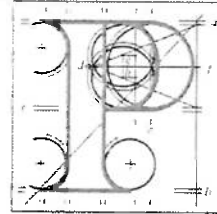


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Valerie McLoughlin & Others  
Lisselan  
St Fintans rd  
Sutton  
Dublin 13

**Date:** 09 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 submission and oral hearing request in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.


The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

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 the meantime 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

RA05

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**DART + Coastal North. An Bord Pleanála Case Number 320164**

Valerie McLoughlin, Lisselan, St Fintan's Road, Sutton, Dublin 13. [Valerie\\_mcloughlin@yahoo.ie](mailto:Valerie_mcloughlin@yahoo.ie) 087 6201165

The impacts of the proposed DART Coastal North project on the whole catchment area is very mixed. All the advantages are with the line north of Howth Junction/Donaghmede station, at a very large cost to the users of what is referred to as the Howth Branch.

Basically the direct train service from Howth to the City Centre/Bray/Greystones is being removed and given to the northern line. The DART Shuttle offered, and portrayed as doubling the service, comes with major difficulties as outlined below. We are responding below to various claims in the report – the responses are in bold.

**In summary:**

The DART shuttle will create traffic chaos with barrier closures, even using the bus will be difficult.

Negotiating Howth Junction/Donaghmede will be extremely challenging for a large cohort of the population.

Businesses in the Howth area will be impacted by traffic; pubs, restaurants and care homes. Individuals using care staff in their homes

Tourism in Howth will be negatively impacted.

It is National Policy to encourage people to use sustainable transport instead of their cars. Removing the direct DART line will discourage residents along the Howth Branch from using public transport.

We are requesting an Oral Hearing on this project as a matter of urgency.

ENVIRONMENTAL IMPACT ASSESSMENT REPORT

JULY 2024

The Proposed Development is driven by several key objectives:

1. To Facilitate Growth in Demand: The GDA is experiencing rapid population growth, which is putting strain on the existing transportation infrastructure. The DART+ Coastal North project will provide the necessary capacity to meet this demand, ensuring that residents and commuters have access to a reliable and efficient public transportation system, while also unlocking development potential of new communities along the corridor.

**Nobody would dream to say that the Coastal North project is a bad idea in and of itself. The main problem lies in taking a service from one area and handing it to another. There is a lack of parity of esteem between the residents along the 'Howth branch' and the residents along the northern section of the line to Drogheda**

2. To Play an Important Part in Achieving Environmental Targets: The transport sector is a

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Fee: € <u>50</u>	Type: <u>CHQ</u>
Time: <u>8-38</u>	By: <u>Post</u>

major source of greenhouse gas emissions. The DART+ Coastal North project will help to reduce emissions by providing a more sustainable mode of transportation.

**The EU Transport White Paper doesn't preclude leaving the Howth line direct to the city in place as it is already electrified .**

3. To Support Economic and Population Growth: The project will support economic growth by providing businesses with access to a skilled workforce and by making it easier for people to travel to and from work. It will also support population growth by making it more attractive to live in towns and villages along the rail corridor.

**This project and the removal of a direct line from Howth to the city centre will impact on the access to the skilled workforce for businesses in Howth and along the Howth branch, with obvious exception of those in the environs of Howth Junction/Donaghmede station. Though the disruption during the construction phase will have a very negative effect in that area.**

4. To Encourage and Enable a Modal Shift: The Proposed Development will encourage people to switch from private cars to public transport by providing a more attractive and convenient option. This will help to reduce traffic congestion, improve air quality, and reduce greenhouse gas emissions.

**Traffic congestion is guaranteed when the barriers at the Baldoyle Road and Sutton Station will be down for over 30 minutes per hour. This will cause a backup particularly on the Baldoyle Road, onto the Dublin Road, affecting travellers, in cars, buses, delivery vans even emergency vehicles, heading to Howth, well away from the said barriers. This will also impact on businesses waiting for their employees and their deliveries.**

5. To Modernise the Railway: The Proposed Development will upgrade the Northern Line to include additional turnback facilities at Drogheda MacBride, Malahide, Clongriffin and Howth Junction & Donaghmede Stations. This will improve the operational capacity of the railway line and allow for more frequent and reliable train services.

