

Dublin City Centre Transport Study Consultation Submission

For Coach Tourism and Transport Council of Ireland (CTTC)



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Executive Summary

CTTC members welcome this opportunity to respond to Dublin City Council's public consultation in relation to the ongoing Dublin City Centre Transport Study. They concur with the need to actively intervene in the management of the City's transport networks to secure positive outcomes for transport users, and for Dublin's economy. Its members are particularly supportive of the study's overarching goal to increase public transport use into, and improving the public realm within, Dublin City Centre.

Although CTTC members are broadly supportive of this joint Dublin City Council/ National Transport Authority (NTA) initiative, they have a number of concerns in relation to key aspects of the approach pursued to date in undertaking the study. Amongst their concerns are:

- inadequate consideration of the existing and future situation (including the role of the private bus and coach sector), in addition to the assumption that Bus Rapid Transit (BRT) schemes as identified in NTA's Implementation Plan will be delivered, despite the apparent lack of a published business case for such investment;
- the limited scope of option generation, including measures inside the study area such as coach parking and shared interchange facilities (as defined by Section 62 of the Dublin Transport Authority Act 2008), and outside such as park & ride, which could compliment the study's emerging recommendations and/ or mitigate impacts; and
- the apparent limited analysis to date of the emerging study recommendations, including traffic impacts within and outside the study area arising from traffic diverted away from the Core City Centre.

In light of the above concerns, CTTC members feel that the study's emerging recommendations may not best serve the interests of transport users, and risk undermining Dublin City Centre's critical economic role at both regional and national levels. Finally, through inadequate consideration of the role of the private bus and coach sector and targeted/ low-cost measures such as coach parking, designation of shared use of public transport interchange facilities and development of park & ride to facilitate continued growth in the future, it is unclear if the recommendations represent value for money for the taxpayer.

Building upon many positive aspects of the study to date, CTTC members recommend that:

- the study approach be reviewed with a view to strengthening identified weaknesses, including greater consideration of the existing and future role of private bus and coach operations, and measures required to support their operations, in addition to a review of future network assumptions such as BRT; and
- the traffic and transport impacts of the proposals be comprehensively analysed to demonstrate, in particular, the capacity of the road network within the City to accommodate diverted traffic.

In doing so, the study has the opportunity to maximise support from the wide range of stakeholders that are essential to the future implementation of its recommendations.

1. Introduction

1.1. Overview

Coach Tourism and Transport Council of Ireland (CTTC) members welcome this opportunity to respond to Dublin City Council's public consultation in relation to the ongoing Dublin City Centre Transport Study. CTTC members welcome the commissioning of this study, concurring with the need to actively intervene in the management of the City's transport networks to secure positive outcomes for transport users, and for Dublin's economy. They are particularly supportive of the study's goal to increase public transport use into, and improving the public realm within, Dublin City Centre.

Although CTTC members are broadly supportive of this joint Dublin City Council/ National Transport Authority initiative, having reviewed the Main Report¹ they have a number of concerns in relation to key aspects of the approach pursued to date in undertaking study. They believe that the current consultation exercise represents an opportunity to address their concerns, and in doing so, to maximise support from the wide range of stakeholders that are essential to the future implementation of the study's recommendations.

1.2. About CTTC

The CTTC is the representative body for Ireland's coach touring companies and Ireland's private bus operators. It promotes Ireland's top independent coach hire operators.

The CTTC's members are experts in all types of coach hire and transport solutions including: provision of scheduled services, school transport, airport transfers, day tours, extended touring, incentive travel and golf tours. In addition to long distance scheduled services, many of CTTC's member organisations also operate licensed bus services in towns and cities throughout Ireland.

All CTTC members are family-owned companies with a combined fleet of over 1,000 coaches, employing over 2,000 people directly. The CTTC comments and makes representation regularly on matters of concern to its members such as public transport, school transport, the coach tourism sector and the tourism industry generally.

1.3. About Transport Insights

Transport Insights is an Irish based transport planning consultancy. With a core team of internationally experienced consultants, we provide innovative, effective and deliverable advice and cost effective,

¹ Dublin City centre Transport Study Consultation Document, June 2015 – hereafter referred to as “the Report”

sustainable solutions. Our client list has expanded includes asset managers, banks, business groups, developers, transport operators, local authorities and national government agencies in Ireland and internationally. Recent Transport Insights' experience includes:

- Metro line extension feasibility study support on behalf of the European Investment Bank (November 2014 to January 2015);
- Demand forecasting, economic and financial appraisal of a major/ €400+ million Metro Line renewal programme; on behalf of METROREX (September to November 2014);
- Cork South Ring Road/ N40 Demand Management Study advice to Cork City and County Councils (March 2014, ongoing); and
- Advice to domestic bus operators, in response to a range of central government policies and initiatives, including bus contracts and transport studies (September 2013, ongoing).

