack of imagination can lead to non-direct, far, and roundabout solutions).

The current proposal as regards Howth-City Centre is not backed up in the current proposal and should be refused.

The current application should also be refused on the following basis. After the application had been filed, reports are coming out of a new proposal to lay two additional tracks into the City Centre (see Appendix 2). This eminently relevant and pertinent to the present proposal and should have been disclosed at the consultation stage and also referenced in the current application.

It undermines the applicant's referred to need for discontinuing the Howth-City Centre direct line. The application as submitted is flawed and lack proper process and disclosure. It needs to be refused.

In a new process the applicant needs to disclose the impact of the additional two lines on the proposal currently being made.

It is also possible for applications to be granted with a sunset clause. For example, only part of an application and only for a specific defined time period. For example, only every second train to be non-direct and during a 1 hour/1.5 hour period and only for a period of 12 months/24 months until new lines are laid.

It is also possible to refuse the current application or to only allow it if applied for at the same time as definitive plans (and any necessary application process) are filed – and which would allow everyone to consider the period by which the additional lines are to become operational.

Clearly, the adverse impacts upon the direct Howth-City Centre line should be minimised but also not extend beyond the opening of the new additional lines recently referred to.

The applicant, the Bord, and the public would benefit from be afforded the opportunity to consider more detailed and better considered plans for both the new rail lines and adverse impact consideration on the Howth-City Centre line at the same time.

In terms of consistency with established planning rules, processes, and protocols, this instant application should be refused and a new application required. Otherwise, the same rules that apply to everybody else would be applied inconsistently and unjustifiably by the Bord.

The current application should also be refused on the basis that there was a lack a proper, fair, and or unbiased, and or non-pre-determined outcome approach.

The current application should also be refused because there was a lack of fair and expected engagement and responses from the applicant during the consultation process.

The current application should also be refused because the circumstances have materially and significantly changes as confirmed by the applicant's failed and ill-judged timetable change planning and rollout, and which necessitated a roll back and apologies.

At the very least, the above demonstrates a need for the applicant to answer a series of direct questions and further information as to why its process in the leadup to this current proposal is not equally unfair, ill-planned and unjustified as currently submitted.

The current application is arbitrary and extremely vague as to what exactly is being proposed in relation to the ending to significant diminishment of the direct Howth-City Centre line. There is a lack of specifics such that there is not sufficient detail and information included such as to enable and justify the lawful grant of this current application proposal.

The current be refused because material information was not disclosed in particular as it related to plans already within the applicant's knowledge in relation to the additional rail lines and which are only now public post the consultation process and post the filing of the instant application. The public should have been afforded to opportunity to see both specific proposals.

Should the current application be considered, it should be on the basis of additional information.

If the current application were to be granted it should only be on a time specific and limited basis.

Finally, it is clear that the applicant has not taken the many, many submissions from concerned commuters and other into account properly or at all. The application as stated should be refused.

Obviously, this is without prejudice to the applicant undertaking a future application.

Kind regards

Paul

Paul Lambert

Appendix 1

 Irish Independent · 13h

Irish Rail 'don't seem to know what they are doing' as timetable revamped again

Irish Rail is to return to a pre-August timetable this week, after it admitted it "got it wrong" when it introduced a new...



Transport

'We got it wrong': Irish Rail to revert to old Dublin Connolly timetable after commuter disruption

Company apologises to commuters for longer journey times due to timetable change on Dublin routes on August 26th

[Irish Rail](#) is to scrap new Dublin commuter train timetables, which were introduced last August, due to punctuality issues which resulted in stinging Government and public criticism.

The company said it “deeply regrets” the problems the revised timetable caused since August 26th on northern lines travelling to the city as well as on the Maynooth commuter and other routes.

Changes will include a restoration of the pre-August 26th-morning timetable pattern on all routes to and from Connolly, with some minor time changes.

The new timetable had increased some intercity services but led to congestion and knock-on delays on routes that feed into Connolly Station.

Irish Times

**Irish Rail apologises after
wheelchair user was accused of
'holding up train'**

Appendix 2

Irish Times

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 Meade 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.