



Submission to the National Transport Authority on the BusConnects Core Bus Corridor Public Consultation

December 2020

Dublin Chamber is a strong supporter of public transport and recognises its importance to the success of Dublin. Businesses throughout Dublin need an effective public transport system for both their employees and consumers alike. Dublin Chamber commends the National Transport Authority (NTA) on its development of a new and improved bus network for the Dublin region. The Chamber is broadly supportive of the BusConnects proposal and has repeated this in various submissions. We also recognise the substantial work that has been carried out by the NTA to examine the suitability and functioning of the current network and to utilise the significant feedback generated during the public consultation period.

BusConnects is one of a number of essential improvements needed to deliver the world-class and sustainable public transport system that the city needs. We share the NTA's ambition for more people to use public transport and for Dublin to have a public transport network that rivals those in the best cities in the world.

The delivery of a much-improved public transport system will require a significant increase in the level of investment in public transport services by central Government to address the shortfall in investment of the past decade. This is particularly true in the case of the bus network, with respect to which the amount of money available limits the ability of the NTA and transport providers to deliver a reliable, consistent, efficient and – importantly – sustainable service.

Overview of Dublin Chamber Position

Dublin Chamber is broadly supportive of the BusConnects project. The proposed redesign comes at a crucial time for Dublin. With the city's population budgeted under the National Planning Framework to grow by 25%, and where previous forecasts of the city's growth have been exceeded, congestion is and will remain one of the most significant challenges facing the Dublin region. If Dublin is to achieve its aim of becoming a sustainable and dense city the role of public transport must dramatically increase, and the BusConnects Core Bus Corridor project is needed now more than ever.

Dublin Chamber particularly welcomes the ambition put forward in the BusConnects plan to:

- Increase bus priority throughout the city, particularly in the core city centre.
- Improve and simplify fare structure and ticketing options.
- Improve bus speeds, reliability, and punctuality.
- Deliver an efficient, low carbon and climate resilient public transport service.
- Reduce the quantity of routes and buses travelling through the city centre while increasing the frequency of city centre services.
- Enable compact growth and regeneration by better connecting the city and making more efficient use of and access to land.
- Improve walking and cycling infrastructure alongside (and in coordination with) the bus network changes.
- Ensure the public realm is carefully considered alongside the delivery of and development of transport infrastructure.

Following the extensive public consultation process undertaken by the NTA we are satisfied that these aims remain at the forefront of the Bus Corridor Project. The changes proposed address specific gaps and needs that arose during the consultation process but crucially do not damage the integrity of the original design.

A more detailed outline of the Chamber's view is included in the remainder of this document. We look forward to working further with the NTA on the BusConnects proposal over the coming months.

The Need for a Network Rethink

As stated in previous submissions the Chamber believes that the current bus network in Dublin is no longer adequate for the city and we support the decision to revise the network. The Chamber has long advocated for modal shift to public transport. For Dublin to function as a modern, sustainable, and smart city with a high quality of life it needs an efficient and reliable public transport system.

Dublin is significantly behind where it needs to be to meet the demands of the current population, a population that is predicted to grow steadily over the next few years. This is due to poor forward planning and a disconnect between land use and transport planning that has occurred over many for years.

In particular, the failure to deliver underground mass transit solutions over the past several decades has left Dublin's transport system in a far from desirable state. Dublin Chamber has welcomed the emerging preferred route for the MetroLink and outlined its support for the DART+ West and Luas Extension projects in recent submissions, and it is anxious that these urgently needed infrastructure projects get approval after many years of discussion. It is disappointing to see the DART Underground is not on the list of priority infrastructure projects in the existing National Development Plan. For Dublin to effectively manage its transport needs and reduce congestion, all of these large infrastructure projects need to be implemented, including BusConnects.

The continued prosperity of Dublin is dependent on an improvement in the city's public transport network. Dublin Chamber's Vision for Dublin 2050 recognises the importance of a world-class public transport to a high quality of life being available in the city. The people of Dublin desire a city that is easy to move around, and where public transport is reliable, sustainable and efficient. Dublin Chamber believes that the desired commute time of no more than 30 minutes should be achievable from anywhere within the M50 to the city centre by the year 2050.