2. Study Scope and Approach

2.1. Geographic Scope

The geographic scope of the study appears to be *“defined spatially as the area within the canals and North Circular / South Circular Roads.”* The analysis however appears to have been limited to a more confined area – *“For analysis purposes, the focus of this Study concentrated on the eastern side of the City Centre, which has the highest concentration of employment and other destinations.”* This area is illustrated in Figure 2.1 of the Report.

2.2. Planning and Policy Context

The planning and policy backdrop to this study is set out in Section 2.5 of the Report, and *“intentionally links directly with the principles, concepts and objectives outlined in the Dublin City Development Plan 2011-2017 and the City Council’s Public Realm Strategy (2011).* Furthermore, the Report states that the study has *“expanded on transport initiatives first outlined in the ‘City Centre Transport Plan’ published by Dublin City Council Roads and Traffic Department in 2008, as well as taking into account the infrastructure investment programme set out in the NTA’s ‘Integrated Implementation Plan’”*

2.3. Best Practice Approaches

UK Department for Transport Appraisal Guidance

Various sources of guidance are available to assist those in undertaking a study such as the ongoing Dublin City Transport Study. One such source, is *“Transport Analysis Guidance – the Transport Appraisal Process”*² published by the UK Department for Transport. The Unit provides *“detail on the process of appraisal and associated requirements for transport interventions – from initial intervention genesis to the detailed appraisal required to support preparation of business or investment cases to support subsequent approval stages and through to post implementation evaluation.”* The Guidance indicates three stages in the transport appraisal process, as follows:

- Stage 1 – Option Development;
- Stage 2 – Further Appraisal; and
- Stage 3 – Implementation, Monitoring and Evaluation.

Stage 1, Option Development

Stage 1 (Option Development) *“involves identifying the need for intervention and developing options to address a clear set of locally developed objectives which express desired outcomes. These are then*

² UK Department for Transport, January 2014

sifted for the better performing options to be taken on to further detailed appraisal in Stage 2.” Within Stage 1, the following steps are recommended:

- Step 1, understanding the current situation;
- Step 2, understanding the future situation;
- Step 3, establishing the need for intervention;
- Step 4a, identifying objectives;
- Step 4b, define geographic area of impact to be addressed by the intervention;
- Step 5, generating options;
- Step 6, initial sifting;
- Step 7, development and assessment of potential options;
- Step 8, produce options assessment report, or similar; and
- Step 9, clarify modelling and appraisal methodology.

For the reasons outlined in the remainder of this submission, the study does not appear to have followed best practice in relation to the understanding of the current and future situation, identification of objectives and generation and sifting of options.

3. Study Challenges and Objectives

3.1. Consideration of Existing and Future Situation

Addressing the Challenges of a Growing City

The Report emphasises the challenges of meeting future growth in demand for travel into the City Centre:

“If growth continues as predicted, by 2023 it is likely that the City’s transport network will have to cater for an additional 42,000 commuter trips coming into the City Centre each day.....” (Section 2.1, Study Area and Context, Overview)

While it is acknowledged that this level of predominantly peak period future growth is substantial, it is noted that:

- In Section 4.1 of the Report, it is clarified that that this increase, of in the order of 20%, is relative to 2011 levels.
- According to Table 2.2, approximately 9k (or over 20%) of this forecast growth has manifested itself in the three year period between 2011 and 2014.
- While the numbers travelling by bus and rail have increased between 2011 and 2014, when compared to 2006 levels, 2014 demand is substantially lower – approximately 3k and 9k respectively for bus and rail. Were passenger levels on bus and rail to return to 2006 levels, a further 12k of demand growth could be accommodated – this could be achieved with limited further investment, including the following measures as listed under the following Transport Network Assumptions (Report, Section 4.3):
 - *“Existing bus routes and frequencies will continue to be reviewed and modified as necessary.*
 - *The DART service will be increased to a 10 minute frequency in peak hours.”*
- In addition to possible future introduction of BRT (noting the absence, at present, of a business case supporting such investment), there appears to be significant scope to accommodate substantial further increases in public transport use beyond historic (2006) levels, in particular following implementation of the additional schemes as listed in Section 4.3 of the Report, including:
 - *Luas Cross City will be operational by the end of 2017....*
 - *The Phoenix Park Tunnel will be opened by the end of 2016, bringing rail passengers from the Kildare line to the east of the city by serving Drumcondra, Connolly, Tara, Pearse and Grand Canal Dock stations.*

- Bicycle use *“has more than doubled to almost 10,500 journeys or 5.4% of total trips – an increase of 114%”*.

