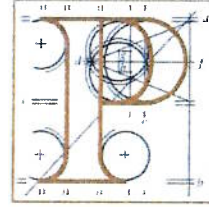


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Tessa Robinson & Others  
18 Abbey Street  
Howth  
D13 CH99

**Date:** 24 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.

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

<b>Teil</b>	<b>Tel</b>	(01) 858 8100
<b>Glaó Áitiúil</b>	<b>LoCall</b>	1800 275 175
<b>Facs</b>	<b>Fax</b>	(01) 872 2684
<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Ríomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

To: An Bord Pleanála, 64 Marlborough Street, Dublin 1

RE: Bord Pleanála Case Reference: NA29N.320164  
DART + Coastal North Railway Order Application

## **Observations/Submissions**

### **Introduction**

These Observations are jointly made by:

Una Sealy, 22 Main Street, Howth, D13C938, [unasealy@yahoo.co.uk](mailto:unasealy@yahoo.co.uk)  
Siobhán Bourke & Jobst Graeve, The Old College & College Lane Gallery, Abbey Street, Howth,  
D13EY23 [siobhanbourke4@gmail.com](mailto:siobhanbourke4@gmail.com) and  
Tessa Robinson, 18 Abbey Street, Howth, D13CH99, [tessrob@gmail.com](mailto:tessrob@gmail.com)

We are residents of Howth and regular users of the Dart service to and from Howth Station. We are very much in favour of public transport services such as the Dart, in particular as a means of reducing the use of cars by private individuals and thereby reducing harmful emissions.

We are not objecting to CIE's application for the Railway Order in respect of the Dart + Coastal North project *per se* but submit that any granting of the Railway Order must be conditional on retention of the direct Dart service to and from Howth Station.

These observations/submissions therefore focus on our reasons and arguments for retention of the direct Dart line to Howth and against the introduction of a "shuttle service" from Howth Junction and Donamede Station that would require commuters to change train as part of the journey in each direction.

### **Submissions re retention of direct Dart service to and from Howth Station**

The introduction of a shuttle service from Howth Junction and Donamede Station will have a negative impact on residents of Howth, Sutton and Bayside, who use the Dart to commute into the City Centre and elsewhere for work, school, college, social, cultural and other reasons.

1. **Safety:** Howth Junction Station is a gathering point for various individuals who are not planning on taking the train. Una's daughter has been harassed and scared at the station. Having seen the proposed improvements to the station, we are far from convinced that this is being sufficiently addressed before plans for Coastal North are going ahead.
2. **Travel Time:** The length of time to commute to and from the Howth leg into the city will be increased by a minimum of ten, and anything up to twenty minutes, with having to change platform and wait for a transfer. This time will be increased further if having to wait for the Lift.
3. **Vulnerable Users:** Any change of train or platform is going to disproportionately affect vulnerable users such as wheelchair users, people with impaired mobility or other physical or mental impediments, school children, older users and so on. There are

access issues in Howth Junction Station that will not be addressed by the proposed upgrade of that station. There will be added stress to these users in having to queue for the lift and potentially miss their transfer.

4. Bicycles: Many environmentally minded commuters including Una's household of five, and Tessa and Siobhan's households, who have a long transfer distance at either end, bring bicycles on the Dart at off peak times. With only one bicycle fitting in the lift at Howth Junction at a time, it is impractical to suggest that these commuters would need to change platforms for a connecting train. The transfer time would potentially be far too long.
5. Increased numbers on trains: People travelling into town at peak times, already can not get a seat on the Dart from Howth Junction in. With 500 new apartments due to come on stream beside Howth Station, and another 160 + with planning permission in the Balscadden site, (all of which got the approval due to the proximity to transport links to the city) there will be a hugely increased number of people traveling from Howth who will not have a chance of a seat on the train coming from Coastal North. This will affect users of the service in all of the stations from Howth Junction to the City Centre stations as, particularly at peak times, trains will already be full or will fill up in Howth Junction. Retaining the direct Dart line from Howth would be that at least every second train arriving in the stations from Howth Junction to the city centre will only have passengers from Howth, Sutton and Bayside (rather than from every station along the extended route).
6. Continuation of Service: Howth residents and visitors have had a direct service to and from Bray/Greystones via Dublin City Centre since inception – albeit a reduced service from the original five trains per hour to the current three per hour – and have a legitimate expectation of continuation of the service. The proposal to reduce the service to a shuttle service between Howth Junction and Howth Station is a retrograde step.
7. Visitors to Howth: Having to change trains will be a deterrent and inconvenience to the many visitors to Howth on whom many of our livelihoods in Howth depend.

### **Unsustainable Development**

This is not just a matter of it being an inconvenience to Howth, Sutton and Bayside residents, visitors and businesses (which it will be) but also concerns the broader question of sustainable development.

This proposed element of the development (removal of the direct dart service to and from Howth Station) is unsustainable as it will effectively downgrade the current public transport offering in Howth, Sutton and Bayside and thereby discourage a number of current and potential users of this public transport service as a result of the inconvenience and potential danger of having to take a shuttle and change train/platform on their journey into the city and will instead drive them to return to or continue to use their cars to commute into the City Centre for work, school, college, social, cultural and other activities. This is a retrograde step that will put further pressure on road traffic along the route particularly during peak times and in particular at pressure points such as Sutton Cross, Fairview and East Wall and of course have consequential negative impacts on the environment.

Our understanding from newsletters and material circulated by our local representatives at Fingal Council and others is that an upgrade of Connolly Station would eliminate the need for removal of the direct Dart service to and from Howth and is the sustainable option for this development.

We therefore respectfully request An Bord Pleanála, if it is minded to grant a Railway Order in respect of the Dart + Coastal North project under this application, to make it conditional on retention of the full direct Dart service to and from Howth Station.

Yours faithfully

Una Sealy  
Main Street  
Howth  
D13CH38  
[unasealy@yahoo.co.uk](mailto:unasealy@yahoo.co.uk)

Siobhan Bourke & Jobst Graeve  
Abbey Street  
Howth  
D13EY23  
[siobhanbourke4@gmail.com](mailto:siobhanbourke4@gmail.com)

Tessa Robinson  
Abbey Street  
Howth  
D13CH99  
[tessrob@gmail.com](mailto:tessrob@gmail.com)