

Draft GDA Transport Strategy 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 the National Transport Authority's public consultation on the Draft Transport Strategy for the Greater Dublin Area (GDA) 2016 – 2035. The strategy has the potential to provide a framework for the planning and delivery of transport infrastructure and services in the region over the next twenty years. Its members are supportive of the emphasis afforded within the Draft Strategy to enhancing the public transport network, and welcome the acknowledgement that, in the context of the Government's recently announced plans for delivery of Metro North by 2026/2027, Bus Rapid Transit along the Swords/ Airport to City Centre corridor may no longer be appropriate.

Although CTTC members are broadly supportive of its recommendations, they have a number of concerns in relation to certain aspects of the Draft Strategy, including:

- An apparent lack of consideration for the lessons learned from previous GDA transport strategies, including forecast versus outturn transport impacts, and reasons why previously identified interventions weren't advanced to delivery.
- A lack of specificity and prioritisation of the transport related challenges facing the Greater Dublin Area, i.e. where, when and how transport problems are likely to be experienced over the next 20 years, and the implications of such transport problems.
- A lack of clarity in relation to the Draft Strategy's objectives, and the process underpinning the appraisal and prioritisation of interventions at a regional level.
- Limited consideration of the role of existing bus and coach services, and opportunities to further exploit their potential, through measures such as bus-based park and ride, shared interchanges and bus stop infrastructure (in accordance with Section 62 of the Dublin Transport Authority Act 2008), coach parking etc.
- Risks to the strategy's deliverability, including an apparent weak economic case for the overall strategy, with a benefit to cost ratio of 1.3 (excluding wider economic benefits) indicating low value for money. Should delivery costs increase, or benefits erode, key elements of the strategy may prove undeliverable.
- An apparent failure to consider the role of private bus operators in supporting the realisation of the Draft Strategy. Extensive international evidence exists (including from research on behalf of the Authority) to support the realisation of substantial operating cost savings following introduction of competitive tendering processes. Such savings could facilitate improvements to public transport services beyond levels which might otherwise be affordable, and/ or accelerate the pace of delivery of planned new transport infrastructure.

In anticipation of Ministerial approval of the Transport Strategy, and as required by the relevant legislation (within 9 months of its approval), CTTC members recommend that their identified concerns be addressed by the Authority within the context of its development of a new Integrated Implementation Plan covering the

next six years. The Plan should afford greater emphasis to the role of private bus and coach operations, and be underpinned by an assessment of future City Centre coach parking requirements, and potential for bus-based park and ride.

To support continued growth in public transport use in the short to medium term, **CTTC members recommend that the identified Core Bus Network and City Centre coach parking facility be included for delivery within the lifetime of the Integrated Implementation Plan.** In developing the Plan, **CTTC also requests that the Authority engage with its members, to assist in the identification of measures that can be implemented at little or no cost to the exchequer** (including the Swords/ Airport to City Centre corridor).

1. Introduction

1.1. Overview

Coach Tourism and Transport Council of Ireland (CTTC) members welcome this opportunity to respond to the National Transport Authority's public consultation in relation to the recently published Draft Transport Strategy for the Greater Dublin Area. CTTC members believe that the Draft Strategy represents an opportunity to secure positive outcomes for transport users (through reduced journey times and improved reliability), and to ensure that transport supports existing economic activity and the realisation of economic growth aspirations in Dublin and surrounding counties. They are particularly supportive of the emphasis placed within the Draft Strategy on continued investment in the development of a comprehensive integrated public transport network.

Although CTTC members are broadly supportive of the contents of the Draft Strategy, they have a number of concerns in relation to aspects of the approach pursued to date by the Authority in its development. They view the current consultation exercise, and subsequent development of an Integrated Implementation Plan, as an opportunity to address their concerns, and in doing so, to maximise support from the wide range of stakeholders that are essential to support the future delivery of the Strategy.

