

SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE NATIONAL TRANSPORT AUTHORITY'S PUBLIC CONSULTATION ON THE FINGAL/NORTH DUBLIN TRANSPORT STUDY

Introduction

The Chartered Institute of Logistics and Transport in Ireland ("the Institute") is the independent professional body for people engaged in logistics and all modes of transport. The Institute is part of an international body with 30,000 members worldwide. As a professional body, the Institute does not lobby on behalf of any sectoral interest, but seeks to take an independent, objective and considered view on matters of public policy.

The Institute welcomes the opportunity to respond to this public consultation.

Strategic Context for Study

There are a number of issues of concern about the strategic context for the study as set out in the published study report.

No population and employment projections specific to the study area have been provided in the report published for consultation. Neither is there any analysis of present and future travel demand in the area or of the key drivers of that demand. There is a reference on page 5 to a Strategic Context Report but this does not appear to have been published for the purposes of the current consultation. It is difficult for the Institute to draw any conclusions on the findings of the study in the absence of published information on these critical factors.

Context for the study is provided by the Authority's Draft Greater Dublin Area Transport Strategy 2011-2030. However this Strategy has never received Ministerial approval and still remains a draft. At this stage it likely to be of increasingly limited value as a strategic backdrop and probably needs to be updated in the near future to reflect the new realities following the sustained crisis in the economy and the public finances.

The Department of Transport, Tourism and Sport published a draft Strategic Framework for Land Transport Investment during 2014 which contained some very sobering information about future transport investment requirements and the limited scope for financing them. The draft pointed to a large and continuing spending requirement just to maintain and renew the existing transport infrastructure and identified very limited potential for spending on new investment. Surely this draft

report is a critical element of the strategic context for any study of future public transport investment requirements in the Greater Dublin Area? The draft conclusions of the Strategic Investment Framework state that there will be limited scope for major investment in new transport infrastructure for the foreseeable future and this in turn suggests that particular priority should be given to low cost/high return investments and to investments which maximise the use of existing assets.

Definition of the Do-Minimum

Section 2.0 of the study report indicates that the DART Expansion Programme, including the proposed DART Underground project, forms part of the Do-Minimum network for the study area in 2035. It is somewhat unusual to include in the Do-Minimum a project which has not been given funding approval to proceed and which is currently under review. This concern is exacerbated by the findings of the draft Strategic Framework for Investment in Land Transport, referred to earlier, which suggest that finding the funding for an investment programme of this scale will be at best very challenging. The Institute therefore recommends that the consultants should review their findings to consider if the exclusion of the DART Expansion Programme from the Do-Minimum would have led to any changes in their conclusions as to the projects to be taken forward for detailed evaluation. The next stage of the study, the more detailed evaluation of the shortlisted projects, should exclude the DART Expansion Programme from the Do-Minimum or alternatively consider the implications of two Do-Minimums which include and exclude this major investment.

Definition of the Study Area

The study area for this project is very extensive, stretching from Clongriffin in the east to beyond Ashbourne in the west. Serving both Dublin Airport and Swords has been identified as a key consideration in deciding whether a project should be taken forward for further evaluation and a number of projects were excluded at the preliminary screening stage because they did not serve Swords. This begs a question as to why they were included for consideration in the first place.

This approach also raises a wider question about adopting a segmented approach to the study of the public transport investment requirements for the Greater Dublin Area. While it is undoubtedly the case that effectively catering for high travel demand in the Airport/Swords corridor will be of major importance in deciding any future transport strategy for the region, it is not the only area or corridor requiring investment. For example, Ballymun and Finglas are significantly dependent on public transport, but have not been prioritised in this study despite being within the study area. This may create a false impression that areas such as these do not

warrant priority. There is also a risk that using a segmented approach to the identification of public transport requirements could lead to some areas “falling between two stools” and not receiving priority in any geographical area selected for study.

