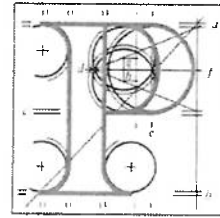


Our Case Number: ABP-320164-24



An
Bord
Pleanála

Sarto Park Neighbours
c/o Richard Kiernan
795 Sarto Park
Bayside
D13 W223

Date: 16 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

Teil	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 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

795 Sarto Park

Bayside

Dublin D13 W223

13th September 2024

Dear Sir or Madam,

Re: Case Number 320164 - Richard Kiernan

On behalf of myself and a large group of my neighbours, I wish to lodge the strongest possible objection to the application for planning permission for Dart + Coastal North.

This project, if approved, will have a profound effect on the quality of life for the residents of the Howth - Sutton - Baldoyle - Bayside and surrounding areas, as it proposes to cease the direct Dart service from Howth to the city centre. The proposal to cease our direct Dart service and replace it with a shuttle service between Howth and Howth Junction Stations is ill conceived, and poorly researched.

The combined population of the above areas is approximately 27,000 according to the latest figures to hand, with 512 apartments currently under construction in Howth, and plans for a further 135 apartments to be built in Deer Park Howth.

There is currently only one very busy narrow road access to Howth, so the Dart line is absolutely crucial to Howth's connectivity to the city, Substituting the direct service with a shuttle service is a non-starter, given that the planning application is based on a premise of there being no increase in the current population of the area occurring. Given the amount of apartments under construction, and in planning, this is a ridiculous assumption to make.

It is proposed that the shuttle service will double the number of trains commuting between Howth and Howth Junction. This will have a serious impact on traffic congestion in the area, due to the fact that there are level crossings at Warrenhouse Road Baldoyle and Station Road Sutton. This means the crossings could be closed for up to 30 minutes at a time. These figures have been cited by Irish Rail in their own submission see Appendix 6.1 Dart + Coastal North Level Crossing Assessment Page 11. This could result in a serious incident being caused by the delay to emergency services such as ambulance or fire brigade.

This also has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings. Dart+'s own study states the following, "The Irish Rail 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)

It is National Policy to encourage people to use sustainable transport instead of their cars. 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

People with mobility problems, wheelchair users and parents with young children in buggies, will be particularly impacted by this proposal, as Howth Junction necessitates the use of stairs or lifts to

change platforms. In the event of a breakdown or maintenance, it is our personal experience that it can take days and even weeks to repair these lifts. In 2023 the Irish Independent reported that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months.

There will be delay and inconvenience to 10,800* journeys caused by changing platforms 2 to 3, on the same level, on the city bound journey. There will be further delay and inconvenience caused by changing from platform 4 to platform 2 via the overhead walkway and lifts. Paradoxically there is an installation of 2 lifts on platforms 2 and 3 but the only existing lift remains on the platform 4 side. Ref: 4.7.3.1.3 Central Connection and 4.7.3.1.5 Donaghmede Entrance. Logically there will be more inconvenience to commuters moving from platform 4 to platform 2 and therefore platform 4 requires a second lift. * The 10,800 journeys figure is sourced from the graphic on Irish Rail's Dart + Coastal North Project website and also 4.3 Project Overview.

<https://www.pleanala.ie/en-ie/case/320164>

Irish Rail propose to remove the "crossing conflicts" at Howth Junction in their proposal. There is mention of signalling upgrades as required. There is no option mentioned to upgrade the signalling to facilitate retaining the Howth direct access. There is no mention of exploring the existing train gaps and block sections in relation to efficiencies. A vastly improved signalling system would be of far greater overall benefit to the rail network.

The loss of direct DART services will have significant negative impacts on local business in Baldoye, Sutton and Howth. Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers. Howth is also a tourist destination with approximately 750,000 people visiting the area every year, This tourism business will be seriously impacted by the removal of the direct dart service

Our area has already been adversely impacted by the recent changes to the Dart timetable which came into effect on 26th of August last, which resulted in overcrowding delays and late trains. The impact of this change was so disastrous that Irish Rail has had to apologise and agree to make amendments to the schedule to address these issues. I'm afraid this kind of debacle does not instil confidence in Irish Rail's ability to plan for anything.

The Dart service from Howth has been in operation for 40 years and Howth has enjoyed a direct train service to the city since 1847, so it is totally unjust to rescind this service from the people of Howth and the surrounding area.

I plead with An Bord Pleanála to hold an Oral Hearing for the DART+ planning application. An Oral Hearing will allow further discussion about the project and the negative impacts these changes will have on our area and the lives of the residents.

Yours faithfully

Richard Kiernan (on behalf of Sarto Park Neighbours)