

## Submission of Dún Laoghaire-Rathdown County Council to BusConnects Dublin Area Bus Network Redesign

### Introduction

This submission has been prepared by the Municipal Service Department in consultation with the Planning Department. Note there will also be responses by Councillors (both individually and collectively), citizens and organisations in the County. This submission is intended to add to the other submissions, not to replace them. This submission will deal with both strategic level issues and more detailed issues.

### Strategic Issues

#### General Support for Proposals

Council welcomes the primary objective of Bus Connects – to make the bus system more useful to more people. We note that the bus is, and will remain, the main mode of public transport in the Dublin Region, serving more passengers than heavy rail, Luas and MetroLink combined. It is therefore essential that the bus system is efficient and customer-focused.

The Council supports the other elements of the overall approach, namely,

- Developing a state-of-the-art ticketing system
- Refreshing the bus livery
- Providing new bus stops and additional shelters with better signage and information
- Transitioning to a new fleet of low-emission vehicles
- Development of Park and Ride facilities at key locations
- Creation of a “next generation” network of cycle facilities.

The provision of 16 core bus corridors with continuous bus lanes and safe cycling facilities is subject to a separate design and public consultation process. The Council will engage positively with this. At this stage, it is worth noting that the proposed Network Redesign would put significantly increased bus flows on a number of roads and streets where there are currently no bus lanes (e.g. Blackrock Village, Taney Road).

#### The County Development Plan

The Council supports the improvement of public transport and cycling which will allow for higher density residential development, thereby creating a more sustainable interaction between land-use and transport. Chapter 2 of the County Development Plan “*Sustainable Travel and Transportation*” sets out the Council’s policies and objectives which are relevant to BusConnects. For convenience, the relevant policies are quoted here:

*ST2: Integration of Land Use and Transportation Policies It is Council policy to actively support sustainable modes of transport and ensure that land use and zoning are fully integrated with the provision and development of high public quality transportation systems.*

*ST3: Development of Sustainable Travel and Transportation Policies It is Council policy to promote, facilitate and cooperate with other transport agencies in securing the implementation of the transportation strategy for the County and the wider Dublin Region as*

set out in Department of Transport's 'Smarter Travel, A Sustainable Transport Future 2009 – 2020' and the NTA's 'Greater Dublin Area Draft Transport Strategy 2016-2035'. Effecting a modal shift from the private car to more sustainable modes of transport will be a paramount objective to be realised in the implementation of this policy.

ST5: Walking and Cycling It is Council Policy to secure the development of a high quality walking and cycling network across the County in accordance with relevant Council and National policy and guidelines

ST7: County Cycle Network It is Council policy to secure improvements to the County Cycle Network in accordance with the Dún Laoghaire-Rathdown Cycle Network Review whilst supporting the NTA on the development and implementation of the Cycle Network Plan for the Greater Dublin Area.

ST11: Public Transport Improvements It is Council policy to secure improvements to the public transport system as set out in 'Smarter Travel, A Sustainable Transport Future 2009-2020' and the NTA's 'Greater Dublin Area Draft Transport Strategy 2016-2035' by optimising existing or proposed transport corridors and interchanges and by developing new Park and Ride and taxi rank facilities at appropriate locations.

ST12: Quality Bus Network It is Council policy to co-operate with the NTA and other relevant agencies to facilitate the implementation of the Bus Network measures as set out in the NTA's 'Greater Dublin Area Draft Transport 2016-2035' and to extend the bus network to other areas where appropriate subject to design, public consultation, approval, finance and resources.

ST13: Bus Rapid Transit (BRT) It is Council policy to co-operate with the NTA and other relevant agencies to facilitate the introduction of Bus Rapid Transit measures as set out in the NTA's 'Greater Dublin Area Draft Transport Strategy 2016- 2035' where appropriate subject to design, public consultation, approval, finance and resources

ST14: Public Transport Interchanges It is Council policy to facilitate the provision of quality public transport interchanges at strategic Rail and Luas stations within the County in accordance with National and Regional guidelines in order to facilitate focussed access to multiple public transport modes and to maximize the movement of people via sustainable modes.

### **Concern with the reliance on Interchange**

The Council has a major concern with the change from direct routes to a greater reliance on interchange between routes. A requirement to interchange has significant negative impact on bus passengers. It adds inconvenience, insecurity and uncertainty. Research done in Dublin, albeit some years ago, estimated that, for bus passengers, one interchange is equivalent to an additional 15 minutes journey time. That value may be less in the context of more frequent and reliable services. However, BusConnects assumes that a requirement to interchange has no negative impact. This is not correct, especially for the elderly, those with mobility impairments and disabilities, and children. Also, the proposed route changes are scheduled to be in place before the infrastructure improvements along the 16 core bus corridors. Without the improved infrastructure, bus journey times will be unreliable and interchange will be less attractive.

A reliance on interchange in the design of the route network seems to have led to a situation where current direct services become unnecessarily disjointed. For instance, the current No.7 route serves the city centre Dún Laoghaire, Sallynoggin, Loughlinstown and Cherrywood. It is proposed to replace this with a new No.7 route and a No.222 route. For customers from Sallynoggin, Loughlinstown and Cherrywood who are travelling to anywhere north Dún Laoghaire an interchange would be required, which would be a significant dis-benefit. As both routes would run on a 10-15 minute headway, there appears to be no benefit in terms of efficiency in the use of the bus fleet.

### **Concern with Impact on Low-income Areas and Accessibility of Hospitals**

Certain sectors of the community are highly dependent on the bus for their daily lives, in particular:

- people from low-income areas, where car ownership is limited, and
- the elderly, and people with mobility impairments and disabilities, who often need the bus for access to medical treatment.

The proposed removal of the No.4 bus and the change in the No.7 bus have significant impact on both these groups. This impact is made clear in BusConnects [Public Consultation Report](#). Figure 44 in Chapter 3 shows that the highest Household Deprivation Index in the County is in Ballybrack and Sallynoggin. Figure 124 in Chapter 8 shows the change in job accessibility is worst for these areas.

### **Concern with the Lack of Potential for Bus Priority on Orbital Routes**

The proposed orbital bus routes would run on roads and streets which have relatively little bus priority (bus lanes) and, due to their narrowness, have relatively little prospect of bus priority. This will make it difficult or impossible to provide fast and reliable journey times for orbital buses. A central element of the strategy of BusConnects includes having more passengers using the orbital routes and interchanging with the arterial routes. A lack of bus priority on orbital routes would undermine this element of the strategy.

### **Concern with Low Levels of Service for High Growth Areas**

There are a number of areas in the County which have had, are having, or will have, significant growth in population or employment or both. In particular, the proposed bus route network would not sufficiently serve the areas of Cherrywood, Stepside and Shanganagh. While there are clearly resource implications, it would be sensible to initiate a good bus service in advance of development, thereby ensuring that new residents would not get into “bad habits” of owning and using cars for their commuting trips.

### **Detailed Issues**

The Council has examined the proposed bus route network design and has a number of proposed options for consideration. It should be noted that Councillors, members of the public and local organisations will make their own submissions, which will include significantly more detailed comments. It is not implied that the Council does not support the comments in other submissions.

The following table sets out a number of options for changes to individual routes or to combinations of routes. Some of the options are stand-alone, some are inter-dependant and some may be mutually exclusive (e.g. there are several options relating to the No.7). Most options include reasons and solutions.

	Change	Effect, rationale, comments
<b>Avoid having two routes that start and end at the same points</b>		
1	Re-route 226 or 227	<ul style="list-style-type: none"> <li>Both routes start at Kiltiernan/Ballyogan/Carrickmines and finish at Blackrock and run along the same route for some distance.</li> <li>One should be to Dún Laoghaire.</li> <li>The other should be routed to Blackrock, or to UCD via St Vincent's Hospital.</li> </ul>
2	Re-route 222 and 229	<ul style="list-style-type: none"> <li>Both routes start at Bride's Glen and finish at Dún Laoghaire and run along the same route for a significant distance.</li> <li>The 229 should be re-routed to Dún Laoghaire.</li> <li>The 227 should be routed to UCD via Blackrock and St Vincent's Hospital.</li> <li>Would increase frequency on coastal corridor.</li> </ul>
3	Re-route S6 or S7	<ul style="list-style-type: none"> <li>Both routes start at Tallaght and finish at Blackrock and run along the same route for a significant distance.</li> <li>One should be rerouted to Dún Laoghaire.</li> </ul>
<b>Extend routes to provide or maintain direct services to city centre or DART or St Vincent's Hospital</b>		
4	Re-route 7 through the city centre	<ul style="list-style-type: none"> <li>The current proposal is for the 7 to run via Kevin Street and High Street, thereby avoiding the man city centre destinations.</li> </ul>
5	Continue 12 to Kiltiernan	<ul style="list-style-type: none"> <li>Would serve this growth area with its only through-service to Dundrum and City.</li> </ul>
6	Continue S4 to DART via Nutley Lane	<ul style="list-style-type: none"> <li>It would link this important orbital to DART.</li> <li>Could still run via Belfield Campus.</li> <li>Possible continuation to C1 terminus if no layover spots at Sydney Parade.</li> </ul>
7	Continue 213 to DART via Nutley Lane	<ul style="list-style-type: none"> <li>This is a local feeder service, but its utility to the growing areas of Kiltiernan, Stepside, Sandyford, and Stillorgan would be significantly improved by continuing to DART.</li> <li>Could still run via Belfield Campus</li> <li>Possible continuation to C1 terminus if no layover spots at Sydney Parade</li> </ul>
8	Continue route 233 to City Centre during peak hours (as a 3xx route)	<ul style="list-style-type: none"> <li>As proposed, the route requires all passengers to interchange at Dundrum. There is no guarantee that there would be sufficient capacity for the passengers' onward journey to the city centre during peak hours.</li> </ul>
9	Continue route 7 to	<ul style="list-style-type: none"> <li>The current route 7 provides direct access from areas with relatively low car-ownership and low incomes to</li> </ul>

	Bride's Glen	both St Vincent's Hospital and the city centre. These connections should be retained, especially as the current No.4 is to be removed.
<b>Alternative options for routes east of the N11</b>		
<b>10</b>	Join the 222 and the 225 into a single route	<ul style="list-style-type: none"> <li>• Would provide a through service from Dundrum to Cherrywood via Stillorgan, Dun Laoghaire, and Sallynoggin with a U-shaped route</li> <li>• Feeder service across Luas, N11QBC, and DART, with each 'leg' of the U-shape optimising connections for inbound and outbound trips (no need to 'double back').</li> <li>• Reduce the number of services terminating at Dún Laoghaire DART.</li> <li>• Reduce interchange costs for those using route</li> <li>• Both services are the same frequency and frequency pattern, and the overall route would be comparable to others of this level of service.</li> </ul>
<b>11</b>	Run S8 down Kill Lane as opposed to Newtown Park Avenue	<ul style="list-style-type: none"> <li>• Compensates for drop of frequency of old 46A (E2) on Dún Laoghaire -N11 leg of route. Would remain as frequent as current 46A, but some busses would require interchange at Foxrock.</li> <li>• Allows for same-stop interchange on E-spine</li> <li>• Picks up IADT and Pottery Road employment area with an orbital route</li> </ul>
<b>12</b>	Reroute 226 to Newtown Park Avenue	<p>(on proposed S8 and 227 alignments to Blackrock)</p> <ul style="list-style-type: none"> <li>• Preserves coverage in context of other changes</li> <li>• Possibly a shorter and quicker route</li> <li>• Downside - leaves Clonkeen Road with no service</li> </ul>
<b>13</b>	Re-route the 211 via Churchview Road	<ul style="list-style-type: none"> <li>• This would have a denser catchment than Church Road but will need to be reconsidered when future, higher-density development occurs.</li> <li>• Bus priority may be feasible on Churchview Road</li> </ul>
<b>• Alternative options for routes West of the N11</b>		
<b>14</b>	Re-route the 10 via Kilmacud Road Upper	<ul style="list-style-type: none"> <li>• This would retain bus services on the Kilmacud Road Upper</li> <li>• Passengers on the Kilmacud Road Lower could use the 225 and interchange.</li> </ul>

## **Public Consultation**

A number of Councillors and members of the public have expressed concerns about the public consultation. There are two main areas of concern. First, the consultation occurred during the summer months of July and August. This is a particular difficulty for voluntary groups, which may not meet during the summer. Given the complexity and radical nature of the proposed changes, some additional time in September and October would have been welcome. Second, it appears that the process was more public information than public consultation i.e. the public were informed of proposed changes, but they do not feel that their concerns were listened to. They feel that BusConnects is not open to any significant changes in the proposals. This seems to be based on two premises. First, media discussion gives the impression that the proposals are a take-it-or-leave-it choice. Second, there appears to be no significant change from the original “concepts”, despite widespread concerns, especially about the increased reliance on interchange.

Given the complexity of the proposed changes, and given the likely number of submissions, it is inevitable that there will be more proposed changes following this public consultation process. The Council would welcome the opportunity to discuss any revised proposals following this stage of consultation.

## **Summary**

In summary, the Council welcomes the primary objective of Bus Connects – to make the bus system more useful to more people. It also supports the other elements of the overall approach, such as ticketing, shelters and cycle facilities. The proposals will support the policies of the Council regarding sustainable travel and transportation as expressed in our County Development Plan.

However, the Council has a number of concerns. At a strategic level, the Council is concerned that the proposals rely on interchange, have a negative impact on low-income areas and on accessibility of hospitals, increase the number of orbital routes where there is little potential for bus priority and do not sufficiently provide for growth areas. At a detailed level, the Council has concerns regarding a number of proposed routes and has suggested alternative options.

Given the complexity and importance of BusConnects, the Council would welcome the opportunity to discuss our concerns at the next stage of the project.