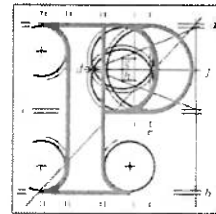


**Our Case Number:** ABP-320164-24



**An  
Bord  
Pleanála**

McHale Family  
Thalassa  
156 Howth Road  
Sutton  
Dublin 13  
D13 V2A0

**Date:** 16 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,

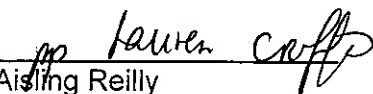
An Bord Pleanála has received your recent letter in relation to the above mentioned case. The contents of your letter have been noted. Please accept this letter as a receipt for the fee of €50 that you have paid.

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
Glaao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Riomhpost	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**  
LDG- 074832-24  
ABP- \_\_\_\_\_  
**12 SEP 2024**  
Fee: € 50.00 Type: cheque  
Time: 7.00 By: reg post

McHale Family,  
Thalassa,  
156 Howth Road,  
Sutton,  
Dublin 13.  
D13 V2A0

The Secretary  
An Bord Pleanála  
64 Marlborough Street,  
Dublin 1.  
D01 V9O2

11<sup>th</sup> September 2024

**Submission as part of the Statutory Consultation Process with regard to the Planning Application (Railway Order Application) for DART + Costal North**

Dear Sir/ Madam,

We enclose our submission in connection with the above and also attach our cheques for €50 in favour of An Bord Pleanála.

**We are not opposed to the principle of the extension of the DART service to Drogheda, and fully support this important project . But we are deeply opposed to the removal of Howth's direct DART service and its replacement with an indirect shuttle service to Howth Junction.**

This proposal will have a devastating impact on Howth, Sutton, Baldoyle, Bayside and surrounding areas with multiple negative impacts as set out in the attached.

We fully acknowledge that we are not experts in train transport systems, however our limited research strongly suggests there are readily available technologies and solutions for modern train movements which would strongly suggest that it is not necessary or justifiable to remove Howth's direct DART service. And that there are more feasible and acceptable technical solutions to achieve the train movements to support the DART+ Costal North Project, rather than cancelling Howth's direct DART service.

Solutions which it would appear are clearly superior to those being proposed and much less disruptive, and which we also review in our attached submission. At the very least as part of the

An Board Pleanála review these alternatives need to be reviewed and explanations sought as to why they are not being implemented a part for he DART+ Costal North Project and the continuation of direct DART service to Howth.

Unfortunately despite a very substantial number of representations to the authorities involved and huge local attendance at meetings etc, they have persisted in pursuing what is increasingly looking like a blinkered and single minded pursuit of their original proposal. Despite mounting evidence of its damaging effects on Howth and surrounding areas, and as noted earlier clear indications that technically feasible and indeed superior alternative solutions.

This is classic groupthink, which we touch on also in our submission, and which unfortunately is an all too human behaviour which we can all be guilty of. But which must be challenged on large scale infrastructure project such as the DART+ Costal North project, which have the capacity to improve or disimproved thousands of people's lives. It is essential that An Board Pleanála now challenge this groupthink and deliver a planning decision which is in the best interest of the overall DART+ Costal North Project and of those whom it will serve.

**We are requesting that an Board Pleanála attach a strict condition to any planning that the existing Howth direct DART service must be maintained now and at all times in the future as part of the DART + Costal North Project.**

**And that if it is necessary to support that essential objective, that a full ORAL hearing is convened.**

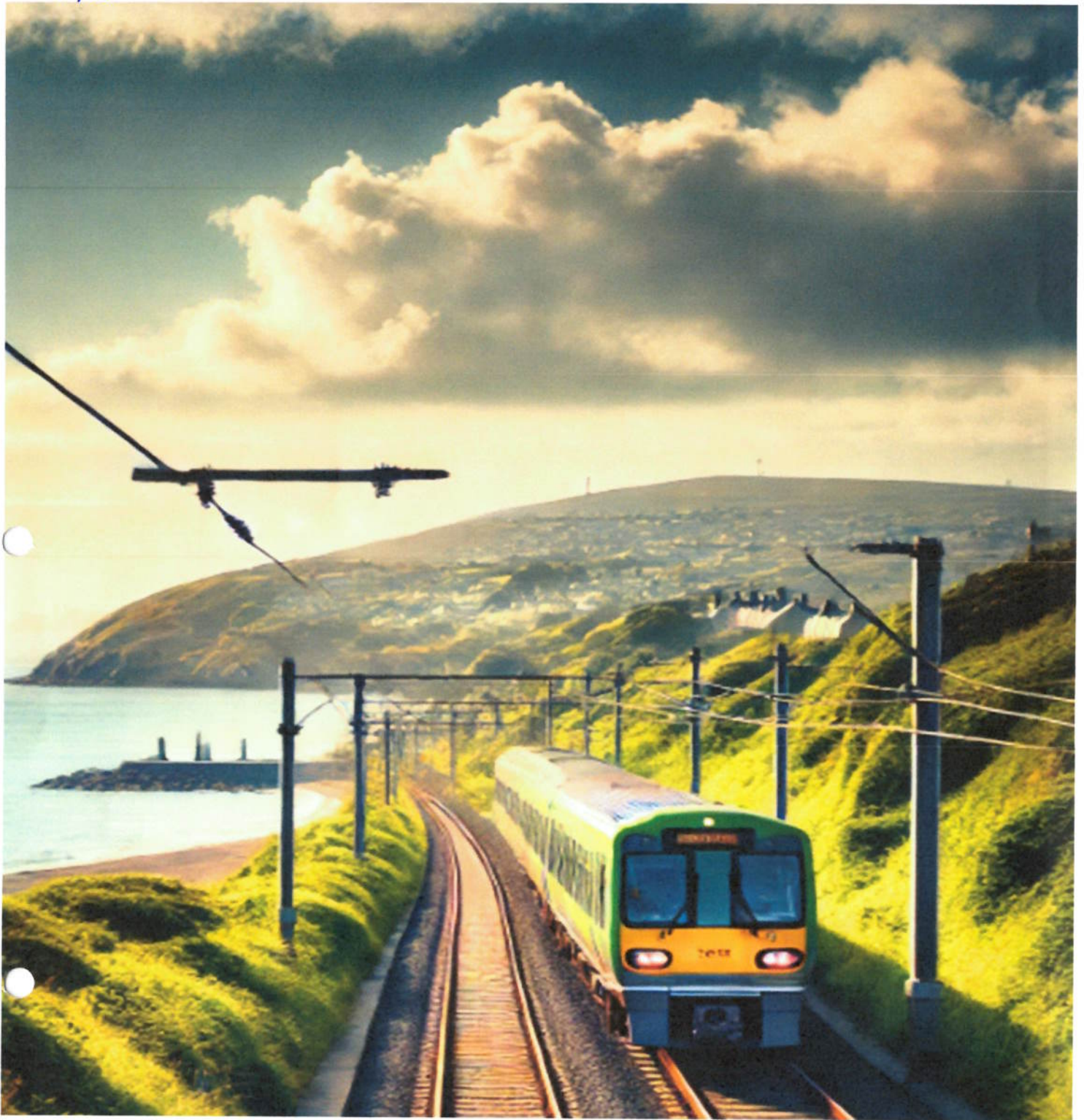
Providing people who will be severely affected by this proposal, with a suitable and independent platform to demonstrate the hugely negative impacts of the cancellation of Howth's direct DART service and to provide them with an opportunity to present the alternative and technically superior alternatives, which in good faith, they are convinced would completely mitigate the need for any such cancelation of Howth's existing direct DART service.

