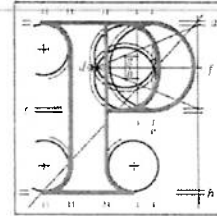


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Siobhan Keegan & Piergaetano Iaccarino
Seabreeze
128 Dublin Road
Sutton
Dublin 13
D13N8X9

Date: 08 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 submission in relation to the above mentioned proposed railway order and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.


The Board will revert to you in due course with regard to the matter.

Please be advised that copies of all submissions / observations received in relation to the application will be made available for public inspection at the offices of the relevant County Councils and at the offices of An Bord Pleanála when they have been processed by the Board.

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 the meantime 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

RA05

Tel	Tel	(01) 858 8100
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64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Objection to DART+ Coastal North Proposals

We, Siobhan Keegan & Piergaetano Iaccarino of Seabreeze, 128 Dublin Rd, Sutton, D13N8X9, wish to raise the following objections to the DART+ Coastal North programme:

Loss of Direct DART Services

- The direct DART services from Howth, Sutton, and Bayside to the city centre and beyond are essential for maintaining strong community connections. The loss of a direct public transport service can disrupt community cohesion, reduce accessibility, and have economic, environmental, and social repercussions.

Increase traffic at Level Crossings

- A shuttle DART service operating every 10 minutes in each direction will cause level crossings to be closed for up to 30 minutes every hour. For instance, the crossing at Sutton Station could be closed for more than 32 minutes, and the Baldoyle Road crossing could be closed for over 30 minutes in a worst-case scenario (*Appendix A6.1 Dart+ Coastal North Level Crossing Assessment, page 11*).
- The traffic assessment by Irish Rail shows that longer closures will lead to increased traffic congestion, with queues on Baldoyle Road potentially 59% longer than current levels (*Appendix A6.1, page 29*).
- This would severely impact the wider road network, negatively affecting, among others, buses (another public transport) and those commuting through Sutton Cross, including parents driving children to/from schools.
- The ongoing large-scale residential development at the entrance to Howth village will only exacerbate the existing traffic congestion.

Negative Impact on Sustainable Travel

- Convenience is a crucial factor in promoting sustainable transport. For sustainable transport options to be widely adopted, they must be not only environmentally friendly but also reliable, accessible, and convenient for people's everyday needs to have their full buy-in. Without convenience, people are less likely to fully transition to sustainable transport, even if they understand its environmental benefits.
- National policy should encourage the use of sustainable transport, but 77% of participants in the second public consultation said they would not be motivated to switch from cars to DART (*Appendix A3.2 PC2 Findings Report, page 21*).
- Irish Rail's second consultation report highlights that the loss of direct services to Dublin City Centre could lead many Howth Peninsula DART users to revert to car use (*Appendix A3.2 PC2 Findings Report, page 3*). This means more cars on the road with increase in accidents, higher levels of noise pollution, and a deterioration in road conditions, which can add to the local government's infrastructure maintenance costs.
- As consequence it is evident that Removing direct DART services is inconsistent with national transport and climate goals.

Accessibility Concerns

- A shuttle service would force passengers to transfer at Howth Junction Station to continue into the city centre, causing challenges for people with disabilities, limited mobility, parents with young children, and wheelchair users, especially given the frequent malfunction of station lifts. It may prevent these groups from using public transport altogether, increasing their isolation or dependency on others, or going back to cars.
- In 2023, Irish Independent reported over 800 lift malfunctions at Irish Rail stations in just 18 months, with repairs often taking days or weeks.
- My elderly parents relocated to Sutton to benefit from direct access to the city centre via DART for medical appointments. Under the current plan, transferring at Howth Junction, possibly facing non-functional lifts and crowded trains, would greatly complicate their journeys, potentially leading to missed or delayed appointments and more stress for them already facing health challenges
- Students, especially those attending schools or universities outside their local areas, rely heavily on direct transport services. A loss of direct public transport could mean longer commute times, making it harder for students to arrive at school on time or participate in after-school activities. In some cases, it might even discourage students from attending educational institutions that are further away, limiting their educational opportunities.

Negative Impact on Local Businesses

- Local businesses, particularly those that rely on foot traffic or workers commuting from outside the area, may experience reduced customer visits due to more difficult or lengthy travel options.
- Longer delivery times caused by traffic congestion and changes in logistics can disrupt supply chains, making it harder for businesses to operate efficiently. This can also deter new businesses from setting up in the area, stunting local economic growth and employment opportunities.
- Direct public transport services are often a key factor in attracting tourists, who value easy, straightforward travel to points of interest. Without direct links to tourist destinations, the area may see a decline in visitor numbers, which in turn can harm hospitality, retail, and cultural sectors that rely heavily on tourism.

Increased Stress and Diminished Quality of Life:

- Commuters may experience heightened stress due to the need for more complex journeys, longer wait times, and crowded services. This can diminish the overall quality of life, as individuals spend more time and energy navigating inefficient transport systems.
- The unpredictability and unreliability of indirect transport services may make it harder for people to maintain a healthy work-life balance, with negative consequences for mental and physical health.