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, and 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, 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. Strategy Scope and Approach

2.1. Strategy Purpose and Legislative Requirements

The stated purpose of the strategy is *“to contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”* It also provides:

- *“a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades”;* and
- *“a transport planning policy around which other agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities.”*

CTTC members note requirements of the Dublin Transport Authority Act 2008 to develop a transport strategy for the region, the objective of which is to *“provide a long-term strategic planning framework for the integrated development of transport infrastructure and services in the GDA.”* It is also noted that *“in accordance with section 12(4), (the strategy) shall consider the future development of the transport system in the GDA for a period of not less than 12 years and not more than 20 years.”*

In recognition of the long-term horizon for planning and delivery of major public transport schemes, CTTC members welcome the Authority’s determination that the upper limit, i.e. 20 years, represents an appropriate planning horizon for the updated Strategy.

While the strategy provides the framework for planning and delivery of transport infrastructure, CTTC members acknowledge interrelationships with the Authority’s short-medium term Integrated Implementation Plan, which, through provisions of the Dublin Transport Authority Act 2008, would be developed *“within 9 months of the approval by the Minister of a transport strategy..... for the ensuing 6 year period”*.

2.2. Transport and Planning Policy Context

Section 2.1 of the Draft Strategy provides an overview of the national, regional and local policy context in which the strategy is being developed, with the Transport Strategy for the Greater Dublin Area a key element of Tier 2 – Regional Planning. In addition to the Draft Strategy’s criticality at a regional level, it is also of the utmost importance to both national, e.g. supporting achievement of national mode share targets; and local planning, e.g. supporting local spatial and economic planning aspirations tiers.

Section 2.3 of the Draft Strategy sets out the transport and planning policy context within which the strategy is being developed. Of greatest significance at a national level, in terms of setting the overarching transport related policy context, are:

- Strategic Framework for Investment in Landside Transport (SFILT), DTTAS 2014;
- Smarter Travel, DoT 2009;
- Planning Policy Statement, DECLG 2015; and
- Infrastructure and Capital Investment 2016-2021, DPER 2015.

