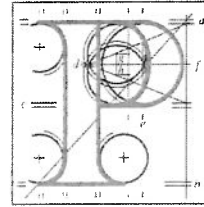


Our Case Number: ABP-320164-24

Your Reference: Tommy & Rosemary Drumm & Others



**An
Bord
Pleanála**

Kiaran O Malley
2 Priory Office Park
Stillorgan Road
Blackrock
A94 P281

Date: 05 November 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. Please accept this letter as a receipt for the fee of €50 that you have paid.

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

Teil (01) 858 8100
Glaio Áitiúil 1800 275 175
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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

23rd October 2024

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1

ABP Ref.: NA29N.320164

Proposal: Railway Order Application for DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch for Córas Iompair Éireann

Date Lodged: 12th July 2023

Observations By: 23rd October 2024

AN BORD PLEANÁLA	
LDG-	075696-24
ABP-	
23 OCT 2024	
Fee: €	50.00
Type:	CO
Time:	11.24
By:	HAND

PLANNING OBSERVATION

Dear Sir or Madam,

This is a planning observation on behalf of **Tommy & Rosemary Drumm, Granada, Carrickbrack Road, Howth, Dublin 13** and **Michael & Lisa Hickey, 27 Carrickbrack Road, Howth, Dublin, D13 V384**, in respect of the above proposed DART + Coastal Railway Order 2024 between Dublin City Centre and Drogheda including the Howth Branch. Attached is a cheque for € 50 in respect of the prescribed fee for a submission. At the outset, our clients have no objection to the proposal to enhance the DART infrastructure to include an extension to Drogheda. However, they do object to the proposed downgrading of the Howth branch to a "shuttle service" when any enhancements must include the retention of the direct Howth service to/from Dublin City centre.

Since 1984, Howth has been accessible by a direct DART service to and from Dublin City centre and beyond (i.e. Blackrock, Dun Laoghaire, Bray, Greystones (post DART extension), etc.). This is a critical piece of transport infrastructure for Howth, which is otherwise only serviced by a single road into and out of the peninsula. The road network is hopelessly inefficient during am and pm peak hours and it is chronically congested during the spring and summer months from tourists and day trippers. Active travel enhancements along the Coast Road have improved walking and cycling infrastructure and safety by segregating the different transport modes but these are the least used forms of transport to and from Howth and they are most vulnerable to the Irish weather.

It is not clear what is precisely being proposed in respect of the Howth Branch as it is called in the documentation. Chapter 4 of the EIAR is the Description of the Proposed Development, contains the following paragraph in section 4.11.1.1:

“Proposed changes to the Howth Branch line, as defined in the TSS, would enable a direct line service between Howth and Dublin City Centre and / or a DART shuttle service between Howth Junction and Donaghmede and Howth stations. This removal of crossing conflicts will enable an increased capacity and frequency of service to and from Howth, from the current three services an hour to a maximum of six services an hour during peak periods. Any future DART shuttle service on the Howth Branch line would also enable improvements in the reliability of timetabling, as trains operating on this branch would no longer be susceptible to delays occurring along the Northern Line.”

From this paragraph, the proposed changes affecting Howth would (i) enable a direct line service between Howth and Dublin City Centre ***and / or*** a DART shuttle service between Howth Junction and Donaghmede and Howth stations, (ii) removal of crossing conflicts will enable an increased capacity and frequency of service to and from Howth, and (iii) ***Any future*** DART shuttle service on the Howth Branch line would also enable improvements in the reliability of timetabling.

We have added emphasis to points (i) and (iii) to highlight to the Board the uncertainty contained in these proposals with respect to the future DART service to and from Howth. Whereas the proposal are clear and specific with respect to the extension to and from Drogheda, the language used in respect of Howth is vague, imprecise and does not commit the operator to any specific level of service. It is our interpretation of the application that the proposal is only intended to provide a shuttle service between Howth and Howth Junction/Donaghmede but there is no clear and unambiguous statement to that effect.

The ‘uncertainty’ over the proposals for Howth date back to the inception of the project, which is presented as a DART expansion proposal to Drogheda with no initial proposals affecting the Howth service¹ but it has morphed into a DART reduction proposal for Howth. The Board is referred to the minutes from the first pre-application consultation meeting on 20th January 2022 and the following from the first paragraph from the discussion section of the minutes as published by the Board:

“Regarding the Howth to Howth Junction & Donaghmede line, the Board’s representatives queried whether this would be exclusively a shuttle service or whether it would also allow for through trains. The prospective applicant clarified that the infrastructure is being designed to enable both. The intention is to focus on a shuttle service during peak hours, but this will be a final operational decision.”

