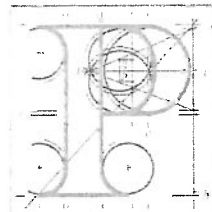


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Pauline M Moreau
4 Seafield
Baldoyle Road
Sutton
Dublin 13
D13Y6K5

Date: 30 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 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

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**SUBMISSION IN RELATION TO THE APPLICATION FOR A RAILWAY ORDER FOR DART COASTAL
NORTH**

PROPOSALS IN RELATION TO THE HOWTH "SHUTTLE" LINE

SUMMARY

1. In the analysis that follows, I look at the impact of operating a shuttle service from Howth the Howth Junction Donaghmede Station from the point of
 - A. inconvenience to passengers,
 - B. to the economy of Howth and
 - C. to the traffic situation at the level crossings at Kilbarrack (actually Baldoyle Road) and by implication at Sutton Station

2. I believe that the issues which I identify are very serious to residents of Bayside, Baldoyle, Sutton and Howth and could be overcome if Irish Rail were to run two trains per hour from Howth direct to Dublin, a reduction of 50 per cent but freeing capacity for the Northern Line.

3. I therefore call on An Bord Pleanála to hold a public consultation/enquiry to address the issues which are not adequately explored in the application for a Railway Order which has as a premise the closure of the direct line from Howth to Dublin.

4. *I invite An Bord Pleanála to consider inter alia the following points*
 - a. *the impact of Irish Rail's proposal to suspend direct trains from Howth to Dublin and provide a shuttle service from Howth to HJDS*

on

 1. *the travelling public*
 2. *tourists and*
 3. *the economy of Howth*

and
 - b. *recommend that An Bord Pleanála seek additional information on the impact of Irish Rail's proposal to close the level crossings at Kilbarrack and at Sutton Stations twelve times per hour and for over 50 per cent of every hour in relation to*
 - (i) *traffic in the area of the level crossings,*
 - (ii) *the impact on access by emergency services to Sutton, Baldoyle and Howth*
 - (iii) *The impact on other public transport, both on the roads crossed by the level crossings and on other trunk roads in close proximity.*

5. I explore these issues in my submission which follows.

**SUBMISSION IN RELATION TO THE APPLICATION FOR A RAILWAY ORDER FOR DART COASTAL
NORTH**

PROPOSALS IN RELATION TO THE HOWTH “SHUTTLE” LINE

Introduction

This submission refers to the following issues:

1. The implicit proposal to replace the direct train service from Howth, Sutton and Bayside to Dublin with a shuttle service from Howth Station to Howth Junction/Donaghmede Station (hereinafter HJDS), including the impact on the travelling public and on the economic situation in Howth

And

2. The resultant impact on the flow of traffic, including, most importantly, emergency vehicles and on public transport vehicles (buses and taxis), goods transportation, drivers, cyclists and pedestrians) arising from the closure of the “Kilbarrack”/Baldoyle Road level crossing twelve times per hour throughout the day. This issue also is also applicable to the Sutton crossing).

Issue 1. Proposed Shuttle Service from HJDS to Howth

Inconvenience to the traveller

1. The hinterland of the Howth to HJDS line has a population of over 22,000 with the option of three Darts and three buses per hour at peak times to Dublin city centre. The population and demand for public transport is growing with significant apartment construction and no car parking spaces in the hinterland.
2. Given the ever-growing populations of North County Dublin, East Meath and South Louth, it is far from clear from the present documentation that Irish Rail has established clearly that there will be space on southbound trains for passengers from Howth/Sutton/Bayside, joining the “mainline” at HJDS.
3. The journey times between Howth, Sutton, Bayside and the city centre will increase considerably due to the need to transfer between trains.
4. The distance between the two trains involves a walk of at least 500 steps and two staircases of 37 and 36 steps respectively. The distance will increase further with the proposed platform extension at HJDS.

5. Irish Rail cannot guarantee the availability of lifts at all times to meet the needs of less abled travellers and of those with children, luggage, etc.
6. The open aspect of HJDS is such that it is cold, making adverse weather a further challenge, particularly with ice in the winter. There is no covered seating.

Economic impacts

1. Howth has long been a key tourism destination for visitors to Dublin, even in the winter, with 1.2 million tourist visits per annum/
2. Apart from fishing, tourism is the main economic activity in Howth, through restaurants, cafes, shops, etc.
3. In addition to overseas visitors, the restaurant sector in Howth also relies on public transport to facilitate its native clientele.
4. The popularity of Howth as a tourism venue and the narrowness of the approach roads makes travelling to the village by car both anathema to national transport policy and difficult for the driver.
5. In my opinion these economic impacts have not been addressed adequately in any of the material produced by Irish Rail and should be sought before An Bord Pleanála considers this application in the context of ALL national policies.

Conclusion and Recommendation

Given the importance of these considerations, I strongly recommend

- that An Bord Pleanála seek additional information from Irish Rail on the impact of its proposal to suspend direct trains from Howth to Dublin and provide a shuttle service from Howth to HJDS on
 - (iv) the travelling public
 - (v) tourists and
 - (vi) the economy of Howth in particular

and

- that An Bord Pleanála initiate a public enquiry to address these issues.

