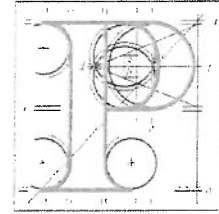


Our Case Number: ABP-320164-24



**An
Bord
Pleanála**

Clodagh 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

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An Bórd Pleanála,
Community Liaison Officer,
DART+ Coastal North,
Iarnród Éireann,
Inchicore Works,
Inchicore Parade,
Dublin 8
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Dr Clodagh Cremen
Kish,
Upper Cliff Rd,
Howth,
D13HX82

09/10/2024

To whom it may concern,

I 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.

Personal Context

I am writing on behalf of myself and my sister, Ms Almha Cremen, as we are both local residents of Howth and are people who come from a neurodiverse family. Within my professional work, I am a Clinical Psychologist. Therefore, the grounds of our objection centre around the impact of the proposed plans on our disabled community in Howth, Sutton, and Bayside. However, we also recognise and share the many other concerns that exist in relation to the building developments and population growth in Howth, and the concerns in relation to traffic congestion that will be a likely consequence should the proposal be approved as it currently stands.

Within our family, there is an adult who has put a great deal of effort into learning to use the DART service and depends on this service to access Dublin city centre. The DART service enabled them to attend third level education in Dublin City. They attained a Bachelor of Arts degree and spent several years over this time developing their autonomy and independence with thanks to the DART service. They currently avail of the DART service several times a week and this service has enabled them to continue to access the city independently, which is of critical importance to their mental health and wellbeing. Therefore, our family have many concerns in relation to the impact of removing a direct line to the city and the effect that an interchange will have on their independence and wellbeing.

Application Review: Introduction

I do wish to commend those involved the plans for their desire to innovate and recognise the great benefit the proposed plans will have overall within North Co. Dublin. Having reviewed the documents submitted as part of the application I can see that a great deal of care and consideration has gone into the application, particularly with regards to the environmental impact of the proposed changes, which is of critical significance and importance.

Nonetheless, I believe the proposed changes to the DART line, specifically the introduction of a shuttle service from Howth Junction to Howth station and an interchange at Howth Junction/Donaghmede are not in keeping with government policy pertaining to the rights of disabled citizens. In addition, I would suggest that these aspects of the proposal may be discriminatory in nature, as those with disabilities will be impacted disproportionately by the proposed changes and there is minimal evidence of any efforts to mitigate the same in a meaningful way within the proposals submitted as they currently stand. I will highlight the rationale for my opinion in the sections which follow, providing detailed information throughout my observation.

DART + Program Objectives

It was reported within the minutes included as part of the An Bórd Pleanála Preapplication Consultation File (documented on the 31/03/2022, 05/03/2023, 17/06/2023, 16/10/2023), within the Inspectors Report, which was documented to have been discussed on the 26/03/2024, and within the Planning Report dated July 2024 that the primary objective of the DART + Programme was *“to support urban compact growth and contribute to reducing transport congestion and emissions in the Dublin region by enhancing the heavy rail network between Dublin City Centre and the areas of Drogheda, Maynooth, Dunboyne, Celbridge, and Greystones, providing a sustainable, safe, efficient, and integrated and accessible public transport service along these corridors”*.

Sub-objectives made reference to long term growth through higher frequency, capacity, and electrified heavy rail services; improving accessibility to jobs, education, and other social/economic activities; supporting urban compact growth along existing rail corridors, deliver and efficient, sustainable, low carbon, and climate resilient heavy rail network, and provide a higher standard of customer experience.

The DART + Coastal North Project identified that the primary objective was to *“deliver a high frequency, higher capacity electrified rail service between Dublin City Centre and Drogheda to support the rapid transition required to deliver on a low carbon climate resilient transport system”*.

Sub-objectives referred to delivering increased frequency, capacity, reliability, and an electrified route. In addition, to deliver solutions to improve the passenger experience where passenger infrastructure interventions are required, to deliver a sustainable, low carbon and climate resilient design solution, to identify cost effective solutions, to minimise adverse impacts on the natural and built environment due to the construction, to minimise adverse impacts on existing rail services, road users, and landowners, and to provide efficient and cost-effective integration of systems.