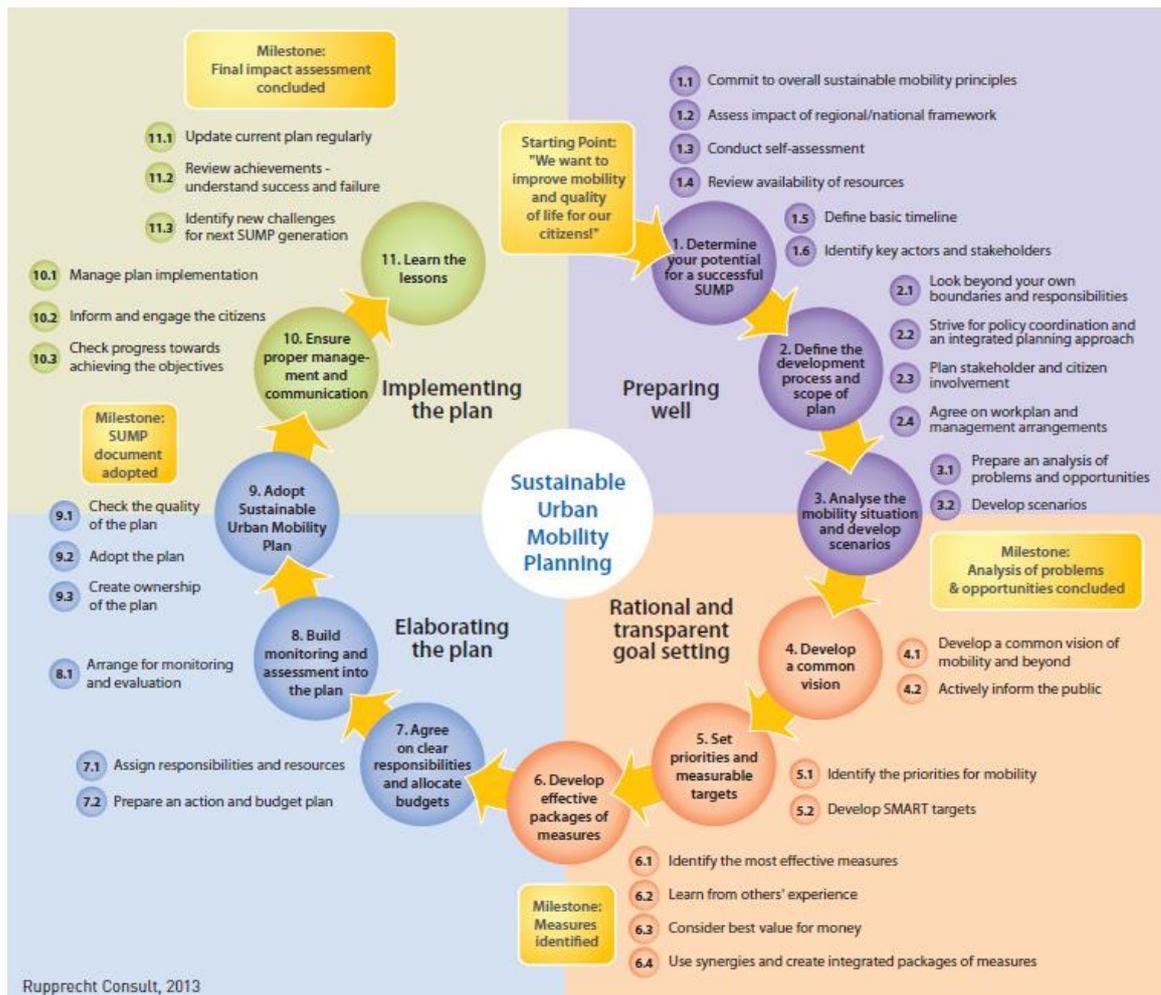
2.3. Strategy Update Approach

The process of developing a transport strategy is complex, however maximising its effectiveness while simultaneously ensuring its deliverability are of the utmost importance. Successful strategies generally share many common elements, such as those illustrated in the planning cycle flowchart from the EU funded Guidelines for Developing and Implementing a Sustainable Urban Mobility Plan (SUMP), and indicated in Figure 2.1 (overleaf). Key elements of a successful transport strategy can be summarised as follows:

- scoping;
- lessons learnt;
- strategy challenges and objectives;
- option development and appraisal; and
- option appraisal and appraisal.

Observations in relation to the Draft Transport Strategy under the above headings are provided within the remainder of this section of the Submission.

Figure 2.1 Planning Cycle for a Sustainable Urban Mobility Plan¹



2.4. Scoping

A comprehensive scoping exercise will ensure the strategy development process is robust, and help in securing stakeholder and subsequent political/ public support. This stage of the strategy development process could include:

- a review of international contemporary best practice to inform and shape the strategy update process;
- scoping compliance with legislative requirements, e.g. Strategic Environmental Assessment (SEA) Directive;
- stakeholder engagement to inform the approach pursued in updating the strategy, and to agree the extent of further engagement during (and after) its development; and

¹ Guidelines: Developing and Implementing a Sustainable Urban Mobility Plan (European Platform on Sustainable Urban Mobility Plans, January 2014)

- investigating and agreeing the scope to enhance alignment between land use/ spatial planning and economic development strategies or policies.

The Authority undertook a consultation exercise in February of this year in relation to the strategy development process, however with the exception of SEA scoping (identifying a need for such an assessment), it is unclear if the scoping stage was sufficiently broad to encompass other areas referred to above.

2.5. Lessons Learned

Most strategies have long term planning horizons and are updated in accordance with reviews of related policies or programmes – generally at 5-6 year cycles. Before developing a new transport strategy, and as recommended by the SUMP process flow chart in Figure 2.1, evaluating the success of the existing strategy can help ensure that lessons are learnt – which elements were successful, which less so, and the reasons why.

