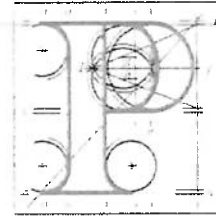


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Lorcan Blake
Niagara
Nashville Road
Howth
Dublin 13

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.

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.

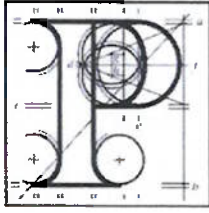
Yours faithfully,


Aisling Reilly
Executive Officer
Direct Line: 01-8737131

RA05

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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



An
Bord
Pleanála

Observation on a Strategic Infrastructure Development Application

AN BORD PLEANÁLA

LDG- 074955-24

ABP- _____

18 SEP 2024

Fee: € 50.00 Type: card

Time: 1301 By: hand

Observer's details

1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's
name

Lorcan Blake

(b) Observer's
postal address

'Niagara', Nashville Road, Howth, Dublin 13.
D13 Y880.

Agent's details

2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal
address

Click or tap here to enter text.

Postal address for letters

3. During the process to decide the application, we will post information and items to you or to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

You (the observer) at the postal address in Part 1

The agent at the postal address in Part 2

Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation.

- (a) **An Bord Pleanála case number for the current application (if available)**
(for example: 300000)

320164

- (b) **Name or description of proposed development**

DART + Coastal North Railway Order 2024

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

DART + Coastal North Railway from Dublin to Drogheda, including in particular the Howth line.

Observation details

5.

Please describe the grounds of your observation (planning reasons and arguments). You can type or write them in the space below. There is **no word limit** as the box expands to fit what you write.

You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information).

I am a resident of Howth of some 45 years and a regular user of the DART service from Howth to Dublin and return, and also a frequent user of The Luas and mainline rail. I am also a senior citizen reaching the point where frequent use of lifts at DART stations will become a growing feature.

While I can identify with the proposed overall intent of the Railway Order application by Irish Rail (IR), I hold strong reservations about the proposed Railway Order intent to apply to the Howth 'Branch' and its train services and its likely adverse consequences for all users: cars, trucks, vans, and in particular buses and the DART. I wish to make my observations under the following headings:

:

- 1. Sutton Cross Road Traffic:**
- 2. Population Growth on the Howth Peninsula:**
- 3. Replacement of direct line services from Howth to Dublin with a shuttle service between Howth + Howth Junction Donaghmede:**
- 4. Howth Junction Donaghmede Station.**

5.

1. Sutton Cross Road Traffic:

Any study of and proposals for the Howth DART line must also consider the wider picture, including the consequences of the extremely limited road access to/from the Peninsula and the likely implications for all road traffic.

Howth is uniquely the only outer suburban Peninsula in Ireland serving the capital city with a single X roads access point, namely Sutton X, for all road traffic, including buses, together with the heavily used DART line service at 'peak' times. .

In addition to residents travelling to/from work, schools, etc., Sutton Cross carries substantial week-end leisure traffic accessing the Howth Peninsula, with the DART carrying substantial and welcome one-day tourist traffic at peak holiday times and indeed off-season times, given its close proximity to the Capital.

Sutton Cross is already a choke point for road traffic congestion, including buses, being a signal controlled choke point for the Howth Peninsula.

For example there was a 2 hour effective stand still due to grid lock on Sunday afternoon on June 23rd last for typically a 20 minute journey.

Without any DART changes, there is already a lack of a comprehensive road traffic management structure and system for Sutton X and the Howth Peninsula, which cannot be separated from any Howth DART line proposals.

Road traffic, pedestrian traffic and DART traffic are all a comprehensive and integral part of the challenge of easing people movement and mobility movement in line with your own stated SID objectives and those of FCC in its Fingal County Development Plan.

5.

2. Population Growth on the Howth Peninsula:

It is projected that the population growth on the Howth Peninsula will increase by 24% over the next 5 years.

There is already a major increase in housing apartments with permission granted on the Peninsula, the residents from which will increase congestion and grid lock at Sutton X and significantly add to the use of the DART services.

Your own ABP SHD planning approval decisions have contributed significantly to this development:

A. ABP (An Bord Pleanála) Case Ref. No. TCO6F. 304637 and TAO6F. 306102.

Former Techrete Site, Beshoff Motors, and Garden Centre, Howth Road, Howth, D. 13.

Construction of 512 no. Apartments, creche, 4 no. Commercial units + associated site works at the above site.

SHD case. Permission granted.