**Obviously this is needed, nobody is arguing against this**

6. To Enable Compact Growth: The Proposed Development will support compact growth by making it easier for people to live, work, and play in towns and villages along the rail corridor. This will help to reduce urban sprawl and create more sustainable communities.

The DART+ Coastal North project will provide much-needed capacity, improve reliability, and encourage a modal shift from private cars to public transport. The Proposed Development will also play an important role in achieving environmental targets and supporting economic and population growth

All of these advantages apply solely to the rail corridor north from Howth Junction/Donaghmede, to Drogheda. 77% of people who took part in the 2<sup>nd</sup> 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 2<sup>nd</sup> 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.

The EIAR 2024 report quotes the 2.2.1.1 United Nations 2030 Agenda (United Nations, 2015):  
In September 2015, *Transforming Our World, the 2030 Agenda for Sustainable Development (the 2030 Agenda)* was adopted by all 193 Member States of the United Nations (UN). The 2030 Agenda aims to deliver a more sustainable, prosperous, and peaceful future for the entire world, and sets out a framework of 17 Sustainable Development Goals (SDGs) for how to achieve this by 2030. Sustainable Development Goals 9 and 11 are the most directly relevant to the Proposed Development:

Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.

Target 9.1: Develop quality, reliable, sustainable, and resilient infrastructure, including regional and trans-border infrastructure, to support economic development and human wellbeing, with a focus on affordable and equitable access for all.

**Obviously.**

Goal 11: Make cities and human settlements inclusive, safe, resilient, and sustainable.

Target 11.2: By 2030, provide access to safe, affordable, accessible, and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.

Significant upgrades to Howth Junction & Donaghmede Station are proposed to provide a more accessible, user friendly and customer focused station for all rail users. This includes proposals to improve the connectivity between platforms between the Northern Line and the Howth Branch platforms to facilitate an increased frequency of stopping services.

**It is our understanding that travelling into the city there are no bridges to negotiate, but coming back there will be. People with any type of mobility issue, either temporary or permanent; a broken ankle, a bad back or knees, respiratory or heart issues, wheelchair users, parents with buggies, people with Autism who might struggle to navigate changing trains; all of these will**

struggle to negotiate Howth Junction/Donaghmede Station. It would be interesting to see any detailed plans for the upgrades, it is very vague in the EIAR. The lifts are regularly out of service, and there are 80 steps to get from platform 1 to platform 4.

The UN Sustainable Development Goal 11, is about '*Making cities and human settlements inclusive, safe, resilient and sustainable*'; in particular the goal under Transport: *By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.*

It is abundantly clear that this project is *in clear breach of this UN goal* in relation to the population of Howth, Sutton, Baldoyle, Bayside and Kilbarrack, by forcing women, children, persons with disabilities and older persons, to use a station that is totally unfit for purpose

#### 4.2.3.2 Works at Howth Junction & Donaghmede Station

The DART+ Coastal North project is proposing significant modification works to Howth Junction & Donaghmede Station to both improve the passenger experience generally, and to develop the station to better serve as an interchange station. Proposed works will include:

- ☒ Extension to Platform 2
- ☒ Improvements to the footbridge and central connection
- ☒ Improvements to Ticket Hall and Station entrances.

Associated track modifications including the construction of a new crossover to the east of the platforms, and alterations to existing OHLE, signalling and telecoms will also be required.

Again, it would be interesting to see any detailed plans for the upgrades, it is very vague in the EIAR. The lifts are regularly out of service, and there are 80 steps to get from platform 1 to platform 4. 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.

#### 4.2.7.1 Operating Pattern and Indicative Train Service Specification

Proposed changes to the Howth Branch line, as defined in the TSS, would enable a DART shuttle service between Howth Junction and Donaghmede and Howth stations, and/or a direct line service between Howth and Dublin City Centre and / or a DART shuttle service between Howth Junction and Donaghmede and Howth stations. This removal of crossing conflicts will enable an increased capacity and frequency of service to and from Howth, from the current three services an hour to a maximum of six services an hour during peak periods.

