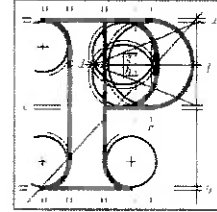


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Sutton Park & Lawns Residents Association
c/o 12 Sutton Lawns
Sutton
Dublin 13

Date: 17 September 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
Glao Áitiúil LoCall 1800 275 175
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64 Sráid Maoilbhríde 64 Marlborough Street
Baile Átha Cliath 1 Dublin 1
D01 V902 D01 V902

Sutton Park & Lawns Residents Association

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

c/o 12 Sutton Lawns.
Sutton.
Dublin D13R8H2.

16th September 2024.

**DART + Coastal North Railway Order 2024 - Northern Line between Dublin City Centre and Drogheda including the Howth Branch
Railway Order Application NA29N 320164.**

Dear Sir/Madam.

I am writing on behalf of Sutton Park and Lawns Residents Association to make the observations in respect of the Strategic Infrastructure Development Application referred to above. At the outset I wish to emphasise that this Association supports objectives to concurrently improve rail service quality for **all** passengers, those resident on the “northern Line” and those residing on the branch line between Howth and Howth Junction alike.

We note the extensive work already done and the extensive engineering and infrastructural developments that will be required on the Northern Line to implement the overall objectives. **We believe that these objectives can and must be met as one extended system without the envisaged downgrading of current DART services and community infrastructure generally in the areas served by the Howth Branch line.** The Association's observations are set out hereunder.

1. Loss of direct DART services.

Direct DART services to and from Howth, Sutton and Bayside to Dublin city centre and beyond are vital to keep our communities connected. In this regard DART services have been running to Bayside, Sutton and Howth for the last 40 years. Moreover a direct train service has been operating between Dublin city and Howth since 1847. The removal of direct services will be seen as clear downgrading of the areas and is occurring at a time of unprecedented building growth in Howth.

AN BORD PLEANÁLA	
LDG-	074875-24
A3P-	320164
16 SEP 2024	
Fee: €	50.00 type: Cash
Time:	10:58 By: HAWTH

2. Impact of proposed Level crossing closures.

Shuttle DART service operating every 10 minutes in each direction as proposed will, according to the projections, cause the level crossing at Sutton Station to be closed for more than 32 minutes every hour, and the Baldoyle Road crossing to be closed for more than 30 minutes every hour in a worst case scenario.

(Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11)

In the view of this Association this level of road closures is simply untenable.

The traffic assessment submitted by Irish Rail as part of its application shows that longer closures of the level crossings will significantly exacerbate current traffic congestion, and bring them to totally unacceptable levels. The traffic study states that traffic queues on Baldoyle Road could be up to 59% greater than they currently are.

(Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29).

This has the potential to seriously affect traffic on the wider road network, adversely impacting bus and car users, cyclists and pedestrians. The impact on response times for emergency vehicles, even those not directly passing through the level crossings could have very serious consequences, including contributing to more serious injury or worse. **This will lead to widespread public anxiety on top of the current disquiet caused by the narrowing of traffic corridors in the area to facilitate the provision of cycle lanes.**

3. Sustainable Travel.

It is National Policy to encourage people to use sustainable transport instead of their cars.

77% of people who took part in the 2nd public consultation said they would not be encouraged to use the DART in preference to their cars.

(Appendix A3.2 PC2 Findings Report page 21).

Furthermore, Irish Rail's 2nd public consultation report found that:

“The loss of direct services to Dublin City Centre and beyond was regularly cited in submissions as grounds for existing DART users from the Howth, Sutton and Bayside to revert from DART usage to private car usage.”

(Appendix A3.2 PC2 Findings Report page 33).

Removing direct DART services in the manner proposed clearly flies in the face of Ireland's national transport and climate policy.

4. Accessibility and Quality of Esteem.

A shuttle DART service will require passengers from the Howth Branch line to disembark at Howth Junction Station and cross over railway lines to continue their journey into the City and beyond, and vice versa on their return journey. There is reference at page 10 in the public consultation no.1 webinar briefing dated 19 March 2022 to increasing trains from 9 to 18 and passengers from 10,800 to 21,600 in the 3 hour peak period from Howth to Dublin city centre. It

is projected that on average up to 400 passengers could be disembarking at Howth Junction to be accommodated on the Northern Line trains to the city.

This will inevitably lead to overcrowding both at Howth Junction Station and on the trains. More importantly it will cause significant difficulty and inconvenience for the elderly, for persons with certain disabilities, for those with limited mobility, for wheelchair users who will need to use the lifts in the station.

The impact could be catastrophic bearing in mind the statistic from 2023 reported by the Irish Independent, that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months and it can take days, and even weeks for lifts to be repaired.

5. Impact on Local businesses

The loss of direct DART services will have significant negative impact on local business in Howth, Sutton, Bayside and Baldoyle and the area generally. Businesses will have to grapple with delays to their deliveries and longer journey times for their staff, customers and suppliers. It will also inevitably have the effect of reducing visitor numbers with the knock on impact on business.

6. Health & Safety and Duty of Care.

The parties responsible for this application have a duty of care to **all users of the rail services**. Local residents and the community at large have major concerns with the lack of adequate security at many of the railway stations in the Coastal North Railway application area as well as on the DART itself. This has been regularly cited as another reason for existing DART users from the Howth, Sutton, Bayside to revert from DART usage to private car usage.”

7. Public Meeting in Sutton

On 2nd September 2024 a public meeting was held at Sutton Cross to discuss the current status of these proposals. A very large space was filled to overflowing illustrating the depth of feeling these proposals are causing in the community. Ironically the numbers attending caused limited traffic disruption because Sutton Cross already has the reputation of being one of the worst traffic pinch points in the city. This submission reflects many of the points made at the meeting and the concerns expressed by the attendees, 99% of whom were local residents from Bayside, Sutton, Baldoyle and Howth. There was no “activist” participation at the meeting which was chaired by Mr. Cian O’Callaghan TD.

It appeared to many attending the meeting that the proposals tended to create an unhealthy and ill-advised wedge between the communities residing in areas served by the Northern Line and the communities residing in those areas served by the Howth Branch line.

Proceeding headlong in the light of its own research outcome projections seemed to many to suggest a mentality among the proponents of the scheme that advising the outcomes would somehow justify them when they occurred. ("Well we told you this could happen and you let us go ahead")

The universal view of the meeting was the proposal of the Rail Authorities in so far as the Howth Branch Line is concerned, was littered with "hair brained" ideas, a last resort so to speak to get over shortcomings over 50 years in their putting in place the necessary rail infrastructural upgrades between Connolly Station and Howth Junction and Connolly Station and Tara Street Station in particular.

Many at the meeting worryingly felt that the **decision to proceed has already been taken** by the rail authorities supported "by the politicians courting the majority" and the attendees feared that this Bord Pleanala process was mere "window dressing". While the Residents Association does not support that view, the evidence for it was based on Iarnrod Eireann publicity material already in circulation and by anecdotal evidence of some politicians already managing the situation by riding "two hobby horses".... depending on to whom (or where) they are speaking.

8 Oral Hearing.

An Bord Pleanala has authority to hold a public attended Oral Hearing in respect of this DART+ planning application. This would allow for further discussion on the identified and known disastrous impact for passengers and the community generally of these proposals. The Residents Association has been instructed by members to urge the Bord to arrange accordingly.

Yours Sincerely



Noel West

Acting Chairperson of Sutton Park & Lawn Residents Association