There is an urgent need for better integration of the various public transport modes in Dublin. Currently, there is an inadequate level of synchronisation across the various modes. This situation unfortunately did not improve as frequencies were increased on the DART and commuter rail lines last year. Particularly during peak commute times, trains become increasingly crowded as they moved closer to the core of the city, and there are significant capacity issues which make transferring from one service to another undesirable, and in some cases, impossible.

Dublin: The 15-Minute City

In response to the ongoing problem of congestion within Dublin, the emerging trends in flexible working and the policy requirement for compact growth and urban density, the Chamber recently produced a report setting out our vision of Dublin as a 15 Minute City.

Dublin Chamber's vision is that within 15 minutes of active transport (i.e. walking or cycling) from their home, Dublin residents should:

- Have access to a key public transport hub to commute around the city to access work or higher-level services;
- Be linked to their local community through safe, accessible, and well-connected footpaths and cycle paths;
- Have access to an open greenspace and high quality public realm;
- Have facilities and services that facilitate local living and support a local economy.

Good public transport, and projects such as BusConnects, are essential to realise the vision of a 15 Minute City. In creating 15 minute communities, Dublin must also link them together and into the wider city using public transport. Our report details how modal change can be achieved if people can access reliable and efficient public transport within 15 minutes of their home, to commute to work or access the wider city.

One of the main issues in transforming a city like Dublin is to plan for modal shift to public transport while also ensuring that the transport system still functions for all its users, including businesses, those making deliveries, and those who need to use private cars, maintenance and emergency vehicles, and buses and taxis. The focus of public transport has historically been on bringing people from the outer edges of the city into the city centre. To increase connectivity, and support the objectives of a 15 Minute City, Dublin needs to move to a grid or network model of public transport that connects more areas to each other, rather than just connecting them with the city centre.

BusConnects represents the first in a series of essential improvements that are needed to deliver the world-class and sustainable public transport system that the city needs. It also represents a change in public transport delivery in Dublin by reducing the need for bus routes to go through the city centre, and creating orbital routes better linking communities together, along with the roll out of segregated cycle lanes. This new approach will reduce interchange trips in the city centre, which is under significant congestion pressure, and support the vision of having more local, multi-use areas that are self-sustaining in the suburbs.

Core Bus Corridors

Dublin Chamber reiterates its support for the Core Bus Corridors Project and supports the principle of creating central corridors or spines along the main arterial roads in Dublin. This is reminiscent of the hugely successful 'Finger Plan' in Copenhagen, though the Dublin version will run over-ground as opposed to underground.

The creation of these spines will require more dedicated road space for buses. Increased bus priority will be essential to achieving a frequent and reliable service. Dublin Chamber welcomes the NTA's intention to run buses on these routes at a frequency of between 4 and 8 minutes.

Increasing the amount of dedicated space for buses will ultimately mean less room for cars. While this may have the effect of slowing some car journeys through the city, it is hoped that it will also encourage more people to take public transport. In this manner it would support the Chamber's vision of a 15 Minute City. According to the Canal Cordon Reports since 2010, there has been a trend of increasing modal share for sustainable transport modes, walking, cycling and public transport, with consistent levels of increase each year. In 2018 this figure peaked at 70%, its highest level since 2006.¹ Correspondingly, there has been a year-on-year decline in proportional car usage. Dublin Chamber welcomes this trend but cautions that it will only continue if bus services are made as attractive as possible. This will require frequent services (no less frequent than every 5 minutes) at peak times.

Feeder & Orbital Services

The ultimate success of the corridors will depend on how well they are fed by other services. The lack of good orbital routes has been a major gap in Dublin's bus network. Too often, bus users are forced to come into the city centre first if they wish to travel to another part of the city.

