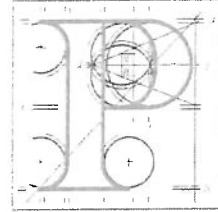


Our Case Number: ABP-320164-24

Planning Authority Reference Number:



**An
Bord
Pleanála**

Residents of Parkvale Baldoyle
c/o Cathy Wyer
6 Parkvale
Brookstone Lane
Baldoyle

D13A2K7

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 and oral hearing request 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

Reference : Dart + Costal North

23rd October 2024

Cathy Wyer 6 Parkvale, Brookstone Lane, Baldoyle, D13A2K7

To Whom it may Concern,

We the undersigned, residents of Parkvale, Baldoyle, wish to make an Observation relating to the proposed development of DART + Costal North.

We are served by Bayside DART Station and have a number of concerns regarding the proposals for the Howth Branch of the Line.

The area that is covered by the Howth Branch is on an isthmus with two roads diverging at Sutton Cross. There is no alternative for traffic but to move along those routes.

Unfortunately, too many of us have experienced the knock-on effect if there is any interruption to what is already a delicate balance of traffic movement involving both private and public transport.

There is no doubt that the proposed development would have a significant, detrimental effect on traffic movement and, therefore, the ability for people from Baldoyle, Sutton and Howth to move around our own local area.

Items in this submission are inextricably linked.

The current proposal would remove direct DART services from Bayside, Baldoyle, Sutton and Howth. The precedent for a direct service was set in 1847 and advanced almost 40 years ago with the introduction of the DART. Replacing it with a shuttle service could not be regarded as an improved service.

The following would be severely impacted by the proposed plan.

- Maintaining Direct DART Services
- Level Crossing Closure durations
- Movement of traffic both Private and Public
- Timely access for Emergency and Garda Vehicles

- Safe accessible commute for all, particularly the Vulnerable in our community
- Capacity to accommodate transferring passengers at Howth Junction
- Increased commuting times

1) Maintaining Direct Dart Services

- Direct DART services from Howth, Sutton and Bayside to the city centre, and beyond, are vital to keep our communities connected.
- The direct train service has been invaluable in providing people in the area with an alternative way of moving around.
- It is a way of guarding against isolation, for younger parents and families, vulnerable people and the elderly in our community.
- The Direct Service between the Dublin City Centre and Howth is important for sustainability, safety, accessibility, economics and tourism.

2) Sustainable Travel.

- It is National Policy to encourage people to use sustainable transport instead of their cars.
- Removing direct DART services does not align with our national transport and climate policy.
- Many of us have attempted to support this policy. Should the plans go ahead this will be significantly more difficult and we will be forced into using our cars more frequently.
- 77% of people who took part in the 2nd public consultation said they would not be encouraged to use the DART over their cars. (Appendix A3.2 PC2 Findings Report page 21)

Furthermore, Irish Rail's 2nd public consultation report found that:
"The loss of direct services to Dublin City Centre was regularly cited in submissions as grounds for existing DART users from the Howth Peninsula to revert from DART usage to private car usage."
 Appendix A3.2 PC2 Findings Report page 33
- Many young people endeavour to take the sustainable transport option. They have a right to expect an efficient, comfortable and safe means of commuting. The proposed plan does not support this: it will increase journey times and the impact on ability to board busy trains arriving on the Northern Line is not clear.
- Many young parents and their children endeavour to take the sustainable transport option. They have a right to expect an efficient safe means of commuting. The proposed plan does not support this.

- g. Many older people and those on Free travel, endeavour to take the sustainable transport option. They have a right to expect an efficient safe means of commuting. The proposed plan does not support this.
- h. Many vulnerable people endeavour to take the sustainable transport option. They have a right to expect an efficient safe means of commuting. The proposed plan does not support this.
- i. Howth junction station is fundamentally inconsistent with use by those of reduced mobility and Irish Rail's record of maintaining functioning lifts is poor.
- j. The Government and City Businesses are trying to encourage people to go into the city centre and use public transport. Having to transfer at Howth Junction would certainly not encourage people to take their business into the city.

3. Level Crossings & Traffic Congestion

The proposed shuttle DART service operating every 10 minutes in each direction would cause significant traffic problems:

- a. In a worst-case scenario, the Level Crossing at Sutton Station could be closed for more than 32 minutes of every hour, and the Warren House Road Level Crossing could be closed for more than 30 minutes of every hour. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page)
- b. This will cause bottlenecks of traffic on surrounding roads and estates. Traffic can at times stretch from the Level Crossing on Warren House Road back to the Traffic Lights at Mayne Road, with traffic trying to get out from side roads building back up. As the crossing at Sutton is also down when the one on Warren House Road is down traffic can already build up back from Sutton Cross along Strand Road to Baldoyle Church. There is also a knock-on effect along the Dublin Road towards Kilbarrick Road.
- c. The traffic assessment submitted by Irish Rail as part of its application shows that longer closures of the level crossings will result in more traffic congestion.

Specifically, the traffic study states that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29). This will be evident not only on the roads where level crossings are present but also the roads feeding onto the main arteries. This has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings.

