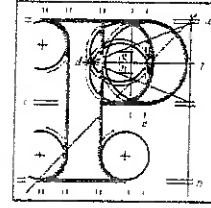


Our Case Number: ABP-317742-23



**An
Bord
Pleanála**

Nigel Kenning
Thingwall
Dublin Road
Shankill
D18 F8C3

Date: 13 October 2023

Re: BusConnects Bray to City Centre Core Bus Corridor Scheme
Bray to Dublin City Centre.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above-mentioned proposed road development and will take it into consideration in its determination of the matter.

Please note that the proposed road development shall not be carried out unless the Board has approved it or approved it with modifications.

The Board has also received an application for confirmation of a compulsory purchase order which relates to this proposed road development. The Board has absolute discretion to hold an oral hearing in respect of any application before it, in accordance with section 218 of the Planning and Development Act 2000, as amended. Accordingly, the Board will inform you in due course on this matter. The Board shall also make a decision on both applications at the same time.

If you have any queries in relation to this matter please contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above-mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Sarah Caulfield
Executive Officer
Direct Line: 01-8737287

HA02A

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Observation on Bus Connects proposal Bray to City Centre,

Submitted by

Nigel Kenning; Thingwall, Dublin Rd Shankill, Co Dublin D18F8C3

Observation; Bus Connects proposal Loughlinstown roundabout to Bray; (part of Bus Connects Bray to City Centre)

ABP reference HA27.317742

The benefit to be gained by installation of bus lanes in the section of the route from Loughlinstown roundabout to Wilford is questioned in this submission, with data provided which appears to demonstrate the development from Wilford to Loughlinstown Hospital roundabout does not contribute anything to the goal of achieving more reliable and reduced bus journey times.

If there are no benefits to improved bus journey times, then other aspects of the scheme must provide the benefits to be able to justify the expenditure and disruption associated with the scheme. The proposed scheme will apparently have “positive, not significant to moderate and long term benefits for cyclist accessibility” (ref section 8.5. This is not glowing recommendation for a key aim and objective of the scheme. There are also positive moderate long term benefits for private vehicles, which may be as a result of the scheme, though this is difficult to understand when the installation of bus lanes would appear to improve the potential flow rate of traffic throughout the Wilford to Loughlinstown section of the Bus Connects without providing a significant benefit for bus traffic.

During the operational phase of the scheme there are negative townscape and streetscape effects on the sections from Loughlinstown roundabout to Wilford and Wilford to Bray. (Townscape and Streetscape Character - Loughlinstown Roundabout to Wilford Roundabout Negative, Very Significant, Short-Term Negative, Moderate, Long-Term environmental impact townscape, (chapter 17 of the Bus Connects submission)

Community Accessibility (Bus Users): University (Newman) Church, Haddington Road, Rathmines, Donnybrook, Merrion Road, Booterstown, Mount Merrion, Kilmacud – Stillorgan, Foxrock, Cabinteely, Ballybrack – Killiney, Loughlinstown, Shankill and Little Bray Positive, Moderate to Profound and Long-Term Positive, Moderate to Profound and Long-Term Bus access (Not sure how this applies to Shankill where the bus service is high service level, possibly lacking in some reliability but nominally already a bus every 6 minutes)

From a bus journey time perspective, surveys carried out show that the benefits of the development in the Loughlinstown to Wilford section are likely to be negligible. This is in contrast to the section from Wilford to Bray, where the benefits are likely to be significant.

Image 2.18 in the Bus Connects submission seems to indicate an expectation that the loading on public transport on the high quality bus scheme will increase in the section from Loughlinstown roundabout to Shankill from approx. 600 per hour to approx. 1200 per hour. This would suggest an expectation that the number of buses on the route section will increase for the current 10 or 11 per hour (scheduled route no.s 145 and 155 at peak hours and 84 and 143) to 20 per hour. With peak traffic volumes currently being approx. 600 traffic units per hour and expected to fall as a result of the scheme being implemented, the increase from the bus volume of 1.5% would probably have a negligible effect on congestion.

In summary, this observation provides data which seems to offer strong evidence that the scheme planned between Wilford and Loughlinstown is unnecessary. There will be negligible improvement in bus times through the proposed changes. This is in contrast to the Wilford to Bray section, where the changes would be expected to provide much of the improved reliability objective for the whole

scheme. The other benefits of the scheme would have to be significantly greater than the proposal identifies to justify the disruption to the social and environmental impacts of the scheme on the Shankill locale.

Traffic data

Traffic data was measured visually at Kenfeld, north of Rathmichael School, in March 2019 on week days, and showed a peak volume of 147 vehicles per 10 mins during the southbound peak (equivalent to 882 vehicles per hour) at 6pm

Morning peak northbound was 107 vehicles per 10 mins at 8am (equivalent to 642 vehicles per hour)

The equivalent figures measured in September 2023 5.40pm showed a peak of 123 vehicles per 10 mins southbound (equivalent to 738 vehicles per hour) and 97 vehicles per hour northbound at 8.50am (equivalent to 582 vehicles per hour). This seems to confirm the longer term expectations that traffic volumes will fall during the planning period. The data collected is shown in Appendix 1 and is summarised in the charts 1 and 2 below.