Dublin Chamber recognises the considerable work carried out by the NTA in consulting with communities on local services. We believe that local communities and users are best placed to offer feedback on how local routes can be improved. Dublin Chamber also notes the considerable resistance to some of the proposed changes during the consultation phase. In this

¹ The National Transport Authority, 'Canal Cordon Report', 2019; https://www.nationaltransport.ie/wp-content/uploads/2019/04/Canal_Cordon_Report_2018.pdf

iteration of the BusConnects programme the NTA clearly shows for each corridor the feedback they received through the consultation process and how they have addressed, where possible, the issues raised.

Interchanges

The network redesign is based on the assumption that passengers are willing to change buses to enable them to get to their destination sooner. This fundamental shift in how the bus network functions will require attention to the needs of passengers who are interchanging. The original consultation process revealed people have significant concerns about the interchanges. This is particularly the case for elderly users or those with disabilities, and there are legitimate concern regarding the required infrastructure surrounding these interchanges. The Chamber notes the NTA's commitment to work with local councils to improve stop locations and pedestrian facilities which will enhance accessibility.

Interchanges between orbital and radial routes are junctions where such facilities may be necessary. An audit should be carried out to identify bus stops in close proximity to Luas stops, DART stations, and other key transfer hubs to assess the requirement for facilities. The security and safety concerns of passengers as they interchange must also be taken into account, and consideration must be given to the development of interchange hubs outside the city centre.

Facilities should mirror those offered in modern train stations where possible. All bus stops should benefit from good public street lighting. At larger and busier stops, shelter should be provided along with enhanced community CCTV. Smart Cities around the world have developed bus shelters that include heaters, electronic interactive maps, green roofs and solar panels. Partnerships could be examined with advertising companies here, learning from the success that was achieved in the roll out of DublinBikes.

Active Transport

Dublin Chamber has long been strong a advocate for the progression of the Greater Dublin Area Cycle Network Plan. Due to the Covid-19 crisis there has been significant demand for greater infrastructure for active transport. Segregated cycle paths and dedicated active transport infrastructure will support modal change and help to realise the Chamber's ambition of a 20% modal share for active transport by 2030.

The proposals outlined in this consultation also detail the extensive cycling and active transport infrastructure that is to be rolled out alongside the core bus corridors. A greater focus needs to be placed on the supporting infrastructure to encourage and enable modal change. More must be done to cater for start-of-journey and end-of-journey active transport. The plan needs to include steps to promote integrated active transport by enhancing facilities at key transport interchanges. Greater provision of park and ride facilities, secure bike parking and legislation for innovative micro-mobility schemes, such as e-scooters, are all important in supporting 'last mile solutions'. Further integration of bike sharing schemes with bus stops and train stations should also be examined to give public transport users options to get to their final destination.

The Covid-19 crisis and its impact on public transport capacity has led to a significant roll out of enhanced active transport facilities across the city with significant uptake and success. As part of the rollout of cycling infrastructure associated with the BusConnects project it is vital to ensure that the various cycling lanes across the city connect to each other and do not operate in silos. The aim of developing continuous dedicated and segregated cycling lanes should be pursued with ambition, and areas should be identified where connection points between the various cycling networks could be enhanced.

Public Realm

The public realm can play a significant role in how safe people perceive an area to be. Excellent street lighting and open and pedestrian-focused spaces enhance the city's overall look and feel, as well as its safety. Specific investment and co-ordination in terms of the development of the public realm alongside the delivery and rollout of the BusConnects projects is certainly considered and highlighted in the *BusConnects Urban Realm Concept Design* document.

Developing the public realm will also require a high standard of facilities at bus stops, including shelters and reliable real-time information at all stops. Smart technologies should allow for considerable advances in these areas in the coming years. Dublin should look to become an early adopter and innovator of such technologies.

Improvements to fares and ticketing

The Covid-19 crisis has resulted in a significant increase in the pace of digitalisation across many sectors, including public transport. Integrated and digital ticketing is now essential. Cash is currently no longer being accepted on Irish Rail, Bus Éireann and Dublin Bus services,² and post-crisis public transport users will have enhanced expectations of the service offering. Digital integrated ticketing is an issue that Dublin Chamber raised previously and following the crisis there will be an acceleration of demand for digital only services.