Thanking you in anticipation.

Yours faithfully.

---

McHale family



**Planning Application (including Railway Order Application)  
for DART + Costal North Project**

**Submission to An Bord Pleanála as part of the Statutory  
Consultation Process**

**September 2024**

### 1. Introduction

We are writing to you as part of the Statutory Consultation process following the lodging with An Bord Pleanála of the Railway Order in connection with the planning application for DART + Costal North project.

We begin by noting that we are not opposed to the DART + Costal project and the extension of the DART to Drogheda. And we support this project and are supporters of public transport and the extensions of it to as many commuters as possible

**However we strongly object to the proposal to replace Howth's current and long standing direct DART service with an intermediate DART shuttle arrangement to Howth Junction . As it will greatly damage the Howth , Sutton, Baldoyle, Bayside and other areas ; we do not believe it is necessary ; and we believe there are much better alternatives**

As such we have been reluctantly forced to make this submission, as a result of the continued instance by the authorities involved to maintain their early decision of replacing the Howth direct DART service with an indirect DART shuttle service.

**Despite mounting evidence that this is unnecessary, unjustified and a retrograde decision that will cause huge disruption and upset in the areas affected. And that perfectly practical and implementable alternative solutions exist which would mitigate any need for this counterproductive and unnecessary decision.**

1. We would strongly urge and request that if a decision to grant planning permission to the DART+ Costal North Project is given, **that there is a binding condition that neither now or at any time in the future, can the existing direct DART services to Howth be interfered with or**

**modified in any way. And in particular that under no circumstances can the existing direct DART service from Howth to the city centre be replaced by an indirect DART shuttle service to Howth Junction.**

**As patently there is not a technical or operational justification for this. And there are clear alternative solution readily to hand.**

**And in this regard , also that the proposed works to Howth Junction, which would be unnecessary and wasteful of public monies in such circumstance are not granted approval or given planning for.**

2. That if An Bord Pleanála are considering granting a planning permission (railway order) for the DART + Costal North project which includes the removal of Howth's current direct DART service to the city, that in such circumstances **there is a properly convened public ORAL hearing** to properly explore and determine why apparent readily available technical solution which would mitigate the need for this new Howth shuttle service were not properly investigated and implemented.

**Anything less than this, we believe will not be in the public interest and certainly not serve the interests of transparency and accountability. And will forever leave unresolved suspicions and concerns, and long term resentment around any decision to interfere with Howth's current and long standing DART service.**

**And forever damage the goodwill to, and reputation of the new DART + Costal North project.**

Having attended public meetings and met and discussed with many of our friends and neighbours the potential withdrawal of our current Howth direct DART service, it is difficult to overstate the great distress and upset which this is causing in the area.

People are genuinely distraught and find it impossible to comprehend that someone would even consider withdrawing this direct DART service, which Howth has enjoyed for nearly half a decade. And before that a direct rail service (tram) for many decades.

We try as best we can to set out in a clear and comprehensive fashion the myriad of negative impacts, and there are many, which the withdrawal of the DART service from Howth will have on it and its residents, and the residents of many surrounding areas.

But importantly we begin our presentation *(Point 2. Below) which is the critical point in our submission as it reviews and sets out why we believe a proposal to replace the DART services with a shuttle DART service should NOT even have been proposed and actively pursued in the first place. That it has always been a deeply flawed strategy and that there is no apparent technical or justifiable operational reasons why it is required.*

We fully acknowledge that we are not experts in train transportation, however our review of readily available technical information with regard to the management of train movements with the aid of modern technology and signalling systems strongly suggests that the proposed DART+ Costal North projected train movements/frequencies can be comfortably accommodated without in any way interfering with the current quite modest 3 direct DARTS per hour, to and from Howth. Equally in this regard we believe this is solidly supported by actual train movements achieved and currently operational (in fact greatly in excess of those required) on similar rail systems elsewhere. Again please refer to our submission as set out in Point 2. Below.

It can make absolutely no sense that the current proposal set out in the planning application for **DART + Costal North is advocating a very substantial increased frequency for a new and we believe unnecessary indirect shuttle DART (not direct) on a limited section of DART line (Howth to Howth Junction) which has 3 active gated road crossings.**

Resulting in massive traffic difficulties and many other challenges for the local area. **When a small and imminently achievable increase in frequency on a section of DART line (Howth Junction to City Centre) with NO gated road**

**crossings and no impact on traffic etc, would completely alleviate and render redundant any need for a hugely controversial shuttle/indirect service to Howth in the first place.** Which as noted is causing huge and unacceptable distress to residents of Howth and surrounding areas. An increase which research would suggest should be readily achievable with a minimum of effort.

It is imperative that as part of the review of the planning application received by An Bord Pleanála that the reasons ( if there are any ) for not implementing the strategy noted above and set out in our Point 2. below is properly investigated and interrogated.

In light of this and the increasing sense that there are clearly achievable and much less disruptive alternatives to enforcing and inflicting a high frequency (not direct) DART shuttle service to Howth, we believe an oral hearing to properly and publicly investigate this in an open and transparent public forum is absolutely essential.

As note anything less than this, we believe will not be in the public interest and certainly not serve the interest of transparency and accountability. It would be reprehensible and unforgivable if Howth's long standing direct DART were to be replaced by a limited and bitterly opposed indirect shuttle DART service when there were easily implemented technical solutions to mitigate against the necessity for same

Indeed might we respectfully submit that if it were subsequently to be shown that readily available technical solutions were indeed available that indicated that the existing Howth DART services were unnecessarily removed and replaced by a much inferior and hugely damaging alternative( after such works were implemented) this would indeed be a very public and reprehensible situation.

**Hence we would respectfully suggest the need for an oral hearing and full public transparency if there is not a binding condition attached to any planning permission that under no circumstance either now or at any time**



**in the future that the existing direct DART services to Howth are interfered with or modified in any way.**

**If this condition is indeed attached we have no objection to the DART+ Costal North project and indeed welcome it as an important piece of infrastructure work which be of great benefit generally. Nor are we requesting a full oral hearing**

In conclusion , all areas, hope for and are quite entitled to expect and anticipate improvements in their local areas with regard to public transport and access to same. But what is now being proposed for Howth and surrounding areas is a clear and serious downgrading in their public transport infrastructure rather than improvement. A service which has existed in the area for many decades and which underpins the whole area. This is clearly unjustifiable and completely unacceptable and it is quite extortionary that it is even being seriously proposed in any circumstances. But particularly in circumstance where we believe it is not required or justified.

We set out in the following pages our submission in support of the above.

**2. With Current Signalling and train management technology; There is no reason to remove the direct DART service to Howth**

**To do so will in fact only cause huge and avoidable problems which can be completely avoided if proper and readily available train management / signalling technologies are properly implemented.**

A review of readily available information and studies clearly highlights that the train movements/frequency necessary **from Howth Junction onwards to Connoly and Grand Canal Dock, where there are no signalled road crossings on the** DART (unlike the South DART for

## DART+ Costal North Project – Submission to An Bord Pleanála

example where there are 5 central city signalled road crossings) should easily be achievable.

