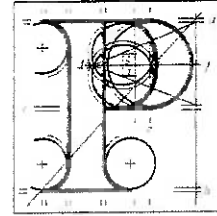


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Helen O'Shea and Others  
31 Woodcliff Heights  
Howth  
Dublin 13  
D13 KP92

**Date:** 08 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

|                    |         |  |
|--------------------|---------|--|
| Teil               | Tel     | (01) 858 8100  |
| Glaó Áitiúil       | LoCall  | 1800 275 175   |
| Facs               | Fax     | (01) 872 2684  |
| Láithreán Gréasáin | Website | <a href="http://www.pleanala.ie">www.pleanala.ie</a>   |
| Ríomhphost         | Email   | <a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a> |

|                      |                       |
|----------------------|-----------------------|
| 64 Sráid Maoilbhríde | 64 Marlborough Street |
| Baile Átha Cliath 1  | Dublin 1              |
| D01 V902             | D01 V902              |

**Helen O'Shea**

**31 Woodcliff Heights,**

**Howth,**

**Dublin,**

**D13 KP92,**

**Ireland**

**Date, 25th September, 2024**

**The Secretary,**

**An Bord Pleanála,**

**64 Marlborough Street,**

**Dublin 1.**

**D01 V902**

**Case Reference: NA29N.320164**

Dear Sir/Madam,

We wish to make an Observation on SID Case Reference **NA29N.320164 Railway Order Application**. I have paid the fee of €50 with the online application.

We are resident in Howth where we have lived all our lives and the DART is a mode of transport that is used almost daily by some of us to travel to work to the city centre. We would like to make the following observations;

#### **1. Loss of direct DART services**

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to keep our communities connected. DART services have been running to Bayside, Sutton and Howth for 40 years, and a direct train service has been running to Howth Station since 1847. In Irish Rail's submission to An Bord Pleanála, there is no guarantee that a limited direct service will still be present if this plan goes ahead. A shuttle service is the only proposed plan for these stations.

## **2. Increase in Population**

Following on from the above point, Howth currently has over 500+ apartments being built right beside the dart station in the old Techrete site, the sites of the Bailey Court and Deer Park Hotel have been sold for a new hotel and more large scale apartments/housing developments. Howth, Sutton, Bayside and Baldoyle already have a population of roughly 20k which will increase sharply in the coming years with these new developments.

## **3. Accessibility**

There is a big issue with people needing to transfer on to trains that will be packed to capacity as they will be coming from the North Line(Drogheda, Laytown, Balbriggan etc) and there are already capacity issues from Malahide with Clongriffin having a large number of people living there. More importantly, people with mobility issues, disabilities and wheelchair users will struggle massively with the transfer as there are a lot of steps in the station and the lifts are broken regularly. Even if the lifts are upgraded, when they break down, it could take days/weeks to fix even if you contact the service number, resulting in these vulnerable communities being isolated. This isn't an instant fix and will mean people will have to resort to buses/cars. There is an aging population in the Howth/Sutton/Baldoyle areas and this proposed change would be hugely detrimental to their access to the city.

## **4. Increased Traffic and pressure on bus service**

With the loss of the direct train service, this will put increased pressure on the public bus service which is already struggling to cope with the capacity issues at capacity at peak hours or on weekends when tourists are visiting Howth. There is no talk of increasing the bus service to balance the loss of the direct train and with an increasing population, this will lead to more cars on roads and more delays.

## **5. Level Crossings**

A shuttle DART service operating every 10 minutes in each direction would 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 32minutes of every hour, and the Baldoyle Road crossing could be closed for more than 30 minutes of every hour in a worst case scenario. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11)

This delay would cause a build up of traffic and the current findings are based on current traffic, not on the fact that there will be more cars on the road by the time this change rolls out.

The 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) This has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings.

## **6. Sustainability**

From Irish Rail's public consultation, the findings were that people would be more encouraged to use their personal cars to travel as opposed to public transport, see below:

*77% of people who took part in the 2 nd 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 nd 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*

This goes against our national transport and climate policy, something that actively encourages the public to use public transport.

## **7. Local Businesses**

The loss of a direct dart will have a major impact on the businesses of Howth, Sutton and Baldoyle due to the traffic build up which will delay deliveries and workers travelling to work. It will also impact the amount of people visiting these businesses, which is something they need desperately with the rising cost of inflation and overheads.

## **8. Safety**

The Howth Junction and Donaghmede train station is not a safe station to transfer at during the day or night. There are rising levels of violent anti-social behaviour in Dublin against vulnerable groups which has not been reduced by government policies. There have been numerous reports of anti-social behaviour, drug use and assaults on people at Howth Junction station and the plan that has been submitted mentions no manned security being present at the station. The only plans involve refurbishing the station, creating anti graffiti walls and improving the lighting but this will not deter any of the aforementioned issues. There is no preventative approach to assure users safety, only cameras to observe it.

## **9. Oral Hearing**

We would strongly request an oral hearing to be held by An Bord Pleanala so that the people's concerns can be heard and to give the people a chance to voice their concerns to the board.

In conclusion, while Iarnrod Eireann did have public consultations and offer 2 rounds of feedback, it seems a lot of it has gone unheard. The above points outline numerous issues that have not been taken into consideration and would be detrimental to these areas and have rippling effects on the economy and climate change initiatives. There is definitely a future where the DART line can run to Drogheda while also retaining Howth, Sutton and Bayside's direct link to the city.

We ask the board to take the above points into consideration and reject the current proposal put forward by Iarnrod Eireann.

Yours Sincerely,

*Helen O'Shea*  
*Evelyn O'Shea*  
*Noel O'Shea*  
*Pierce O'Shea*