A successful transport strategy can be assessed through its effectiveness and deliverability, however evaluating success in this way is acknowledged to be complex, and therefore the selection and use of key ‘*success indicators*’ would add value to learning lessons from past planning processes. These could include a review of the extent to which previous strategy components been advanced to delivery, and outturn versus forecast transport impacts for elements that have been delivered. In each instance, developing an enhanced understanding of success or otherwise in delivery, and in terms of performance, can increase confidence in future decision making. For example:

- key schemes contained within the preceding regional transport strategy, “*Greater Dublin Area Draft Transport Strategy 2011-2030, 2030 Vision*” included Metro North, Metro West, Lucan Luas Line, Southwest Luas and DART Underground, none of which have been substantially advanced to delivery in the intervening period; and
- analysis of forecast versus outturn transport impacts (travel demand, ratio of volume to capacity etc.) arising from the M50 upgrade would add value to further planned widening of this road to the south of Junction 14 (Sandyford).

Section 1.1.2 of the Draft Transport Strategy sets out “*transport achievements since the previous strategy*”. This includes a list of both transport schemes (e.g. Luas Cross City, Phoenix Park Tunnel) plans (e.g. GDA Cycle Network Plan), concepts (e.g. BRT) and outcomes (e.g. increased cycle and public transport use). Although these achievements do not appear to have been directly attributed to the previous strategy itself, it would be valuable if outcomes such as increased public transport or cycle use were related to measures contained within the previous transport strategy (and indeed its

predecessor, A Platform for Change). Furthermore, in developing the current Strategy, it would also be valuable to establish why previously identified scheme have not to date been advanced to delivery. As part of a lessons learned activity, CTTC members also recommend a comparison of changes in estimated capital delivery costs over time (including land acquisition), to identify timing implications of planning and delivering new transport infrastructure.

2.6. Strategy Challenges and Objectives

Transport Challenges

Section 1.1.5 of the Draft Strategy presents “*challenges for transport in the GDA*”, and for the benefit of clarity are copied below:

- *“an assumed return to sustained economic growth;*
- *substantial population growth;*
- *full employment;*
- *that no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and*
- *that the environment in the GDA is protected and enhanced.”*

While the above transport challenges provide an overarching context for development of the strategy, transport problems have specific spatial and time related characteristics, and greater clarity in relation to where, when and how these problems are likely to impact on the performance of transport networks is considered beneficial. Furthermore, to inform the prioritisation of challenges, developing an enhanced understanding of their implications, in terms of the realisation of economic, social and environmental outcomes would add further value.

Having reviewed the Draft Strategy, a greater level of specificity in relation to the identified transport challenges would add value to the determination and prioritisation of intervention by the Authority and other transport agencies in the years ahead.

Strategy Objectives

Objectives represent a strategy’s ‘*raison d’être*’, i.e. the transport related land use, economic, social and environmental outcomes sought through development of the strategy. They generally also underpin the appraisal of potential strategy components, and key decisions regarding its ultimate composition. As a result, it is essential that selected strategy objectives are underpinned by a sound understanding of current and future transport problems, and their economic, social and environmental implications, i.e. the strategy’s challenges. It is also important that the objectives are sufficiently robust against externalities - unexpected land use changes, economic pressures etc.

Clarity in relation to the strategy's objectives, the evidence base underpinning their selection, and how the identified objectives have informed the composition of the Draft Strategy would provide greater confidence in relation to the strategy's ultimate effectiveness in addressing regional transport priorities over the next 20 years.

2.7. Option Development and Appraisal

Option Development

To maximise confidence that the strategy contains the most appropriate set of complimentary measures, it is essential to ensure consideration of the full 'toolkit' of potential interventions. The Draft Strategy is supported by a series of studies, covering specific corridors/ geographic areas (North Dublin Transport Study, Navan Corridor Study, Inner Orbital Study, Outer Orbital Study etc.) and modes (Core Bus Network Report, Park and Ride Report), however the option development process at an overarching/ regional level lacks clarity.