General conclusions from the very quick and limited survey seem to show that traffic volumes are stable at worst and may be reducing over time. There is adequate road capacity to accommodate any potential increase in bus traffic that may arise because of the Bus Connects development in the area without the necessity to install bus lanes.

Chart 1

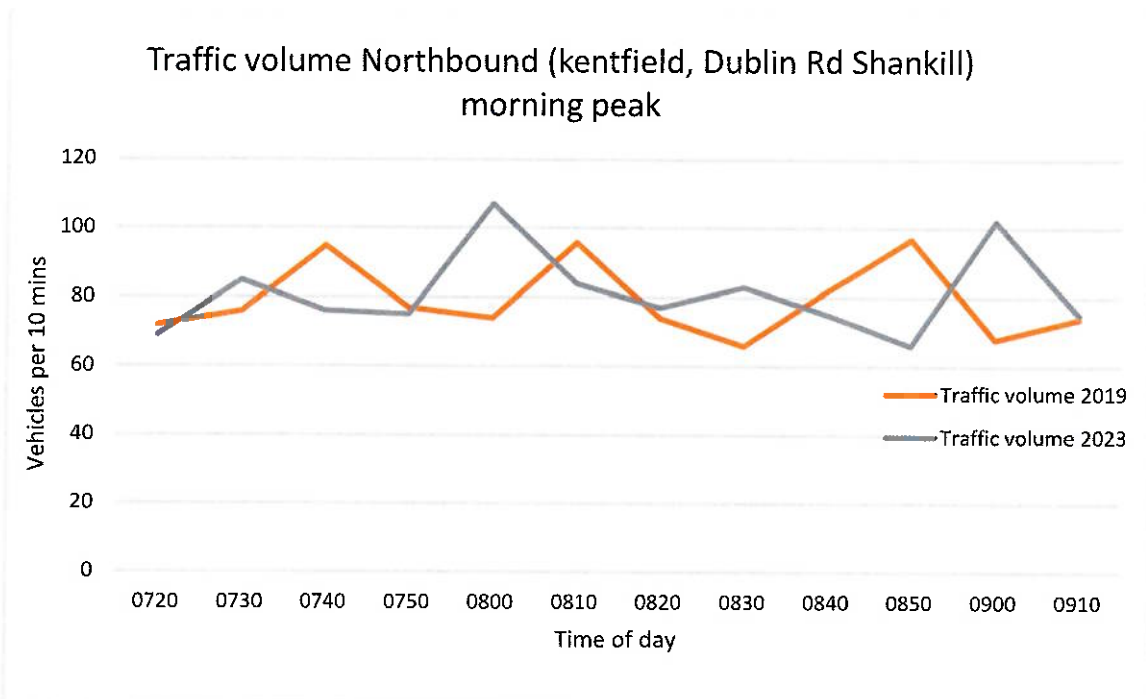
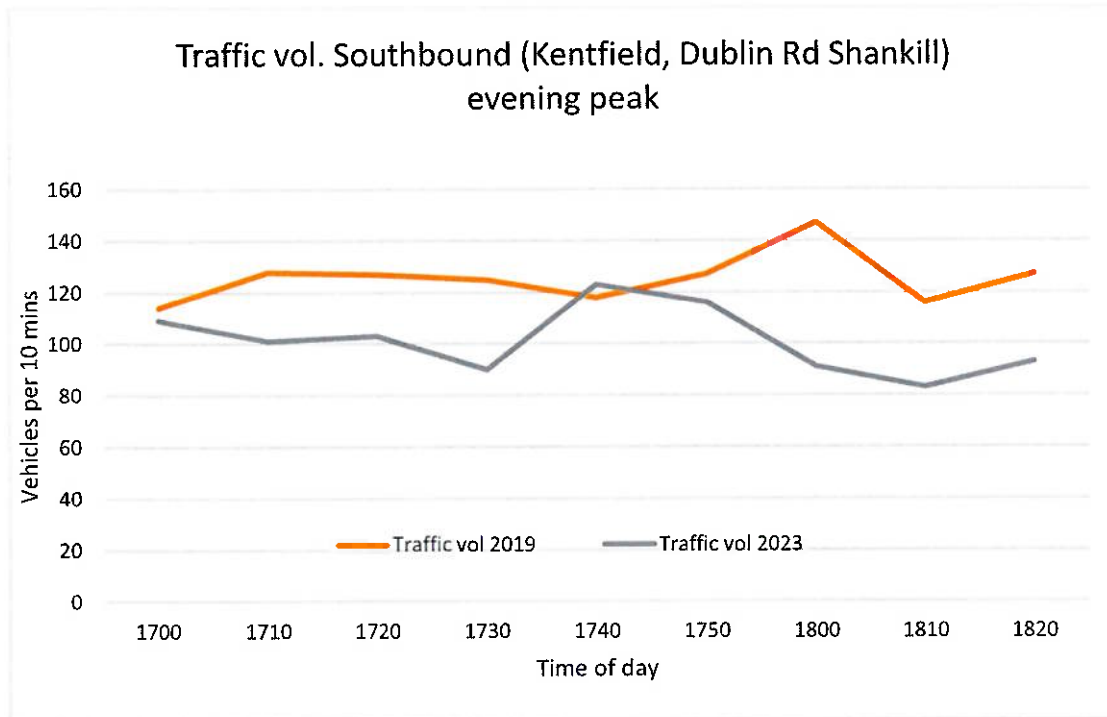


