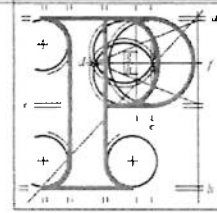


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Thomas P. Broughan  
Dáil Éireann  
Dublin 2

**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](http://www.pleanala.ie).

If you have any queries in the meantime 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

RA05

<b>Tel</b>	<b>Tel</b>	(01) 858 8100
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<b>Láithreán Gréasáin</b>	<b>Website</b>	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
<b>Riomhphost</b>	<b>Email</b>	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

The Secretary,  
An Bord Pleanála,  
61 – 64 Marlborough Street,  
Dublin  
D01 V902

<b>AN BORD PLEANÁLA</b>	
LDG- <u>074988-24</u>	
ABP- _____	
19 SEP 2024	
Fee: € <u>50</u>	Type: <u>CARD</u>
Time: <u>14.49</u>	By: <u>HAND</u>

Re. Plan NA 29N 320164  
Application for Railway Order – Dart Plus  
Coastal North Railway Order 2024

Dear Secretary,

This is a brief submission to the statutory consultation on the above application. Like many of my former constituents in Dublin Bay North, I believe the proposed application creates serious transport and environmental disamenities and drawbacks for the receiving population in Howth, Sutton, Bayside and Baldoyle. These disamenities include:

The Longstanding Problems at Howth Junction Donaghmede Rail and Dart Station and the Repeated Failure of Irish Rail to Address and Resolve these Problems;

This issue is virtually ignored in the ARUP Environmental Impact Assessment Report. Howth Junction Donaghmede Station has always had grave deficiencies for passenger

accessibility, facilities and security. There are particular concerns in late evening and wintertime darkness for commuters with a lack of necessary Irish Rail personnel at the location. Over past decades since 1984 Irish Rail has never responded to these issues to the satisfaction of local commuters and their representative bodies. Plan 320164 now proposes shuttle Dart services to Bayside, Sutton and Howth (the so-called 'Howth Branch Line'). The shuttle service and resulting change of train at Howth Junction Donaghmede presents a worrying prospect and great inconvenience for my former constituents. Section Four of the EIAR gives no details of what the 'Reconfiguration' of Howth Junction Donaghmede will actually entail beyond the 'removal of train crossing conflicts'. Local Howth Sutton and Bayside residents ask e.g. if there will be increased presence of Irish Rail administration and security staff during all opening hours of this station. Will all accessibility and other facilities including toilets, coffee/tea/water etc. now be available at this regional junction station.

There is much focus in the EIAR and Railway Order on 'Higher Frequency' on the Howth to Connolly line but many Dart users like myself wonder why existing frequency cannot simply be maintained and improved on the existing direct service alongside proposed development of the Malahide to Drogheda Dart expansion.

## Level Crossing Chaos;

The level crossings in Sutton and Baldoyle are features of a much earlier period of the Howth to Connolly railway. In other European cities similar to Dublin, such as Manchester, expanding cityrail and tram systems have built tunnels and overpasses for their permanent ways in heavily populated city districts. Nothing similar is proposed in this Arup EIAR for north east Dublin. Inevitably the proposed increase of 3 to 6 trains an hour at peak on the Howth to Donaghmede line will result in the level crossing barriers down for 30 or more minutes in those high peak hours. The result will be huge delays for pedestrians and cyclists including schoolchildren and for private and business vehicles on Baldoyle Rd./Warrenhouse Road and on Station Rd./Strand Road. Howth Town and peninsula has effectively one entrance road at Sutton Cross and the inevitable traffic backlogs from the nearby closed level crossings will greatly exacerbate existing hold-ups for access to and egress from the peninsula.

Howth acts as an environmental lung and recreation location for much of Northside Dublin with up to one million visitors per year (in addition to growing numbers of residents). While improved Dart and rail services would assist accessibility for residents and visitors alike, the current proposals in Plan 320164 would make existing traffic logjams in the area even worse. The only alternatives would be to drop the shuttle proposal and enhance current direct service from Howth to

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Connolly or for significant structural changes at the two major level crossings in the district.

Alternatives.

Section Three of the ARUP EIAR on alternative strategies to avoid or alleviate the problems with this Railway Order is very disappointing. In fact this section is just a few paragraphs of pointless questions and empty answers. The disastrous decision of the Austerity Government in 2015 to defer the Metro North project and 2011 Railway Order was very damaging for the whole Dublin and Irish economy. It greatly delayed the thorough redevelopment of North Dublin commuter rail and now even further delays are unconscionable. But many other European city regions have relatively easily solved the problems presented by this current Railway Order for so many existing commuters. Manchester Airport e.g. is served both by mainline rail and by an impressive tram system. Even a small capital like Tallinn in Estonia, a country with a population smaller than Dublin's has managed to develop a tramline to the airport about 7 years ago. So former constituents have often asked why a new rail line was not considered from Fairview/Clontarf alongside the existing lines out to Howth Junction or Clongriffin with a further easily built western extension into the heart of Dublin Airport. That is certainly a strategy which would have strongly appealed to Spanish or Chinese transport planners given their success at quickly rolling out

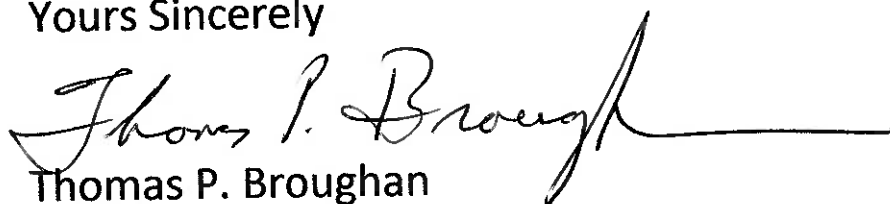
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low cost urban rail and tram systems. Obviously, such a type of rapid public transport development is not ruled out by Plan 320164 or by the Metrolink project especially as Dublin airport capacity increasingly rivals Manchester airport. But a very clear benefit from such a development for Howth/Sutton/Baldoyle and the whole Dart Plus project would be additional frequency direct services based on the existing well used service from Howth to Connolly and beyond.

Conclusion;

The public is acutely aware that critical public transport infrastructure must be urgently built for a growing sustainable and climate resilient economy. In that context the overall Dart Plus Expansion Project is welcome. But the proposed loss of amenity for the receiving population of the areas I formerly represented in Dublin Bay North is regrettable and can be avoided. With that important caveat to the current Railway Order, I urge An Bord Pleanála to address the key issues raised above in your determination on the Order to ensure strict conditions are applied to protect the residents and communities of Howth, Sutton, Bayside and Baldoyle.

Yours Sincerely

  
Thomas P. Broughan