

Fingal/ North Dublin Transport Study Consultation Submission

For Coach Tourism and Transport Council of Ireland (CTTC)



Final Submission

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6			
7			
8			

Distribution

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1	Draft submission v1.0 to CTTC	CMcK	08/01/2015
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5	Final submission v4.0 to CTTC/ NTA	CMcK	19/01/2015

Introduction

CTTC members welcome this opportunity to respond to the National Transport Authority's current public consultation in relation to the ongoing Fingal/ North Dublin Transport Study. Having reviewed the consultation documents, they have however concerns in relation to the study's scope, approach and underpinning assumptions. As a result, they feel the study's emerging recommendations lack the required level of robustness, and may not best serve the interests of both transport users and the taxpayer through compromising delivery of higher specification public transport schemes and suboptimal allocation of Exchequer funds respectively.

Background

In Autumn 2014, the National Transport Authority launched a public consultation in relation to a proposed Swiftway Bus Rapid Transit (BRT) scheme from Swords/ Airport to the City Centre. The proposed BRT scheme, with an estimated cost of over €200 million, represents substantial capital investment on behalf of the Exchequer.

The scheme's origins stem from the decision in 2011 to defer Metro North, a key element of the Authority's Draft Greater Dublin Area Transport Strategy 2011-2030. Arising from the deferral of that scheme, and uncertainty regarding when, or if, it will be delivered, there is now in effect no transport strategy for North Dublin, and therefore no strong basis for short-term investment decision making.

Fingal/ North Dublin Transport Study Scope

The Stage One Appraisal Report states that the *"overall objective of this Fingal/ North Dublin Transport Study is to identify the long term public transport solution to connect Dublin City Centre, Dublin Airport and Swords."* Furthermore, it notes that *"the study is being developed to ensure that the public transport needs of this Swords/ Airport to City Centre corridor are adequately addressed in the study horizon year of 2035."* The study therefore seeks to identify longer term transport investment requirements in the context of delivery of the Swords/ Airport to City Centre BRT scheme.

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. The rationale for definition of the do-minimum scenario has not been provided, however it is noted to presently have schemes without funding approval, including the proposed:

- DART Underground Tunnel; and
- Swords/ Airport to City Centre BRT scheme, which does not at this point have a published Business Case.

The study fails to consider medium to long-term investment requirements independently from potential short-term investment decisions (namely relating to BRT); and in doing so, is likely to undermine higher specification public transport schemes that provide greater medium-long term benefit to North Dublin - see later. As such, and in the absence of a transport strategy for North Dublin, the study does not provide an alternative strategic basis for short-term investment decision making.

Approach Pursued

- Transport problems:- in undertaking a transport study, best practice dictates that, at an early stage in the study programme, the extent of current and future transport problems within the study area are identified. These could include, for example, operational performance issues facing public transport (overcrowding, delay, unreliability etc.) and private transport modes (poor journey times and journey time unreliability). Furthermore, it is also deemed prudent to establish the economic, social and environmental implications of such performance issues to identify those that are of greatest significance – this should then inform the identification of study specific objectives. This does not appear to have formed part of the approach pursued to date in undertaking the study.
- Options to address the problems:- Having identified the study specific objectives, it is prudent to consider a wide range of options. To establish a need for future Exchequer funded capital investment (and ongoing subvention), interventions that can be delivered by, or in partnership with, the commercial sector should be considered. It is unclear if these options have been considered in undertaking the study, and to date, no engagement appears to have taken place with commercial operators. The study appears therefore to have failed to demonstrate a need for state intervention.
- Appraisal framework and its application:- The Department for Transport’s “*Common Appraisal Framework (CAF) for Investment in Transport Projects and Programmes*” has been used as a basis for appraising options. While CAF may represent an appropriate framework, by its very definition it should have been tailored to reflect the study area specific transport problems. Applying CAF in a non-contextualised manner undermines confidence that the emerging recommendations will address the study area’s transport problems.
- Study assumptions:- The outcome of the appraisal process is highly sensitive to the underpinning assumptions, and the rationale supporting these assumptions is deemed insufficient. For example, the Report notes that:
 - “*the population distribution pattern of Scenario A (development scenario considered in developing the Authority’s Draft Greater Dublin Area Transport Strategy 2011-2030) will be applied with growth projections taken from the Central Statistics Office (CSO) M2 F2*”.
 - The Draft Greater Dublin Area Transport Strategy however states “*it (i.e. Scenario B) is more likely to support the sustainable integration of transport and land use and therefore Scenario B was*

used for forecasts of growth distribution and settlement patterns.” The rationale for selection of the alternative development scenario within the context of this study has not been provided. It is, however, likely to result in preferential appraisal outcomes for bus-based options (including BRT), i.e. due to lower passenger demand, these solutions are more likely to ultimately emerge as recommendations of the study.

- *“average journey speeds for BRT range from 20-25kph”*, however average BRT journey speeds of 26 kph are assumed by the study for appraisal purposes. The evidence in support of this higher value for BRT is unclear. Additionally, it does not appear to take account of the likely range of speeds achievable. This is illustrated through analysis of light-rail alignment options by the RPA, whereby speeds of between 14 and 27 kph are deemed achievable depending on the route alignment.
- As a result of the assumed 26kph BRT speed, BRT (4 and 5) journey times from Pavillons Swords to St. Stephen’s Green in the City Centre are estimated at 27 minutes. By comparison, despite having broadly the same alignment through the Port Tunnel, average all-day Swords Express’ journey times from Swords to Eden Quay in the City Centre (a shorter route) are currently 32 minutes across the day. Given that BRT services *“are subject to a speed limit of 60kph”*, and Swords Express services travel at higher speeds (generally limited to a maximum of 80kph along the route), the unsupported 26 kph BRT operating speed assumption is deemed likely to result in a preferential appraisal outcome for bus-based options, relative to other intervention types.