- d. We have significant concern that Emergency Vehicles as well as the Gardai will be unable to progress in a timely manner along those routes due to the congestion and Level Crossing Closures. Currently emergency vehicles can be held up for significant periods of time with Level Crossing Closures.
- e. With the huge increase in building that has taken place in the surrounding areas there has been a significant increase in traffic. With major developments in Howth and in Baldoyle the impact is already being felt.
- f. For some vulnerable people or children, the current experience of delay with the Level Crossings closures, causes anxiety. An increase in the delays will only raise this level of anxiety. These people do not have the option of taking public transport, and their world is being increasingly impacted by the plans.

4. Shuttle Service

- a. A shuttle DART service will require people to transfer DARTs at Howth Junction Station if they want to continue into the City Centre or proceed towards Howth.
- b. It is difficult to trust that those commuters who are forced to transfer will find a place on a train coming from the North Line. The case for the need for increased capacity on the Northern line has been made. If this is correct, then those trains will be largely full by the time they reach Howth Junction. The quality of service for those on the Northern line is clearly going to be improved at the expense of those on the Howth line.
- c. This will affect many different groups:
 - i. We endeavour to encourage independence in our young people and those who are vulnerable. This plan is an obstacle to their achieving it.
 - ii. People with disabilities who use the service regularly will be particularly impacted by the highly unsuitable infrastructure of Howth Junction station. Those with mobility or sensory impairments, wheelchair users as well as parents with young children will also be significantly impacted. This is especially the case if the lifts are not operating correctly. In 2023 the Irish Independent reported that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months. It can take days, and even weeks for lifts to be repaired.
 - iii. Those with Intellectual disability and Autism Spectrum Disorder, whose increased independence government and society are trying to promote, will be significantly impacted. Moving from a direct service from relatively quiet stations, with only two platforms to managing connecting trains, in a station with four platforms, with significantly higher numbers of passengers moving in all directions increases the difficulty and stress for these people, making them less likely to use the DART service.

- iv. We do not have confidence that there is adequate security service in order to make a safe journey under the proposed change. Significant anti-social behaviour is well-documented at Howth Junction station, including threatening and dangerous activity directed at women. All public transport users must feel confident that using public transport is a safe option. If the new service requires that those living in Baldoyle/Bayside, Sutton and Howth must change in Howth Junction this will disproportionately impact female passengers, which will result in women and girls limiting their travel, particularly at night. Women and girls should not have to choose between safety and independence.
- v. Many students, in both school and college, use this service. In particular students of school-going age, waiting for trains in either direction, will be vulnerable unless there is a visible proactive security presence at Howth Junction.
- vi. Consideration will also need to be given to the large number of people who use the service to get to Howth particularly in the summer months and when events are on. Significant numbers of people milling around on train platforms cannot be deemed safe. Without proper management of numbers of people safety would be put at risk.

6. Economic Impact & Local Businesses.

- a. The loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth.
- b. Huge numbers of tourists use the DART as a simple and direct way to reach one of Dublin's nicest attractions. This has significant economic benefits for the local businesses and the local economy. Visitors to Dublin are much less likely to take day trip to somewhere that requires them to change trains. They will more likely visit places for which there are direct routes, where they are not forced to transfer to get to their destination.
- c. Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers.
- d. SMEs and individuals who are endeavouring to keep businesses going in this economic climate should not have another obstacle put in their way.

Alternative Suggestion

We urge you in the strongest possible terms to consider the impact of the Plan on the people living along the Howth Branch.

We recognise the importance of providing better infrastructure to meet this need but Irish Rail has also, this month, unveiled plans to expand capacity between Dublin Connolly and Malahide to four tracks in order to separate Intercity and Commuter Lines <https://www.irishtimes.com/transport/2024/10/09/irish-rail-to-unveil-plans-for-new-tracks-through-north-dublin/>. It lacks prudence to only unveil those plans next year, entirely separate from the current plans to remove the direct service to Howth.

The current proposal would remove direct services from one area to enhance services to another, significantly impacting people who reside along the Howth Branch.

There is clearly opportunity to plan for a schedule in which the Howth line retains direct services while still very significantly improving arrival of multiple services to Dublin City Centre.

Increasing the infrastructure capacity by adding new lines should be prioritised over reducing the level of existing services.

We recognise that Irish Rail needs to develop the Northern Line to serve a large population of potential commuters which is likely to grow further. We urge an Bord Pleanála to consider those plans in their totality. There is clearly scope to plan for a schedule in which the Howth line retains direct services while still very significantly improving arrival of multiple services to Dublin City Centre.

We urge an Bord Pleanála to consider those plans in their totality.

We respectfully request an *Oral Hearing* so that these matters can be discussed with relevant stakeholders before permission can be granted.

Yours faithfully

Residents of Parkvale Baldoyle Dublin 13
No.2 Vinnie & Catherine Rosney
No.5 Anna Brooks, Maria Yeates & Kiaran Keyes
No.6 Cathy and Brian Wyer
No.7 Laurence & Margaret Fox
No.8 Sandra Adams & Colm Cunningham
No.10 Louise and Dave Power
No.14 Eric Kelly & Lisa Brady

No 19 Barry & Phil Fox

No22 John and Lyndsey McCartney

No.28 Peter and Michelle Teeling

No.37 Shannon Glaspy & Rory Fogarty

No.38 Kevin and Andrea Thomas