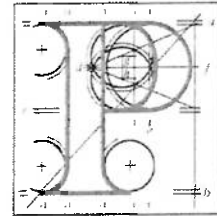


Our Case Number: ABP-320164-24
Planning Authority Reference Number:



**An
Bord
Pleanála**

Ronan Mannion & Others
53 St. Fintan's Road
Sutton

D13 RH36

Date: 19 September 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

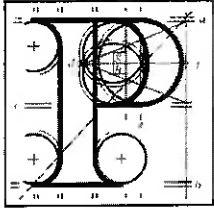
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Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublín 1
D01 V902



Observation on a Strategic Infrastructure Development Application

Observer's details

1. 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

Ronan Mannion, Alison McQuaid, Darren Cowzer,
Catriona Loftus, Niall McNamara, Sarah Williams, Ann
Williams, Fergus McNamara, Deirdre McNamara

(b) Observer's
postal address

53 St Fintan's Road, Sutton, Dublin 13 D13 RH36

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Not applicable

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. 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

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)

320164

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

DART + Coastal North

- (c) **Location of proposed development**

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

Click or tap here to enter text.

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).

We strongly object to the proposal to cease direct train services to and from Howth, for the following reasons:

1. Traffic congestion

A shuttle DART service operating every 10 minutes in each direction would cause the level crossings to be closed for up to **32 minutes of every hour** at Sutton Station **and 31 minutes of every hour** at Baldoyle Road. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11).

Major traffic tail backs occur frequently under the existing schedule. It will be bedlam at the level crossings if the gates close for thirty minutes every hour and the consequent impact on peoples' daily lives and livelihoods will be severely detrimental. The traffic assessment submitted by Irish Rail as part of their application shows that longer closures of the level crossings will result in more traffic congestion. The traffic study states that traffic queues on Baldoyle Road could be up to 59% longer than is currently the case (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29).

This will also have a significant impact in terms of traffic on the wider road network, including buses and cars that aren't passing through the level crossings.

5. Grounds

2. Population Increase Howth

The increased number of residential units currently under construction and in the planning pipeline will lead to a significant population increase on Howth peninsula, requiring a fast and efficient train and bus service to provide access to the city centre and beyond, to reduce reliance on private vehicles. It is National Policy to encourage people to use sustainable transport instead of their cars. **Seventy seven percent** 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). Removing direct DART services does not align with our national transport and climate policy and will lead to serious congestion on the single road coming off the peninsula.

3. Tourism

Howth is a highly popular tourist destination with many people taking day trips, which will be much more awkward for everyone, if a change of train is required on the outward and inward journeys.

4. Accessibility

A shuttle DART service will require people to transfer trains at Howth Junction Station if they want to continue into the City Centre and again on their return journey. This will cause difficulties for people with disabilities, limited mobility, and wheelchair users where they need to use the lifts in the station. In 2023 the Irish Independent

5. Grounds

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.

5. Loss of direct DART services

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond serve to keep the communities connected. The DART has been running to these stations for forty years and there has been a direct line to and from Howth since 1847.

6. Business Implications

The loss of direct DART services will have significant negative impacts on local business in Sutton and Howth. They will have to grapple with delays to their deliveries, loss of custom because of traffic congestion and longer journey times for staff and customers.

7. Safety concerns

Howth Junction is renowned for juvenile delinquent behaviour. Young kids travelling to school and vulnerable people travelling to the City will be less inclined to use indirect DART services where they have to disembark at Howth Junction to get on to another train therefore putting more strain on bus services and it will also lead to increased traffic due to more people travelling by car.

As mentioned previously, **seventy seven percent** 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).

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.

For Office Use Only

FEM – Received		SIDS – Processed	
Initials		Initials	
Date		Date	

Notes