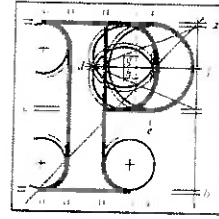


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Residents of Asgard Road
c/o Clíodhna Puirseil
28 Asgard Park
Howth
D13 PH97

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

14 September 2024

Case Number: 320164

To whom it may concern:

We, the residents of Asgard Park, Howth, Co. Dublin wish to submit the following points in objection to the above case, proposed by Irish Rail.

Loss of direct service to Howth, in favour of increased to others:

Bayside, Sutton and Howth have had direct services since the launch of the Dart service and Howth has had a direct service since 1847. Currently during the morning peak, Malahide has 13 direct services, Drogheda has 8 and the Howth line has 7. Furthermore, there are only two direct buses into the city centre every hour – considerably less than from Drogheda or Malahide. Large numbers of young people use these services to attend schools in/near the city centre and the southside, as well as commuting to universities. Therefore, the removal of direct services to the city centre will negatively affect the already poor public transport services in the Howth area.

Impact of level crossing closures

Despite an initial argument that the shuttle service would mean the gates wouldn't be closed for as long each time, it appears that a 10 minute shuttle would result in a number of the level crossings being closed 50% of the time. The level crossing closures already cause tailbacks on surrounding roads of up to 10-15 minutes at certain times. 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)

As a peninsula, Sutton Cross is the only entry and exit point and the road is often backed up there – at times there is a queue from Howth village through to Sutton Cross. Delivery services cannot afford to lose time waiting in this traffic thus impacting businesses in the Howth/Sutton area. Howth has an industrial harbour, with many HGV deliveries coming and going throughout the day.

Furthermore, there is an impact on the emergency services and their access. Howth Coastguard are often called to Portmarnock, Dollymount and for helicopter landings in Beaumont and the Phoenix Park, they cannot attend these time critical, life or death events in time if they are stuck in traffic behind barriers. The area's nearest hospital and fire station are 15-30 minutes drive away, without any traffic delays, and with the bicycle lanes now in place, there is no room for cars to allow emergency vehicles through when stuck in traffic.

Disingenuous use of traffic levels.

The road usage figures that Irish Rail use in their proposals do not include the additional vehicles that will be using the roads daily, with the new Techcrete development, Baily Hotel development and development of housing and a new hotel in Deer Park. It is expected that the population on the peninsula will grow by over 20%. Irish Rail are ignoring these increases and even still admitting that tailbacks could be increased by over 50%, thus themselves proving the shuttle service does not make any sense. Furthermore, the planning for these new developments was given with the current rail service. The apartments are not yet completed and Irish Rail are asking for a less favourable service to be provided. In addition, Irish Rail's second 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. Therefore, removing direct DART services does not align with our national transport and climate policy.

Inclusive and Accessible Public Transport

The Bayside, Sutton, Howth line has a very mixed population who use the Dart as the quickest and most direct route into the city. Even when “re-imagined” Howth Junction/Donaghmede will not be a fully accessible interchange. It relies on multiple lifts (which cannot be guaranteed operational) and cannot cope with high levels of usage. 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.

In London, where there are lifts required in high usage stations, they are large enough to each accommodate numerous pushchairs and wheelchairs. The Irish Rail lifts are too small and would not be able to cope with the amount of people using the lifts.

Furthermore, no amount of reimagining of Howth Junction can make it a safe place for those with additional needs, women and young adults to be travelling through. The station would need permanent staff on every platform and barriers stopping general access & access of scooters and bikes. The old station was unsafe, the current station is unsafe and there is no belief amongst commuters that a new station would be any different. Over the last 20 years, Irish Rail have removed staff and reduced safety in the majority of suburban stations.

Commuters will be forced into driving to stations closer to town and parking in residential areas to avoid using Howth Junction.

The removal of direct routes will also impact the Autistic and Neurodiverse community, who as it stands, can travel into training centres in Raheny and Clontarf or on into town on the Dart independently because their journey is direct. The need to change platforms, which may not always be the same platforms and access already overcrowded trains, affects their ability to carry out an independent life and is a discriminatory act.

Tourism

Since the pandemic, there has been a significant increase in tourists visiting Howth. This is no longer just a summer-weekend phenomenon, with large tourist groups arriving by Dart throughout the week and year. When the Dart line is off for maintenance, there is chaos with the levels of tourists trying to access the Dublin Bus service, thus proving how impactful the direct service to Howth is. The Drogheda/Malahide routes could not cope with the amount of people travelling to Howth Junction and then switching services. Furthermore, it is very likely to cause considerable confusion amongst tourists and impact their experience and future visits.

Seventy-five percent of the submissions in the second Public Consultation carried out by Irish Rail were from the Bayside, Sutton, Howth area. It is undemocratic to have this level of public feedback and ignore it. If An Bord Pleanála is willing to grant permissions for increased housing in the area, it should not also be granting permissions that will result in reduced public transport for the same areas. We ask for an oral hearing to be held on this matter.

In summary, any permission for infrastructure being implemented to increase the service on the Drogheda line, should not result in the reduction of direct services to Howth and this should be a condition of An Bord Pleanála granting permission.

Submitted by Clíodhna Puirseil, 28 Asgard Park, Howth, D13PH97, on behalf of the below residents of Asgard Park, Howth:

Damian & Bernadine Jennings, 20 Asgard Park
Brenda & William Morgan, 17 Asgard Park
Andrew & Nicola Bonnell, 22 Asgard Park
Helen & Sylvain Borel, 23 Asgard Park
Hendrik & Annette Bogers, 11 Asgard Park
Tony Fernandez, 14 Asgard Park
Chris & Jackie Howard, 6 Asgard Park
Lyndon, Senan, Dylan Leggate & Clíodhna Puirseil, 28 Asgard Park
Geraldine Garry, 30 Asgard Park
Kevin & Angela Tonge, 2 Asgard Park
Georgina & Alan Staunton, 18 Asgard Park
Sinéad McCormack, 24 Asgard Park
Paul Brophy, 27 Asgard Park