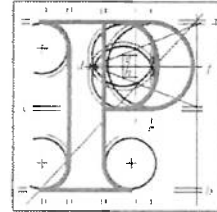


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

Thomas Galligan  
Kuranda  
Carrickbrack Road  
Sutton  
D13 FC79

**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](http://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](mailto: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	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

An Bord Pleanála,  
64 Marlborough Street,  
Dublin 1,  
D01V902

Planning Application: ABP-320164

An Bord Pleanála,

Submission: Reduced Accessibility

My main observation on the DART + Coast North SID is with regards to the impact on Accessibility. The loss of direct dart services, the increased level crossings and increased traffic will all significantly impact Accessibility.

The European Union (EU) defines **accessibility** in the context of enabling equal access to products, services, and environments for all people, including those with disabilities. This definition applies broadly across physical infrastructure, digital environments, transportation, information, communication, and more. Accessibility is a key element of the EU's broader goals of **non-discrimination, inclusion, and equal opportunity**.

If there is a reduction or full withdrawal the direct service to Howth then individuals and groups with disabilities living in the Bayside, Sutton, and Howth areas will not have the same access as individuals and groups that live in areas such as Malahide and other northern coastal towns.

A shuttle DART service is not the solution and cannot be classified as equal access to transportation as it 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 disabilities, limited mobility, and wheelchair users where they need to use the lifts in the station.

### **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 and maintain accessibility. 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.

The loss of the direct DART services goes against the European Accessibility Act (EAA), Regulation (EU) No 1371/2007 – Rail Travel, and UN Convention on the Rights of Persons with Disabilities (CRPD). The loss of the direct DART services will make it harder to travel and so reduce accessibility. Below are summaries of the European Accessibility Act, Regulation (EU) No 1371/2007 – Rail Travel and the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

## European Accessibility Act

The European Accessibility Act (2019) aims to improve access to products and services, including transport services, for people with disabilities across the EU. It sets standards **for accessibility in transportation** infrastructure such as ticketing and information systems, which must be accessible to everyone, including those with disabilities.

## Regulation (EU) No 1371/2007 – Rail Travel

This regulation ensures that people with disabilities have access to rail services and receive assistance when needed. Key provisions include:

## United Nations Convention on the Rights of Persons with Disabilities (CRPD)

The EU and all its member states are signatories to the CRPD, which outlines a framework to promote and protect the rights of persons with disabilities, including the right to **accessible transportation**. It serves as the basis for many of the EU's laws in this area.

### **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. 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). The increased level crossings will make health and disability services harder to access not easier. This goes against the EAA, Regulation (EU) No 1371/2007 and CRPD.

### **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.

The increased traffic will make health and disability services harder to access not easier. Going against the EAA, Regulation (EU) No 1371/2007 and CRPD.

Direct DART services is an essential service and to take it away will have a negative impact on Dublin society in particular those who need more accessibility and not less.

Kind regards,

Thomas Galligan

Kuranda,  
Carrickbrack Road,  
Sutton,  
Dublin  
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Ireland