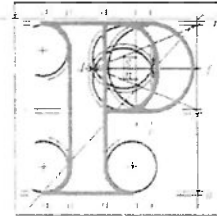


Our Case Number: ABP-320164-24



An
Bord
Pleanála

Howth Tidy Towns members
c/o Nicola Chambers
Mountain View
Upper Cliff Road
Howth
D13AV66

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.

If you have any queries in the meantime 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

RA05

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Glaó Áitiúil	LoCall	1800 275 175
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D01 V902	D01 V902

Dart + Coastal North Scheme Howth Tidy Towns Submission to Bord Pleanála

This submission is being made on behalf of Howth Tidy Towns members. We have 26 active members but liaise with the various other community groups and businesses in the area.

Our mission is to help make Howth a better place to work, live and visit. A committed group of volunteers we work to enhance and maintain our physical environment, with a strong focus on biodiversity and sustainability. We foster community pride and support the development of inclusive community facilities. We promote awareness of our heritage and are cognisant of the need for sustainable economic development to ensure Howth continues as a thriving and neighbourly community.

Contact 1 name: Nicola Chambers (Howth Tidy Towns Treasurer)
Contact 1 Address: Mountain View, Upper Cliff Road, Howth, Co.Dublin, D13AV66
Contact 2 name: Helen Lahert (Howth Tidy Towns Chairperson)
Contact 2 Address: 55 St. Peter's Terrace, Howth, Co.Dublin.
Contact email: howthtidytowns1@gmail.com

From this perspective we wish to make the following observations about the impact of the proposed Dart +Coastal North Scheme.

1. Loss of direct DART services

Howth is undergoing a period of rapid housing development, with a resultant increase in population. **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. Reducing or removing this direct access **will segregate our community and will encourage residents to revert to car usage**; it will also **discourage people to come to Howth for recreational or business reasons.**

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

Dart + Coastal North Scheme Howth Tidy Towns Submission to Bord Pleanála

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)

Removing direct DART services does not align with our national transport and climate policy.

2. Sustainable travel : Level crossings

As currently proposed, a shuttle DART service operating every 10 minutes in each direction would cause the level crossings to be closed for up to a maximum of 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 in a worst-case scenario. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11). This will result in **increased emissions from idling cars, increased congestion**, in addition to the **additional car usage** outlined above, **with negative impact upon wildlife, biodiversity, and human health.**

3. Sustainable travel :Increased traffic

The traffic assessment submitted by Irish Rail as part of their application **shows that longer closures of the level crossings will result in more traffic congestion.** We welcome visitors to Howth, and traffic management is already a serious issue, especially at the weekends. This will only increase with the completion of large residential developments currently underway.

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.

Dart + Coastal North Scheme Howth Tidy Towns Submission to Bord Pleanála

4. Local businesses

The loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth.

- Businesses will have to grapple with **delays to their deliveries and longer journey times for staff and customers.**
- There are currently approximately 1.5 million tourists coming to Howth each year – from within the country and external visitors. These tourists are vital to the sustainability of hospitality businesses in the area. The loss of a direct DART service will have significant affects on the numbers of these tourists who travel to the area by train, as a significant number would most likely pick another destination along the DART route with a direct service thus causing a huge potential **decrease in revenue and potential closures for businesses** in the area
- Local businesses will also be affected by the potential loss of the direct service as a large number of their staff would be commuting into the area using the DART – it will cause increased commute times and thus making the area a **less enticing place to work.**
- Care home staff, and carers will find it increasingly difficult to ensure they are where they need to be at the time their clients need them there.

5. Accessibility:

A shuttle DART service will require people to transfer at Howth Junction Station if they want to continue to stations after Howth junction.

This will cause difficulties for people with disabilities, the vulnerable (children or elderly commuters), those with limited mobility, and wheelchair users where they need to use the lifts in the station.

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 which is not acceptable if users have to change trains to use the service.

6. Safety concerns with Howth Junction Station:

Dart + Coastal North Scheme Howth Tidy Towns Submission to Bord Pleanála

There are a significant amount of children that use the DART to get to schools outside the area and also children that commute into the area to go to our local schools. The thoughts of these children having to change DART trains at Howth junction is **a significant worry for parents due to the anti-social behaviour that has been an on-going issue at that station**. Parents of children who commute outside the area will most likely use their cars to either drive their children to school or bring the children to another station with a direct route due to safety concerns, thus increasing congestion in the area and at other stations at peak times.

Schools within the area may see a reduced number of enrolments in relation to children that would be required to use the DART to commute to the schools.

These safety concerns are mirrored by all vulnerable commuters who will be discouraged from using our public transport system. The DART service should be accessible and usable for all our community.

7. Increased commute times:

Having to change trains will **increase the journey time for commuters** which mirrors the above concerns that this proposed change will adversely affect the numbers of people that will want to use the service.

Oral Hearing

We understand Bord Pleanála can hold an Oral Hearing for the DART+ planning application. This would allow further discussion about the project and the negative impacts these changes will have for current and future generations. We would welcome and are directly requesting an Oral Hearing.