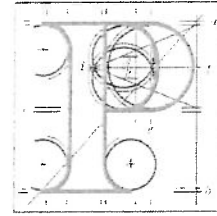


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Tim O' Neill and Lindsay Bond O'Neill
9 Shielmartin Drive
Sutton
Dublin 13
D13 V6X5

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 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.

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

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Tim O'Neill and Lindsay Bond O'Neill
9 Shielmartin Drive
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21st October 2024

RE: Observation on a Strategic Infrastructure Development Application (320164).

Dear Sir/Madam,

We would like to make a submission in relation to the above application, specifically in relation to the suggestion that the current direct dart service from Howth and Sutton to Dublin city centre and beyond is to be stopped and replaced by a subsidiary service which will result in a requirement take a dart to Howth Junction/Donaghmede Station and then change train and join a train traveling from Malahide and beyond into Dublin.

We are extremely worried by this suggestion for a variety of reasons as noted below:

- 1. Loss of direct connectivity to Dublin City.** Direct Dart connectivity to Dublin city from Howth, Sutton and Bayside Stations have been a feature of the DART service since its inception. Prior to this there has been a direct train service between Howth and Dublin City since 1847. This is extremely important to allow the community in this part of Dublin access the rest of the city in a straightforward and time efficient manner. It also allows other Dubliners and tourists to access this area with similar ease to enjoy the amenities for which Howth and the area around it is justly famous (approx one million visitors per annum). The loss of a direct service will negatively impact both types of travellers – those commuting for work and business and those travelling for pleasure – in terms of speed of journey and also the relative safety that direct connectivity provides.
- 2. Sustainable travel.** At a time when sustainable travel is being promoted both locally and internationally, anything that makes public transport less attractive will likely negatively impact of this. The loss of direct services will likely result in more people turning away from the DART service and travelling by private car. There are multiple new apartment developments in the Howth/Sutton/Bayside area many of which have used the direct connectivity to Dublin City as a positive factor in their location and liveability. Most of these new developments are being advertised as having direct access via the Dart to the city centre and southside. The loss of this connection and change to a shuttle service is likely going to see many of the new occupants resorting to private rather than public transport which runs counter to public policy.
- 3. Level Crossing closures.** A Shuttle service travelling on the Howth to Howth Junction line every 10 minutes in either direction will result in prolonged periods of closure of level crossings, especially at Sutton Station and Warrenhouse Road/Baldoyle Road. These closures will amount to upwards of 30 minutes of closed rail lines every hour. This will cause significant onwards traffic congestion in the area for public, private, and more importantly emergency services. With the roads at Sutton Dart Station and The Baldoyle Road both closed when the level crossings are down emergency vehicles would have to make a significant detour via Donaghmede and The Kilbarrack Road which would likely add significantly to emergency response times and which could in return result in worse

outcomes for people or their property. It is also likely that these additional closures will have knock on effects on other transport services, especially Dublin Bus services travelling in the area due to the knock-on road gridlock that will be caused by these prolonged closures.

4. **Accessibility and traveller safety.** The requirement to alight from the proposed shuttle dart at Howth junction and join another train will cause significant disruption to numerous groups using the DART service. The Howth Junction Station is relatively sprawling for a suburban station and will require people with reduced mobility, particularly those in wheelchairs and people with reduced vision, or families with small children significant inconvenience to transit from one platform to another. The lifts in this station are regularly out of action and when they are not working there are multiple sets of stairs to be traversed to get from one platform to another. Irish Rail does not have a good record of fixing lifts and at any one time, there are multiple lifts out of order as documented by Irish disability groups. There have also been a number of well documented instances of anti-social behaviour in this station which have resulted in injury to innocent service users. While there are some CCTV cameras, there are a large number of blind spots which reduce the overall safety of this station. The lack of on-site staff or security further reduces the safety of people using the service. The safety concerns have been well documented and we have no doubt that you will face significant exposure to liability if you ignore these concerns, should anyone be put in dangerous situations.
5. **Effects on Local Businesses.** It is likely that there will be a significantly negative impact on local businesses in Baldoyle, Sutton and Howth from the dual effects of increased traffic congestion and likely loss of pleasure travellers, especially to Howth. Howth has multiple tourists travelling to it round the year to experience the many opportunities for leisure activities, historic immersion and fine dining as well as traveling to Ireland's Eye and beyond. The loss of a direct Dart service from Dublin City is likely to result in a non-inconsiderable drop in these travellers who contribute significantly to the local economy.
6. **Effect on Work-Life Balance.** The loss of direct connectivity to Dublin City is also likely to result in increased inconvenience for people working in these areas but commuting and using the DART service to do so. Similarly, people commuting into Dulin and using the Dart to do so for either employment or education will be faced with longer commutes and the likelihood of having to wait in the cold and wet winter months for a DART train to bring them into town which is most likely going to be full already. The increased commuting time and worse commuting experience is likely to result in at least some of these people turning to private transport to make their journeys.

We urge you, in light of all these concerns, to reconsider these plans. Recently there has been a suggestion of dual lines on the northside at certain stations. This would allow darts to remain as they are, as darts could "pull over" to allow high speed trains to go past. This would surely be a much better long term solution rather than removing our direct service and giving those who live here a worst service – this proposal is taking us backwards instead of forward.

Kind regards
Lindsay & Tim O'Neill