This is somewhat unclear. The use of 'and/or' means what? The mistake in this paragraph notwithstanding, is there a decision to be made between providing a direct line service from

**Howth to the City Centre AND a DART shuttle between Howth and Howth Junction/Donaghmede , or solely a DART shuttle between Howth and Howth Junction/Donaghmede? When will this decision be made, and conveyed in writing?**

## 7.2 Receiving Environment

Within the study area, Irish Rail's Northern Line connects Connolly Station with the suburbs of northeast Dublin and the towns of Malahide, Donabate, Skerries, Balbriggan, Laytown and Drogheda. The Howth Branch connects the suburbs of Howth, Sutton and Baldoyle with the Northern Line at Howth and Donaghmede Junction. \*The current DART service extends to Malahide and Howth. **[\*It should be noted that the DART doesn't 'extend' to Howth. It was opened 40 years ago FROM and TO Howth. Howth has never been an extension of the DART. Malahide is.]**

[...] Howth, Malahide, Laytown and Skerries are important tourism destinations.

The catchment has a population of over 300,000 of whom over 160,000 live north of the existing terminus of the DART service at Malahide. This population has increased by nearly 10% since 2016. In Electoral Divisions, such as St Mary's in north County Meath, the population has increased by over 38%, while that of Donabate has increased by over 24%. Much new apartment development is underway or proposed in other locations such as Clongriffin. The catchment has a large number of commuters who travel into Dublin for work or college on a daily basis. Almost 50% of these commuters currently travel by private vehicle. Outside of Dublin, the proportion travelling by train averages 8%, although this figure is higher in locations where the local station is more central to an urban population such as Donabate where train accounts for 19.6% of journeys. It is intended that the Proposed Development will provide for more frequent services and much improved capacity between Dublin and Drogheda and that this will attract more people to use the train for commuting and for other journeys. In Howth, 15% of commuting journeys are currently by train, but the proposed doubling of services is likely to increase the proportion.

**The Central Statistics Office (CSO) recently released inbound tourism statistics for the first half of 2024. From January to June 2024, Ireland welcomed over 3.2 million overseas tourists, generating over €2.7 billion for the economy. Out of 154 tourist destinations and trips in and from Dublin on Trip Advisor, the coastal cliff walk in Howth is at number 9, and the only tour that costs the price of a Dart ticket. Howth has a yearly tourist population of 1.4m. When it becomes apparent that Howth is no longer a free and accessible area to visit, the numbers will slowly ebb away. And it goes without mention that there are countless businesses relying on tourists to Howth.**

**Regarding population, the EIAR 2024 report does not take into account specifically the 500 apartments on the road approaching the village, that are nearing the end of construction. Also the**

apartments that are not even out of the ground in the centre of the village on the old Royal Hotel site. Not to mention the long awaited work to be done on the site of the Deerpark Hotel at the entrance to the village, across from the 500 apartments. The population of Howth is reckoned to increase by 24% in the following years.

### 7.3 Potential Impacts and Mitigation Measures

On operation, very significant or profound positive effects on journey characteristics will be realised by all passengers, and especially by commuters for whom journey time reliability is most important. The proposed introduction of a shuttle service on the Howth Branch will present inconvenience to some passengers where there is a need to change to mainline services, but the effect on journey amenity will be minimised by the proposed extension of the platform at Howth Junction and Donaghmede Station. For passengers on the Howth Branch, the net effect will still be positive due to the increased frequency of services. The unavoidable increase in the frequency of level crossing closures will have a slight effect in increasing the wait duration when barriers are closed but is projected to lead to a slight reduction in traffic queues specifically at the Sutton crossing where tailbacks from the Sutton Cross road junction occur frequently, particularly on summer weekends.

**The attitude that there are tailbacks regularly at the Sutton Cross road junction, so what, is extraordinary. This report offers ONE positive effect for the Howth Branch, the increased frequency of services, services that we have to take a shuttle Dart to avail of, and minimising the negative effects that this Dart shuttle will have on the local traffic, and the users of Howth Junction/Donaghmede. The effect on traffic congestion in the Sutton and Baldoyle Road area is completely minimised and again the report does not factor in the estimated 24% increase in the population in Howth**

### 7.4 Residual Effects

Most of the negative residual effects are released by residences, businesses and community facilities which are located close to the railway line where works are proposed. These effects are principally environmental in nature, for example due to noise and vibration, or construction traffic. However, these works will be finite in duration and often very short-term. The more significant residual effects are likely in the vicinity of stations at Howth Junction and Donaghmede, Clongriffin, Malahide and Drogheda.