It is acknowledged that measures to accommodate delivery of specific transport schemes, and to further promote increased walking and cycling, are likely to be required, and indeed are likely to be essential if the growth in cycling experienced in recent years is to continue into the future. The extent to which the emerging draft recommendations are required to accommodate forecast travel demand growth up to 2023 into and within the City Centre is however unclear.

Future Network Assumptions – Bus Rapid Transit (BRT)

To ensure a consistent assessment of options by transport studies, best practice dictates that careful consideration is given to defining the future transport network in the absence of any options identified by the study, i.e. the do-minimum scenario. This is essential to ensure that uncertainties regarding the future delivery of transport schemes do not undermine the identification of study options and the consistency in which they are treated - and ultimately the robustness of the recommendations which emerge from a study.

It is noted that the main network assumptions as listed in Section 4.3 of the Report includes BRT:- *“Bus Rapid Transit services will operate through the City Centre in line with the proposals set out in the NTA Integrated Implementation Plan.”* At this point, none of the three identified BRT schemes have a published business case, and as such do not have funding approval. Furthermore, they do not have statutory planning approval. The rationale for consideration of BRT’s delivery as a certainty is therefore unclear, and risks undermining the robustness of the study findings.

3.2. Study Objectives

The setting of clearly defined study objectives represents a key initial step in undertaking a transport study – these represent the study’s *raison d’être*. As recommended in the above guidance, they should be evidence based, considering the current and future situation and their transport problems: *“they should be consistent with wider local, regional and national objectives identified in Step 1, but focused on addressing the identified need, rather than seeking to contribute to all of these objectives.”*

The study objectives have not been set out alongside each other within the Report, although various references to them are made throughout the Report, including:

- *“The overarching objective of this Study is to develop a platform for the implementation of the policies and objectives of Dublin City Council and the NTA, and achieve, as stipulated in Chapter 5 of the City Council’s Development Plan, a modal share of 55% for public transport, 10% walking, 15% cycling and 20% for private car.”* (Section 3.1, Challenges and Requirements for Transport Within the City Centre, Overview)

- *“.....with the objective of ensuring that the overall transport system is capable of operating efficiently and reliably, with consistent journey times. (Section 5.1, Transport Network Proposals, Overview)*
- *“.....with the objective of reducing the amount of traffic using the city centre to get to their destination.”*
- *“....An overall objective of ensuring that public transport can operate as efficiently as possible.” (Section 5.2, Transport Network Proposals, Proposals)*
- *“Key objectives of this Study are to safeguard the efficiency of the bus operating environment in the context of Luas Cross City and increased congestion, as well as enabling the bus network to transport a significantly increased number of commuters, shoppers and visitors into Dublin City each day.” (Section 6.1, Bus Network Proposals, Overview)*

With the exception of the Dublin City Development Plan’s overarching City Centre mode share targets (which are presented as a key objective of this study), it is noted that other objectives above are presented in relation to, and justification for, specific study recommendations.

Best practice dictates that practitioners *“identify a clear set of intervention-specific objectives to address the identified problems.”* The extent to which an understanding of the existing and future situation has informed the determination of the problems to be addressed by the study, and subsequently how these steps have informed the identification of objectives is however unclear.

As potential measures will contribute positively to the achievement of some objectives and hinder the realization of others, a failure to clearly present study objectives, and to then use these objectives as a basis for assessing the merits of study options undermines confidence in the robustness of the study recommendations.

In considering the existing and future situation, appropriate attention should be given to the role of private bus and coach operations and their facilities, including, for example park & ride and coach parking. Although recommendations in relation to both are included within the Report, it is unclear that the existing and potential future role of private bus and coach operations has been adequately considered (see Section 4.1 of this submission).

4. Option Generation and Appraisal

4.1. Option Generation

Previous Studies and Plans

Section 2.5 of the Report provides the planning and policy backdrop to this study with clear references and linkages to:

- the Dublin City Development Plan 2011-2017;
- Your City, Your Space - the City Council's Public Realm Strategy (2011);
- Dublin City Council's City Centre Transport Plan (2008); and
- the NTA's Integrated Implementation Plan 2013-2018.

In relation to the City Council's public realm strategy, the Report states that:

"This plan has fully incorporated the philosophy and suggestions as set out in the Public Realm Strategy, and has developed proposals which seek to facilitate the design policies outlined in the Strategy."

