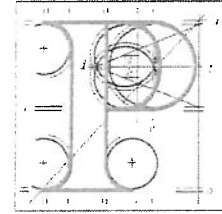


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Sean and Eimear Cremen
Kish
Upper Cliff Road
Howth
Dublin 13
D13HX82

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

Teil
Glaio Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email bord@pleanala.ie

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

An Bórd Pleanála,
Community Liaison Officer,
DART+ Coastal North,
Iarnród Éireann,
Inchicore Works,
Inchicore Parade,
Dublin 8
D08 K6Y3

Sean and Eimear Cremen
Kish,
Upper Cliff Rd,
Howth,
D13HX82

09/10/2024

To whom it may concern,

We would like to submit an objection to the DART + Coastal North Railway Order 2024 Application (Ref: NA29N.320164) which was recently filed, specifically in relation to the proposed introduction of a shuttle service from Howth Junction/Donaghmede to Howth Station and the introduction of an interchange as a result.

Despite the acknowledgement that one would need to “*bear in mind*” the needs of people with disabilities within the application and reports, there is minimal evidence of the same throughout the thousands of pages which have been submitted as part of this application. Indeed, even within the “Non-Technical Summary”, we noted that the document was over 100 pages; something which would be completely inaccessible to a person with an Intellectual Disability, who would require adapted easy to read materials as a reasonable accommodation. This guidance could have been provided had disabled people been considered in a meaningful way through engagement with organisations such as the National Disability Authority, the CRC, AsIAm, or Inclusion Ireland. However, none of these organisations were included within the list of persons and bodies served with the draft order and accompanying documents, as documented within the Inspectors Report; nor were any of these organisations engaged with throughout the pre-application period as documented within the minutes dated 20/01/2022, 31/03/2022, 05/04/2023, 17/06/2023, and the 16/10/2023.

It is our view that the disabled citizens impacted by the introduction of a shuttle service have been excluded from the planning phases, consultation processes, assessments, and auditing – all of which is reflective of the original omission of “Accessibility” within the Goals and Objectives highlighted by the DART + North Coastal Service.

The system involved in this whole process was not set up to include their voices in a meaningful way, which is of critical importance and we believe this to be a violation of their rights. The DART service has enabled people we care about to participate in society and the effect this has had on their quality of life cannot be quantified in data or statistics. Their voices and needs matter in the same way as any other citizens, and we do not believe these needs were considered as part of this application process.

We would urge An Bórd Pleanála, to decline Córas Iompair Éireann (CIE) the permission to introduce a shuttle service to Howth and interchange at Howth junction on the basis that the disabled citizens within the area were not consulted or engaged with in a meaningful way, nor were disability bodies, organisations, and advocacy groups. There is minimal evidence of any of the recommendations made by the NDA being implemented within the application and no evidence of a Disability Impact Assessment, which is a requirement as part of the application. In addition, the health effects on this population were largely ignored (in particular the psychological health effects), the risk of an interchange/ shuttle service to this population largely undocumented, and mitigation for the same mostly excluded. We believe the processes highlighted as part of this aspect of the application are therefore not operating in accordance with the Disability Act (2005), nor the United Nations Convention for the Rights of Persons with Disabilities (UNCRPD).

We would like to express our thanks to you for reviewing this information and look forward to hearing your decision on the same.

Yours sincerely,

Sean and Eimear Cremen