Set out below are the details around this argument. Please refer to Appendix 1 for supporting documentation referenced in the below

- The attached literature from reputable European agencies (Appendix 1) and organisations would clearly demonstrate that times of 1.62 minutes between intercity trains is achievable with investment in modern signalling technology /automated train technology /Traffic Management Systems.
  - 1.62 minutes between trains indicates movements of up to **37 trains per hour being achievable. No where like this number of movements on the main DART + Costal line would be required to maintain direct DART services to Howth.**
- The attached article from the Irish Times of the 2<sup>nd</sup> Sept 2024 (Appendix1) indicates that trains up to every 5 minutes might be required in the future (presumably at peak times), to support commuters travelling from Drogheda and elsewhere on the new DART+ Costal line.
  - 5 minutes between trains **indicates a train movement of only 12 trains per hour actually being necessary .**
- Looking at our nearest neighbour and the **London Central Line, information available would indicate (see attached Appendix 1) that they achieve movements of 34 trains per hour at max peak periods and between 27 and 30 during the rest of the peak time** , on this line. **There are clear parallels between the London Central Line and the DART which supports a comparison between the two. SEE BELOW.**
  - Both are largely a twin track system.
  - In terms of density of stations both are similar with an average of 1 station per mile (DART approx. 31 stations over 29 miles ; London Central Line 49 stations over 46 miles). This is important as stations of course will cause trains to stop and will affect speed of movement.

- Whilst the London Central Line is largely underground and does not have road crossings as a result, **it is important to note that on the North DART from Howth Junction to Connolly and thereafter all the way to Grand Canal Docks there are no major road crossings. This is very important to note.** For example, on the South side of the city there are 5 DART road crossing quite near the city (Lansdowne ; Serpentine ; Sandymount; Sydney Parade ; Merrion Square.) Also, underground services like the Central Line have much more challenging issues around Health and Safety , means of escape from tunnels etc. And these are not an issue for the overground DART in Dublin
- So, in terms of comparing the Central Line in London with the DART rail from Howth Junction to Connolly or indeed through to Grand Canal Docks, it is worthy of note that;-
  - Both are largely twin track systems
  - Very similar in terms of density of train stations (station numbers per mile of track)
  - No road crossings causing issues with train frequency
  - **Central Line apparently operates to a peak of 34 trains per hour . It would appear DART + Costal North may require movements of only up to 15 trains per hour at peak times between Howth Junction and the city centre – with no DART road crossings involved\_ (12 Drogheda and 3 Howth) to facilitate maintaining the Howth direct service in comparison. Less than half the 34 being achieved apparently on the London Central Line and elsewhere.**
- In terms of train movements of up to 15 per hour or every 5 minutes, to facilitate Howth direct service (12 on the main line and the 3 Howth DARTS from Howth Junction onwards). **It is important to note that this only needs to be achieved on the main line from Howth Junction on to Connolly / Grand Canal Docks etc. etc. ....NOT on the Howth-to-Howth Junction section.**

## DART+ Costal North Project – Submission to An Bord Pleanála

- Currently Howth has a direct service every 20 minutes or 3 trains per hour. All the road crossings on the North DART from Connolly to Howth are on the Howth Section of Line (Howth to Howth Junction). There are **3** in total ( Howth Lodge Apartments ; Sutton ; Baldoyle). **As noted thereafter there are no major road crossing from Howth Junction onwards to town.** So, maintaining this frequency and a direct service as is, causes no change to arrangements.
- As noted earlier (Irish Times Article) there may be a need to achieve 12 train movements per hour on the main DART + Costal North Line at peak movements in the future.
- If you add in the current 3 movements on the direct Howth Service, that is 15 movements per hour on the main line (12+3) from Howth Junction onwards, where the current 3 Howth DARTS will join with the 12 from Drogheda.
- This is hugely below the movements of 37 per hour that available literature suggests might be achievable with the use of the latest signalling technology etc and also greatly below what it appears is being achieved on the London Central Line.
- So, it must be asked, with the availability of all the technology referenced in the attached documents, **why the current 3 direct train services to and from Howth could not be routed directly and safely on to the main DART+ Costal Line at Howth Junction without the need for disembarking and changing trains in Howth Junction.**
- 15 trains per hour thereafter from Howth Junction into Connolly and indeed on to Grand Canal Docks (12 on the main line and 3 from the Howth Line) from available literature and the example of the London Central Line would appear imminently achievable with the use of the latest technology.
- **Also critically important to note that from Howth Junction thought to Connolly on to Grand Canal Docks there are no major road crossings. Which is a critical consideration for ensuring train frequency without traffic disruption.**
- The direct service to Howth would have to be integrated at Howth Junction with the main line service for Howth, but this arrangement currently exists and is in operation. Whereby the current direct Howth Service is integrated with the newer DART service to Malahide. And without any difficulty. As noted with modern signalling systems etc, it is difficult to think this current arrangement could not be continued and fully facilitated with regard to the new services from

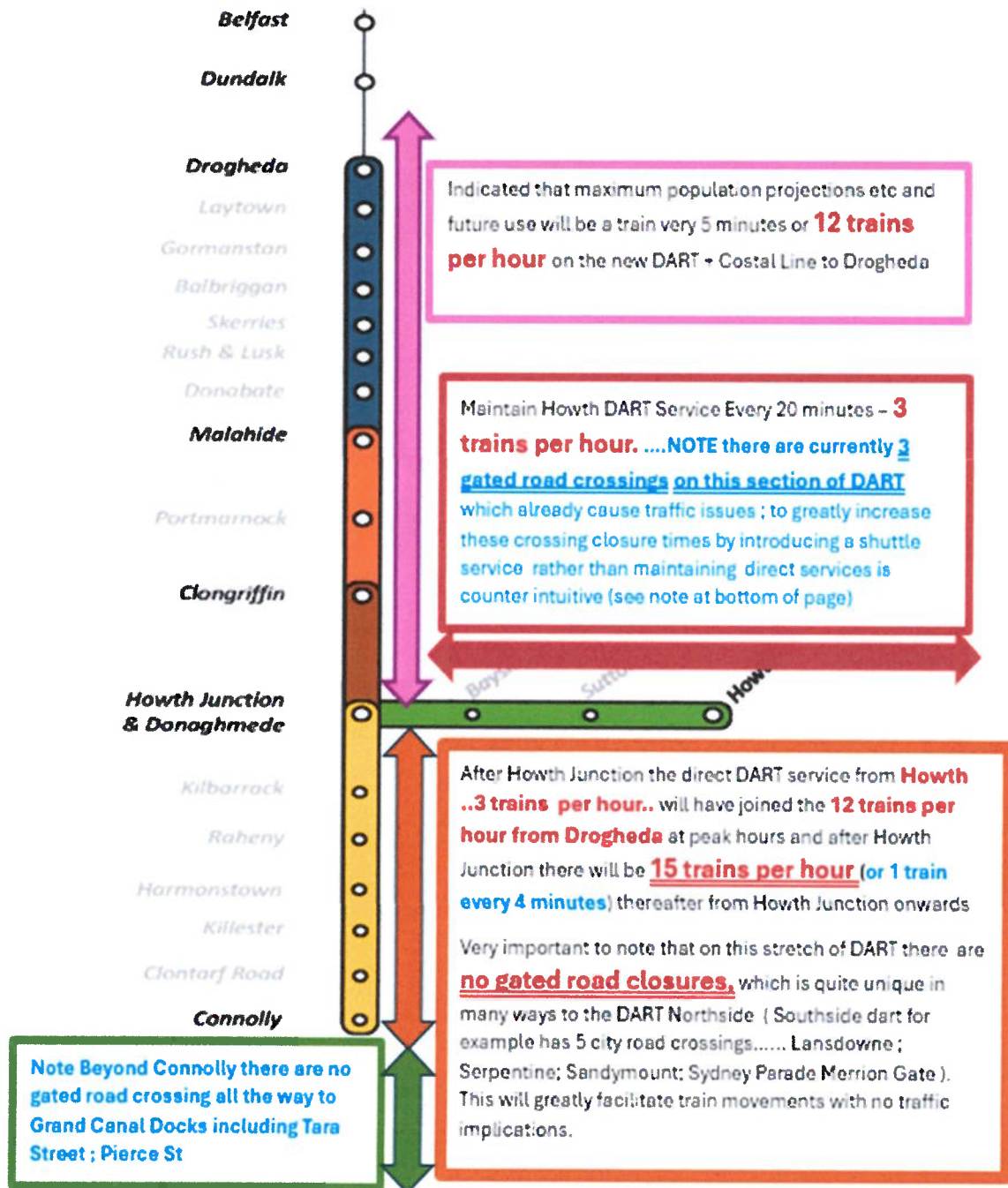
Drogheda (which is an extension to the existing Malahide line in any case). Even if in the worst-case scenario this occasionally might involve a short wait for those on the Howth DART service (whilst passengers remained on board) whilst a mainline train cleared the station. This being infinitely preferable to passengers having to disembark the train in Howth Junction with all the issues around crossing lines, changing platforms, need to use lifts for disabled passengers, security etc, etc, etc.