Accessibility was not referred to as an objective of the DART + Coastal North Project within any of the documentation submitted, despite the fact that accessibility was highlighted at part of the

primary objectives of the DART + Programme. I believe this to be a critical omission, and the evidence of this omission on the application process will be discussed and highlighted below.

Legislation and Policy Cited

I noted within the application European, Government, and local policies were often quoted to provide a rationale to support the application process, as is documented within the minutes of the meetings dated 31/03/2022, 05/03/2023, 17/06/2023, 16/10/2023, and within the Inspectors Report, which was documented to have been discussed on the 26/03/2024, and within section 5 of the Planning Report, dated July 2024, from which I noted the following listed below.

- **5.1.1 United Nations 2030 Agenda (United Nations, 2015).** It was reported that sustainable development Goals 9 and 11 were “most directly relevant to the proposed development: *“Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation... Goal 11: Make cities and human settlements inclusive, safe, resilient, and sustainable”*”.
- **5.3.3 National Sustainable Mobility Policy.** It was identified that the current project is aligned with the Department of Transport’s National Sustainable Mobility Policy (NSMP), which provides a strategic framework for active travel/ public transport to support the reduction of carbon emissions by 2030. The policy is guided by three key principles: 1) Safe and Green Mobility; 2) People Focused Mobility; and 3) Better Integrated Mobility. The second principle (People Focused Mobility) includes the following goals: *“Take a whole journey approach to mobility, promoting inclusive access for all; Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users Moder; Promote sustainable mobility through research and citizen engagement”*. It was discussed that the DART+ Programme was highlighted within the policy document as being a key element in relation to the first principle (Safe and Green Mobility); however, the principle of “People Focused Mobility” was not referred to elsewhere within the report or the relevance of the same to the DART + Coastal North Project.
- **5.3.5. Department of Transport: Statement of Strategy 2021-2023.** It was reported that this strategy represents the Department of Transport’s primary strategic plan, with key priorities set out indicating the Department’s high levels goals, including the following *“connectivity; Sustainability: Economy, Environment, and Society; Safety, Security, and Accessibility; Effective Regulation; Stakeholder Engagement; Organizational Excellence and Innovation”*. It was noted within the report that the Statement of Strategy specifically identified and linked the DART + Coastal North project as a key strategic project related to the delivery of Strategic Goal 2: Sustainability: Economy, Environment, and Society; however, it was not referenced within the report how the project may be related to Strategic Goal 3: Safety, Security, and Accessibility.
- **5.5.1 Dublin City Development Plan 2022-2028.** It was reported that the Dublin City Development Plan was adopted by Dublin City Council on the 02/12/2022 and set out policies and objectives to ensure that the city develops to meet the needs of all residents. It was highlighted within the report that the main policies related to the DART + Programme includes the following:
 - *“Policy QHSN11: 15-Minute City To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and*

well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.”

- *“Policy QHSN12: Neighbourhood Development To encourage neighbourhood development which protects and enhances the quality of our built environment and supports public health and community wellbeing. Promote developments which: Encourage sustainable and low carbon transport modes through the promotion of alternative modes and ‘walkable communities’ whereby a range of facilities and services will be accessible within short walking or cycling distance;”*
- **5.5.2 Fingal Development Plan 2023 – 2029.** It was reported that the Fingal Development Plan 2023-2029 set out a spatial framework to guide future development within the county and was underpinned by a strategic vision intended to guide the sustainable development of Fingal. The following strategic objectives were listed as being relevant to the DART + Coastal North project: *“Policy CMP18 – Public Transport. 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.”*