Competitive Impacts

The Authority’s Guidelines for the Licensing of Public Bus Passenger services states *“In line with the objectives outlined in the PTR Act 2009 the Authority may reject all or part of an application if the proposed service could result in head-to-head competition with an existing licence holder, jeopardising the preservation of good order and safety on public roads.”* It is noted that specific BRT options emerging from this stage of the study, in addition to the proposed Swords/ Airport to City Centre BRT scheme, appear to operate in head-to-head competition with Swords Express. Were these BRT options to be operated commercially, it is unclear if they would qualify for a license. Conversely, were they to operate as Public Service Obligation (PSO) services, the Authority would ultimately need to decide on the validity of a PSO contract for a scheme that the Authority itself is promoting.

Other Observations

In assessing BRT3 the Report (4.3.3) states *“providing a high standard BRT within the north inner city will be difficult to achieve because the current road network is heavily trafficked, quite narrow and serves a large residential area. Restricting traffic movements in the area would therefore be very difficult to achieve without significantly impacting upon access”*.

In Section 4.3.4 the Report states that *“significant delays during and after construction unless the route is given priority, especially in the North City area, it is unlikely to deliver the level of journey time benefits required”*; and under Environmental Issues (Section 4.3.5), it states that *“environmental constraints along the R108 suggests that the greatest constraints would be the adverse environmental and safety impact generated by traffic diverting through residential areas following reduced capacity on the main arterial routes.*

The above arguments appear equally pertinent to the proposed Swords/ Airport to City Centre BRT scheme, which passes through densely populated areas and on heavily trafficked corridors within the urban core from Santry to Earlsfort Terrace. These reservations do not appear to have been alluded to in the recent BRT consultation documents.

Emerging Recommendations

Various light rail alignments (LR3, LR4 and LR5) and Optimised Metro North options have emerged from the appraisal forming part of this stage of the study, however the assumption that the Swords/ Airport to City Centre BRT scheme will be delivered, and its inclusion as part of the do-minimum scenario, will increase the cost and time required to construct other schemes sharing the same alignment. The inclusion of this BRT scheme within the do-minimum scenario - a scheme with the Authority has described as *“an interim partial transport solution in the shorter term....”*, and with no demonstrable transport justification or Business Case, therefore acts to undermine the identification of schemes that would deliver greater medium-long term benefits within the study area. As such, there is a significant risk that both LR5 (light rail to Swords via Airport and Drumcondra) and Optimised Metro North will ultimately fail to emerge as recommendations of the study. Revised land use assumptions underpinning the study, and unsupported assumptions regarding BRT operating speeds will further reinforce the attractiveness of BRT options relative to alternative solutions.

Summary

- Arising from the deferral of Metro North, NTA’s Draft Transport Strategy for the Greater Dublin Area lacks current relevance in the wider North Dublin Area.
- The current scope of the North Dublin Transport Study fails to provide an alternative strategic basis for decision making (including for the proposed Swords/ Airport to City Centre BRT scheme) as it fails to consider medium-long term investment requirements independently from potential short-term investment decisions – instead it assumes BRT delivery as a certainty, with all other options considered in this context.
- The assumptions underpinning the study lack sufficient evidential support or rationale; and land use and BRT operational speed assumptions will support bus-based solutions (including BRT) ultimately emerging as recommendations of the study.

- The study has failed to consider the specific future transport problems facing the study area, and public transport options have not been appraised by reference to these problems. The study has not therefore demonstrated that these problems will be addressed by the shortlisted public transport options.
- The role of the commercial sector in delivering solutions either on its own or in partnership with the public sector at reduced cost to the state (including lower levels of subvention) has not been considered. As a result, the need for Exchequer funded capital investment has not been demonstrated by the study.
- Specific BRT options emerging from this stage of the study, in addition to the proposed Swords/ Airport to City Centre BRT scheme, appear to operate in head-to-head competition with Swords Express. Were these BRT options to be operated commercially, it is unclear if they would qualify for a license. Conversely, were they to operate as Public Service Obligation (PSO) services, the Authority would ultimately need to decide on the validity of a PSO contract for a scheme that the Authority itself is promoting.

In light of the above, the emerging study outputs, as summarized in the Stage One Appraisal Report, provide limited confidence that the study's recommendations will address North Dublin's transport problems and achieve best value for money for the tax payer. Furthermore, it fails to provide the strategic context for a decision to deliver the proposed Sword/ Airport to City Centre BRT scheme.

Recommended Way Forward

As per CTTC's recent BRT submission, it is recommended that the appropriateness of BRT be assessed alongside options such as enhanced bus services, light rail, metro and heavy rail in addressing the corridor's short, medium and longer term transport investment requirements. This could, for example, form part of an update by the Authority of the Greater Dublin Area Transport Strategy; or alternatively a strategic assessment of the North Dublin area, which would provide critical inputs to the update process, once it commences.

In the absence of a strategic understanding of North Dublin's transport investment requirements, and in the absence of a Business Case for the proposed Swords/ Airport to City Centre BRT scheme, CTTC members recommend that further planning and design activities on this scheme be halted.

Finally, CTTC members emphasise their desire for the Authority to engage with existing commercial operators along the corridor of the proposed scheme to identify the scope to enhance service provision in accordance with latent current and forecast future passenger demand.