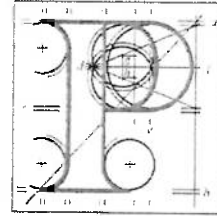


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

William Quinn  
7 Thormanby Hill  
Howth  
Dublin 13  
D13P5K8

**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 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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William Quinn,  
7 Thormanby Hill,  
Howth,  
Dublin,  
D13P5K8.

20<sup>th</sup> Day of September, 2024.

To whom it may concern,

The Fingal County Council area is one of the fastest growing population centres in the Republic of Ireland, therefore necessitating the need for increased public transport services to Dublin city centre. However, any such development must be considered reasonable, and consideration should be given to the requirements of existing residents and those of the future.

I have been a resident of Howth for over 25 years and rely heavily on both the DART and bus links into the city centre for the purposes of work and leisure, and in the past for study. I have observed immense change in Ireland, witnessing the development of the Luas, the opening of new DART stations, an increase of frequency on the line, and the introduction of the BusConnects programme to name a few. Public transport links to the city are crucial for the economic prosperity of the region, bringing tourists and residents alike in and out of our city.

However, it is unfortunately submitted to An Bord Pleanála that the applicant's plans are untenable and will fail to provide any meaningful improvement to the public transport system in Dublin. Instead, the plans in the current format will increase the burden of inconvenience on both locals and visitors to the detriment of everyone. The plan is entirely isolated from wider developments and changes to our public transport system. As a result, the proposed development will further fragment an already disconnected public transportation system in the city. Listed below are my points of objection:

**1. Increased Passenger Journey Times on the Howth Branch:**

It is apparent from the planning documentation that the "shuttle service," between Howth and Howth Junction will operate primarily during the morning and afternoon rush hours. This will add considerable time to the journeys by passengers travelling from the Howth branch towards the city centre.

In addition, Irish Rail has a poor record of punctuality and reliability. The scenario where passengers transferring from the shuttle service to the main northern line are left stranded at Howth Junction and Donaghmede station for an unreasonable amount of time can easily be foreseen when Irish Rail's present day performance is assessed. This is not acceptable for those relying on the service to get to work, an appointment, or their studies.

Furthermore, the current redevelopment plans for Howth Junction and Donaghmede station are vague and ambiguous. Unless sufficient passenger sheltering is in place, transferring passengers could be left exposed to the elements for unreasonable amounts of time. This is particularly so in winter periods.

## **2. Concerns Around Disabled and Elderly Passenger Access**

The plan fails to give sufficient considerations to those with disabilities or the elderly.

At present, railway stations in Ireland are a nightmare for disabled passengers. Stations are often unstaffed, and passenger lifts being out of service is a daily occurrence across the network. By introducing a shuttle service on the Howth branch, the applicants are acting to discriminate against two vulnerable groups in our community at an especially important time of day. Having to change trains at a busy station when wheelchair bound without any support from staff is an almost impossible task but unfortunately will become a regularity under the applicant's proposal.

## **3. Concerns Regarding Passenger Safety/Anti-Social Behaviour at Howth Junction and Donaghmede**

Howth Junction and Donaghmede Station has unfortunate record when it comes to passenger safety and the presence of anti-social behaviour. The applicants plans fail to demonstrate how this issue will be addressed under the new development. It is therefore entirely likely that incidence rate of anti-social behaviour will increase against passengers under the applicant's plan. The station at present is seldom staffed, and at present there is insufficient public transport security and policing in existence for current and future passengers numbers on the network.

It is submitted that any approval for the applicant's plan must be predicated on the implementation of a legal undertaking for the provision of sufficient security/policing services at Howth Junction and Donaghmede station and that, at a minimum, the applicant's should undertake to ensure that the station is manned during peak hours.

#### **4. Concerns Regarding Local Impact to Traffic Conditions due to increased DART Frequency**

The Howth/Sutton area, as a tombolo, has an extremely limited amount of space from which the areas can be accessed by road and rail. Indeed, there is an extensive overlap between the road and rail networks along the Howth branch, with 4 automated level crossings operating.

I reject the finding of the traffic impact assessment and of which made the conclusion that minimal impact would be made should the applicant's plans be permitted. During the weekends, and particularly during the high season with good weather, traffic congestion at level crossings can be significant. This is particularly the case on approach to Sutton Cross from Strand Road, where long tailbacks are not unusual. This has created, at present, an intolerable situation for locals wishing to access their homes and local services but are severely impeded from doing so owing to the increasingly busy traffic situation in Howth.

The applicant's plans would negatively contribute to this, and indeed could pose a serious risk to the accessibility of the emergency services to the area. It is a statistical reality that our elderly population is growing, and with that comes the need for increased access to emergency services. The applicant's plans have offered no further solutions to traffic impacts beyond the provision of an impact assessment. It is submitted therefore that the applicant's plan is incomplete in light of the fact that insufficient consideration has been given to the wider local traffic management plans and furthermore would ultimately undermine the applicant's efforts to reduce CO<sub>2</sub> emissions as any reduction would simply be offset by the increased emissions of vehicles stuck in congestion.

#### **Concluding remarks:**

The applicant's plans are aspirational and incomplete, failing to take into account a number of factors such as the impact to local traffic or how such changes to the service could impact elderly and disabled customers.

Permission should not be granted until such a time that the applicant can guarantee that:

- No additional traffic congestion and associated dangers/emissions will be caused as a result of the plan.
- Provisions are in place to ensure that vulnerable members of society get equal access to the service at all times of day.
- Adequate security and policing provisions are in place.
- At least some direct services remain during peak hours to facilitate faster journey times into Dublin city centre.

Attached herewith is €50.00 as required for my submission. Please acknowledge receipt of this observation.

Yours sincerely,

William Quinn.