Issue 2 Traffic Implication at the Kilbarrack Level Crossing from the new Proposal to run a Shuttle Service between Howth and Howth Junction Donaghmede Station

1. Appendix A6.1 of Irish Rail's application offers an assessment of the impact of the proposal by Irish Rail on the level crossings as a result of the new shuttle service between Howth and HJDS.

My review concerns the crossing on the Baldoyle Road, entitled the “Kilbarrack” crossing in the documentation, but the issue also applies to the other major level crossing close to Sutton Station, and to a lesser extent to two other crossings.

2. Based on its modelling and with the proposed frequencies of 12 trains per hour, the following is my understanding of the situation:

a. In any one hour, the level crossing on the main access route from the Howth Road northbound towards Baldoyle, Portmarnock, Dublin Airport will be closed for at least 31 minutes.

b. In their traffic survey, it was found that in peak times in 2023 at the Kilbarrack crossing

- i. 366 vehicles per hour travelled northbound in the morning
- ii. 435 vehicles per hour travelled southbound in the morning
- iii. 472 per hour travelled northbound in the evening
- iv. 345 per hour travelled southbound in the evening (Source Table 4.1)

c. In their modelling of the queuing times associated with these closures, it was found that

i. In the mornings, the “adjusted” longest queue length at Kilbarrack crossing would be

1. 820 m travelling southbound, which “in a reasonable worst-case scenario, there is a possibility that the longest southbound queue may block back across the Warrenhouse Road/Dublin Street Junction”; and
2. 549 m travelling northbound, about which it is noted that “there is a possibility that the longest northbound queue may block back across the Dublin Road/Baldoyle Road Junction south of Kilbarrack Level Crossing.

And

i. In the evenings, the “adjusted” longest queue length at Kilbarrack crossing would be

3. 229 m travelling southbound, which “in a reasonable worst-case scenario, there is a possibility that the longest southbound queue may block back across the Warrenhouse Road/Dublin Street Junction”; (Source Table 4.10 and discourse)

and

4. 550 m travelling northbound, about which it is noted that “reaching 116% of the available space at Kilbarrack northbound arm in the PM peak means that the queue will block beyond the available space fairly regularly”. Source: Table 4.13 and discourse)

3. It is important that the reader understand that there is one road carriage in each direction on the R109 between Clontarf and Howth and on the Baldoyle Road/Warrenhouse Road between

the R109 and Portmarnock and on the Strand Road between Baldoyle Road and Sutton Cross. In most places there is also a defined and “blocked off” cycle track.

4. Because the analysis finds a similar situation at the Sutton level crossing, the impact of this proposal to run 6 trains an hour from Howth the HJDS on local traffic is as follows:
 - a. There will be traffic chaos in the whole area of Baldoyle and Sutton, during peak hours.
 - b. Emergency services (ambulances, Garda cars and Fire brigade) will not be able to access any of these key localities due to the narrowness of the roads and the presence of defined cycle lanes with bollards.¹
 - c. Other public transport, such as buses H2 (to Baldoyle, Portmarnock and Malahide) and the 102 (Sutton to Dublin Airport via Swords) and of course taxis will be delayed while the forecast build-up of queues in the evenings on the Dublin Road going northbound will impact bus routes H3 and 6 to Howth.
 - d. The transport of all goods from the motorway to Howth and Sutton must transverse one of these junctions and traffic coming from the city centre will be impacted by queues at the Howth Road/Baldoyle Road junction.
 - e. For many people, the non-availability of “cross-country” public transport requires them to use private vehicles to go to work. Their travel time will be extended due to the closure of these crossings.
 - f. Access to a number of estates adjoining these routes will also be impacted negatively by the build-up of traffic, caused by the excessive closure of these level crossings to accommodate a shuttle service.

CONCLUSION AND RECOMMENDATIONS

It is my belief that the Conclusion (Section 6: Appendix 6.1 Page 58) to the analysis of the impact on level crossings is very light on “in depth” analysis of the findings and does not adequately address the issues drawn from its own information. Including the issues raised above.

I strongly recommend that

1. An Bord Pleanála seek additional information on the impact of Irish Rail’s proposal to close the level crossings at Kilbarrack and at Sutton Stations twelve times per hour and for over 50 per cent of every hour on
 - i. traffic in the area of the level crossings,
 - ii. the impact on emergency services

¹ In this regard, the writer witnessed a situation where a road traffic accident on the Dublin Road at Sutton on Friday 11th October 2024 necessitated a Garda car having to drive on the footpath close to the Marine Hotel in Sutton and a fire engine having to drive on the footpath close to Sutton Station to get through to the accident site, while a driver known to the writer experienced a delay of over 1.5 hours getting through Sutton due to this incident.

- iii. The impact on other public transport, both on the roads crossed by the level crossings and on other trunk roads in close proximity

and

2. that An Bord Pleanála initiate a public enquiry to address these issues.

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