



## **Submission to the National Transport Authority re Dublin Area Revised Bus Network December 2019**

Dublin Chamber, on behalf of our 1,300 member companies, welcomes the opportunity to offer feedback regarding BusConnects and the revised network proposal.

Dublin Chamber commends the National Transport Authority (NTA) on its decision to consider a new and improved bus network for the Dublin region. The Chamber is broadly supportive of the BusConnects proposal and has repeatedly highlighted this viewpoint in various submissions. We also recognise the substantial amount of work that has been carried out by the NTA to examine the suitability and functioning of the current network and to utilise the significant amount of feedback generated during the public consultation period.

Dublin Chamber recognises the importance of public transport, with the bus network at its heart, to the success of Dublin. We share the NTA's ambition to have more people using public transport and for Dublin to have a public transport network that rivals those in the best cities in the world.

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. 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. Higher levels of investment will be required in order to address the shortfall of the past decade. This is particularly true in the case of the bus network, where the amount of money available is limiting 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 proposal. The proposed redesign comes at a crucial time for the Dublin region, given the current growth and economic prosperity being experienced, and in light of the growth and opportunities that are forecast

over the coming years and decades. If Dublin is to achieve its aim of becoming a sustainable and dense city the role of public transport must dramatically increase.

In particular, we welcome the ambition put forward in the BusConnects plan to:

- Increase bus priority throughout the city, particularly in the core city centre
- Improve and simplify the fare structure and ticketing options
- Reduce the quantity of routes and buses travelling through the city centre while increasing the frequency of city centre services.
- Improve walking and cycling infrastructure alongside (and in coordination with) the bus network changes.

Following the extensive public consultation process undertaken by the NTA we are satisfied that these aims remain at the forefront of the Revised Network Proposal. 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 fit for purpose and we support the decision to revise the network.

The Chamber has long advocated for and encouraged more people to use 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 as a city is currently significantly behind where it needs to be to meet the demands of the current population, a population that is also predicted to grow steadily over the next few years. This is due to poor forward planning and disconnect between land use and transport planning that has defined the city 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 is anxious that after many years of discussion that the urgently needed infrastructure project gets approval.

Contrastingly, it is disappointing to see the Dart Underground is once again not on the list of priorities for Irish Rail as they focus on increasing their fleet. For Dublin to effectively

manage its transport system and reduce its congestion it needs all of these large infrastructure projects 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, where public transport is reliable, sustainable and efficient. Dublin Chamber believes that a 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 has unfortunately not improved as frequencies were increased on the DART and commuter rail lines over the last few months. Particularly during peak commute times, trains become increasingly crowded as you move closer to the core of the city and there are significant capacity issues making transferring from one service to another undesirable, and in some cases, impossible.

### Feeder Services

The ultimate success of the radial spines will depend on how well they are fed by other services. Dublin Chamber recognises that considerable work needs to be done in terms of refining local services. We note considerable resistance to the proposed changes during the consultation phase. Dublin Chamber believes that local communities and users are best placed to offer feedback on how these local routes can be improved. We encourage the NTA to continue with the extensive levels of engagement that have already been carried out around the city.

In future iterations of the BusConnects plan, Dublin Chamber would like to see more attention given to other feeder possibilities, including cycling facilities (cycle lanes and bike stand facilities) and park and rides along the spines, particularly around the edge of the M50 and the canals. Dublin Chamber believes that improvements to the cycling network in Dublin, in line with the NTA's cycling strategy which was published in 2013, can significantly complement the public transport network in Dublin.

### Orbital Routes

The lack of good orbital routes is a major gap in Dublin's bus network. Too often, bus users are forced to come into the city centre in order to travel back out to another part of the city. For example, someone living in Lucan, who is looking to get to Dublin Airport by public transport, is currently required to take a bus into the centre of Dublin in order to catch

another bus northwards. This type of journey is not compelling and leads to people opting to use a private vehicle to make the journey instead. Dublin Chamber welcomes the ambition to change this in BusConnects. There is also an opportunity to further exploit the potential of Dublin Airport as a public transport hub, particularly given plans for the emerging route for the MetroLink line.

Dublin Chamber is disappointed by the lack of attention that has been given in the BusConnects plan to improve the current public transport deficit around the M50. There is very little proposed in the BusConnects plan that will help address the high level of congestion that is currently seen on the M50. We would like to see this addressed in the next iteration of the plan.

### Improvements to fares and ticketing

Dublin, and society in general, are moving increasingly towards a cashless system and Dublin Chamber has long advocated for a fare system that allows the user to pay for where they are going as opposed to how they get there. Dublin Chamber would also welcome a flat fare structure.