Another concern about a segmented approach is how to bring the component parts together to form a coherent overall strategy for the Greater Dublin Area and how to determine overall regional, and indeed wider national, priorities for investment in a climate of tightly constrained resources. We should at least acknowledge the possibility, however remote, that a project which emerges as a priority for the Dublin Airport/Swords corridor might not warrant the same priority when considered at a regional level or might conflict with other regional or local priorities. It is also possible that projects emerging from this current evaluation process might get a head start over other equally valuable projects elsewhere in the Greater Dublin Area. The Authority needs to consider how it will guard against these undesirable consequences. One option would be to bring forward the review of the overall Transportation Strategy for the Greater Dublin Area. As we said earlier, the current draft probably no longer adequately reflects the realities on the ground, as regards the likely growth in travel demand and the availability of public funding for transport investment.

Shortlisting of Options

The approach that appears to have been taken was to shortlist projects from each of the three modes – heavy rail, light rail and BRT. We ask the consultants to consider whether the shortlist of projects selected for further evaluation might have been different if all 25 projects had been reviewed together rather than in mode-specific packages.

Heavy Rail Options

The Institute has no particular objections to the heavy rail projects which it is proposed to take forward for detailed evaluation. They represent two of the principal alternative alignments already identified to potentially serve Dublin Airport, and by extension Swords. We would ask the consultants to give particular attention to the following issues in carrying out a more detailed evaluation of these projects:

- We welcome the acknowledgement in the study report that the implications of the DART Expansion Programme in terms of journey times and capacity will need to be studied in more detail. However we would argue that the work needs to go further. It should look at the capacity implications if the DART Expansion Programme is not implemented or is significantly delayed. In other words, is sufficient track capacity available to deliver these projects

in an effective way if the DART Expansion Programme does not go ahead? We should also consider, in a wider regional and national context, whether these projects represent the best possible use of whatever capacity is available, either with or without the DART Expansion Programme. Particular attention should be given to the utilisation of capacity on the Northern rail corridor given existing constraints, the relatively complex service patterns and the potential for residential development along the corridor as far north as Drogheda and Dundalk.

- Travel times relative to competing modes, and particularly the private car, will be of particular importance in determining the success or otherwise of particular projects. Direct service, without interchange, will also be an important consideration. This includes as direct access as possible to the Dublin Airport terminals.

Light Rail Options

There needs to be greater clarity as to what precisely will be evaluated in the next phase of the study. The Table on page 82 seems initially to suggest that LR3, LR4 and LR 5 should be progressed to detailed evaluation but it is subsequently proposed that only LR3 will be brought forward, with the precise routing of the southern section remaining to be determined. It is important that all three variants be adequately evaluated as the choice of preferred option is finely balanced. LR3 would deliver a shorter journey time, particularly compared with LR5, but has a much higher capital cost range than the other two and lower catchment population and employment. LR5 does not serve Ballymun and if it was the chosen alignment for the southern section of the project, alternative means of providing better public transport services to Ballymun and indeed Finglas would have to be considered.

The travel times for the light rail options are not particularly attractive and the Airport station would not be within the footprint of the terminals. These are significant drawbacks which should be considered further during the detailed evaluation.

While we have no objection to LR7 (Optimised Metro North) being taken forward for detailed evaluation, we would like to sound one note of caution. Because a substantial proportion of Metro North is planned to be underground, the principal determining factor of the ultimate capacity of the system will be the length of station platforms. In the Optimised variant now proposed, the length of station platforms is set at 60 metres rather than the original 94 metres. This reduces the ultimate capacity of the system from 20,000 ppdph to 12,000. If this project were to emerge as the preferred option, it is questionable whether it would be wise to proceed with a project which had such a serious and insurmountable infrastructure constraint on its ultimate capacity.

Bus Rapid Transit Options

The Institute has no particular objections to the BRT projects which it is proposed to bring forward for detailed evaluation.

We welcome the increase in the maximum capacity of BRT from 3,600 ppdph to 4,500. However we repeat the concern expressed in our earlier submission to the Authority in response to its consultation on BRT that an unduly conservative approach is being adopted and should be further reconsidered.

Practical experience elsewhere and observation of performance on the existing QBCs in Dublin suggests that significantly higher capacities are potentially achievable. We accept that there will be constraints which mean that higher frequencies and capacities are not always achievable, but this is not a sufficient reason for adopting such a conservative capacity ceiling. Another reason for considering a higher capacity threshold is the fact that the levels of public funding available for transport investment are likely to be constrained for an extended period and are unlikely again to reach the levels achieved (in real terms) in the late 2000s. There is therefore an increased imperative to seek effective lower cost solutions to transport deficiencies; high performance BRT is one such potential solution.