The study appears to treat Dublin City Council's City Centre Transport Plan in a similar manner:

"The initiatives and proposals presented in this document have been incorporated into the City Centre Transport Study."

While it is considered essential to build upon previous relevant studies, the current study represents a new planning initiative, seeking to bring together a range of previous plans, support future growth, and facilitate delivery of new transport infrastructure. As a result, the objectives of the current study will be different to those of previous studies, necessitating that the merits of previous study recommendations are independently assessed. It is unclear that this study has taken this opportunity to do so. Furthermore, the extent to which a more extensive set of options beyond those emerging from previous studies have been identified and considered is unclear. This is expanded upon below for two specific areas of interest to CTTC members.

Coach Parking

Section 10.4.4 of the Report includes recommendations in relation to coach parking facilities, as follows:

- *"It is proposed that a Coach Parking Facility will be developed close to the City Centre, providing secure bus parking and driver facilities off-street, within easy access of the main city attractions/employment areas. A planning application is currently being prepared for such a facility at a site in the Dublin Docklands area."*

- *“Such a facility will remove a large amount of bus layover from the city centre, which will have a number of benefits for the city’s public realm, with the removal of stationary buses from the streetscape, particularly in areas of architectural heritage (Mountjoy Square/Marlborough Street/Merrion Square).”*

While the provision of new coach parking facilities within the City Centre is welcome, the role of the coach (and privately operated scheduled bus) industry does not appear to have been sufficiently well acknowledged by the study. For example, the Report does not attempt to assess existing demand for coach parking, and the extent to which this is likely to grow in the future. This is considered essential to inform:

- the priority given to the development of an off-street coach parking facilities;
- location, capacity and operating characteristics of such facilities;
- whether one or more facility is needed to accommodate growth in demand up to 2023 and beyond; and
- the appropriateness, feasibility and timing of removal of on-street City Centre coach parking facilities as currently proposed by the study.

Coinciding with delivery of new off-street coach parking facilities, it is recommended that existing on-street coach parking facilities are time-restricted, thus making best use of the limited facilities available within the City Centre. Consideration should also be given to driver information and smart technology solutions to provide information to coach drivers in relation to on-street facilities and occupancy levels.

Shared Use of Interchange Facilities

The Report (Section 6.3.3.4) recommends development of *“high quality, on-street passenger interchange points between public transport services”* at the following locations:

- *“Amiens Street /Store Street (Train/Bus/Luas/Taxi/dublinbikes/Car);*
- *Westmoreland Street/D’Olier Street (Train/Bus/Luas/Taxi/dublinbikes); and*
- *Heuston Station (Train/Bus/Luas/Taxi/dublinbikes/Car).”*

As noted above, under the ‘Coach Parking’ heading above, the role of the privately operated scheduled bus industry does not appear to have been sufficiently well acknowledged by the study. Were it given greater prominence, CTTC members feel that the benefits of designating the above locations as shared facilities (as defined by Section 62 of the Dublin Transport Authority Act 2008), thus allowing access by private operators, would emerge as a clear recommendation of the study. Failing to do so will, in the view of CTTC members, reinforce the dominant position of existing state bus operators, and constrain the potential role of the private sector to accommodate growth in travel demand to/ from Dublin City Centre.

Bus and Rail-Based Park and Ride

The study acknowledges bus as *“the primary mode of public transport in the Dublin region”*, with bus *“currently transporting five times more people than travel by Luas, and over twice as many as rail system.”* Additionally, Section 4.3 of the Report states that *“existing bus routes and frequencies will continue to be reviewed and modified as necessary.”*

Despite this acknowledgement of the significant role of bus, it is unclear if the study’s emerging draft recommendations will maximise the full potential of bus to accommodate further growth in public transport passenger demand into the City Centre. In addition to enhanced bus priority, bus stop, information and ticketing facilities, bus-based park and ride offers potential to intercept car-based trips at the edge of the congested urban area. In the context of the emerging draft recommendations to restrict vehicular traffic within the Core City Centre (through implementation of new bus gates), bus and rail-based park and ride could play an important role in mitigating identified traffic and transport impacts, and reduced accessibility to and within the City Centre.

Section 10.3.1.2 sets out the emerging study recommendations in relation to Heuston Station, including development of a *“new multi-story car park which would serve intercity train users as well as commuters accessing public transport options at Heuston Station.”* While this recommendation is welcomed by CTTC members, more comprehensive consideration of the role of park and ride is recommended. This includes consideration of the merits of facilities outside the study area.

