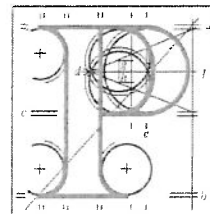


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Peter and Margaret O'Shaughnessy  
20 Woodcliff Heights  
Howth  
D13EF86

**Date:** 05 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.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://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](mailto: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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**Glaó Áitiúil** 1800 275 175  
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D01 V902 D01 V902

The Secretary,  
An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01 V902.

20 Woodcliff Heights,  
Howth,  
Dublin 13,  
D13EF86

22<sup>nd</sup> October 2024

**Re : ABP No. 320164 Dart + Coastal North**

We wish to note our objection to the above proposal particularly as it relates to the direct link from Howth to Dublin city. This service has been in existence since the inauguration of the line in May 1847. It is now proposed to remove/restrict this service which serves Howth, Sutton and Bayside and replace it with a shuttle service between Howth and Howth Junction. The rationale in Irish Rail's submission for this proposal is both disingenuous and confusing. It states that *'the project is seeking to deliver the infrastructure at Howth Junction & Donaghmede Station that could enable the operation of both a DART shuttle service on the Howth Branch line as required, and/or a direct through service to/from Dublin City Centre'*. It does not elaborate as to how this could/would operate, if at all.

The proposal states - *Proposed changes to the Howth Branch, will enable both the service frequency and capacity to increase, along with improvements to the reliability of timetabling. The reliability of the Howth Branch will increase as the proposed shuttle service would mean **that trains operating on this branch would no longer be susceptible to delays occurring along the Northern Line.*** In other words, you can arrive at Howth Junction on time, only to be *'susceptible to delays'* along the *Northern Line'*. There is aspirational evidence in the proposal that such delays will be overcome.

The proposal further states that *'the frequency and quality of service will provide a viable transport alternative to communities along the route and help encourage people to migrate from private car use'*. There is no evidence to support this view. To reduce the existing service and force commuters to change trains at Howth Junction cannot be regarded as *'a viable alternative'*. In reality it will only encourage the greater use of private cars.

Fingal County Council has encouraged the intensification of residential use along transport links and has allowed greater densities than would be allowable in other areas. They have also decreased the provision of private parking in such developments. This was to encourage the use of public transport. In the past five years the number of apartments built or under construction in the vicinity of the Bayside to Howth Dart catchment area has increased by more than 800 units of varying sizes. The occupants of these new developments will not be encouraged to use the DART if it becomes restricted at Howth Junction.

Irish Rail have recently announced that they acknowledge, at last, the difficulties and short comings of increasing the capacity of the existing twin track Northern line and they note - *'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'*.

We suggest that this 'acknowledgement' is just a smoke screen to allow the current proposals to be accepted. It has always been known that the root problem with the line is that there are only two tracks. Four tracks would, of course, eliminate the need for the Howth shuttle line and they should be installed as quickly as possible.

Obviously, any new study would have to take into account the bottleneck that remains along Butt Bridge. This has already been addressed in the DART underground proposals which were shelved back in 2015 and are now scheduled for after 2042!!


It is clear that Irish Rail does not have a comprehensive overview for the Northern line's redevelopment. What is also clear is that robust simulations of the proposed train timetables have not been undertaken.

There are many other reasons as to why these proposals should not be approved as they have not been adequately evaluated or addressed -

- Universal access issues – on/off access to trains; the inability of Irish Rail to provide working lifts on an ongoing basis
- Security in Howth Junction on a constant basis throughout the working day
- Access for residents to their homes in Howth Lodge during prolonged periods when the traffic barriers are closed
- Build-up of traffic onto main roads when the traffic barriers are closed.

I trust that that An Bord will agree with our objections, and will issue a Decision to Refuse Permission in due course.

Yours sincerely,



**Peter O'Shaughnessy**



**Margaret O'Shaughnessy**