It would appear therefore that there are clear and available technological solutions to fully maintaining the direct service to Howth, which has clear advantages on many fronts for all involved.

- The current proposal of a shuttle service between Howth and Howth Junction (as part of the DART +Costal North planning application) and the frequency of same will cause huge traffic issues **on the only 3 road crossings that exist on the current line from town to Howth.**
- Why increase the frequency of DART movements (DART shuttle service) on the only section of North DART where there is a high density of road crossings over a relatively short length of track are (3 crossings in total). Greatly increasing traffic disruption to an already challenging traffic position in the Howth area. Also an area where huge numbers of apartments are being built and several large schools , primary and secondary are located.
- It is counter intuitive to do this when, it would appear that it is entirely feasible to facilitate the frequency of trains from Howth Junction on to town needed to maintain current direct DART services form Howth to town.
- Importantly noting that the increase in DART frequency **from Howth Junction to town,** will in contrast to the Howth Proposed shuttle service, cause no traffic disruption (with gates down at level crossings) **as there are no major road crossings on this section of DART line.**
- Finally noting that 15 train movements per hour from Howth Junction to town is greatly below what it would appear it is possible to achieve using modern technology and what is being achieved on similar lines elsewhere. (again greatly assisted by the fact there are no road crossings of the DART line involved.)

**Please see the chart below (over page) which summarise the points made above ;-**

**DART+ Costal North Project – Submission to An Bord Pleanála**

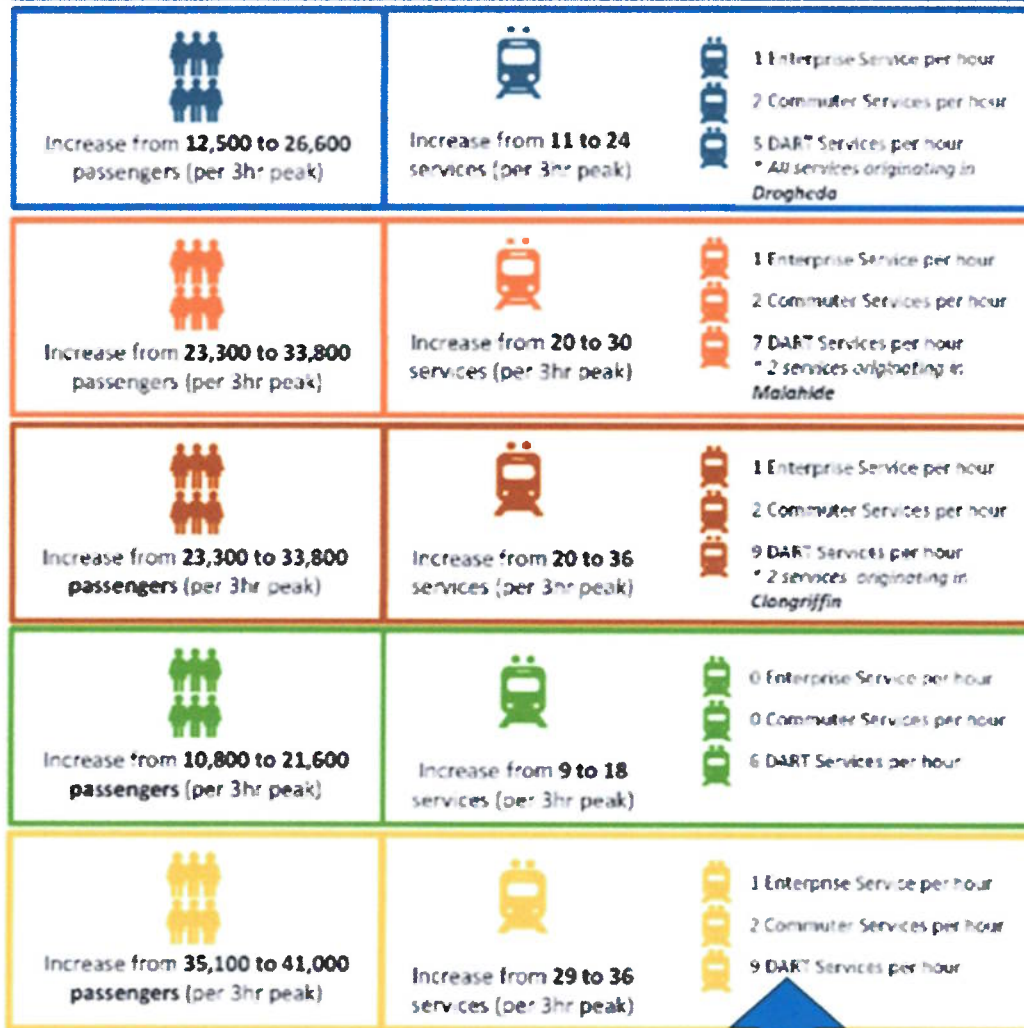


**IMPORTANT NOTE :** Research indicates that with the latest signalling and use of technology, movements of up to 37 train movements per hour can be achieved, and are being achieved on twin track city rail systems. It is important to note that nowhere near this frequency of service needs to be achieved to support the continuation of direct DART services from Howth. In fact all that needs to be achieved to support direct DART services is 15 train movements pre hour on a limited section of track from Howth Junction to City Centre (where 3 services from Howth join the 12 services from Drogheda). Importantly the rail section from Howth Junction into the city centre and for several stations beyond have NO ROAD CROSSINGS, unlike Howth / Sutton / Baldoye which has 3 road crossing on a short section of DART. It is counter intuitive to greatly increase a shuttle service in Howth (causing huge road closures) rather than a small and technically achievable increase in frequency of in services on the Howth Junction to City Centre section which has no road crossings. Also removing the need for passengers to and from Howth to disembark and change trains at Howth Junction, which many people are strongly opposed to.

## DART+ Costal North Project – Submission to An Bord Pleanála

**Note:**

- Enterprise & Commuter Services, originating in Belfast and Dundalk respectively, are expected to continue with current stopping patterns.
- DART Services to have potential to stop at all stations.



**This is presumably a maximum figure of future usage and amounts to 12 trains per hour (1+ 2 + 9)**

It makes no sense at all that anyone would ...!!

- Do away with a 3 DART per hour direct service from Howth and replace it with a higher frequency shuttle service....**on the only section of line from the City Centre to Howth which has any road crossing (3 in total).**  
Causing traffic issues to an area which is already facing serious traffic problems.
- **When instead increasing movements from 12 to 15 trains per hour for a limited length of DART from Howth Junction to City Centre ... a unique section of DART which has no road crossings.....would enable the direct DART service to Howth to be maintained .....with a win....win situation for all involved**
- When research of available technology and similar train lines in London for example suggests **that movements of up to 37 trains an hour are possible with the latest signalling technology /train management systems..... 15 movements per hour is less than half of this.**

### **3. Existing Serious Traffic Congestion ; Greatly Exaggerated and Compounded by the unnecessary introduction of a shuttle DART Service in Howth to Replace the current Direct DART Service (which technically and operationally is not justifiable)**

As matters currently stand the Howth peninsula and surrounding areas are already facing hugely challenging traffic conditions. With traffic backing up very seriously when DART road crossing gates are closed.