Chart 2



Bus Journey time data, Bray to Loughlinstown section of Bus Connects

This data was generated by taking bus journeys on the days commencing Saturday 02Sep and ending 07Sep. A total of 6 journeys northbound were surveyed, with 2 starting from Bray at 7.43 am and 8.24am. For southbound journeys, a total of 7 were surveyed, with 3 starting at 4.12pm, 4.57pm and 5.57pm. The time as the bus arrived at or passed at each stop was recorded. Times were always recorded to the nearest lower minute. For a number of the journeys, an effort was made to measure the length of time the bus was stopped at bus stops. (The number of stops was used to plot journey times and number of stops, but no clear correlation is evident. As a result, stop time data is not included in this observation, but is available should it be required. No claim to precision is made but should be a reasonable reflection of actual performance). The data generated is shown in Appendix 2 and is summarised in the charts below which show journey times of sections of the journeys shown against the number of stops the bus made in that section of the journey.

General conclusions from this quick and simple survey seem to show the following

- The number of stops made does not seem to have great impact on journey times
- Journey times between Quinsboro Rd and Woodbrook varied from 4 to 9 mins northbound and 5 to 13 mins southbound. These are wide variations for a journey length of approx. 1.2km and seem to offer significant opportunity for journey time improvement with appropriate design changes such as those proposed in Bus Connects.

- Journey times between Woodbrook and Loughlinstown Hospital varied from 7 to 9 mins northbound and 6 to 9 mins southbound, a much narrower variation for a journey length of approx. 2.3km, almost twice the distance from Woodbrook to Bray Quinsboro Rd.