Disability Legislation & Policies

- **UN Convention on the Rights of Persons with Disabilities.** Ireland ratified the UN Convention in 2018. Article 9 states that in order for persons with disabilities to live independently and fully participate in all aspects of life, they need to have access not only to accessible transportation but also to infrastructure, the built environment, information and communication processes and technologies and to other public facilities and services.
- The **2030 Agenda for Sustainable Development**, adopted by all United Nations Member States in 2015 identifies integrated universally designed transport systems as core elements in creating healthy, sustainable and inclusive cities and communities.
- Section 6.3 of the **National Planning Framework for Project Ireland 2040** also identifies universally designed transport services, in addition to housing, education, and health services, as key areas that need to be developed to facilitate the development and progression of diverse and inclusive communities.
- The importance of transport in the lives of persons with disabilities and the necessity for transport services that are accessible to everyone is also highlighted in **The Comprehensive Employment Strategy 2015 – 2024; National Disability Inclusion Strategy 2017 – 2021.**

Universal Design

I observed that The Disability Act was highlighted within the minutes dated on the 17/06/2023 as part of the pre-application consultation process and also within Volume Four of the Environmental Impact Assessment Report (EIAR), Appendix A3.2: PC2 Report, with an assertion that *“Iarnród Éireann is committed to serving the needs of older customers and those with accessibility challenges.”*

Within the Disability Act 2005, Universal Design is defined as follows:

“Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people, regardless of their age, size or disability. This includes public places in the built environment such as buildings, streets or spaces that the public have access to; products and services provided in those places; and systems that are available including information and communications technology (ICT).”

I note, that within the Disability Act (2005) there are obligations on public bodies to ensure that the services provided to the public are accessible to people with disabilities. Indeed, a public body may achieve the above by conducting an analysis of the accessibility of the services provided, an analysis of how integrated the service are to determine whether there is any variation in the manner in which disabled people access the service provided, devise practicable and appropriate actions plans to address the issues of integration/ accessibility in consultation with the stakeholders, and promote the measures taken to ensure the general public is made aware of them.

I note, that the National Disability Authority (NDA) made a submission for the DART + North Project in 2022 as part of the consultation process; available on their website (<https://nda.ie/publications/nda-submission-for-dart-north-project>). The NDA are an independent statutory body that provides guidance to the government on policy and practice relevant to the lives of disabled citizens and promote the universal design of the built environment, products, services, information, and communication technologies to improve their accessibility. I noted the following information included within the submission:

“Approximately one in ten people with disabilities said that inadequate/inaccessible transport systems prevented them from participating in social events. About one in six people with a disability are not in work who would be interested in a job, cite transport or parking as an issue for them. Those with sight, mobility or intellectual disabilities are most likely to cite transport as an issue for employment.”

The following recommendations were made by the NDA as part of the 2022 public consultation submission:

- It was recommended that Irish Rail adopt and implement a Universal Design approach... and continue this approach throughout the entire project.
- It was recommended that The DART + North project should consider planning approaches that ensure that each element regarding the development and delivery of this programme includes accessibility as a key component to support all users to access transport services so they can participate in mainstream society. This includes persons with disabilities.
- It was recommended that a strategy was developed and published on the DART+ North website detailing how Irish Rail will ensure that any future impact assessments for this proposed project would examine the potential effects this project could have on persons with disabilities and older people. This strategy was recommended to also have a clear commitment from Irish Rail that it will ensure that every element of the proposed DART+ North project will meet the needs of persons with disabilities and older people.
- The NDA acknowledged that as part of the report on the DART+ Coastal North project, Stage 2 of the process did involve analysis under a framework which included accessibility and social inclusion. However, the NDA recommended more consideration be put into this element of the assessment. The NDA recommended developing and publishing a strategy on the DART+ Coastal North website detailing how the Irish Rail will ensure that any future

impact assessments for this proposed project will examine the potential effects this project could have on persons with disabilities and older people. This strategy should also have a clear commitment from Irish Rail that it will ensure that every element of the proposed DART+ Coastal North route will meet the needs of persons with disabilities and older people.