Which in turn causes huge health and safety issues on the roads and surrounding areas as traffic backs up to traffic lights and access to houses and businesses and a number of major schools in surrounding areas is badly affected.

It is simply inexplicable and against all logic that it could be suggested that increasing the frequency and length of road closures on the DART section from Howth Station to Howth Junction, **the only section from Howth Station to the City Centre on the DART line which has any gated DART road crossings** is an appropriate or necessary solution or requirement to support the DART + Costal Project.



Particularly where it is increasingly evident that a small increase in the proposed frequency of trains for a limited section of DART line from **Howth Junction to the City Centre** (12 to 15 per hour) will mitigate against the need for this Howth shuttle service. **Particularly as uniquely this section of DART has no gated DART road crossings** which would cause traffic disrupting. In contrast to the much shorter Howth Station to Howth Junction section which has three gated DART road crossings.

And also in the light of clear evidence that modern signalling and train management systems can support train movements per hour greatly in excess of this and these much higher train movements are being achieved on similar track sections elsewhere

**4. Long Established tradition of school children (of all ages) and college students using the DART both from and to Howth and serious concerns and health and safety challenges around having to change trains and platforms at Howth Junction.**

There is a long standing tradition in Howth and surrounding areas for children of all ages to travel to various schools in the City. And the selection of such schools is often heavily influenced by their access to the DART Line or schools which operate direct bus shuttle service to and from the DART Line. There is a huge number of such schools.

Both our son and daughter travelled to schools by way of the DART, one getting a shuttle bus service from Lansdowne and one from Sydney Parade. Both were quite young when they started using them and one of the reassuring things for us was that when we safely saw them on to the DART in Sutton, we knew they would not have to disembark the DART again until they safely got to the other disembarking station. Where they would have a safe and supervised shuttle bus service waiting for them to take them to school. Similarly on the way back there would be a bus from school waiting to bring them to the DART station from where they would then travel directly back to Sutton without having to leave the DART and change platforms etc.

**If you ever stood in the DART stations in Sutton / Howth in the morning and in the evening when children and college students were leaving and returning from their schools you would be overwhelmed by the number of students (many of them quite young) involved. Many of them also hauling large and heavy school bags filled with books.**

Our daughter thereafter went to Trinity using the Pearse Street DART station and our son went to Kevin Street also using the Pearse Street DART. Both of them often returning late

in the evenings after courses/ projects etc. Again we were always reassured that they left Pearse Street and did not have to change platforms/ trains mid-way on their travels.

Unfortunately Howth Junction station has a long standing reputation for challenging and antisocial behaviour, which is well documented. We had discussed with our children safety and coping strategies if this behaviour around the Howth Junction station extend on the DART itself at any stage. And most unfortunately there were examples and times when it did occur at Howth Junction. But fortunately there were adults on the train who were in a position to intervene and mitigate the challenging situations involved (usually unsupervised younger children perpetrating same) or security personnel removed the persons involved from the train.

If our children at the time were forced to disembark the DART mid journey and cross DART lines and change platforms, particularly in Howth Junction station it is highly probable we would not have let our children use the DART and would have had to make arrangements to complete the journeys involved by car rather than public transport (which they always used).

Equally a large number of pupils both secondary and primary travel from other areas to Howth and again they make extensive use of the DART.

The removal of the DART direct service to Howth can only therefore have the effect of moving many children/pupils and their parents away from public transport and into commuting by car.

It will also fundamentally attack and challenge the tradition over many generations of schoolchildren in Howth having safe public transport access to a wide number of schools conveniently located to the main DART line.

### **5. Large amount of new high volume developments recently approved and nearing completion in Howth and surrounding areas ; Very substantial increase in numbers living in Howth and surrounding area ; Questions about planning much of which was based on direct access to the city on direct DART Services.**

There are a huge amount of new developments being built in Howth, some completed, some nearing completion and some due to commence. The scale and volume of these has increased exponentially in recent years.

One of the largest such developments which is clearly evident as you enter Howth is very substantial and has the potential for well over 1,000 to 1,400 people to take up

residency there. It is built directly beside the DART station in Howth with immediate access to the DART. Similarly the largest single apartment development in Sutton has capacity for several hundred residents and is located a short walking distance from the Sutton Dart. Currently work has commenced on developments on the site of the former Grand Howth and there is substantial planning applications for the Deer Park / Howth castle estate. Both of which are immediately adjacent to the Howth DART station.

One of the primary factors in supporting the application for these developments was their adjacency to direct DART services to the city centre. And this inevitably was one of the primary motivators for granting permission to what are high volume developments in an area that previously had no such developments.

**It feels like a huge betrayal of local trust, and of people who supported providing essential housing in the area (high density developments), that having approved and supported these developments,... the direct Howth DART service which was used for justifying them is now to be removed.**

We really would suggest that an Board Pleanála visit Howth and see for themselves the development which is nearing construction completion immediately adjacent the Howth DART station and see for themselves the scale and bulk of this development. We are not objecting to this development which seems of a high quality, but very much objecting the withdrawal of the direct DART service supporting it.

### **6. Access and Health and Safety Issues for young people ; elderly people and people with disabilities at Howth Junction ; disembarking Howth DART , changing platforms, crossing bridges, arriving on different platforms, waiting on platform for next train, getting on next train...etc..!**

We have already touched on the issue of young people travelling on the DART and the strong tradition in Howth, Sutton , surrounding areas of many young people travelling on the DART to school etc.

This change of DART would be most concerning on any station, but occurring as it would in Howth Junction is particularly concerning. We acknowledge of course that the great majority of people living in the area and using the Howth Junction DART are good , law abiding people, but there is a substantial minority who is it is simply a record

of fact have engaged in very worrying anti-social behaviour at Howth Junction in particular.

As noted earlier, when our children were young and travelling daily to and from school on the DART, we had discussed and agreed with them protocols and coping strategies, particularly around any anti-social or threatening situations they might encounter around Howth Junction on their trip. And unfortunately they did encounter and see such incidents. Not by any means on a regular basis, but often enough to be of great concern to us. It was however somewhat reassuring that the incidents involved were sometimes observed on the platform from the safety of the DART, or when such behaviour did extend on the DART itself, they were generally in a carriage with responsible adults present.

We can say with absolute certainty if our young children were required to make the transfer of DARTS at Howth Junction now being proposed as part of the DART+ Costal North project, we not be happy for them to use the DART. And would not have used it.

**Irrespective but certainly compounded by strong security concerns relating to Howth Junction, the proposed challenging transfer arrangements proposed for Howth Junction as part of the DART + Costal North Project is hugely concerning also for elderly persons, many with mobility issues, people with disabilities, poor sight etc.**

At the moment for example people with disabilities can safely get on the DART, in Howth, surrounding areas, accompanied to the station by loved ones as might be necessary, and arrive directly to their city centre station. **The city DART stations have nothing like the convoluted and challenging transfer arrangements in crossing platforms etc, that are now proposed for Howth Junction** and none of them having a situation whereby people having disembarked the DART are expected to wait on another platform for another DART.

Equally in some cases it is not unusual for young persons, elderly persons, or persons with disabilities to be met at the other end of the DART by persons who can assist them. Often with prior arrangement of family, carers, school authorities etc.