We recognise that higher vehicle frequencies would carry some risk of bunching and of vehicles delaying each other and would require more than one vehicle to clear junctions in a single traffic light phase. We understand from the Core Dublin Network Study that the NTA's preference is to avoid this in the interests of maintaining service quality. However, given the passenger volumes that need to be carried and the limited number of public transport corridors available in Dublin, it is not practical to pursue this policy. Corridors should be designed to allow higher frequency vehicle flows while minimising the impact on service speeds and reliability on the core BRT routes.

We note that another constraint on BRT capacity is the fact that the longest bus currently authorised to operate on all Irish public roads is 18.75 metres in length. Longer vehicles of upwards of 24 metres are available and could potentially be used in certain circumstances, increasing the capacity threshold by up to 25%.

The Institute considers that the approach to the design of BRT routes should be based on LRT standards. The aim should not be to build a "tram on tyres" but rather to deliver a public transport product of equivalent quality coupled with the flexibility of the bus. Consider what would be appropriate if LRT was being built on the route and only depart from that standard where there is a robust and objective technical justification for doing so. There is no reason why lower standards should be acceptable for a bus than for a tram.

The study report expresses some concerns about operating a BRT route through the Port Tunnel which we consider somewhat misplaced for the following reasons:

- There is no such thing as a BRT vehicle. Any type of bus can be used on BRT services. It depends of journey length and other factors. Swords/Airport to city via Port Tunnel would be an express service rather than a stopping service. Therefore a seated only vehicle with fewer doors would best suit this corridor
- According to the Rules of the Road, a vehicle-specific limit of 65km/h, not 60km/h, applies to buses which are designed for standee passengers (whether single or double decker). An 80km/h vehicle-specific limit applies to buses which are not designed for standee passengers on all roads other than motorways or dual carriageways and a 100km/h limit applies on motorways and dual carriageways where no lower speed limit is in place. Consideration would also have to be given to any particular speed restrictions or any other limitations which might be applied in the Tunnel.
- Standee double decker buses currently use the Port Tunnel (Dublin Bus routes 33X, 142 and 747 and private sector route 191 to Balbriggan).
- There are many express services to/from all parts of the country, both Bus Eireann and private sector, using the Port Tunnel between Dublin Airport and the city centre. These would all benefit from a BRT route between city centre and Port Tunnel entrance, including priority through tolls. This might not be designed for typical BRT vehicles, stops etc., but would critically give fast, reliable times for all express bus services.

Issues for Consideration in the Next Phase of the Study

Dublin Airport is a very significant generator of traffic demand in the study corridor, comprising air passengers, meeters and greeters and persons employed in the Airport zone. The pattern of travel to and from the Airport is also different to the general pattern of commuter travel in the corridor and the wider region. For example, the peak periods and the origins/destinations are likely to be materially different. Air travel is continuing to grow and Dublin Airport could be handling in excess of 30 million passengers per annum in the medium term. The traffic demand implications of a growth in air travel should to be considered separately from general traffic demand growth in the study area. A challenge for the consultants will be to ensure that the specific requirements of the Airport and the wider study area are adequately reflected in the analysis.

Travel times for public transport need to be competitive with the private car. The travel times for some of the options considered in the current study were excessive and would not be competitive. This issue requires particular consideration in the next phase of the study and should separately assess the implications for general commuters and people accessing the Airport.

No prior assumptions should be made about the most appropriate public transport mode to be used. An argument is often heard that the Airport should be rail connected because most major airports have rail connections. However a counter-

argument can be made that the role of the bus in providing access to Dublin Airport has changed enormously for the better in the last decade or so, with a much greater range of commuter and long distance services and much increased capacity. Decisions on mode choice should flow from the analysis and only from the analysis. The implications of the preferred public transport option for road traffic should be carefully considered and this includes the implications for ordinary bus services, freight traffic and taxis.

As mentioned earlier, the continuing and likely long term constraints on public funding for investment and public service obligations must form an important part of the evaluation process. There is no point recommending projects which are simply not affordable and will not be delivered; nor is it appropriate to develop land use strategies based on such assumptions.

The outcomes need to be considered in the context of the requirements of the wider Greater Dublin Area and of national transportation priorities.

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