- It was advised that a Disability Impact Assessment was an obligation to be included with all substantive proposals requiring Government Approval, as stipulated within The Cabinet Handbook. Guidance was provided in how to conduct this assessment.
- It was recommended that within the DART + North project that Irish rail would have a **sustained engagement process with a diverse set of users**.
- It was recommended that the DART + North project should contain an action plan and key deliverables for a cross departmental approach between Irish Rail, the National Transport Authority, the NDA, the public transport service providers, relevant Government Departments and related agencies to ensure effective development and implementation of the proposed DART + North project, to ensure that it provides an integrated, universally designed public transport service.
- It was recommended that user testing be implemented as an important aspect of the sustained engagement process. It was highlighted that impact assessments for the project should have user testing as a key criterion to facilitate the development and progression of the project. It was suggested that Irish Rail and the proposed advisory committee could have developed and piloted an audit tool to assess the capacity of the proposed project to provide integrated universally designed public transport services that are easy to access, easy to understand and easy to use by everyone regardless of age, size ability and disability. The NDA offered support in developing/ piloting the same.
- It was recommended that Irish Rail use a definition of accessibility which details how every element of the DART + North Project would be universally designed, so as that it is easy to access, understand, and use for everyone regardless of age, size, ability, and disability. It was advised that the same definition could be applied to future assessments conducted as part of the project.
- It was recommended that every aspect of the service be accessible, including the design of the DART stations, location of the DART stations, the design and location of pedestrian level crossings, pedestrian pathways, **interchanges**, way finders, tactile surfaces, the built environment, the number of transfers a person may need to make in one journey, the need for information to be easy to access/ understand.
- It was recommended that the design and procurement of certain products and services must comply with **EU Directive 2019/882 on the accessibility requirements for products and services** (harmonised standard EN 301 549).
- It was recommended that Irish Rail implement the **European standard I.S. EN 17161:2019 ‘Design for All - Accessibility following a Design for All approach in products, goods and services - Extending the range of users’** when designing and procuring products, goods and services.
- It was recommended that Irish Rail implement the **European Standard I.S. EN 17210:2021 ‘Accessibility and usability of the built environment - Functional requirements’**.
- It was advised that under the European Accessibility Act electronic ticketing machines, check in machines and information terminals must comply with accessibility requirements set out in this Act. Member states are obliged to transpose the European Accessibility Act into national legislation by 28th June 2022 with implementation commencing from June 2025.

- It was recommended that information provided must be accessible, and that Irish Rail should utilise the Customer Communications Toolkit for the Public Service - A Universal Design Approach which will help to produce universally designed written, verbal and digital communications that can be easily accessed, understood and used by everyone.
- It was advised that the NDA's **Code of Practice on the Accessibility of Public Services and Information provided by Public Bodies** outlines the statutory obligations public bodies have in providing accessible services and information under section 26, 27 and 28 of the **Disability Act 2005**. These sections of the Disability Act 2005, incorporate the core elements of an integrated universally designed public transport service.
- It was recommended that the DART+ North project use this Code of Practice to deliver an integrated universally designed public transport service.

Having reviewed the information filed as part of the railway order, I have not noted nor observed any analyses nor action plans in relation to how the proposed plans may impact disabled citizens within the areas of Howth, Sutton, and Bayside across the thousands of pages which have been submitted as part of the application. Such exclusion could have been avoided through meaningful engagement with the National Disability Authority (NDA). However, there was no evidence documented of consultation or engagement with any disability bodies, organisations, or advocacy groups within the application process.

Public Consultations

Through reviewing the minutes and information provided within the presentations made as part of the pre-application consultation process on the 28th of August 2023, I noted that the issue of disability and accessibility was raised by the local community as part of the second public consultation process. These concerns were referenced in a single paragraph within the 328-page report on this Consultation Process, located in Volume Four of the EIAR Appendix A3.2. I noted the following response offered to these concerns within the report in section 4.2.1.2 on Equality:

“The provision of facilities that cater for the needs of those with access & mobility needs is at the forefront of thinking when developing solutions such as those proposed at Howth Junction & Donaghmede Station. The proposed upgrades have been designed in accordance with all current design standards and guidelines to ensure all passengers are catered for in an equitable and appropriate manner. Iarnród Éireann is committed to serving the needs of older customers and those with accessibility challenges. The company has a dedicated Accessibility Users Group, which meets quarterly to discuss current and future plans for the organisation and the impacts that these plans have on those that find using the services more difficult than others. For those that travel with Iarnród Éireann and need assistance, a dedicated Accessibility officer is available and is happy to provide assistance. For more details see Iarnród Éireann Accessibility (irishrail.ie)”