Charts of journey times against stops

Chart 3

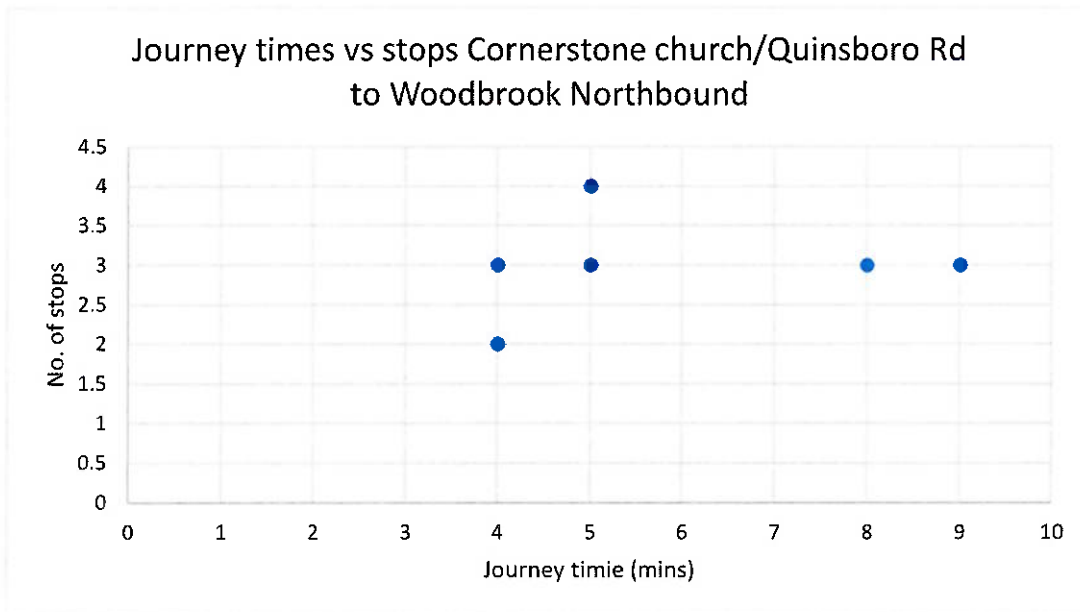


Chart 4

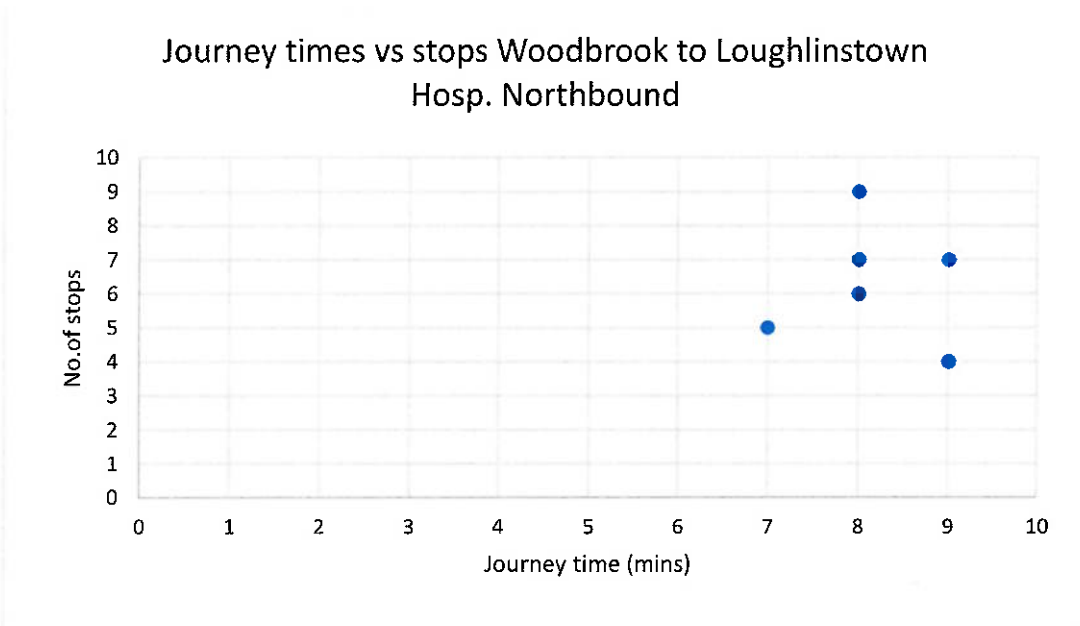


Chart 5

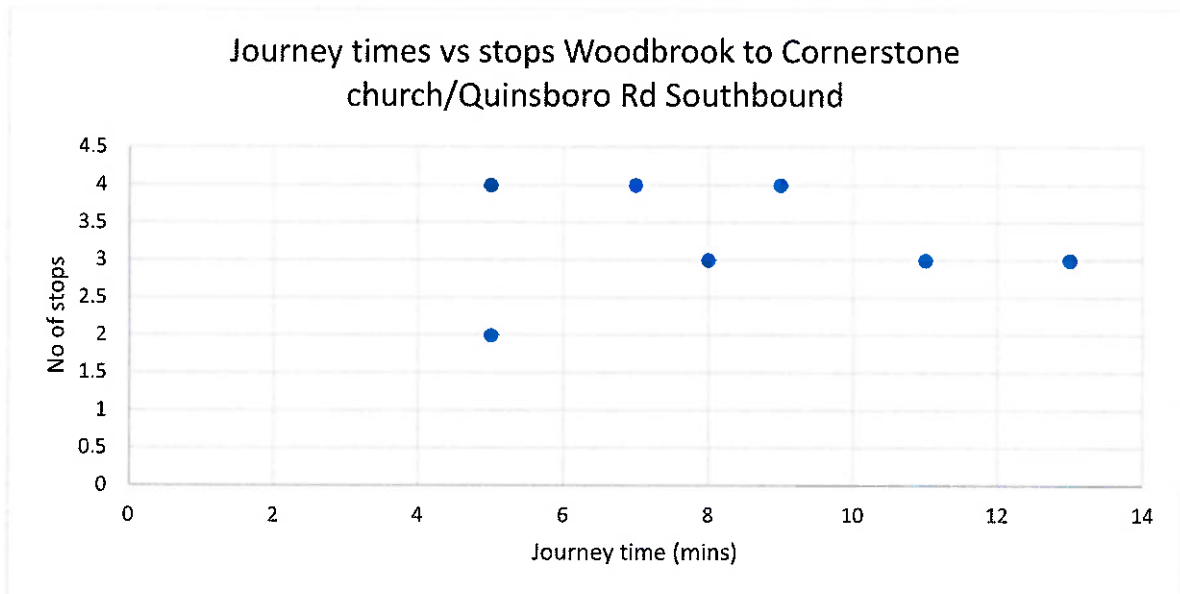
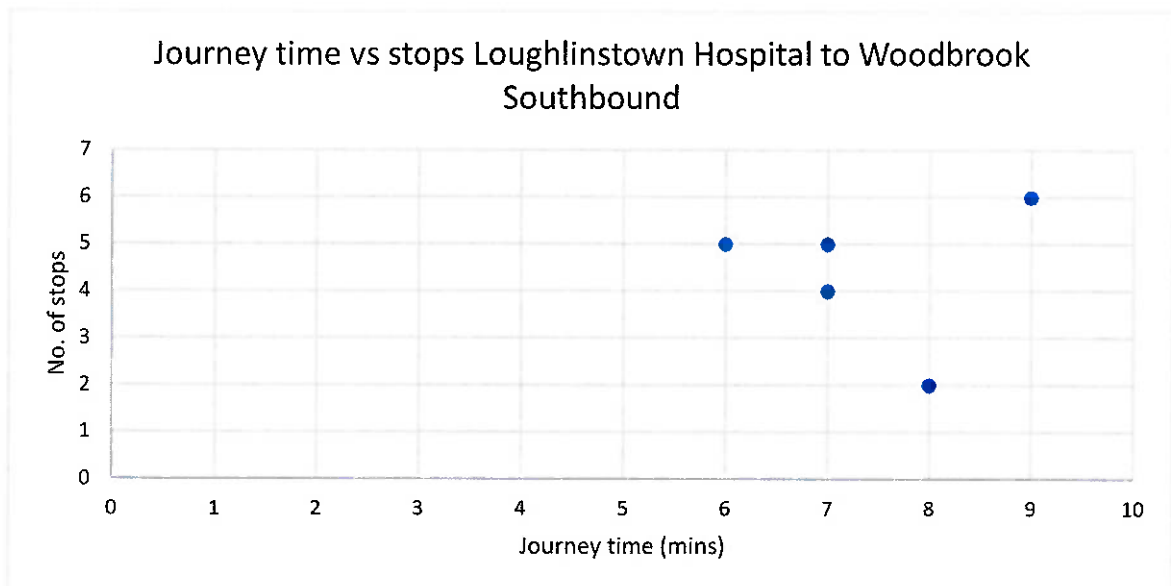


