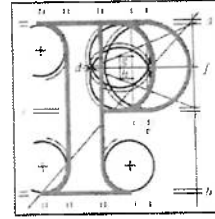


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Mary Clarke and others
41 Thormanby Lawns
Howth
Dublin 13
D13 F762

Date: 10 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

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64 Sráid Maoilbhride	64 Marlborough Street
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D01 V902	D01 V902

41 Thormanby Lawns
Howth
Dublin D13 F762

Dear Sir/Madam,

AN BORD PLEANÁLA	
LDG- <u>074776-24</u>	
ABP- _____	
10 SEP 2024	
Fee: € <u>30.00</u>	Type: <u>cheque</u>
Time: <u>9.00</u>	By: <u>reg post</u>

We the undersigned wish to make the following observations on the proposed changes to the Dart + Coastal North plans. We are all natives and residents of Howth. While we approve in principle of improved rail services for Drogheda and other towns, we are adamant that these should not be and do not need to be achieved through the proposed degradation of service to the Howth, Sutton, Baldoyle and Bayside communities. The DART direct trains have served these communities for 40 years and a direct rail line has existed since 1847. Reasons for the proposed changes would have to be that there is no other way to improve services to other locations and that it is unavoidable to inflict such a loss on many thousands of commuters. Neither of these propositions is true.

Negative Consequences for Commuters

This proposed loss is unacceptable to thousands of commuters and several different groups who would be grievously affected: residents of Howth, Sutton, Baldoyle and Bayside who work in the city, workers who travel to these areas, schoolchildren travelling from Howth into the city and in the other direction to schools in Baldoyle, Sutton and Howth, third level students travelling to college, people with reduced mobility for whom a broken journey is an ordeal, the 1.5 million visitors and tourists who come to Howth each year, and the many businesses in Baldoyle, Sutton and Howth who will suffer delays to deliveries and longer journey times for staff and customers. Howth will also suffer significantly from loss of tourism.

Journey time is a significant factor. The present journey time from Howth to the city is 26-28 minutes. The future journey time is not ascertainable because Irish Rail has stated that this is an operational matter, not to be determined until the infrastructure is in place. One thing is certain: it will be worse. In addition to longer journey times is the question of accommodation on the trains. Commuters transferring at Howth junction to trains coming to and from Drogheda are likely to find them full and may have further delays waiting for one with space. Irish Rail claim that this will be addressed by greater frequency of trains, but this will have calamitous effects on road traffic, discussed further below.

Health and Safety Problems at Howth Junction

Another cause of anxiety is the platform change at Howth Junction. While this is relatively straightforward when coming from Howth, the platform change when coming from the city will still involve ascending to another level. Lifts on the DART services are frequently out of order for protracted periods of time. In 2023 the Irish Independent reported that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months. Repairs can take days, and even weeks.

Should this occur, those with small children, buggies, wheelchair users and those with reduced mobility will be unfairly disadvantaged. This is against European Human Rights law, which is predicated on equality and safety for all citizens.

The platforms at peak hours will not be able to accommodate safely the thousands of workers and students forced to change at Howth Junction – a serious infringement of health and safety regulations.

Howth Junction has also been the site of anti-social behaviour and at times criminal activity. This has not been adequately addressed by Irish Rail. More lights and CCTV will not fix this. Schoolchildren, the vulnerable, the elderly and those with reduced mobility will be particularly vulnerable at night and in the dark winter months, but it is not an acceptable prospect for anyone.

Deleterious Effects on Road Traffic

Irish Rail proposes providing several more trains from Drogheda and up to six Howth shuttles per hour. This is an astonishingly incompetent suggestion and completely unworkable. Irish Rail has acknowledged in its own literature that the four level crossings on the Howth line, Baldoyle Road, Station Road, Lauders Lane and Howth Lodge could face closures of up to 30 minutes per hour. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11). Dreadful as this is, Sutton Golf Club commissioned its own study by a professional traffic analysis company, and the findings were that these closures are likely to be even longer. The negative consequences are evident: traffic jams which already occur and extend back to the main roads will intensify, causing total chaos. Irish Rail's traffic study acknowledges that traffic queues on the Baldoyle Road could be up to 59% longer than they currently are. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29).

Residents of Howth Lodge apartments will be locked in or out of their homes for unacceptably long periods of time each hour.

Traffic to Howth is already severely challenged on the two lane approach road to the peninsula. Due to Fingal Council and An Bord Pleanala's judgments in favour of aggressively dense developments on the former Techrete site, the Baily Court and other sites, Howth will have an increase of population of 24% in the next couple of years. The Techrete site of 512 residential units offers only 0.7 parking space per apartment, presumably in the expectation that residents would use the direct rail line. The same kind of parking provisions also apply to the Baily Court development. Irish Rail's proposals mean not only the loss of the direct DART line, but also the serious deterioration in bus services due to road traffic congestion. People will not tolerate a degraded transport service. Instead, they will return to cars. The resultant increase in road traffic and parking congestion will increase current traffic chaos. It prompts the question if the planning and transport infrastructure authorities in Ireland ever communicate with each other.

Sustainable Transport

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

Over three quarters of the people who participated 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)

Irish Rail's 2nd public consultation report states:

"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).

In the context of global warming and the imperative need of governments to encourage people out of cars and on to public transport this proposal is staggeringly inept.

Oral Hearing

Finally, we would argue that it is essential that An Bord Pleanala make an impartial oral hearing available to the public for two reasons.

Firstly, Irish Rail's copious material promoting the Dart + Coastal North project has emphasised the positives and glossed over the negatives of the loss of a direct rail line.

Secondly, Irish Rail has also ignored the fact that this loss was the core objection, made unanimously at its public consultations. This is not a fair or transparent process. It is deeply unsatisfactory, and we argue that a further hearing, moderated impartially, is a necessity.

Yours faithfully,

Mary Clarke

Mary Clarke

Terry Barry

~~Terry Barry~~

Valerie Darby

Valerie Darby

Edgar Mc Loughlin

Edgar Mc Loughlin P.C.

Jack and Miriam Kinahan

Miriam Kinahan Kinahan

Anne Verdon

Anne Verdon