A. ABP Case Ref. No. TAO6 F. 313133.

Site at Balscadden Road and the former Bailey Court Hotel, Main Street.

Demolition + construction of 180 no apartments and assoc site works.

SHD case. Permission granted with conditions.

B. Glenveagh Homes have lodged plans with FCC within Howth Demesne.

Application for a 135 apartment scheme on a site adjoining Howth Demesne in Deerpark, Howth. 72 2-beds + 63 one-beds on a 1.5 hectare (3.8 acre) site, ranging from 3 to 5 storeys in height.

If one also includes the one off single builds, that is easily 1,000 units under construction or in the planning process.

With the encouragement to use public bus and DART services, the population growth will result in a significant increase of passengers travelling into and out of the city each morning and evening at 'peak' times.

5.

3. Replacement of direct line services from Howth to Dublin and return with a shuttle service between Howth and Howth Junction Donaghmede.

A direct line train service from Howth to Dublin and return has been a continuous unbroken service to and from Howth since the branch line to Howth opened in 1846.

Currently the frequency of south bound DART trains from Howth at peak times is 3 trains per hour, with a similar pattern for north bound trains to Howth.

Under the DART + Coastal North Railway Order 2024, IR plans to increase the frequency to 6 trains each way on the Howth branch line during 'peak' periods, with the service terminating at Howth Junction Donaghmede.

This would mean that the four level crossings on the Howth Branch would be closed to road traffic for longer periods in the peak hours, including the impact on bus services (H1, H2 and the 102) and the impact of the delays on pedestrian and bicycle traffic.

Data suggests that the level crossing barriers at in particular Baldoyle Road and at Sutton Station could be lowered for ca. 25 to 30 minutes in every hour at peak times (12 closings per hour of ca. 3 mins for each barrier lowering).

These are also peak times for residents of Howth, Sutton and Bayside commuting to work by car, truck or van, or undertaking school runs, etc.

There is thus a genuine and realistic fear that the extended closure times of the level crossings on Station Road and Baldoyle Road would result in road traffic backing up onto the R105 Howth to Dublin Road and down both the same roads to SS. Peter & Paul's Church in Baldoyle.

5.

4. Howth Junction Donaghmede Station:

Under the IR proposals, Dublin bound Howth passengers would be required to change platforms at Howth Junction Donaghmede Station and then board a DART service from Drogheda or Malahide.

This represents a material degradation of the service currently enjoyed.

The negative impact of changing trains at Howth Junction Donaghmede would mean:

Difficulty in finding a seat on an already crowded train from Drogheda or Malahide.

Changing platforms at Howth Junction requiring the use of the footbridge or lifts.

Limited lift capacity at peak times.

exposure to the elements while waiting.

Perceived security risk to passengers using Howth Junction, especially heightened during the hours of darkness.

Extended journey times.

The likelihood is that the resulting discomfort and inconvenience would cause some commuters to cease using the Dart and revert to private cars, while potential new passengers would be deterred from using the DART.

Within the Howth Junction Donaghmede Station, the overall structure makes it unsuitable for significant numbers of passengers to change trains and platforms.

There will be a particularly negative impact on the mobility impaired and senior citizens to/from Bayside, Sutton and Howth in changing trains and platforms at Howth Junction and trying to secure seats on crowded mainline DART trains.

It will be similar for parents with children in buggies and/or toddlers being led by the hand.

The lift capacities will be inadequate for the number of passengers likely to need to use them at 'peak' times.

5.

Overall Summary Conclusion: The IR submission under the DART + Coastal North Railway Order 2024 would represent a material degradation of the service currently experienced by DART passengers between Howth and the city, and would precipitate a disastrous situation for all users, be they in cars, trucks, vans, or on buses and the DART. It would be a loose, loose, loose for all on the hinterland between Howth and the Howth Junction Donaghmede Station.

The current DART service should be maintained and

I very much request and support the need for an Oral Hearing.

Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

You can insert photographs and similar items in your observation details: grounds (part 5 of this form).

If your supporting materials are physical objects, you must send them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

Fee

7. You **must** make sure that the correct fee is included with your observation.

Observers (except prescribed bodies)

- strategic infrastructure observation is €50.
- there is no fee for an oral hearing request

Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

Yes, I wish to request an oral hearing

No, I do not wish to request an oral hearing

Final steps before you send us your observations

9. If you are sending us your observation using **the online uploader facility**, remember to save this document as a Microsoft word or PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

This also applies to prescribed bodies sending an observation by email.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.