Chart 6



Journey time data is provided in Appendix 2

Additional notes

The proposed Light controlled crossing to the north of Seaview Park appears to be incorrectly located. With a significant amount of bus users coming from the Shanganagh Rd area, the crossing should be located to the south of Seaview Park. (detail only). Doubling the width of the road and will tend to increase traffic speed, (despite the fact that the speed limit for the route remains unchanged at 50k/hr) adding to the dangers associated with crossing the road at non-light controlled crossings.

Dublin Bus appears to use Castle St. as a bus driver change point. On 2 of the journeys surveyed, drivers changed at this point, the changes taking 2 mins and 16 mins. There are opportunities here for journey times to be made more reliable. (The delays caused by the changes were removed from the data for the purpose of analysis.)

Most of the conclusions from the surveys would have confirmed anecdotal evidence. I must assume that Dublin Bus are aware of the congestion points and times of delays that occur in the section from Quinsboro Rd to Woodbrook in both directions. Similarly Dublin Bus should be aware that there are no (or negligible) traffic generated bus delays in the section from Woodbrook to Loughlinstown in either direction.

Appendix 1

Traffic flow data Kentfield, between Loughlinstown roundabout and Rathmichael NS

Traffic survey Kentfield Northbound 2019

| Date | Time start | Time finish | Dir. | No.of vehicles | | Date | Time start | Time finish | Dir. | No.of vehicles |
|-------|------------|-------------|------|----------------|--|-------|------------|-------------|------|----------------|
| | 0600 | | | | | | 1330 | | | |
| | 0610 | | | | | | 1340 | | | |
| 08mar | 0620 | 0630 | n | 32 | | 12mar | 1350 | 1400 | n | 60 |
| | 0630 | | | | | | 1400 | | | |
| | 0640 | | | | | 01mar | 1410 | 1415 | n | 18 |
| 08mar | 0650 | 0700 | n | 50 | | | 1420 | | | |
| 06mar | 0700 | 0710 | n | 83 | | 04mar | 1430 | 1440 | n | 76 |
| 06mar | 0710 | 0720 | n | 73 | | 04mar | 1440 | 1450 | n | 73 |
| 05mar | 0720 | 0730 | n | 72 | | 04mar | 1450 | 1500 | n | 52 |
| 01mar | 0730 | 0740 | n | 76 | | | 1500 | | | |
| 05mar | 0740 | 0750 | n | 95 | | | 1510 | | | |
| 06mar | 0750 | 0800 | n | 77 | | | 1520 | | | |
| 01mar | 0800 | 0810 | n | 74 | | | 1530 | | | |
| 06mar | 0810 | 0820 | n | 96 | | 06mar | 1540 | 1550 | n | 60 |
| 01mar | 0820 | 0830 | n | 74 | | | 1550 | | | |
| 05mar | 0830 | 0840 | n | 66 | | | 1600 | | | |
| 01mar | 0840 | 0850 | n | 82 | | | 1610 | | | |
| 06mar | 0850 | 0900 | n | 97 | | | 1620 | | | |
| 01mar | 0900 | 0910 | n | 68 | | | 1630 | | | |
| 06mar | 0910 | 0920 | n | 74 | | 05mar | 1640 | 1650 | n | 37 |
| | 0920 | | | | | | 1650 | | | |
| 07mar | 0930 | 0935 | n | 22 | | | 1700 | | | |
| | 0940 | | | | | | 1710 | | | |
| 28feb | 0950 | 1000 | n | 49 | | | 1720 | | | |
| | 1000 | | | | | | 1730 | | | |
| | 1010 | | | | | 12mar | 1740 | 1750 | n | 58 |
| | 1020 | | | | | | 1750 | | | |
| | 1030 | | | | | | 1800 | | | |
| | 1040 | | | | | | 1810 | | | |
| | 1050 | | | | | | 1820 | | | |
| | 1100 | | | | | | 1830 | | | |
| | 1110 | | | | | 12mar | 1840 | 1850 | n | 63 |
| | 1120 | | | | | | 1850 | | | |
| | 1130 | | | | | | 1900 | | | |
| | 1140 | | | | | | 1910 | | | |
| | 1150 | | | | | | 1920 | | | |
| | 1200 | | | | | | 1930 | | | |
| 04mar | 1210 | 1220 | n | 53 | | 06mar | 1940 | 1945 | n | 26 |
| | 1220 | | | | | | 1950 | | | |
| | 1230 | | | | | | 2000 | | | |
| | 1240 | | | | | | 2010 | | | |
| | 1250 | | | | | | 2020 | | | |
| 06mar | 1300 | 1310 | n | 82 | | | 2030 | | | |
| | 1310 | | | | | 12mar | 2040 | 2050 | n | 41 |
| | 1320 | | | | | | 2050 | | | |