We can attest to this with regard to our own children, who were met at, and in the afternoon/evening brought back to the DART stations by organised school shuttle bus arrangements. In all cases with a responsible adult on the bus who knew the children involved and often built up a strong rapport with them.

In such a scenario which can also apply to elderly persons and persons with disabilities, are we now to assume we must be expect to arrange an intermediary to be in Howth Junction to try and identify such people and see them safely across platforms and on to another train. Such an arrangement is simply not tenable.

**The transfer proposed at Howth Junction is a shocking and quite frankly distressing incursion on the existing rights of people who have lived in Howth for many generations, their children, and new families who have moved to Howth on the basis of the safety and security of direct DART service to the city centre.**

An incursion on the existing rights of their elderly parents, on their young children, or relatives, friends who may have challenging disabilities.

### **7. Impact on the Business and Professional Life of Howth and surrounding areas. A hugely negative impact on tourism/ visitors to the area, which the local economy is hugely reliant on.**

Earlier we made reference to the very serious traffic issues in Howth and surrounding areas generally. Greatly compounded when the gated DART road crossings are closed, resulting in tailbacks on both sides of these gate . Which will be hugely and unacceptably seriously exacerbated if a shuttle DART service is introduced on the Howth DART line.

Issues which are already impacting on businesses and schools in in the area, with often long traffic tailbacks in the Howth and surrounding areas , meaning long delays and already dissuading people from doing business in the area.

Equally as a result of actively promoting Howth, (by government, planning and local authorities ) as a special amenity area and attractive to tourism, businesses in Howth have become hugely reliant on tourism and visitors to support and sustain the local economy and support local employment.

**The vast majority of tourists arrive to Howth by DART and this is clearly evident to anyone who observes the DART in Howth and the flow of passengers to and form it.** The provision of a direct service from the city centre is obviously hugely important in maintaining the area as a tourist attraction.

Anyone would know when travelling abroad themselves that getting on a direct train service to a destination, while staying in a new and often unfamiliar city is a huge attraction in travelling to a designated seaside/ tourist area. Being advised that they must now change DART in an unfamiliar suburban station, waiting on platforms for another train etc, is a huge disincentive. Equally the historical challenges/issues with Howth Junction are well known and with modern on line forums and active reviews of tourist related issues, any difficulties with regard to issues/areas in any city are quickly posted on line and circulated widely.

**There can be no doubt that the removal of Howth's direct services will impact hugely negatively on tourism in the areas and** tourists will simply look at making trips to resorts/ seaside areas/ harbours which have a direct DART line. In all likelihood hugely damaging businesses in Howth and overloading other areas which are already attractive tourist destinations.

The residents of Howth have long accepted and embraced much of the areas planning designation as a special amenity area. With constraining policies about planning permission being granted often to existing residents who may wish to try and provide a second house in their properties for family etc. It has world-wide recognition (in The Lonely Planet international guide book etc) for its beautiful cliff walks and trails and its unspoiled natural beauty and views, its bustling harbour and wonderful restaurants. Repeated government and local authority initiatives have rightly actively promoted this, and as a result encouraged businesses to be developed to cater for this tourism. With a huge number of jobs dependant on these businesses.

**Are we to be now told that after all this investment and active encouragement of developing a tourism/visitor based economy in Howth that the very transport infrastructure which supports it, and is the lifeblood of it, is to be modified and changed in a way that will clearly discourage tourists from now travelling to Howth .**

This is simply unacceptable and offhand treatment of peoples businesses and livelihoods.

- 8. Many people in Howth and surrounding areas, purchased their properties for themselves and their families primarily on the basis of a direct and accessible direct DART service from Howth/surrounding areas to the city centre and there will be an**

**inevitable negative impact on Property and Values in the Local Area. .**

We moved to Howth nearly 40 years ago. One of the main reasons, and in fact the main reason for purchasing our first house in Binn Eadair View was that it was within a hundred yards of a direct and regular DART service to the city centre. We have since moved house twice as our family grew and both houses have been within a very short walking distance of the Sutton DART station.

We have used it and our family have used it over many decades.

The removal of this direct service will greatly undermine the attractiveness and value of property in the area, much of which has been purchased recently by young families (for the very reason there is a good/direct DART service) with often large mortgages. Possibly plunging such people in to negative equity in their homes.

**In an era when public transport and sustainability are to the fore and areas are being promised improved public transport arrangements, Howth and surrounding areas seem to have been ignored and instead of improvement in public transport facilities we are being threatened with a huge reduction in the quality of our already existing transport infrastructure and one which we have enjoyed over the best part of half a century.**

**9. The very strong likelihood that Grouphink is now impacting negatively on the final planning application now submitted for the DART+ Costal North, with regard to continuing with the proposed Howth shuttle DART service option .....and the strong argument for a third party check /ORAL hearing**

As this project has progressed with public consultation and feedback from people on the ground who use the Howth DART service over many years/decades there is a growing sense that at an early stage in the process the decisions was made by the authorities involved to reduce the long standing DART service to Howth to an indirect shuttle service. And that decision was not really up for any meaningful review or consideration thereafter.

Despite huge public feedback from those in Howth and surrounding areas clearly pointing out and demonstrating the hugely negative impact this proposal will have. It clearly has been pursued with an evident single minded determination by those involved in managing and overseeing it.

During public consultations, when information has been sought about the logic and technical justification for this decision making, and if alternatives have been properly reviewed and considered, the responses have been vague and evasive and obviously overly defensive with regard to maintaining the original solution proposed and invested in. Even when clear cases have been presented and mounting technical evidence provided to the relevant authority that it is not the right decision, and that alternative solutions exist which will mitigate and indeed completely remove the negative aspects of the current proposal.

**This is not to be overly critical of the persons involved, as groupthink is a very natural and all too regularly occurring human phenomena, which we are all occasionally subject to.** But what it does highlight is the critical importance of having checks and procedures in place to mitigate the negative impact of groupthink and ensure it does not improperly influence the decision making process. **This is particularly important on a large and complex infrastructure project such as DART+ Costal North Project, and is often to the benefit of the persons themselves who unbeknown to themselves have inadvertently gotten caught in a group think environment**

**Below is an overview of some of the key groupthink phenomena, which we increasingly feel is becoming evident with regard to the DART+ Costal North Project, and the persistence in adhering to the original proposal for the replacement of the direct Howth DART with an indirect shuttle DART.**

- **Collective Rationalization:** The group collectively rationalizes warnings or negative feedback that might suggest a need to change course. Members convince themselves that their strategy is right despite clear evidence to the contrary.

Residents of Howth and surrounding areas feel their multiple submissions and warnings around the negative impact to the Howth DART proposal is being ignored. Also their submissions around much more workable and less disruptive alternatives are not receiving appropriate due diligence or consideration.



- **Stereotyping of Outsiders:** Groupthink can lead to a dismissive view of anyone outside the group or alternative perspectives. Opposing viewpoints or external criticisms are often seen as uninformed, biased, or hostile.

Certainly in Howth and surrounding area there is a growing sense of frustration with what is perceived as the failure of the relevant authorities to listen to the local populace. Despite huge public feedback. And indeed a sense that the real concerns and feedback of the local residents being dismissed.

- **Sunk Cost Fallacy:** Groups may continue a failing strategy because of the psychological investment in previous decisions. They feel that abandoning the strategy would mean wasting time, resources, and effort already spent. Even if abandoning or modifying the original proposal is clearly in the long term interests of the project itself.