The rollout of the Leap card and its ability to work across the DART, Luas and bus network has been a welcome development for the city. However more must be done to harness the latest payments technology to improve access to transport across Dublin. Dublin Chamber welcomed the introduction of the 90-minute fare period; this was long overdue in a city of Dublin's size. Fare prices need to more accurately reflect the full passenger journey rather than charging for each part and discouraging interchange.

The Chamber calls for technology to be used to enhance integration of Dublin's public transport services. Buses, trams, and trains are not competitors but all essential components of Dublin's public transport offering. Greater collaboration is needed between the organisations that run

² The Irish Times, 'Coronavirus: Bus and train drivers will no longer accept cash, says union', 2020; <https://www.irishtimes.com/news/ireland/irish-news/coronavirus-bus-and-train-drivers-will-no-longer-accept-cash-fares-says-union-1.4204146>

these services to enhance the transport network and their passenger's complete journeys. There is a need for greater development of existing electronic transport app services in Dublin. A single Dublin transport app that integrates across all transport networks, bus, bike, Luas and DART, and shows accurate 'real-time' information to allow passengers commute to their destination in the quickest way possible. Such a move would strengthen Dublin's 'Smart City' credentials.

Enforcement

One of the main benefits of the BusConnects plan is its commitment to consistency of journey time facilitated by the introduction of dedicated bus corridors. This commitment however can only be met if the bus corridors are kept for the sole use of buses and not subject to significant congestion by other vehicles.

Enforcement of this will become a significant issue if it not addressed and invested in from the start. There are many roads and areas in Dublin where the effectiveness of bus lanes is significantly limited by poor driver behaviour and a lack of enforcement. This can lead to significant delays for public buses, leading to inconsistent, and often lengthy, journey times, detracting from the attractiveness of the bus as a transport option. If BusConnects is to be a success then these issues must be addressed.

This is already a significant issue for the city with 10,400 drivers receiving fines for illegally driving in a bus lane in the Dublin metropolitan area since 2017,³ a figure which is continuing to rise each year. The NTA and Government need to take a pro-active approach to enforcement of the rules of the road. There is a clear role for technology to play here, e.g. through high-spec cameras and automatic number plate recognition systems which should be installed across the city, particularly at known congestion spots. Dublin Chamber encourages stakeholders to approach the use of enforcement technology with an open mind and look at international best practice in this area.

Sustainability

The Government's Climate Action Plan contains several key actions related to the bus network. These are aimed at both encouraging modal shift and developing a sustainable transport system, and they include measures to transition the urban bus fleet to low emission vehicles (LEVs). The Chamber strongly supports this position and would like to see a greater commitment to and integration of the Climate Action Plan into future iterations of the BusConnects plan. Dublin Chamber also notes the changes to the route proposals in order to

³ Breaking News, 'Figures show big rise in drivers caught using bus lanes in Dublin', 2019; <https://www.breakingnews.ie/ireland/figures-show-big-rise-in-drivers-caught-using-bus-lanes-in-dublin-959666.html>

ensure the retention of most existing trees, and a commitment to planting a substantial number of new trees along the routes in response to feedback from their consultations.

In our previous submissions Dublin Chamber welcomed the firm commitment given by the NTA to upgrading the existing bus fleet to a fleet of low emission vehicles. By 2023 half of the bus fleet, approximately 500 buses, will be converted to low emission vehicles, with full conversion completed by 2030. This will reduce both noise and air pollution throughout the city. The use of electric, hybrid and hydrogen-powered buses in London is expected to reduce emissions by 84%.⁴ These results will hopefully be replicated in Dublin.