In particular, it is not apparent that the Draft Strategy has given adequate consideration to the role of the private sector, and its potential in satisfying future transport demand. In light of their potential to deliver transport services at little or no cost to the exchequer, this could, and should, include private bus and coach operators. Furthermore, the Draft Strategy has apparently failed to consider the implications of recent transport related evolutions and their potential to reduce public transport demand – these represent risks to the Draft Strategy's robustness, and could limit the scale of planned capital investment requirements.

Option Appraisal

To ensuring a robust basis for decision making, it is essential that the strategy adopts a structured, systematic and transparent basis for assessing the merit of potential strategy components.

As noted above, the Draft Strategy has been informed by a series of studies, covering various corridors/ geographic areas and modes; and in the absence of an overarching appraisal framework, individual studies supporting the strategy's development appear to have adopted bespoke criteria. For example, six criteria (demand, key destinations served, journey times, significant engineering impacts, significant environmental impacts, and high level costing) have formed the basis for appraisal within the Outer Orbital Study, whereas the North West Corridor Study has utilised three criteria (demand accommodated, journey time and cost). In neither instance do the criteria appear to relate to identified transport challenges at a regional level.

As the strategy challenges have not been prioritised at a regional level, and used as a basis for providing a consistent appraisal mechanism to which options are assessed, it is not possible to ascertain which of the Draft Strategy's recommended transport schemes are of highest priority.

2.8. Package Development and Appraisal

The package development process represents an opportunity to assess the effectiveness of shortlisted options in a greater level of detail, and together as part of a comprehensive package of measures, i.e. the strategy. Although specific studies may have developed packages at a local level, the process underpinning the strategy at a regional level lacks clarity. In addition to exposing the trade-offs between contrasting strategic choices (e.g. a strategy comprising low versus high-levels of capital investment, or with a greater emphasis on bus based versus light rail investment), the package development process provides an opportunity to:

- consider the extent to which short-listed schemes simultaneously address both current and future transport problems, therefore de-risking the dependency of key strategy components on external factors, in particular land use developments;
- explore the programming of interventions and interdependencies in greater detail than for short-listed options in isolation; and
- secure the support of key stakeholders (including Government and opposition parties) to the emerging strategy.

From the information provided within the Draft Strategy, the extent to which the above elements have underpinned the strategy development process to date is unclear.

3. Draft Strategy Recommendations and Benefits

3.1. Introduction

The Draft Strategy includes an extensive set of interventions aimed at accommodating the needs of a growing population and economy over the next 20 years. CTTC observations in relation to a number of these proposals are set out in this section of the Submission.

3.2. Light Rail Infrastructure and Services

Metro North

Section 5.3 of the Draft Strategy set out a series of proposals to expand Dublin's light rail network. Amongst the proposals are a new Metro North, which is described as a *"light rail link from St. Stephen's Green to Swords and serving Dublin Airport, operating in tunnel under Dublin City Centre, and providing a high frequency, high capacity service"*, and furthermore as *"a modified version of the original Metro North proposal which proposes providing a similar service at significantly reduced costs."*

Given its potential to reduce journey times and improve journey reliability between the City Centre and Dublin Airport, the scheme has the potential to enhance connectivity between the City Centre and international destinations. As a result, CTTC members support the Authority's proposed development of light rail along this corridor. The economic case for extension of the scheme to Swords is however predicated on substantial future development in Swords, an external dependency which represents a potential risk to the overall scheme's delivery.

Other Light Rail Proposal

CTTC members also note proposals to develop a new Luas line to Lucan; extend the Luas Red Line to Poolbeg; extend the Luas Green Line to Bray, and to upgrade this line from St. Stephen's Green to Bride's Glen to Metro.