As per this submission, residents in Howth and surrounding areas are now fully and genuinely convinced that the relevant authorities are reluctant to review and re-consider a patently sub optimal solution with regard to future DART services to Howth and that this groupthink is very likely a contributing factor to this continued resistance to local concerns and alternative solutions.

- **Commitment and Consistency Bias:** Once a decision is made, there's a strong psychological drive to remain consistent with that choice. Groups may continue down a flawed path to avoid appearing indecisive or acknowledging they were wrong.
- **Fear of Admitting Failure:** Groups may fear the repercussions of admitting a mistake, including loss of credibility, power, or financial consequences. Admitting failure can feel personally and professionally threatening.
- **Escalation of Commitment:** Groups might double down on a failing strategy as a way to justify their past decisions, hoping that additional effort or resources will eventually lead to success.

There is a growing sense of frustration in Howth and surrounding areas that the above behaviours are becoming evident **with regard to the decision making around the removal of Howth's direct DART service and replacing it with an indirect a patently inferior indirect shuttle service.**

In these circumstance the need for mitigation measures to address this very understandable and all too often human response of groupthink. **And it is absolutely essential that as part of An Board Pleanála’s review that these mitigation measures ae implanted.**

Ensuring that groupthink does not unduly influence decision making around a project and result in a sub-optimal and damaging outcome. Measures such as the following need to be seen to have been properly implemented , with demonstrable proof that they have been implemented.

- **Encourage Open Dialogue:** Foster an environment where dissent is welcomed and opposing viewpoints are encouraged, properly reviewed an considered.

A strong belief now in local areas that dissent and opposing viewpoints have not been encouraged and considered.

- **Appoint a Devil’s Advocate:** Assign someone the role of questioning the group’s decisions, helping to expose weaknesses in the strategy.

We have seen no real evidence that alternatives to the cancellation of Howth’s long standing direct line were ever properly considered., or reviewed with any expert third party.

The only devil’s advocate on the project to date has been the local populace.

- **Seek External Opinions:** Bringing in outside perspectives can help counteract the insular thinking typical of groupthink.
- **Promote Independent Thinking:** Encourage members to evaluate options independently before group discussions to minimize conformity pressures.
- **Structured Decision-Making:** Use structured techniques, and methods or nominal group technique, to gather individual opinions before converging on a group decision

As part of the public engagement to date, there is now a clear groundswell of local opinion that despite a huge attendance at meetings, many submission and feedback etc, that really the persons involved in progressing the DART+ Costal North project were only paying polite lip service, **and that the public engagement was a box ticking exercise to rubber stamp the decision that had made at an early stage in the whole process and before any proper engagement with wider groups.**

This opinion has now been strongly reinforced by the planning application (Railway Order Application) that has now been lodged with An Bord Pleanála. It is evident that this application has played little or no attention to the huge local feedback from Howth and surrounding areas. It has not addressed in any meaningful way the deep local concerns which were presented in a factual and comprehensive fashion to the authorities involved. They have also clearly ignored the clear alternatives which are available to provide alternative solutions, which would allay local fears and we believe actually enhance the whole offering.

The final planning submitted offers what are largely cosmetic changes to the DART station in Howth Junction, which offer no real solution to the points raised repeatedly during local engagement and ignore the real issue of concern which is to maintain the direct DART service to Howth . Adhering rigidly to the original plan the authorities have decided is the right one from day one. When there is now clear and growing evidence to the contrary. **A clear and classic example of Groupthink, now negatively impacting the project**

**This highlights the absolutely essential need for An Bord Pleanála to thoroughly investigate and challenge the assumptions around the withdrawal of the Howth direct DART service as part of the overall DART + Costal North Project . Which as set out in this commentary we believe is unnecessary, counterproductive and will greatly tarnish the reputation of an overall welcome extension of the DART service to Drogheda.**

**And in support of that principle to request an ORAL hearing if this is deemed necessary.**

## 10. Conclusion / Summary

It is quite clear that the withdrawal of the direct DART service to Howth will have devastating effects on Howth, Sutton Baldoyle and Bayside and indeed other adjoining areas. The main ones of which ( but by no means all) we have addressed in this submission.

Despite repeated representations to the authorities in charge of this project about these deeply concerning issues and clear evidence of much better , technically feasible

alternatives being available, they (the authorities) have persisted in proceeding down the line of removing Howth's direct DART service.

In what is becoming an increasingly defensive approach to their original proposal which they appear overly invested in and unwilling to consider alternatives. Despite these alternatives clearly being available and greatly mitigating the negative impact of the removal of the Howth direct DART service.

Instead the final planning as now presented to An Bord Pleanála, make what are largely cosmetic changes to the Howth Junction changeover of trains, which completely fails to address any of the real concerns, repeatedly highlighted to them

This approach is clearly indicative now of Groupthink, a human emotion which we can all be guilty of. But where it is impacting on a major infrastructure project, to the clear detriment of that project, then it needs to be challenged and mitigation measures implemented

We are hopeful and expect that an Bord Pleanála will challenge this Groupthink and protect and ensure that the Howth direct DART service is not removed, as to do so is

clearly detrimental on so many fronts and not at all necessary or justified. Much better alternative solutions exist which will greatly improve the whole DART+ Costal North project.



## **Appendix 1**



## European Rail Traffic Management System (ERTMS)

ERTMS is a single European signalling and speed control system that ensures interoperability of the national railway systems, reducing the purchasing and maintenance costs of the signalling systems as well as increasing the speed of trains, the capacity of infrastructure and the level of safety in rail transport.

### Page content

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The European Rail Traffic Management System (ERTMS) is a single European signalling and speed control system that ensures interoperability of the national railway systems, reducing the purchasing and maintenance costs of the signalling systems as well as increasing the speed of trains, the capacity of infrastructure and the level of safety in rail transport.

ERTMS comprises of the European Train Control System (ETCS), i.e. a cab-signalling system that incorporates automatic train protection, the Global System for Mobile communications for Railways (GSM-R) and operating rules.

Technical specifications for ETCS and GSM-R are published in the [Control Command and Signalling \(CCS\) Technical Specification for Interoperability \(TSI\)](#).

GSM-R provides voice communication for train drivers and signallers and provides data communication for ETCS. ERTMS and GSM-R rules are published in the [Operation and Traffic Management TSI](#).

ERA plays the role of system design authority for ERTMS. In that respect, it must establish a transparent process to manage, with the contribution of the sector's representatives, any [system changes](#).

# INCREASING INFRASTRUCTURE CAPACITY

## HOW ERTMS IMPROVES RAILWAY PERFORMANCE

Today, railway operations in several parts of the world and in Europe in particular require a constant and increasingly intense flow of trains on busy routes. By allowing a reduction of headways between trains, signalling systems play a major role in increasing capacity on railway networks, as more trains can run on the same track. Whilst the primary objective behind its creation was to ensure interoperability in Europe, ERTMS also offers considerable benefits in terms of infrastructure capacity, which explain its increasing success outside Europe.

### How can signalling affect rail infrastructure capacity?



Whilst signalling originally aims to control railway traffic safely and avoid collisions between trains, it increasingly plays an important role in increasing capacity, i.e. influencing the number of trains on a given line and the distance between them, and has therefore become a crucial part of railways' competitiveness. In the early days, "Movement Authorities" (i.e. the command for a train to continue its run at a given speed or brake in order to stop at a given location) were passed on to train drivers by flagmen or elevated flags located on the various sections of the track. These were replaced over time by lineside signals (traffic lights) which are nowadays still largely present on most railway networks. However, the emergence of High Speed trains and the need to ensure a higher level of safety led to the emergence of Automatic Train Protection (ATP) systems in the 1970-1980s. As opposed to the previous lineside signalling systems, ATP will automatically apply the brakes if the driver fails to respect the Movement Authority – thereby removing the risk of a human error and allowing for higher speeds and shorter headways between trains.

