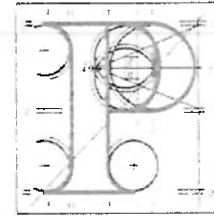


Our Case Number: ABP-320164-24



An
Bord
Pleanála

Old Castle Residents' Association
c/o Norma O'Mahony
No. 6 Old Castle Avenue
Carrickbrack Road
Sutton
Dublin 13
D13 E3C6

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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Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
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64 Sráid Maoilbhríde	64 Marlborough Street
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D01 V902	D01 V902

Old Castle Avenue Residents'
Association
No. 6 Old Castle Avenue
Carrickbrack Road
Sutton D13 E3C6

0749 51-24

The Secretary
An Bord Pleanála
64 Marlborough Street
Dublin 1.
DO1V902

AN BORD PLEANÁLA
LDG- 16th September 2024
ABP- _____
18 SEP 2024
Fee: € 50.00 Type: CHQ
Time: 8.52 By: POST

Bord Pleanála Case reference: NA29N.320164

DART + Coastal North Railway Order 2024 – Northern Line between Dublin City Centre and Drogheda including the Howth Branch

Dear Sir/Madam,

Old Castle Avenue Residents Association has been in existence for over 30 years and has taken an active interest in planning, environmental, biodiversity and traffic management issues throughout that time.

We wish to object to planning application by Irish Rail in relation to its DART + Coastal North project for the reasons set out below.

The Application relates to various works that are necessary to give effect to Irish Rail's proposal to remove direct DART Services from Howth, Sutton and Bayside stations to the city, and replace these with a shuttle service to Howth Junction Station, where passengers would be required to alight the shuttle train and board the DART passing through that station from Drogheda and Dundalk.

This breach's a fundamental principal - namely that public transport improvements for one group of public users should not be made at the expense of another group of public transport users.

Our objections are based on the following points:

Effect on traffic in Sutton area -

The Sutton area is already adversely affected by heavy traffic, which has been getting heavier in recent years. This growth in traffic can be attributed to many factors, in particular the growth of the population of the Howth peninsula, the growth of Howth village itself as business and leisure destination (in particular at weekends and on public holidays throughout the year), and the presence of 3 national schools and 3 secondary schools in the area.

In addition to the environmental damage involved, this traffic has a serious effect on the quality of life of residents of the area, making roads in the peninsula and

surrounding areas virtually impassable at peak times, and posing safety issues for cyclists and pedestrians, in particular children and the elderly. Preventing further traffic congestion in the area, including by ensuring the availability of accessible public transport, is therefore an imperative in the proper planning of the area.

The proposal to replace the current DART service with a shuttle service will have the effect of the level crossings in the Sutton area (Claremont Road, Lauder's Lane, Station Road and Baldoyle Road) being down for up to 30 minutes per hour. This will have the effect of drastically curtailing the movement of traffic around these crossings, with the following likely results:

At peak times, Baldoyle Road, Dublin Road, Station Road, Strand Road (Baldoyle), Sutton Cross, Howth Road and Greenfield Road are all likely to become gridlocked, to the extent that movement into and within the area (including by emergency vehicles) will be severely affected;

Movement between the Howth peninsula and Baldoyle (Donaghmede, Portmarnock, Malahide and Dublin Airport) will be rendered extremely difficult, affecting schools, families, church and funeral attendees, shoppers, tourists and businesses in the catchment areas on both sides of the line to Howth.

Use of public transport will, ironically, become less feasible for travellers, as congestion will render Sutton DART Station virtually inaccessible to those not within walking distance of the station (a significant number of DART users) and greatly increase bus journey times. Apart from those parking at Sutton Station, even more people are dropped and collected at the station at present. The inevitable gridlock from the current proposals will mean that many existing Dart users will be prevented from reaching Sutton Station. In addition the excessive closure of Station Road at present (due to inefficient line closures) regularly prompts drivers to take risks to try to reach Sutton Station. This risk taking behaviour can only increase if there are more frequent and lengthier road closures.

Effect on feasibility of public transport in Howth peninsula area -

The proposal involves the removal of direct DART Services from Howth, Sutton and Bayside stations to Bray/Greystones (via Dublin city centre), and their replacement with a shuttle service from these to Howth Junction Station, with passengers changing trains at that station, and the "improvement" of Howth Junction Station to facilitate this.

The proposal must be seen in the broader context of its deleterious effect on public transport to and from the Howth peninsula, something currently relied upon by thousands of commuters and large number of tourists and other leisure travellers. The requirement to change trains at Howth Junction Station is highly likely to have the effect of making the DART service unusable or unattractive to many current users, as it will involve:

An inevitable increase in journey times into the city centre, taking account of delays in changing platforms and likelihood that shuttles and DARTs will not always synchronise. Recent (26th August 2024) timetable changes by Irish Rail (have already had to be reversed - so one can have little confidence in its ability to deliver on any commitments it might give in the context of its current proposals.

Travellers having to climb several flights of stairs in order to go from one platform to another. This will render the DART service virtually unusable for disabled and elderly travellers as well as those travelling with small children and/or buggies. It will also mean that even able bodied travellers will have to engage in the task of climbing flights of stairs and crossing a bridge: something that will be deeply unpleasant at rush hour when several hundred commuters will be doing this simultaneously, often at speed when their intended shuttle or mainline DART is approaching the other platform.

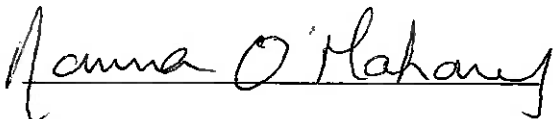
Risk to personal safety: the proposal will result in commuters having to spend time in Howth Junction station, sadly a station that has been attributed with anti-social behaviour.

Commuters from Howth, Sutton and Bayside will struggle to find seats on city bound trains which arrive at Howth junction.

Lack of provision for recent development on Howth peninsula-

We understand that the Irish Rail proposal, in assessing the likely effect of the proposal on the Howth peninsula area, does so on the basis of outdated population figures for the area. In particular, the figures do not take account of recent residential developments on the peninsula, including the building of apartments at the old Techrete site and at Santa Sabena in Sutton, which have, or will have, the effect of significantly increasing the population. Indeed, the granting of planning permission for these developments (some of which provide limited parking facilities) was based on the assumption that their residents could avail of reliable public transport for their day to day travel.

Yours faithfully,



NORMA O'MAHONY, (norma.broadreach@gmail.com)

Chairperson

On Behalf of Old Castle Avenue Residents' Association

Fee enclosed