Traffic survey Thingwall Kentfield Southbound 2019

| Date | Time start | Time finish | Dir. | No.of vehicles | | Date | Time start | Time finish | Dir. | No.of vehicles |
|-------|------------|-------------|------|----------------|--|-------|------------|-------------|------|----------------|
| | 0600 | | | | | | 1330 | | | |
| | 0610 | | | | | 12mar | 1340 | 1350 | s | 71 |
| | 0620 | | | | | | 1350 | | | |
| 08mar | 0630 | 0640 | s | 18 | | 04mar | 1400 | 1410 | s | 70 |
| | 0640 | | | | | 04mar | 1410 | 1420 | s | 76 |
| | 0650 | | | | | 01mar | 1415 | 1420 | s | 40 |
| | 0700 | | | | | 04mar | 1420 | 1430 | s | 66 |
| | 0710 | | | | | 12mar | 1440 | 1450 | s | 60 |
| | 0720 | | | | | | 1450 | | | |
| 08mar | 0730 | 0740 | s | 45 | | | 1500 | | | |
| | 0740 | | | | | | 1510 | | | |
| | 0750 | | | | | | 1520 | | | |
| | 0800 | | | | | 06mar | 1530 | 1540 | s | 74 |
| 04mar | 0810 | 0820 | s | 43 | | | 1540 | | | |
| 05mar | 0820 | 0830 | s | 44 | | | 1550 | | | |
| 04mar | 0830 | 0840 | s | 69 | | | 1600 | | | |
| 04mar | 0840 | 0850 | s | 53 | | | 1610 | | | |
| 04mar | 0850 | 0900 | s | 75 | | | 1620 | | | |
| 04mar | 0900 | 0910 | s | 58 | | 05mar | 1630 | 1640 | s | 102 |
| 04mar | 0910 | 0920 | s | 65 | | | 1640 | | | |
| 04mar | 0920 | 0930 | s | 45 | | | 1650 | | | |
| | 0930 | | | | | 04mar | 1700 | 1710 | s | 114 |
| 07mar | 0940 | 0950 | s | 77 | | 04mar | 1710 | 1720 | s | 128 |
| | 0950 | | | | | 04mar | 1720 | 1730 | s | 127 |
| 06mar | 1000 | 1010 | s | 52 | | 04mar | 1730 | 1740 | s | 125 |
| | 1010 | | | | | 04mar | 1740 | 1750 | s | 118 |
| | 1020 | | | | | 04mar | 1750 | 1800 | s | 107 |
| | 1030 | | | | | 05mar | 1800 | 1810 | s | 147 |
| | 1040 | | | | | 05mar | 1810 | 1820 | s | 116 |
| | 1050 | | | | | 05mar | 1820 | 1830 | s | 123 |
| | 1100 | | | | | | 1830 | | | |
| | 1110 | | | | | | 1840 | | | |
| | 1120 | | | | | 12mar | 1850 | 1900 | s | 96 |
| | 1130 | | | | | | 1900 | | | |
| | 1140 | | | | | | 1910 | | | |
| | 1150 | | | | | | 1920 | | | |
| 04mar | 1200 | 1210 | s | 51 | | 06mar | 1935 | 1940 | s | 28 |
| | 1210 | | | | | | 1840 | | | |
| | 1220 | | | | | | 1950 | | | |
| | 1230 | | | | | | 2000 | | | |
| 06mar | 1240 | 1245 | s | 23 | | 12mar | 2010 | 2020 | s | 68 |
| 06mar | 1250 | 1300 | s | 79 | | | 2020 | | | |
| | 1300 | | | | | | 2030 | | | |
| | 1310 | | | | | | 2040 | | | |
| | 1320 | | | | | | 2050 | | | |