### Is signalling the only way to increase capacity on a given rail network?

No. There are a number of options to increase capacity, from building additional lines or renewing existing tracks, lengthening trains and loops or platforms, to operating more frequent services and higher density trains. However, by opting for a modern signalling system like ERTMS, which can be combined with ATO and/or Traffic Management Systems, operators may easily increase the frequency of trains on a given line. Instead of building another line or length-



### What gains can be expected from moving from a conventional trackside signalling system to a cab-signalling ATP system like ERTMS?



Infrastructure capacity is always a result of several technical and operational factors, and this makes it difficult to provide a generic figure. However, it is commonly acknowledged and demonstrated by experience that the use of an ATP system like ERTMS with an appropriate block system enables up to 40% capacity increase on currently existing infrastructure. This is considerable and explains why countries all over the world are massively opting for ERTMS when building new lines or resignalling their network, with nearly 50% of the total ERTMS sales being made outside Europe.

## There are already a number of ATP systems already in operation. Does ERTMS offer any additional capacity as compared to them?

As the most recent signalling system, ERTMS is publicly acknowledged to have better performance in terms of capacity than its predecessors. This is due to the cab signalling features and the ability of ERTMS to take into account the braking compatibilities of each individual train – thereby allowing for shorter headways between trains and higher speeds.



## Does ERTMS level 2 enable higher capacity increase than level 1?



Basically, the use of ERTMS level 2 can offer considerable advantages in terms of capacity increase. Indeed, when using level 2 a continuous stream of data informs the driver of line-specific data and signals status on the route ahead, allowing the train to reach its maximum or optimal speed but still maintaining a safe braking distance factor. This therefore enables higher operational speeds and reduced headways (see dedicated factsheets #3 on “ERTMS levels”). In addition, ATO (Automatic Train Operation) can be added to ensure that very short headways are maintained in a real operational setting, installed system making their jobs more complicated and increasing potential risks.

## Concretely, how many trains per hour can run on an ERTMS line?

As already mentioned, this depends on a variety of factors which make it difficult to provide a generic estimate. A 2008 study by RWTH Aachen University (Institute of Transport Science) for the International Union of Railways (UIC) provides a first estimates of the line capacity when using different ERTMS levels, concluding for instance that using ERTMS level 2 with optimised block sections allows to have a minimum headway of only 2.51 minutes between two high speed trains and 1.62 minutes between regular intercity trains, depending on the assumptions. In practice, real gains can however be calculated by taking examples of ERTMS lines which are already in operation. A typical example of a high-capacity ERTMS lines is given in the Swiss case of the Mattstetten – Rothrist line, which operates in level 2. An estimated 242 trains – both freight and passengers run on the line every day, at speeds of up to 200 km/h. The headway between trains has been reduced to less than two minutes (110 seconds), allowing for a considerable capacity increase! SBB infrastructure manager reported (ETR, September 2008) a 15% capacity increase with ERTMS Level 2 on already optimised lines. In case of lines with mixed traffic (passengers plus freight), a capacity increase of up to 25% was reported. Many other examples may be found, such as the Thameslink line with ETCS and ATO to achieve an increase from 16 to 24 trains per hour, the LGV Est in France with designed headways of 110 seconds at 300km/h or the planned ETCS Level 2 upgrade of the Paris – Lyon HSL due for completion in 2024. For Paris – Lyon, the ETCS installation will increase the capacity from 13 to 14 trains/h in each direction at peak times. Further infrastructure work including the electronic interlockings and traffic management system will enable the ETCS to deliver a throughput to 16 trains/h by 2030.

## Is this ‘capacity advantage’ of ERTMS recognised globally?

Yes. All across the globe, ERTMS is seen by the railways as “the” way to increase capacity on busy routes. For instance, ERTMS is already in service in the route between New Delhi and Agra (one of the busiest lines in India) and is in service in Mexico City suburban line Cautitlan – Buenavista, as well as in busy parts of the dense Chinese railway network. Together with other advantages, capacity increase has made ERTMS a very successful standard across Europe (see ERTMS factsheet #7 on “Deployment outside Europe”) as well as the most demanded signalling system elsewhere for new and upgraded lines.

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It currently operates the second-most frequent service on the network, with **34 trains per hour** (tph) operating for half-an-hour in the westbound direction during the morning peak, and between 27 and 30 tph during the rest of the peak.

### 49 stations

The Central line is a London Underground line that runs through central London, from Epping, Essex, in the north-east to Ealing Broadway and West Ruislip in west London. Printed in red on the Tube map, the line serves **49 stations** over 46 miles (74 km), making it the longest line on the Underground.

 Wikipedia

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[Map](#) [Timetable](#) [Time](#)

Showing results for ***how many station in howth to connolly dart line***  
Search instead for [how many station on howth to connolly dart line](#)

The DART train (Howth→Dublin Connolly) has **10 stations** departing from Howth and ending at Dublin Connolly. Choose any of the DART train stations below to find updated real-time schedules and to see their route map.

Search for: [How long is the DART from Dublin to Howth?](#)

How long is the DART in Dublin? ^

The DART serves 31 stations and consists of **53 route kilometres** of electrified railway (46 km (29 mi) double track, 7 km (4.3 mi) single), and carries in the region of 20 million passengers per year.



# More Drogheda trains may curtail direct Howth Darts

MARTIN WALL

Passengers travelling to and from Howth, Sutton and Bayside into Dublin may have to change trains along the way in the future as the direct service faces curtailment to make way for more frequent services between Drogheda and the city centre.

Commuter trains on the line from Drogheda to Dublin may need to run at a frequency of every five minutes to cater for a projected surge in population in the area in the years ahead, transport chiefs have forecast.

The National Transport Authority (NTA) has warned such a development would lead to curtailment of existing direct services from Howth to Dublin city. The NTA said it "may be possible to still run some direct train services from Howth to the city centre at a certain time during the day". It said this would be assessed when detailed timetable modelling was carried out at a later date.

However, it suggested that many passengers would have to change at Howth Junction where a faster shuttle service would serve the existing stations at Bayside, Sutton and Howth. At present, trains to and from Dundalk, Drogheda and Belfast share the same tracks as Dart services to and from Howth on the section of line between Connolly Station and Howth Junction.

At the moment, there is mainly a 20-minute service frequency to Howth and the same to Malahide from Dublin city centre. The NTA maintained that the current arrangements

would come under pressure in the face of increased demand for services on the northern line. "It is envisaged that, in the future, a frequency of up to five-minute services will be needed on the northern line to cater for the forecast passenger numbers. This would represent, effectively, the operational limit of the twin-track northern line and, accordingly, the capacity wouldn't be available to run additional trains directly between Howth and the city centre."

Fingal County Council, which covers much of north county Dublin, sees itself as the "growth outlet for housing in the Dublin region". It believes that given its location and space available, its population - which stood at about 330,500 in 2022 - could increase to 350,000 by 2031.

The NTA told Social Democrats TD Cian O'Callaghan in reply to a parliamentary question it was proposed that, at some point in the future, the Dart service pattern would be changed.

It said under such a plan Dart services running to Dublin city centre would operate mainly on the northern line (Connolly-Malahide-Drogheda), and the route between Howth Junction and Howth would operate mainly as a feeder shuttle. "In such event, it is proposed that a high-frequency Dart shuttle would be put in place between Howth and Howth Junction, operating at a frequency of every 10 minutes or better. The frequency of trains to Howth, albeit on a shuttle service from Howth Junction, would at least double under this proposal."

