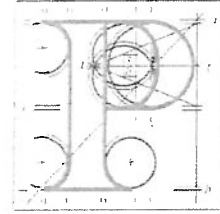


**Our Case Number: ABP-320164-24**



**An  
Bord  
Pleanála**

Richard and Elaine Roddy  
37 Offington Avenue  
Sutton  
Dublin 13  
D13 P9V0

**Date:** 31 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 and oral hearing request in relation to the above mentioned case. The contents of your letter have been noted.

More detailed information in relation to strategic infrastructure development can be viewed on the Board's website: [www.pleanala.ie](http://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](mailto: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 Marlborough Street  
Dublin 1  
D01 V902

Richard and Elaine Roddy  
37 Offington Avenue  
Sutton  
D13 P9V0  
Dublin

Date: 22<sup>nd</sup> October 2024

An Bord Pleanála  
64 Marlborough St,  
Rotunda,  
Dublin 1,  
D01 V902

**RE: Observation in relation to An Bord Pleanála case reference number: ABP-320164 Strategic Infrastructure Development (SID) DART+ Coastal North: Changes to Howth Dart route**

To Whom it may concern,

I am submitting this observation on behalf of myself and my wife Elaine via the online portal in relation to the proposed changes to the Howth Dart route as part of the Strategic Infrastructure Development (SID) DART+ Coastal North (An Bord Pleanála case reference number: ABP-320164).

We live at 37 Offington Avenue, Sutton, in close proximity to the Sutton Dart station. We have three children currently aged 11, 8 and 3.

We have reviewed the application for the Proposed Development and note that the proposal to remove direct Dart services to Howth has significant implications for local businesses and community, as well as our family personally, who rely on the direct Dart service.

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to keep our communities connected. 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.

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). 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. 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 are not passing through the level crossings. This is a disaster. The traffic congestion and travel times in Sutton and Baldoyle have reached concerning levels, exacerbated by the current volume of vehicles and the closure of level crossings. In many cases, it is faster to walk than to drive short distances; however, this is not a viable option for families with small children, elderly individuals, or those with disabilities. And not viable at all for longer distances. As local residents, we often feel

constrained within the peninsula during peak hours, especially during busy tourist seasons and on sunny days, making it impractical to travel beyond Sutton Cross due to the heavy traffic. While we appreciate living in Sutton and the surrounding area, the current situation is unsustainable. This issue is likely to worsen with the large residential developments underway by Marlet at the former Techrete site, as well as the approved residential project in Howth Village.

We would also like to add that it is National Policy to encourage people to use sustainable transport instead of their cars. 77% of people who took part in the 2<sup>nd</sup> public consultation said they would not be encouraged to use the DART over their cars. (Appendix A3.2 PC2 Findings Report page 21). Furthermore, Irish Rail's 2<sup>nd</sup> 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. Furthermore, where people are being forced to use their cars instead of the DART, this will further exacerbate the traffic congestion referred to above.

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 cause difficulties for people with small children (including our family), as well as significant challenges for people with disabilities, limited mobility, and wheelchair users where they need to use the lifts in the station. 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.

The loss of direct DART services will have significant negative impacts on local business in Baldoyle, Sutton and Howth. Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers. It is anticipated that this is very likely to result in loss of customers and difficulty finding staff to work in local businesses and ultimately loss of revenue with business closures inevitable.

Howth is a very popular tourist destination, with is in part due to the ease of access via the existing direct DART service from Dublin City Centre. Howth offers visitors breathtaking views of the sea, dramatic cliffs, and lush landscapes, making it a perfect spot for outdoor enthusiasts and nature lovers. The area is also famous for its harbour, which is dotted with fishing boats and pleasure craft, providing opportunities for various water activities, including sailing and kayaking. Visitors can enjoy fresh seafood at local restaurants. In addition to its natural beauty, Howth boasts historical sites, such as the iconic Howth Castle, the ancient ruins of St. Mary's Abbey, and the scenic paths of the Howth Head Peninsula, which attract hikers and walkers alike. It is understood that visitor numbers are of the order of c. 1 million per annum. It is inevitable that there will be a notable reduction in visitors should the DART direct service be discontinued.

It is understood that there is an alternative solution is being considered which could all direct Dart services to be retained while allowing the extension of DART services to Drogheda. Irish Rail have recently announced plans to provide four tracks between Connolly Station and Malahide to facilitate the separation of commuter and intercity services. These plans provide a viable alternative to removing direct DART services from Howth, Sutton and Bayside. It is our view that increasing infrastructure capacity by adding new lines should be prioritised over any proposals to reduce the level of existing services.

We request that An Bord Pleanála calls for an oral hearing to allow further discussion about the project and the negative impacts these proposed changes will have.

We have paid the correct fee of €50 when submitting this observation online.

Kind regards,

Richard and Elaine Roddy