Traffic survey Kentfield Northbound 2023

| Date | Time start | Time finish | Dir. | No.of vehicles | | Date | Time start | Time finish | Dir. | No.of vehicles |
|-------|------------|-------------|------|----------------|--|------|------------|-------------|------|----------------|
| | 0600 | | | | | | 1330 | | | |
| | 0610 | | | | | | 1340 | | | |
| | 0620 | | | | | | 1350 | | | |
| | 0630 | | | | | | 1400 | | | |
| | 0640 | | | | | | 1410 | | | |
| | 0650 | | | | | | 1420 | | | |
| | 0700 | | | | | | 1430 | | | |
| | 0710 | | | | | | 1440 | | | |
| 13sep | 0720 | 0730 | n | 69 | | | 1450 | | | |
| 13sep | 0730 | 0740 | n | 85 | | | 1500 | | | |
| 13sep | 0740 | 07550 | n | 76 | | | 1510 | | | |
| 13sep | 0750 | 0800 | n | 75 | | | 1520 | | | |
| 13sep | 0800 | 0810 | n | 107 | | | 1530 | | | |
| 13sep | 0810 | 0820 | n | 84 | | | 1540 | | | |
| 13sep | 0820 | 0830 | n | 77 | | | 1550 | | | |
| 13sep | 0830 | 0840 | n | 53 | | | 1600 | | | |
| 13sep | 0840 | 0850 | n | 75 | | | 1610 | | | |
| 13sep | 0850 | 0900 | n | 61 | | | 1620 | | | |
| 15sep | 0900 | 0910 | n | 102 | | | 1630 | | | |
| 15sep | 0910 | 0920 | n | 75 | | | 1640 | | | |
| 15sep | 0920 | 0930 | n | 66 | | | 1650 | | | |
| | 0930 | | | | | | 1700 | | | |
| | 0940 | | | | | | 1710 | | | |
| | 0950 | | | | | | 1720 | | | |
| | 1000 | | | | | | 1730 | | | |
| | 1010 | | | | | | 1740 | | | |
| | 1020 | | | | | | 1750 | | | |
| | 1030 | | | | | | 1800 | | | |
| | 1040 | | | | | | 1810 | | | |
| | 1050 | | | | | | 1820 | | | |
| | 1100 | | | | | | 1830 | | | |
| | 1110 | | | | | | 1840 | | | |
| | 1120 | | | | | | 1850 | | | |
| | 1130 | | | | | | 1900 | | | |
| | 1140 | | | | | | 1910 | | | |
| | 1150 | | | | | | 1920 | | | |
| | 1200 | | | | | | 1930 | | | |
| | 1210 | | | | | | 1840 | | | |
| | 1220 | | | | | | 1950 | | | |
| | 1230 | | | | | | 2000 | | | |
| | 1240 | | | | | | 2010 | | | |
| | 1250 | | | | | | 2020 | | | |
| | 1300 | | | | | | 2030 | | | |
| | 1310 | | | | | | 2040 | | | |
| | 1320 | | | | | | 2050 | | | |

Traffic survey Kentfield Southbound 2023

| Date | Time start | Time finish | Dir. | No.of vehicles | | Date | Time start | Time finish | Dir. | No.of vehicles |
|-------|------------|-------------|------|----------------|--|------|------------|-------------|------|----------------|
| | 0600 | | | | | | 1330 | | | |
| | 0610 | | | | | | 1340 | | | |
| | 0620 | | | | | | 1350 | | | |
| | 0630 | | | | | | 1400 | | | |
| | 0640 | | | | | | 1410 | | | |
| | 0650 | | | | | | 1420 | | | |
| | 0700 | | | | | | 1430 | | | |
| | 0710 | | | | | | 1440 | | | |
| | 0720 | | | | | | 1450 | | | |
| | 0730 | | | | | | 1500 | | | |
| | 0740 | | | | | | 1510 | | | |
| | 0750 | | | | | | 1520 | | | |
| 14sep | 0800 | 0810 | s | | | | 1530 | 1540 | s | 84 |
| 14sep | 0810 | 0820 | s | | | | 1540 | | | |
| 14sep | 0820 | 0830 | s | | | | 1550 | | | |
| 14sep | 0830 | 0840 | s | | | | 1600 | | | |
| 14sep | 0840 | 0850 | s | | | | 1610 | | | |
| 14sep | 0850 | 0900 | s | | | | 1620 | | | |
| 14sep | 0900 | 0910 | s | | | | 1630 | | | |
| 14sep | 0910 | 0920 | s | | | | 1640 | | | |
| 14sep | 0920 | 0930 | s | | | | 1650 | | | |
| | 0930 | | | | | | 1700 | 1710 | s | 109 |
| | 0940 | | | | | | 1710 | 1720 | s | 101 |
| | 0950 | | | | | | 1720 | 1730 | s | 103 |
| | 1000 | | | | | | 1730 | 1740 | s | 90 |
| | 1010 | | | | | | 1740 | 1750 | s | 123 |
| | 1020 | | | | | | 1750 | 1800 | s | 116 |
| | 1030 | | | | | | 1800 | 1810 | s | 91 |
| | 1040 | | | | | | 1810 | 1820 | s | 83 |
| | 1050 | | | | | | 1820 | 1830 | s | 93 |
| | 1100 | | | | | | 1830 | | | |
| | 1110 | | | | | | 1840 | | | |
| | 1120 | | | | | | 1850 | | | |
| | 1130 | | | | | | 1900 | | | |
| | 1140 | | | | | | 1910 | | | |
| | 1150 | | | | | | 1920 | | | |
| | 1200 | | | | | | 1930 | | | |
| | 1210 | | | | | | 1840 | | | |
| | 1220 | | | | | | 1950 | | | |
| | 1230 | | | | | | 2000 | | | |
| | 1240 | | | | | | 2010 | | | |
| | 1250 | | | | | | 2020 | | | |
| | 1300 | | | | | | 2030 | | | |
| | 1310 | | | | | | 2040 | | | |
| | 1320 | | | | | | 2050 | | | |