However, I noted no evidence of any consultation, engagement, guidance, or feedback from said Accessibility Users Group anywhere else within the EIAR report, nor within any of the documentation which was included as part of the pre-consultation process that occurred between CIE and An Bord Pleanála. In addition, through reviewing the minutes and presentations associated with the pre-consultation process I observed that many efforts were made to engage with the residents as part of the Public Engagement initiatives, documented within the minutes

from the meetings which occurred on the 31/03/2022 and the 17/06/2023. However, despite these efforts I noted no evidence nor reports of efforts to engage with the local disabled communities, as per the recommendations of the NDA.

I observed that within Volume 2 of the EIAR, Chapter 23 (Human Health), it was reported that within Dublin Fingal the 2015 Central Statistics Office (CSO) data identified that 10.2% of the population in Fingal have a disability, which was noted to be 2.7% lower than the national average. Within the report the 2022 CSO data was provided which indicated that there were 8369 residents in Howth, 8106 residents in Baldoyle, and 5773 residents in Sutton; there was no data reported in relation to the population of Bayside. Given the available data, one may assume that there are roughly 2269 disabled citizens within these areas. These estimates would not include the number of residents who are older or those with chronic health conditions who are unable to drive and depend on the direct line to Dublin City from Howth, Sutton, and Bayside. Despite these figures, there was no evidence of any meaningful consultation or engagement with these residents as part of the public consultation processes. For example, no evidence of adapted information or easy to read materials were provided, there was no evidence of reports or feedback from disabled citizens, and there was no evidence of engagement with local community organisations, such as the Central Remedial Clinic (CRC) located in Clontarf.

Population Effects and Risk Mitigation

I observed that within Volume 2 of the EIAR, Chapter 23 (Human Health), it was reported that a dependency ratio of 46% (i.e. those are aged between 0-14 and 65 years and over as a proportion of those aged 15-64) existed within the region of Fingal. I note that it was reported that this was 3.3% below the national average and an opinion was provided that this ratio could therefore be described as “low”. However, I observed that no criteria, rational, nor assessment was provided to support the reader in identifying how this conclusion was formed. I am aware that within the scientific field one may consider the degrees of variations as standard deviations above and below the mean to determine if a difference is statistically significant; and such variations are often classed with descriptions such as low, medium, or high etc.; however, within the report no other data was provided to support the position that the dependency ratio described could be considered as “low”. I feel that it is important to highlight this evaluation as an opinion, as opposed to a fact, as such a position may be utilised as part of the rationale within the risk assessments and impact of the proposed changes on the disabled citizens within the area.

I note that we have an aging population within Ireland, a fact which is based on a significant amount of data and often referenced within Government policies and strategies (e.g. National Positive Ageing Strategy, 2013; The Commission on Care for Older People, etc.). Indeed, the CSO has reported that the number of people aged 65 years and over is estimated to have risen by over 40% between 2013 and 2023, from 569,000 to 806,000, and is expected to double again to 1.6 million by 2051. However, despite these facts I noted that there was no reference to the aging population, CSO projections, or the prevalence of chronic health conditions which may impair driving within Volume 2 of the EIAR, Chapter 7: Population, nor within Chapter 23: Human Health.