The roll out 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 welcomes the introduction of the 90min fare period, this will allow users to interchange between different forms of public transport without incurring additional costs. This is 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 also calls for technology to be used to enhance access and integration of the Dublin's public transport offering. 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 these services to enhance the transport network and their passenger's complete journeys. There is a need for 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 both cars and taxis.

Enforcement of this will be a significant issue if it not addressed and invested in from the start. There are many roads and areas in Dublin currently where the effectiveness of bus lanes is significantly limited by poor driver behaviour and a lack of enforcement. This typically leads to significant delays for public buses, leading to inconsistent, and often lengthy, journey times, which detracts significantly 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<sup>1</sup>, a figure which is continuing to rise each year. The NTA and Government need to take a pro-active view in terms of how the rules of the road will be enforced. There is a clear role for technology to play here, such as 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.

### Interchanges

The network redesign is based on the assumption that passenger are willing to change buses to enable them to get to their destination sooner. This fundamental shift in how our bus network functions also requires a change in how we look after and meet the needs of passengers who are interchanging. The original consultation process showed that people have significant concerns about the interchanges. This is particularly the case for elderly users or those with disabilities and the concern for 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 represent junctions where such facilities might be necessary. An audit should be carried out to examine the location of bus stops in close proximity to Luas and Dart stations and other key transfer hubs to assess the requirement for facilitates. 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. While the BusConnects programme mentions that 'a program of improvement would progressively bring better shelter and lighting to all interchange stops' a firmer commitment is required.

Facilities should mirror those offered in modern train stations. All bus stops should benefit from good public street lighting. At larger busier stops, shelter should be provided along with

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<sup>1</sup> <https://www.breakingnews.ie/ireland/figures-show-big-rise-in-drivers-caught-using-bus-lanes-in-dublin-959666.html>

enhanced community CCTV. Smart Cities around the world have developed bus shelters that include heaters, electronic interactive maps, green roofs and solar panels. Partnership examples could be examined with advertising companies similar to the success that was achieved in the roll out of DublinBikes.

### Demand management

Increasing the amount of dedicated space for buses will ultimately mean less room for cars. While this may have the impact of slowing car journeys through the city, it is hoped that this will have the desired effect of encouraging more people towards taking public transport.

According to the Canal Cordon Report 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.<sup>2</sup> Correspondingly, there has been a year on year decline in car usage. Dublin Chamber welcomes this change but cautions that it will only continue if bus services are made as attractive as possible. This will require frequent services (no greater than 5 minutes) at peak times. It will also require a high standard of facilities at bus stops, including shelters and reliable real-time information at all stops.

### Sustainable Transport

The Government's Climate Action Plan contains several key actions related to the bus network. These are aimed at both encouraging modal shift and having a sustainable transport system, including measures aiming 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. We would also encourage the NTA to immediately consider piloting certain bus routes using more environmentally sustainable vehicles such as bio-methane, hydrogen and electric hybrid busses. The use of electric, hybrid and hydrogen-powered buses in London is expected to reduce emissions by 84%.<sup>3</sup> This ambition should be replicated in Dublin. The Chamber encourages the NTA to show a willingness in future iterations of its BusConnects plans to engage in largescale pilot schemes to trial alternative fuel options for the city's urban bus fleet.

### 24-hour Bus Routes

Dublin Chamber has welcomed the recent rollout of a 24hr 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 24hr transport facilities recognising the need and

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<sup>2</sup> [https://www.nationaltransport.ie/wp-content/uploads/2019/04/Canal\\_Cordon\\_Report\\_2018.pdf](https://www.nationaltransport.ie/wp-content/uploads/2019/04/Canal_Cordon_Report_2018.pdf)

<sup>3</sup> <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/cleaner-buses>

demand for such services. The current way in which our transport system operates does not reflect how our city functions. Dublin Chamber would like to see an enhanced roll-out of 24-hour services across the city where appropriate. Late night workers, such as those in the hospitality sector or healthcare sector, need to have access to these services to commute to and from work. The lack of housing in the city has compounded this issue and increased commute times for many workers. The Chamber would like to see increased focus on the possibility of more 24hr routes and how they would be facilitated in the BusConnects plan.

### **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. On its own, BusConnects presents only a short-term measure 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. The lack of a modern, sustainable, and reliable public transport system is already emerging as a concern and a barrier to incoming investment and jobs opportunities. While we welcome the aims of BusConnects in providing a more efficient bus service, the reality is that projects such as MetroLink and Dart Underground must be progressed alongside it without delay.