On operation, the Proposed Development will have provided track improvements and electrification of the Northern Line to Drogheda MacBride Station. This will permit an extension of the DART service north of Malahide and an increase in the frequency and capacity of services making rail a more attractive choice for people living between County Dublin and County Louth. In addition, the Proposed Development will have provided for a doubling of services to Howth, increasing service

frequency and reliability for people in Baldoyle, Sutton and Howth. The Proposed Development will have wider public good and economic benefits in terms of offering an alternative to the current high reliance on private vehicles.

The Proposed Development will result a significant positive effect for businesses in terms of the ability to recruit employees from a larger catchment, and for employees who will be able to find satisfying employment across a larger area. These positive effects extend to wider economic benefits, including a positive economic contribution from aggregate journey time savings and the combined effect of improved competitiveness, productivity gains and increased labour force participation from the ability of people to access more productive and rewarding employment. There will also be positive effects for tourism due to the improved frequency of services to destinations such as Howth and Malahide, and the easier ability to access locations such as Balbriggan and Laytown.

**It is utterly disingenuous to say that there will be positive effects for tourism in Howth. Saying that the service is doubled without pointing out the negative effects by *how* the service is doubled is insulting to anyone's intelligence. The access to employees will go side by side with the difficulties in said employees' journeys to Howth, along with deliveries being impacted by the road congestion en route to Howth.**



### **3.2 Overview of Alternatives Considered**

The reasonable alternatives considered at option selection stage were framed within the following scenarios for each significant intervention required.

#### **3.2.1 Do-Nothing**

The Do Nothing scenario wherein the proposed interventions do not go ahead and therefore the capacity and potential of the public transport system remain restricted and the project objectives are not met.

#### **3.2.2 Do-Minimum**

The Do Minimum scenario wherein the proposed interventions go ahead but only those which can generally be met within the existing rail corridor. The Do Minimum scenario in this context is not passive, as some level of works and intervention is necessary to meet the Project objectives and requirements, albeit the least burdensome in terms of lands outside the rail corridor.

#### **3.2.3 Do-Something**

The Do Something scenario(s) wherein the proposed interventions go ahead but interventions are required beyond the existing railway corridor impacting on 3rd party / private lands at some locations.

#### **3.2.4 Do-Something Preferred Option**

The Do-Something "Preferred Option" is that option which best provides for the Proposed Development to go ahead and for the project objectives to be met while also minimising the impacts outside the rail corridor. The passenger capacity and frequency of trains is increased. The frequency and quality of service that will be provided will provide a viable transport alternative to communities along the route and help encourage people from private car use. Sustainable economic development and population growth is supported through the delivery of an efficient, sustainable, low carbon and climate resilient heavy rail network. Ireland's advancement towards a low emissions transport system and emission reduction targets are achieved.

**The Do-Something option is the preferred option. It is undeniable that all the advantages apply to the northern line, and absolutely none to the Howth Branch, in fact all the impacts to the Howth Branch are negative ones, despite the efforts to present a DART shuttle service to Howth Junction/Donaghmede as a positive impact**

**However the most important and impactful effect of this change is the accessibility to Howth Junction/Donaghmede Station. To reiterate, it is abundantly clear that this project is in clear**

***breach of UN Sustainable Goal 11*** in relation to the population of Howth, Sutton, Baldoyle, Bayside and Kilbarrack, by forcing women, children, persons with disabilities and older persons, to use a station that is totally unfit for purpose

This submission has been prepared by Valerie McLoughlin, Lisselan, St Fintan's Road, Sutton, Dublin 13. [Valerie\\_mcloughlin@yahoo.ie](mailto:Valerie_mcloughlin@yahoo.ie) 087 6201165 for and on behalf of the following:

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*Ann Faherty Howth*

*Marie Garvey Howth*

*Anne Gormley Sutton*

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*Suzanne Hogan Sutton*

*Emer Kirwan Sutton*

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*Edie O'Neill Sutton*

*Geraldine Regan Sutton*

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