3.3. Bus Infrastructure and Services

Core Bus Network

Section 5.5 of the Draft Strategy states that bus proposals set out within the Draft Strategy have been informed by a series of studies. Arising from these studies, the Draft Strategy recommends development of a *"Core Bus Network"*, which *"comprises sixteen radial bus corridors, three orbital bus corridors and six regional bus corridors"* and is *"supplemented by other bus services operating on lower frequency routes and by local buses running on other routes."*

Within the core network, it is intended to *"to achieve, as far as practicable, continuous priority for bus movement on the portions of the Core Bus Network within the Metropolitan Area. This will mean enhanced bus lane provision on these corridors."*

CTTC members welcome the Authority's proposed development of this network, and in light of the current role of bus as the most dominant public transport mode, recommend that its development be afforded the utmost priority by the Authority in development of its Integrated Implementation Plan.

Bus Rapid Transit

Section 5.5.4 of the Draft Strategy sets out the Authority's proposals to implement Bus Rapid Transit (BRT) along a number of the identified Core Radial Bus Corridors. Two cross-city schemes are proposed connecting Blanchardstown and UCD, and Clongriffin to Tallaght. CTTC member note proposals for the Swords/Airport to City Centre corridor to:

“provide a higher level of public transport capacity than the existing provision, both in advance of new Metro North and also to serve areas south of the M50 subsequent to the implementation of new Metro North. This additional capacity will take the form of a BRT service or a BRT type service or a conventional bus corridor upgrade along this route or parts of this route. The exact arrangements to be implemented will be determined in conjunction with the development arrangements for new Metro North, and will be designed to be complementary to the new Metro North proposal.”

In light of the Government's commitment to delivery of Metro North by 2026/2027 as set out within its recently published Infrastructure and Capital Investment Plan 2016 - 2021, there is no apparent economic case for development of BRT along a broadly similar alignment to that of Metro North. Furthermore, as noted earlier, additional demand to the north of the airport is predicated on future development of Swords, with little evidence that such development will have any material near term transport demand impact. As a result, CTTC members recommend that any demand growth prior to Metro North's delivery between key nodes along the corridor (the City Centre, Airport and Swords) be accommodated through enhancements to conventional bus and coach services, supported by continuous bus priority infrastructure as proposed for the Core Bus Network. In light of existing private bus operations along this corridor, CTTC recommends that the Authority engage with its members to explore the role of private bus operators in delivering enhanced public transport in advance of, and post, Metro North's delivery.

Coach Parking

Section 5.5.6 of the Draft Strategy sets out “other bus related measures” and includes: “the development of a coach parking facility in Dublin City Centre, to facilitate the removal of on-street coach layover”. The provision of new coach parking facilities within the City Centre is welcomed by CTTC, and is deemed a high priority by its members. It is not apparent however that the role of the coach (and privately operated scheduled bus) industry has been sufficiently acknowledged within the Draft

Strategy. In particular, it is unclear if existing demand for coach parking, and the extent to which this is likely to grow in the future has been assessed. This is considered essential to inform:

- the priority given to the development of off-street coach parking facilities;
- the location, capacity and operating characteristics of such facilities;
- whether one or more facility is needed to accommodate growth in demand up to 2035 and beyond; and
- the appropriateness, feasibility and timing of removal of on-street City Centre coach parking facilities as proposed.

If not completed to date, CTTC members recommend that the above assessment be undertaken by the Authority in advance of, and as an input to, development of its upcoming Integrated Implementation Plan.

Bus Station and Bus Stop Infrastructure

Private operators are currently precluded from using certain public transport infrastructure within the Greater Dublin Area. In particular, current designation of bus stop infrastructure and bus stations for exclusive use by state operators, which hinders private operators through increased operating costs (arising from increased out of services vehicle kilometres); and reduced attractiveness of service offer (due to sub-optimal set down and pick up locations and facilities).

In addition to development of a coach parking facility, Section 5.5.6 of the Draft Strategy sets out proposals to develop “*new bus station facilities to provide for intercity and regional buses which serve Dublin City Centre*” and to rationalise “*stop poles and sharing of nearby bus stops between operators.*”

While the above proposals are welcomed by CTTC member, clarity that such facilities will be designated for concurrent use by private operators (in accordance with Section 62 of the Dublin Transport Authority Act 2008) Section is sought. Furthermore, CTTC members advocate enhancements of bus stops, with a single, uniform style of bus stop pole, flag and information carousel; provision of enhanced travel information including stop specific timetables, route maps and real time bus arrival information; and the installation of bus shelters, incorporating seating, in high usage locations (where space permits).