I observed that within Table 7.3 of Chapter 7: Population the following definitions were provided as listed below:

- *Positive: A change which improves the quality of the environment as realised or perceived by human beings*
- *Neutral: No effects realised or perceived by human beings, or effects that are imperceptible, within normal bounds of variation or within the margin of forecasting error.*
- *Negative: A change which reduces the quality of the environment as realised or perceived by human beings.*
- *Slight Effects: A small effect which causes noticeable changes in the character of the environment realised or perceived by human beings without affecting its sensitivities.*
- *Moderate Effects: An effect that alters the character of the environment as realised or perceived by human beings in a manner that is consistent with existing and emerging baseline trends.*
- *Significant Effects: An effect which, by its character, magnitude, duration or intensity significantly alters a sensitive aspect of the environment as realised or perceived by human beings.*
- *Very Significant Effects: An effect which, by its character, magnitude, duration or intensity significantly alters most of a sensitive aspect of the environment as realised or perceived by human beings*

It was reported within Table 7.16 that the proposed changes (i.e. the introduction of a shuttle service and interchange at Howth Junction) would impact the journey amenity, due to the effects of construction, such as works on the new connection to the central platform and the station entrances. These effects were reported as “moderately negative”, with “high sensitivity”, as “sensitive subsets” (i.e. disabled citizens) would be impacted. It was noted that these effects would last for 24 months and that they would be mitigated through the use of “signage” and “facilities for people with disabilities”; without a clear description or indication of the same. Similarly, I noted that within Table 7.17 it was reported that the journey characteristics would be affected to the Howth branch due to the proposed increase in train services using a shuttle service which was reported to be a “very significant” and “positive” effect on the population. It was also reported within the same table that the nature of the journey amenity would change for passengers on the Howth line, and these were considered as “slight negative” and “Neutral” effects. I observed within Volume 2 of the EIAR, Chapter 27: Mitigation and Monitoring Measures, it was reported within Table 27 that construction mitigation was proposed, which included “*provide clear directional signage and access facilities for passengers during works internal to the station, bearing in mind the needs of more sensitive subsets and people with disabilities*”.

Despite the acknowledgement to “bear in mind” the need to consider people with disabilities, I noted no other reported consideration of the effects/ long term effects of introducing a shuttle service and interchange on this population outside of the above, nor mitigation plans for the same. It would appear to me, that the assessment that the proposed changes would have a “very significant” and “positive” effect on the population was based on the general population, a position which was very clearly opposed by local residents as documented within EIAR Volume 4, Appendices A3.1 PC1 Findings Report and A3.2 PC2 Findings Report; along with the meeting minutes documented on the 31/03/2022, 05/03/2023, 17/06/2023, 16/10/2023, and within the Inspectors Report, which was documented to have been discussed on the 26/03/2024.

Within EIAR Volume 2, Chapter 23: Human Health, section 23.8.7 the psychological impacts are considered. I noted the following within this section:

“Human beings may experience annoyance from the temporary effects of the Construction Phase, such as noise or dust as a nuisance. Annoyance is not in itself a health effect, although it

is recognised that there can be potential impacts on a person's overall psychological well-being... If someone develops a psychological illness such as anxiety or depression this becomes a medical impact. In terms of assessing the psychological impact, an impact is assessed as either positive or negative, if it is likely that the overwhelming majority of people will experience that effect. Where different psychological impacts are anticipated from the same scenario the assessed psychological impact is neutral. Many people will utilise Proposed Development when operational to meet their transport needs. This includes getting to work, accessing services or any other reasons. This means they will not be in cars, and they will not be dealing with issues associated with traffic and traffic jams. This means that there is expected to be positive psychological impact on those people. There may be increased opportunities for exercise because of the easier, more frequent access to beaches and other areas of physical activity. This in turn would also have a positive effect on psychological health, as well as physical health. While some might experience annoyance for a variety of reasons during the operational phase there is no reason to believe that this would exceed the positive psychological effects. Overall, the impact on human health is deemed as probably positive, in that the overwhelming majority will experience positive effects, but at worst neutral."

