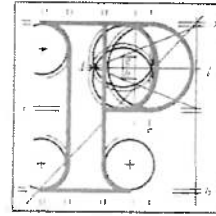


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Louise Whelan & Others
114 Bayside Boulevard North
Bayside
Dublin 13

Date: 16 September 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,

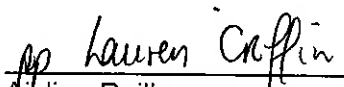
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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 relation to the matter 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

RA03

Teil	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 Maoibhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

OBSERVATION DOCUMENT – DART + Coastal North Project

Submitted by: Louise Whelan, 114 Bayside Boulevard North, Bayside, Dublin 13

Ann Shaw, 110 Bayside Boulevard North, Bayside, Dublin 13

Catherine Whelan, 64 Verbena Lawns, Bayside, Dublin 13

1. Loss of direct DART services

It is imperative that the Direct Service from Howth to City Centre is retained.

Making this a Condition of Planning should be included, given the reasons outlined in following paragraphs.

The Direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to keep our communities connected. The proposed Shuttle Service on the Howth Line would be ineffective and of little use.

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.

2. Level Crossings

The existing closures cause traffic to back up to the junction with Dublin Road, and along Dublin Road, back to Sutton Park Junction. At current rates of closures there are significant difficulties for Ambulance and Fire Service vehicles. (See Point 3 below giving additional information on the impact of further Level Crossing closures).

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 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) .

Next Page....

3. Increased traffic Congestion

While 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, that assessment does not adequately reflect real impact.

The current sustainable public transport service provide by Dublin Bus, will be severely impacted by the extra Level Crossing Closures and traffic congestion.

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.

As shown at Point 2 above, there was no consideration of the knock-on effect to traffic flow further back along the road network.

4. Sustainable travel

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

Dublin Bus services will be heavily impacted by extra Level Crossing closures.

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).

Many Dublin Bus users may revert to using their cars.

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.

5. Accessibility

A shuttle DART service will require people to transfer DARTs at Howth Junction Station if they want to continue into the City Centre.

This will lead to passenger congestion on platforms, thereby posing a risk to safety. Given the large scale housing developments already under construction in Howth, Portmarnock, Donabate, Portrane, Lusk, Rush and further on to Drogheda, trains arriving at Howth Junction will be already full, resulting in significant numbers not being able to board. Each proposed Shuttle train from Howth will add more passengers to the platform congestion.

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.

This will cause difficulties for people with disabilities, limited mobility, and wheelchair users, baby buggies/prams, where they need to use the lifts in the station.

Howth Junction Station is of major concern regarding anti-social behaviour, public safety and security risks. For passengers who will walk to Howth Junction via the Kilbarrack Road, the security problems/safety risks still exist. The approach road to Howth Junction is extremely isolated.

Provision of additional lighting, CCTV and new stairwells will not eliminate these problems.

6. Local businesses

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

Deliveries to and from local businesses can only be made by road vehicles. Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers.