Submission to second round of Bus Connects Network Redesign consultation.

Overall, I welcome the proposal to redesign and simplify bus routes and improve connections between bus routes and between bus and rail. Most of my comments below are aimed at better achieving those objectives.

1. Howth to city centre (31/a, H3)

This redraft of Bus Connects has reinstated a direct bus route from Howth to the City Centre (now H3).

In discussing the value of a radial route in my response to the last consultation, I pointed out that the option of a coastal route should be considered:

There may be a good case for a direct bus route designed to serve both tourists and local need. It could travel along the coast for the entire route. If it did so it would give access to the land side of the causeway to Bull Island and Dollymount Beach, an important amenity area currently without a public transport service.

This option doesn't seem to have been considered and I again request that it be looked into.

The H3 bus service is proposed at a lower frequency (every 30 minutes) than the current 31/a (every 20 minutes. When I asked why this was, there seemed not to be any clear reason. The current service is well used. If there is analysis suggesting a lower frequency would be sufficient, please make it available.

This service is to go as far as either Abbey St. (mapped) or Amiens St. (text). I had understood that in order to maximise interchange opportunities and to bring people closer to more city centre destinations, buses would cross the city rather than end on the outskirts of the city centre. Why is this not the case with this route and the other H routes?

2. Kilbarrack, Howth Junction, – existing 17a, new N8

In response to the previous consultation I said:

This route should start at the Dublin Road in order to connect with N6 and to serve the population on both sides of Kilbarrack Road, who currently have an excessively long walk to any form of public transport. There are many options for turning the bus. The easiest to implement would involve going south on the Dublin Road as far as Blackbanks and turning up Greendale Road. The bus could either turn at the roundabout or continue through it and turn right on Thornville Road to rejoin the Kilbarrack Road.

There has been no change to this aspect of the route in the current proposal. I don't know if it was considered or not, but it should be.

3. Howth, Sutton, Baldoyle, existing 31a, new 290

The proposal is to replace an hourly direct bus to the city centre serving the south side of the peninsula with a service every 40 minutes in connecting to the Dart at Sutton. Going the other way it will also connect to the Dart in Howth. This is to be timed to connect with every second train in Sutton.

The loss of the 102 has broken a connection from Swords which was used in particular for school access. Extending the 290 to Clongriffin would enable connection there to buses to Swords as well as to rail services.

4. Malahide to City Centre

The H2 should go as far as Malahide Station. If necessary a turning bay could be provided in Bridgefield Car Park

5. Integration of bus with rail and integration of rail services with each other

Iarnród Éireann has recently changed rail timetables, to massively reduce the number of diesel trains stopping at Howth Junction, Clongriffin or Portmarnock. This has broken the following connections:

- North County (Donabate, Rush and Lusk, Skerries, Balbriggan, Laytown, Drogheda) is no longer connected to the 17a at Howth Junction to access DCU and Beaumont. This trip requires a further connection at Malahide.
- Similarly travellers going between stations north of Malahide and stations east of Howth Junction must now change at both Malahide and Howth Junction.

Additionally, the timetabling of the Darts (combined with the removal of the diesels) means that the connection between the two Dart spurs at Howth Junction now has a standard 19 minutes waiting time.

These changes reflect a failure to understand that rail and bus services must be connected and that just like bus services, rail services must be integrated with each other. Many of the Bus Connects changes in this area rely on the concept of interchange. Iarnród Éireann should not simultaneously be making interchange between rail lines and between rail and bus more difficult.

6. Interchange facilities

In my previous submission, I emphasised the need for "smooth and quality transfer" between buses and between buses and trains.

At Howth, effective interchange includes a redesign of the area around the station, in particular to provide a bus shelter for passengers transferring from trains to eastbound buses. (I have separately requested that a taxi rank be provided at the station as taxis have created

their own unofficial rank nearby; the changes for both of these and for dropoff could be done as part of an overall public realm project for the station area.)

At Sutton, there is an evident existing need for a pedestrian crossing at the railway station. The running of an effective bus service serving Sutton Station also requires some way for buses which have just picked up passengers at the station to join traffic on the road.

Interchange with Howth Junction station should be provided by sheltered bus stops immediately beside the ramp up to the station, with signage and a welcoming environment for passengers making the connection.

7. Port Tunnel routes, Swords Express

After queries, I understand the following to be the case with the Port Tunnel routes. I would be glad to be corrected if I have misunderstood. My summary understanding of all this is that we are to have two types of local buses in Dublin:

- Integrated buses: Dublin Bus, and the routes which have just been tendered to Go Ahead Although run by different operators, these are to provide an integrated service.
- Unintegrated buses: Swords Express, Fingal Express and some other private routes which already exist. These are considered in some respects, unclear to me, not to be public transport.

Dublin Bus, Go Ahead, Luas/Veolia, Iarnród Éireann are to offer integrated services with integrated ticketing both between buses and with all heavy and light rail. They will have accessible vehicles.

Swords Express ticketing is not and, we are told, will not be integrated. They do not offer accessible vehicles. Swords Express (and I think some other operators) are not part of the integrated ticketing system. Unlike rail and light rail services, they are not shown on the Bus Connects maps or isochrones or the online bus route mapper. (Amazingly we are hiding public transport routes from the public on these maps!)

However, despite not showing them on the maps, Bus Connects has clearly been designed not to compete with the Swords Express service. It offers no other public transport service outside of a peak hour bus to the substantial population in Holywell who currently avail of Swords Express as their only bus service. Furthermore Dublin Bus will run only a few peakonly buses through the Port Tunnel.

It appears, for reasons which have not been given, (despite requests) that the standard bus network will not run on routes served by Swords Express and other private operators.

Services run by Swords Express (using the Port Tunnel) will simultaneously be recognised in the sense that Dublin Bus will not replicate the service they provide, but not recognised in that they will not be part of the urban public transport network and there will be no integrated ticketing for their passengers. This has a particular consequence for mobility impaired passengers, as Swords Express runs non-accessible buses.

This is not acceptable in terms of the service being provided to people in Swords, Holywell, Drinan, etc., who are entitled to the same quality of integrated accessible public transport as anyone else in the city.

In addition, it makes no sense. The Port Tunnel is the best bus corridor in the city. Use of the Port Tunnel should be part of bus route planning instead, as it appears, being marked off limits for unclear reasons.

8. Availability of information about buses

Bus Connects is full of commitments about integration of buses and availability of information. The process of fragmentation of ownership and operation of bus routes is operating in the opposite direction.

A number of bus routes such as 17a and 102 have been tendered out to be run by another operator. The stated intention is that the public shouldn't have to be concerned about who runs the bus service. However, the result in practice is that the 17a and 102 simply disappeared from the Dublin Bus app. The app doesn't direct passengers to any other source of information, telling us instead that there is no such bus service. If Bus Connects is about providing an integrated service, it should ensure that it is as easy as possible for the public to find out about buses.

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