Despite the previously stating the following "*bearing in mind the needs of more sensitive subsets and people with disabilities*", I observed no consideration for the psychological impacts of the proposed changes, nor mitigation strategies regarding the same in relation to the disabled citizens of Howth, Sutton, and Bayside. Within my work as a Senior Clinical Psychologist, I have seen the impact of accessibility issues on the mental health and wellbeing of disabled people. I have worked within the area of neurorehabilitation in organisations such as Beaumont Hospital, The National Rehabilitation Hospital, and Headway Brain Injury and Support Services, with people experiencing Epilepsy, Strokes, Traumatic Brain Injuries, Brain Cancers, Visual Impairments, Intellectual Disabilities, and Autism. In addition, in my current work, I am employed as a Senior Psychologist working within the Later Life Services in St John of Gods Hospital, Stillorgan and frequently work with patients experiencing neurodegenerative diseases, such as Dementia and Parkinson's Disease. Therefore, I believe that I am in a position to offer a professional opinion on the matter based on these experiences. I would strongly dispute the position that the psychological impact on human health will be "*at worst neutral*" for the disabled and older citizens of Howth, Sutton, and Bayside, who represent roughly 10% of the population.

Research produced from the Irish Longitudinal Study on Aging (TILDA) in 2019 identified that 23.3% of adults over the age of 50 in Dublin used public transport as their most frequent mode of transport, and that driving decreased with age.¹ It was found that access to independent travel was associated with lower depressive symptoms, greater social networks, and higher levels of social participation. Those with reduced levels of driving reported higher loneliness, depressive symptoms and reduced quality of life.¹

It has been found that 30% of people with all types of disabilities have problems with public transport, compared to just 3% of the general population.² There are challenges for those with intellectual disabilities in accessing public transport, which significantly disables their participation in their local communities causing psychological distress and mental ill health. Engaging in public transport requires a range of skills, such as visual processing skills, language

¹ Donoghue, O. A., McGarrigle, C. A., & Kenny, R. A. (2019). Who's in the driver's seat? Impact on social participation and psychosocial wellbeing in adults aged 50 and over. *Transportation research part F: traffic psychology and behaviour*, 64, 522-531.

² Friedman, C., & Rizzolo, M. C. (2016). The state of transportation for people with intellectual and developmental disabilities in Medicaid Home and Community-Based Services 1915 (c) waivers. *Journal of Disability Policy Studies*, 27(3), 168-177.

skills, decision making skills, and problem-solving skills – resulting in more restrictions in relation to public transport for this population relative to other groups. Indeed, research has demonstrated that those with multiple impairments and cognitive impairments were significantly less willing to choose a route which involved a transfer, even in the interest of travel time saving due to the increased complexity involved with the same.³

Whilst a significant amount has been done to improve the physical accessibility of public transport, there has been little improvement to reduce its complexity and increase the cognitive accessibility on rail routes. It is my opinion that the introduction of an *unnecessary* interchange is reflective of a cognitive barrier that will significantly impact those with cognitive/ neurological impairments disproportionately within the areas of Howth, Sutton, and Bayside and the risk of the same has been unacknowledged and therefore unmitigated within this application. I observed within the EIAR, Chapter 27: Summary of Mitigation and Monitoring Measures there were “*No project specific monitoring is proposed in relation to the Population effects.*” However, I noted that there were 10 pages of mitigation and monitoring measures included on the topics of bats, badgers, otters, marine mammals, other mammals, birds, reptiles, amphibians, and fish. The considerable effort that went into the potential impact on our wildlife is admirable and important.

I observed that disabled people were mentioned once within this 69 paged chapter.

Conclusion

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, which I diligently reviewed for the same. Indeed, even within the “Non-Technical Summary”, I 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 my opinion 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.

I would like to end my objection with a personal observation, as a person who has grown up in a neurodiverse family. I have spent decades witnessing “the fight” for services, as is often described within the media. These services are often described in relation to health and education, but also include transport. The time involved in this “fight” is often undocumented and thus, the work involved often remains unclear. In the interest of clarity, I wished to advise that I have spent over 12 hours after work reading through thousands of pages as part of this application, recording notes, data, and reviewing wider Government legislation, policies, submissions, and CSO statistics. I have put time into writing this observation because I deeply care about disabled

³ Park, J., & Chowdhury, S. (2022). Investigating the needs of people with disabilities to ride public transport routes involving transfers. *Journal of Public Transportation*, 24, 100010.

people: something which is reflected in both my personal and professional life. 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 I believe this to be a violation of their rights. The DART service has enabled people I 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 I 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.

Dr Clodagh Cremen

Ms Almha Cremen