Public Transport Service Operations

The Strategy recommends substantial revisions to the transport networks in Dublin over the next 20 years, including a variety of new or reconfigured bus services. The strategy does not appear however to contain any reference to how these services would be operated in the future, so as to maximize the strategy’s value for money. The introduction of competitive tendering has, according to international

research by Ernst and Young on behalf of the Authority² *“found unit cost savings of up to 50 percent, with many estimates clustered in the 20-30 percent range.....”* High-level analysis by Transport Insights, on behalf of CTTC³, of Bus Éireann unit operating costs relative to those of private domestic operators supports the realisation of unit cost savings of approximately 30% in the Irish context.

Applying these unit cost savings of 30% to Dublin Bus and Bus Éireann operations has the potential to reduce the annual combined subvention of €106 million (in 2012, excluding emergency funding of €5.33 million paid to Dublin Bus) to €23 million, i.e. a benefit of over €83 million per annum.

In its international research Ernst and Young also found that *“By putting a service out to tender, market forces are brought to bear to reveal the most economically efficient provider, thereby leading to lower costs. An enhanced level of customer service quality can also feature as an element of the contract award criteria.”*

The Draft Strategy represents capital investment of approximately €10 billion over a 20 year period. Through reducing bus operating costs, the Authority could improve public transport services beyond levels which might otherwise be affordable, and/ or accelerate the pace of delivery of planned new transport infrastructure. It could also enhance the economic case for specific transport schemes, where the lifetime operating and maintenance costs represent a significant proportion of overall costs. This is particularly relevant for bus-based transport schemes.

3.4. Cycling Infrastructure

The Draft Strategy builds upon the outputs of the Greater Dublin Area Cycle Network Plan, which contains proposals *“to expand the urban cycle network to over 1,485 kilometres in length, and will provide over 1,300 kilometres of new connections between towns in the rural areas of the GDA.”* While the planned development of a regional cycle network is welcomed in principle by CTTC members, further analysis of trade-offs between priority for cyclists versus bus along parts of the network is needed, to ensure the needs of the former do not compromise the priority afforded to bus service operations.

3.5. Demand Management

While the strategy contains an extensive set of infrastructural and service based recommendations, Section 5.9 of the Draft Strategy sets out a complimentary set of demand management measures.

² Proposals to Directly Award a Public Bus Service Contract to Dublin Bus in 2014, 2. Economic Analysis of Direct Award Bus Contract in the Dublin Market (Ernst and Young, September 2013)

³ NTA Bus Services Consultation Submission, Final Report (Transport Insights, October 2014):-
http://www.cttc.ie/_fileupload/Tendering%20Submission.pdf

CTTC members are broadly supportive of the role of demand management, however feel that ‘carrot’ or restrictive demand management interventions should not be implemented in the absence of realistic and attractive alternatives.

3.6. Park and Ride

Section 5.10 of the Draft Strategy sets out proposals for development of park and ride, recognising its potential to *“provide the opportunity for modal transfer from the private car to the public transport network, for trips where car use is necessitated at the point of origin.”*

CTTC members welcome the Draft Strategy’s proposals to *“develop a network of strategic rail-based park and ride facilities”* and note the Authority’s commitment to *“consider the potential for bus-based park and ride, in particular, close to high quality road corridors leading from Hinterland towns, with good bus priority to commuter destinations in the Metropolitan area.”* CTTC members believe that bus-based park and ride offers strong potential to enhance public transport use from trips with origins outside the City travelling to locations with a high concentration of trip ends, namely the City Centre. In doing so, it can reduce traffic congestion on radial routes to and from the City Centre. Furthermore, as the capital costs of delivering bus-based park and ride infrastructure are small compared to many other elements contained within the Draft Strategy, it represents an affordable and deliverable short-medium term solution. In accordance with the Draft Strategy’s proposals to *“consider the potential for bus-based park and ride”*, CTTC members recommend that the Authority assess the potential of bus-based park and ride in advance of, and as an input to, development of its upcoming Integrated Implementation Plan.

