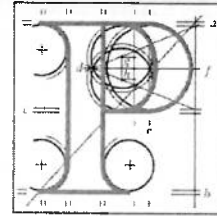


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Glencarraig Residents Association
c/o Derek Fennell
5 Glencarraig
Sutton
Dublin 13
D13 W1K2

Date: 10 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 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
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

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

5th September 2024

Submitted by:

Derek Fennell, (chairperson Glencarraig Residents Association)

5 Glencarraig, Sutton, Dublin 13, D13 W1K2

Below are the points from a group submission from Glencarraig Residents Association, Sutton where the local community are in total opposition to the proposed changes to the DART infrastructure and the overriding feeling is that the direct DART to Howth must be maintained for the following reasons:

1. Loss of direct DART services

The direct DART services from Howth, Sutton and Bayside to the city centre and beyond are vital to keep our communities connected.

DART services have been running to Bayside, Sutton and Howth for 40 years, and a direct train service has been running to Howth Station since 1847.

2. Level crossings

A shuttle DART service operating every 10 minutes in each direction would cause the level crossings to be closed for up to 30 minutes of every hour. This will affect emergency service vehicles, buses, car users, bicycles, pedestrian, etc.

For example, the crossing at Sutton Station could be closed for more than 32 minutes of every hour, and the Baldoyle Road crossing could be closed for more than 30 minutes of every hour in a worst case scenario. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 11)

3. Increased traffic

The traffic assessment submitted by Irish Rail as part of their application shows that longer closures of the level crossings will result in more traffic congestion.

The traffic study states that traffic queues on Baldoyle Road could be up to 59% longer than they currently are. (Appendix A6.1 Dart+ Coastal North Level Crossing Assessment page 29)

This has the potential to impact traffic on the wider road network including buses and cars that aren't passing through the level crossings.

4. 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 over 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 was regularly cited in submissions as grounds for existing DART users from the Howth Peninsula to revert from DART usage to private car usage."

- Appendix A3.2 PC2 Findings Report page 33

Removing direct DART services does not align with our national transport and climate policy.

5. Accessibility

A shuttle DART service will require people to transfer DARTs at Howth Junction Station if they want to continue into the City Centre.

This will cause difficulties for people with public safety issues, disabilities, limited mobility, wheelchair users and the elderly where they need to use the lifts in the station.

In 2023 the Irish Independent reported that lifts at Irish Rail stations were marked out of service over 800 times in just 18 months. It can take days, and even weeks for lifts to be repaired.

6. Local businesses

The loss of direct DART services will have significant negative impacts on local business in Bayside, Baldoyle, Sutton and Howth.

Businesses will have to grapple with delays to their deliveries and longer journey times for staff and customers.

7. Expected population increase.

At present, the local population is 20,000 approx. This is expected to increase by 20% in the next five years. There has been significant new housing development in the local area.

Over 500 apartments currently being built in the old Techcrete site in Howth.

Over 100 apartments already build in the Santa Sabina school site in Sutton.

Over 100 apartments to be build on the Bailey Court Hotel in Howth.

Over 100 apartments proposed to be built in the Deerpark estate in Howth.

All these people need a direct DART service to Howth. A reduction in public transport beggars belief.

8. School children

- the **Green School Initiative** whose aim for decades was to reduce the congestion caused by students traveling to school by car. The changes proposed will drive an increase in children being dropped to the school gate.
- the **Safe Routes to School Initiative** which invested in "front of school" treatments that enhanced access to school grounds and created a safe space for students at the front of school. The drop-off points designed at schools will become over-whelmed and unsafe as students switch to commuting by car.

It also goes directly against a key recommendation made in the OECD and the Irish Climate Change Advisory Council report, '**Redesigning Ireland's Transport for Net Zero: towards systems that work for people and the planet**', to "redefine the goal of the transport system as sustainable accessibility

in order to challenge ingrained mindsets and shift away from identifying high mobility, in terms of reduced travel time, with well-being."

The students attending Sutton Park School, St Fintans Primary, and Santa Sabina at the moment only have access to a number 6 bus which is scheduled just once an hour. This bus service is prone to not turning up due to staff shortages at Dublin Bus. The only other access to public transport is a once-a-day service, of the 102C and 102. This is the complete public transport network available to the students. As a result, many students take a 30 minute walk to Sutton Station, to get on the DART. Subsequent to the proposed changes, these students would be expected to walk 30 minutes, or get the once-daily service to Sutton Station, then get the shuttle at peak time to Howth Junction and wait on a full platform to change to a potentially full peak time DART. This will, for sensible reasons, lead to a mindset of parents/guardians driving students to school.

This foreseeable resultant shift back to students traveling to school by private cars, will occur against the backdrop of gridlock caused by all railway crossings in the area being closed for 30 or more minutes per hour.