So, when this proposal was initially presented to the Board nearly three years ago, the applicant wasn’t sure what level of service would be provided to and from Howth. Again, vague and imprecise language was used but more importantly the prospective applicant stated that any decision on the level of service to and from Howth would ***“be a final operational decision”***. This is an unacceptable approach to the provision of a key sustainable transport service to and from Howth.

¹ The Board should note the title of the project is DART + Coastal Railway Order 2024 between Dublin City Centre and Drogheda including the Howth Branch, which confirms the secondary or ‘add-on’ status applied to the Howth Branch.

Not only does it leave existing and future service users 'in the dark' and threaten the viability of services at Howth that depend on the DART as the primary form of transport for their customers, it seriously undermines the entire assessment presented with this application to the Board. For example, how can the applicant's agent affect an environmental impact assessment when the precise nature and extent of part of the proposal remains unknown and is subject to a future operational decision? The same applies to screening for appropriate assessment and the Natura Impact Statement; neither can be done properly without knowing the precise nature and extent of the proposed development.

An additional deficiency in the scheme assessment is train capacity and whether or not there will be enough room on the trains to accommodate the projected increased demand and usage of the services. Currently, it is a common complaint that trains do not have sufficient capacity to cater for peak hour demand whether that is the DART, intercity or Luas services. If our understanding of the proposal is correct, persons using the Howth shuttle service particularly in the morning times are susceptible to not being able to board a southbound train at Howth junction that may be full when it arrives at the station. The issue of train capacity for actual passenger numbers is of critical importance and is being recognised by planning authorities and the Board in assessing large scale residential developments, so the same should apply here.

From the modal share comparisons in EIAR Chapter 6 Traffic & Transport, the project is anticipated to result in a substantial modal shift from private car to DART with *"the most significant change is evident within the 5 km buffer north of the M50/R139."* While this shift is positive and to be welcomed, the unintended consequence would be no room at Howth junction for passengers from Howth looking to join a train to Dublin City centre and beyond. This scenario is easily avoided by maintaining the existing direct service between Howth and Dublin City centre thus not introducing a necessity to change trains at Howth Junction.

As is admitted in the application documents, the proposed changes enable a direct line between Howth and Dublin City Centre and there is no planning or environmental justification to not maintain it. In fact, the application does not present an argument for the reduced level of service on the Howth branch but instead it promotes the DART + to Drogheda with the Howth branch being relegated to a shuttle service. It is submitted to the Board that any decision to grant must expressly include the provision of a direct service between Howth and Dublin City Centre with the maximum six services an hour during peak periods.

This would not prejudice the implementation of the DART + Coastal North Drogheda to the City Centre, which initially did not relate to the existing service to and from Howth. By preserving and enhancing the Howth to Dublin City Centre service, the Board would *"reduce car dependency and promote and facilitate sustainable modes of transport"* at Howth and *"Protect, enhance and ensure the sustainable use of Fingal's key infrastructure"* as required by Strategic Vision 9 and 10 respectfully in the Fingal Development Plan 2023-2029. Further, it would *"Support the provision of a high-quality public transportation system that is accessible to all to serve the needs of the County and to enable a significant shift from car-based travel to public transport"* per Policy CMP18 in the development plan. These strategic visions and policy are identified in the accompanying planning report with this application and they equally apply to the direct DART services to and from Howth as they do to the proposed service to and from Drogheda.

There is overwhelming sustainable transport, land use planning and climate change justification to maintain a direct DART services between Howth and Dublin City centre and beyond as part of the DART + Coastal North Railway Order. The Railway Order application openly acknowledges that the proposed changes would enable a direct line service between Howth and Dublin City Centre to be maintained and the train frequency doubled to 6 services during peak periods. It follows that the Board is invited to condition a direct line service between Howth and Dublin City Centre with 6 services during peak periods as part of any decision to approve the DART + Coastal North Railway Order.

Please acknowledge receipt of this submission and direct all future correspondence to this office.

Regards,



Raymond O'Malley

Kieran O'Malley & Co. Ltd.

ROM: rom

Enclosure 1. A cheque for € 50 payable to An Bord Pleanála