3.7. Outcomes

Section 9 of the Draft Strategy sets out a *“summary of outcomes”* of the strategy. As noted elsewhere within this Submission, the Draft Strategy does not appear to have been underpinned by an identification of priority related challenges, or objectives. As such, it is difficult to determine the extent to which it represents the most effective means of intervention on behalf of the Authority. Based on information provided within Section 9 of the Draft Strategy, the following further observations are made:

Travel Demand Growth

Figure 9.2 presents forecast growth in travel demand by corridor up to 2035, however comparable demand growth on the M50, noted in the Draft strategy to be of *“critical national importance”* and deemed equally important in accommodating labour markets and business to business connectivity requirements at a regional level, has not been presented. It is presumed travel demand will grow at a similar level to that for the region as a whole, i.e. in the order of 25%, however bearing in mind joint

Dublin City Council/ National Transport Authority proposals to restrict through traffic movements in the City Centre, a higher level of demand growth could be experienced.

Strategic Road – Forecast Travel Times

Figure 9.3 presents the forecast “do minimum” and “do strategy” travel times on strategic roads, with comparable outputs for City Centre roads presented in Figure 9.4. To provide a clearer understanding of the effectiveness of the Draft Strategy, it would be valuable if comparable data for a 2015 (or similar) base year (as per Figure 9.5 for the M50) were also presented.

Forecast M50 Performance

Figure 9.5 presents base year and forecast 2035 “do strategy” performance data (volume/ capacity) for the M50. It is noted that the performance of the M50 is not envisaged to deteriorate significantly over the next 20 years despite substantial forecast growth in transport demand. As the Draft Strategy recommends bus-based enhancements along the orbital M50 corridor, it is presumed that maintaining the M50’s existing performance attributes are dependent on the implementation of demand management measures (alluded to in Section 5.9 of the Draft Strategy). Without a greater level of capital investment in new/ improved public transport services than that which is currently envisaged, it is unclear if such measures can be implemented without increasing generalised travel costs (through imposition of fiscal interventions) along the corridor. In light of the M50’s significance at a regional and national level, such increases in traffic congestion, and/ or imposition of fiscal interventions, will likely increase generalised travel costs, and as such is deemed to represent an economic risk.

Forecast Public Transport Crowding

Figures 9.6 and 9.7 present public transport crowding (load to capacity) outputs for 2011 and 2035 “do strategy” forecast years. To assist in understanding the impacts of the Draft Strategy, comparable “do minimum” outputs would add clarity.

Forecast Mode Share

Figure 9.9 presents travel to work mode share forecasts for 2011 and 2035 “do strategy” forecast years. A modest increase in public transport mode share is envisaged, from 21.6% to 25.8%, with a step change increase in the mode share for walking and cycling, increasing from 16.2% to 29.3%. The key factors underpinning the growth in walking and cycling are not immediately apparent, with demand management assumed to play a major role. It is unclear if there is precedent at an international level for comparable regions, of such a radical modal shift towards active travel modes within the timeframes envisaged by the Draft Strategy.

Economic Benefits

Figures 9.11 and 9.12 present travel times by user to the City Centre, and indicate a major increase in areas within a one hour journey by public transport to this area. Such journey time savings, if delivered, appear to underpin the majority of the strategy's economic benefits, as detailed in Section 9.3.6. This is presented with the Draft Strategy as providing *"a high level indication of the economic viability of the Strategy"*. A benefit to cost ratio of 1.3 is forecast, excluding wider economic impacts. This indicates that the Draft Strategy is likely to deliver low, or at best medium value for money. Considering risks of costs increasing and benefits eroding, this high-level benefit to cost ratio of 1.3 appears to represent a risk to the strategy's future delivery.