Appendix 2

Bus journey time data between Bray Cornerstone Church /Quinsboro Rd and Loughlinstown roundabout

Southbound journey times; 2023

| Day | Sat | Mon | Mon | Tue | Tue | Thu | Thu |
|--------------------|-------|-------|-------|-------|-------|-------|-------|
| Date | 02/09 | 04/09 | 04/09 | 05/09 | 05/09 | 07/09 | 07/09 |
| Loughlinstown Hosp | 1424 | 1502 | 1612 | 1657 | 1757 | 0718 | 0802 |
| Kentfield | 1425 | 1503 | 1613 | 1658 | 1758 | 0719 | 0803 |
| Station Rd | 1427 | 1504 | 1614 | 1659 | 1759 | 0720 | 0804 |
| Stonebridge Close | 1428 | 1505 | 1616 | 1701 | 1800 | 0722 | 0806 |
| Claremount | 1429 | 1506 | 1617 | 1702 | 1801 | 0723 | 0807 |
| Shanganagh Castle | 1431 | 1507 | 1618 | 1703 | 1802 | 0724 | 0808 |
| Shanganagh Cem. | 1431 | 1508 | 1619 | 1703 | 1802 | 0725 | 0808 |
| St.James Church | 1432 | 1508 | 1620 | 1704 | 1803 | 0726 | 0809 |
| Woodbrook | 1433 | 1509 | 1621 | 1704 | 1803 | 0727 | 0810 |
| Old Conna Av | 1437 | 1513 | 1623 | 1708 | 1806 | 0728 | 0811 |
| Castle St | 1443 | 1518 | 1625 | 1711 | 1808 | 0730 | 0813 |
| Dwyer Park | 1443 | 1519 | 1626 | 1712 | 1809 | 0730 | 0813 |
| Cornerstone Church | 1446 | 1520 | 1628 | 1713 | 1811 | 0732 | 0815 |

Northbound journey times; 2023

| Day | Mon | Mon | Tue | Tue | Thu | Thu |
|--------------------|-----------|-------|-----------|-------|-------|-------|
| Date | 04/09 | 04/09 | 05/09 | 05/09 | 07/09 | 07/09 |
| Cornerstone Church | 1529 | 1632 | 1725 | 1813 | 0743 | 0824 |
| St.Cronan's Rd | 1530/1546 | 1633 | 1726/1728 | 1815 | 0743 | 0827 |
| Roseville Court | 1546 | 1634 | 1729 | 1815 | 0745 | 0829 |
| Old Conna Av | 1551 | 1636 | 1730 | 1817 | 0746 | 0832 |
| Woodbrook | 1552 | 1636 | 1731 | 1818 | 0748 | 0833 |
| St.James Church | 1553 | 1637 | 1732 | 1819 | 0749 | 0834 |
| Shanganagh Cen. | 1553 | 1638 | 1732 | 1819 | 0749 | 0835 |
| Shanganagh Castle | 1554 | 1639 | 1732 | 1820 | 0750 | 0835 |
| Crinken Lane | 1554 | 1640 | 1732 | 1821 | 0750 | 0835 |
| Claremount | 1555 | 1640 | 1733 | 1821 | 0751 | 0836 |
| Stonebridge Close | 1557 | 1641 | 1733 | 1822 | 0752 | 0836 |
| Station Rd | 1558 | 1642 | 1734 | 1824 | 0753 | 0838 |
| Kentfield | 1559 | 1643 | 1735 | 1824 | 0754 | 0840 |
| Loughlinstown Hosp | 1601 | 1644 | 1736 | 1826 | 0756 | 0842 |

Note 1

Note 1

Delays caused by driver changes discounted in analysis