24-hour Bus Routes

Dublin Chamber has welcomed the rollout of a 24-hour service on the 41 (City Centre, Airport, Swords) and the 15 (Ballycullen road, City Centre, Clongriffin) routes. The Chamber has long advocated for the rollout of 24-hour transport facilities, recognising the need for such services. The current way in which the transport system operates does not reflect how the city functions; and with recent developments and potential changes in relation to Dublin's night-time economy more must be done in this area. Dublin Chamber would like to see an enhanced rollout of 24-hour services across the city where appropriate. Late night workers, such as those in the hospitality sector or healthcare sector, students attending night courses, and those enjoying an enhanced night-time economy need to have access to these services to move around the city. The lack of housing in the city, particularly the city centre, has compounded this issue and increased commute times for many. The Chamber would like to see increased focus on the possibility of more 24-hour routes and how they would be facilitated in the BusConnects plan.

BusConnects post Covid-19 Crisis

The Covid-19 crisis has brought new issues to the fore in relation to public transport. Since the start of the crisis there has been a dramatic fall off in public transport usage. This reduction is a result of travel restrictions on individuals, reduced service offerings, and people avoiding public transport fearing risks of infection.⁵ The bus network is also now operating a reduced service across the city and the maximum persons per vehicle has been significantly reduced to facilitate social distancing.

The Covid-19 crisis has also had a significant impact on the way people work, which in turn impacts on the way they commute and move around the city. Remote and flexible working practices may have a notable impact on transport infrastructure usage and capacity in the future. Flexible work practices, such as staggering the start of the working day between 7am

⁴ Greater London Authority, 'Cleaner Buses', 2019; <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/cleaner-buses>

⁵ Transformative Urban Mobility Initiative, 'The COVID-19 outbreak and implications to public transport – some observations', 2020; <https://www.transformative-mobility.org/news/the-covid-19-outbreak-and-implications-to-public-transport-some-observations>

and 10am will have the potential to significantly enhance capacity at peak times. Currently however, the number of daily users has plummeted, and there is a fear that the hard-won modal shift from the private car to public transport could regress after this crisis due to fears of infection.

Dublin Chamber believes that steps can be taken by the NTA to restore confidence for public transport users under the BusConnects proposals:

- **Impact assessment:** An impact assessment on the implications of the Covid-19 crisis on users' long-term view of public transport should be carried out. Confidence must be restored for commuters to use the service and to increase the modal share of those travelling by bus and other forms of public transport in Dublin.
- **Cleaning and disinfection:** Regular disinfection of vehicles and periodic deep cleaning must be prioritised and widely communicated going forward. While current levels of cleaning may not be sustainable in the long term, increased cleanliness of the vehicles would increase confidence among public transport users post-pandemic. The provision of hand sanitisers on all public transport across the city, as done in South Korea, would also be very beneficial.⁶
- **Enhanced capacity:** Before the crisis, large sections of the public transport system, including the bus network, were operating at full capacity during peak commuter times. By reducing journey times, the new BusConnects programme should ease capacity issues, providing much needed space on buses. The benefits of the BusConnects project such as reduced journey times and enhanced capacity should be clearly communicated to the public.
- **Active transport:** The installation of cycle corridors alongside the Bus Corridors is an essential part of the BusConnects programme. Anecdotally, there are some reports of an increase in people cycling and walking during the current period, facilitated by the quieter streets. This must be capitalised on and encouraged.

Beyond BusConnects

Dublin Chamber ultimately views the BusConnects project as part of a larger plan to alleviate congestion and enhance public transport infrastructure in the city. Considered in isolation, BusConnects offers only a short-term remedy that will enable the existing transport network to function for as long as possible. In the medium-to-long term, much more ambitious investment is required in Dublin's transport infrastructure. Dublin Chamber welcomes the aim of BusConnects to providing a more efficient bus service, while stressing that projects such as MetroLink, DART+, DART Underground, Luas expansion, and the GDA Cycle Network must be progressed alongside it without delay.

⁶ Transformative Urban Mobility Initiative, 'The COVID-19 outbreak and implications to public transport – some observations', 2020; <https://www.transformative-mobility.org/news/the-covid-19-outbreak-and-implications-to-public-transport-some-observations>