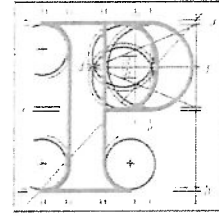


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Dorota Piaskowska & Pawel Lewandowski  
6 Offington Drive  
Sutton  
Dublin 13  
D13X3C5

**Date:** 31 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 letter and oral hearing request in relation to the above mentioned case. The contents of your letter have been noted.

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 relation to the matter 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

RA03

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## Observation regarding An Bord Pleanála Strategic Infrastructure Development Application

Case number 320164

### DART+ Coastal North Railway Order 2024

Herewith we would like to share our observations regarding the DART+ project.

The DART+ project proposes railway infrastructure upgrades required to improve commuter travel options and the sustainability of travel. However, the details of how trains will operate following the upgrades raise significant concerns both in terms of commuting and in terms of social and environmental sustainability, compromising the envisaged benefits of this project. We believe these concerns must be addressed to eliminate the negative consequences of the project in these regards.

Our concerns centre around the **loss of direct DART services** from Howth, Sutton and Bayside to the city centre and beyond. This would be a significant step backwards for commuting. Direct DART services have been running to these locations in Dublin for 40 years, and a direct train service has been running to Howth Station since 1847. This service is vital for people traveling to work, universities, and schools in the city and in the Bayside, Sutton, and Howth areas, and to the approx. one million of tourists and visitors to Howth and Sutton annually. It is also vital for businesses in these areas.

With the loss of direct DART services, Irish Rail are proposing that these DART users would **transfer onto other trains at Howth Junction / Donaghmede station**. This station is **unsafe**. Its design allows anti-social behaviour to go unnoticed and makes it difficult to police. As a result, anti-social behaviour is rampant. Better lighting and other cosmetic improvements proposed following the public consultations of the DART+ project will not resolve the underlying problems. The effect will be that commuters will avoid transferring at this station, resorting to cars.

Furthermore, the station has **poor accessibility**. It requires taking the equivalent of three storeys of steps up and then down to change platforms. The lifts are frequently broken, including at the time of writing this observation. 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 weeks for a lift to be repaired. In effect, vulnerable passengers, such as those with disabilities, limited mobility, wheelchair users,

families with young children, and other people with additional needs, will be unable to use this DART service.

The proposed changes will also negatively affect other public transport and road users. A shuttle DART service operating every 10 minutes in each direction, as proposed by Irish Rail, will cause the **level crossings to be closed for up to 30 minutes of every hour**. For example, the crossing at Sutton Station could be closed for more than 32 minutes of every hour, and the Baldoyle Road crossing could be closed for more than 30 minutes of every hour. (Appendix A6.1 DART+ Coastal North Level Crossing Assessment page 11). Both these level crossings are on popular bus and cycle routes. The long closings will lead to significant **delays for other public transport and active travel users** and **increase traffic congestion**, including on adjacent roads and bus routes not crossing the railway, such as those on Dublin Road. The increased congestion will also negatively affect local businesses due to delays to deliveries and longer journey times for staff and customers.

The extent of the problem is illustrated by the traffic study included in Irish Rail's application, which 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 study assumes no increase in the number of road users in the affected areas. This is an unreasonable assumption considering the thousands of new apartments being built there, for which planning permissions were given in view of the direct train connection to city centre being available. And so, one can only expect a more significant increase in congestion than projected in the DART+ application.

Furthermore, the long closing of the level crossings and the increased congestion will cause **difficulties for emergency services** and put lives at more risk due to the length of time it would take for services such as ambulances to reach patients and bring them to hospitals.

Last but not least, the loss of direct services and the increased congestion will **negatively affect environmental sustainability of travel**, counter to current National Policy. Buses and cars will be in traffic and running engines for longer, and more people will choose to drive. In fact, Irish Rail's 2<sup>nd</sup> public consultation regarding the DART+ project 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). Also, 77% of respondents 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).

In summary, how the upgraded infrastructure is planned to be used following the completion of the DART+ project will not only inconvenience travellers, but also decrease the safety and the social and environmental sustainability of travel.

We believe it is critically important that the operational details are reconsidered at this time, and that conditions that address these concerns are attached to any planning permission. In particular, it is critically important to **keep direct DART services** from Howth, Sutton and Bayside to the city centre and beyond.

In closing, we would like to ask An Bord Pleanála to hold an **oral hearing** for the DART+ planning application. An oral hearing would allow further discussion about the project and the negative impacts it would have if allowed as currently proposed. Thank you for your consideration.

Yours sincerely,

Dorota Piaskowska and Pawel Lewandowski

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