4.2. Option Appraisal

Having identified a comprehensive set of options to address the study objectives, options need to be assessed to determine the extent to which they contribute to the study’s identified objectives (in isolation or in combination with other options), and are deliverable. As per the earlier mentioned DfT guidance, this process could include:

- Sifting:- *“An initial sift should therefore be undertaken to identify any ‘showstoppers’ which are likely to prevent an option progressing at a subsequent stage in the process.”*
- Further assessment:- *“developing potential options to a sufficient level of design/specification and collecting sufficient evidence to be able to distinguish the relative costs, benefits and impacts of the options under consideration.”*

In both instances, the development of a structured and transparent assessment framework is essential in determining the relative merits of potential interventions. Furthermore, such a framework provides confidence that shortlisted options will address the objectives of the study (and in doing so, help address traffic and transport problems in the City), and ultimately provide the supporting rationale for the appropriateness of the emerging study recommendations.

The Report does not provide information in relation to the sifting and appraisal process pursued in arriving at the emerging draft study recommendations.

5. Impact Assessment

5.1. Traffic Network Proposals

To achieve the modal shift targets intended from the study, and in particular significant increases in cycling and public transport use, the study's emerging draft recommendations include a number of major interventions. Amongst the proposals are new bus gates at:

- the north quays at Bachelors Walk;
- the south Quays at Aston Quay, Burgh Quay or Georges; and
- Westmoreland Street/D'Olier Street.

In addition to the above new bus gate proposals, it is also proposed *“to reduce the number of traffic lanes through College Green to one lane in each direction. This is a significant change but one that is necessary if the streetscape of College Green is to be radically improved, and if appropriate provision is to be made for both Luas and non-vehicular modes of transport through this area.”* To accommodate the reduction of College Street to one lane in each direction, it is proposed to extend the operating hours of the bus gate to operate in future on a 24 hour basis.

5.2. Traffic and Transport Impacts

The intended outcomes of the proposed traffic network changes are included in Section 5.4 of the Report:

“The changes will allow the road network to be utilised more efficiently for all modes traversing and accessing the city centre, and will facilitate the transformation of central places, such as College Green and the Quays. The proposed revisions to the road network will ensure that the city remains accessible by private vehicles, particularly in relation to access to car parking in the vicinity of the north side and south side retail centres.”

It is noted that the outcomes are referred to as *“intended”* and no evidence is provided within the report to indicate the traffic impacts of the proposals have been modelled. The proposals represent a radical reconfiguration of the vehicular network within the Core City Centre. While one likely outcome of the proposals is to encourage a modal shift from car to public transport – which would be welcome, diversion of trips away from links affected by the proposed restrictions represents a further and potentially more significant outcome (in particular for through trips, i.e. those with origins and destinations outside the City Centre).

The road network within Dublin City already experiences significant traffic congestion, in particular during peak periods. Arising from existing levels of traffic congestion on the road network, it is unclear if it can accommodate diverted traffic, without leading to potentially substantial further increases in

traffic congestion. The traffic impacts of the proposals do not appear, as of yet, to have been modelled. As a result, the appropriateness of the emerging draft study recommendations, and in particular those measures that restrict vehicular movement on key links in the Core City Centre area, is unclear.

6. Summary and Recommendations

6.1. Summary

Coach Tourism and Transport Council of Ireland (CTTC) members welcome this opportunity to respond to Dublin City Council's public consultation in relation to the ongoing Dublin City Centre Transport Study. Their members welcome the commissioning of this study, concurring with the need to actively intervene in the management of the City's transport networks to secure positive outcomes for transport users, and for Dublin's economy. CTTC members are particularly supportive of the study's goal to increase public transport use into, and improving the public realm within, Dublin City Centre.

Although CTTC members are broadly supportive of this joint Dublin City Council/ NTA initiative, they have a number of concerns in relation to key aspects of the approach pursued to date in undertaking the study. Arising from these concerns, there is a risk therefore that the emerging draft recommendations will:

- place an unnecessary burden on the exchequer to fund their implementation; and/ or
- give rise to further unintended impacts both within and outside the study area.

6.2. Recommendations

Building upon many positive aspects of the study to date, CTTC members recommend that:

- the study approach be reviewed with a view to strengthening identified weaknesses, including greater consideration of the existing and future role of private bus and coach operations, and the measures required to support their operations (including specifically coach parking, designation of shared use of public transport interchange facilities and development of park & ride), in addition to a review of future network assumptions such as BRT; and
- the traffic and transport impacts of the proposals be comprehensively analysed to demonstrate, in particular, the capacity of the road network within the City to accommodate diverted traffic.

In doing so, the study has the opportunity to maximise support from the wide range of stakeholders that are essential to the future implementation of its recommendations.