

SUBMISSION FROM THE CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND TO THE NATIONAL TRANSPORT AUTHORITY'S PUBLIC CONSULTATION ON THE DRAFT INTEGRATED IMPLEMENTATION PLAN FOR TRANSPORT IN THE GREATER DUBLIN AREA 2013-2018

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 the public consultation in respect of the draft integrated implementation plan for transport in the Greater Dublin Area ("the draft Plan"). Our submission begins by making some general remarks on the draft Plan and then goes on to respond selectively, Chapter by Chapter, to a number of topics.

General Remarks on the Draft Plan

The NTA submitted its draft Transport Strategy for the Greater Dublin Area 2011 to 2031 to the Minister for Transport, Tourism and Sport in June 2011 for his approval. It is not clear from published sources what the current status of that draft Strategy is. This is relevant to the current public consultation for a number of reasons. There is no explicit reference in the draft Integrated Implementation Plan to the draft Strategy and it is not clear if or how the Plan is intended to begin implementation of that Strategy. Section 13 of the Dublin Transport Authority Act 2008 requires the Authority to make a Plan within 9 months of the approval by the Minister of the Transport Strategy. It is not clear what will happen if the Minister decides to approve the Transport Strategy at some early future date. It seems likely that the Authority would have to make a new Plan and undertake a new public consultation process, particularly if the Minister required amendments to the Strategy. The overall situation is unsatisfactory and the current draft Plan is being considered in somewhat of a strategic vacuum. The final version of the Implementation Plan should make appropriate reference to the draft Strategy and indicate the extent to which, if at all, it influenced the preparation and content of the Plan.

Section 13 (4) of the 2008 Act requires the Minister for Transport, Tourism and Sport, in consultation with the Minister for Finance, to provide written guidance to the Authority on multi-annual funding arrangements and the Authority must have regard to that guidance in preparing the Plan. There is no evidence in the draft Plan that the Minister has to date provided that written guidance. There is some reference in Chapter 5 to the Government's published document "Infrastructure and Capital Investment 2012-12" and to guidance from the Department that projected figures may be used for proposed capital expenditure in 2017 and 2018. Prima facie this does not appear to meet the explicit statutory requirement to

provide written Ministerial guidance and the opportunity should be taken in the final version of the Plan to clarify this issue.

The draft Plan includes no financial perspectives in respect of current expenditure requirements up to end of 2018. In many ways this is more important than investment expenditure as it determines how efficiently and effectively the existing transport system is used. Adequate current funding is required to ensure that infrastructure and vehicles are adequately maintained, to support the provision of public transport services under public service obligations and to cover operating costs for many systems such as signalling, real time passenger information, integrated ticketing and communications.

The draft Plan lacks the detail one would usually expect from an implementation document. In many ways it reads more like a strategy than an implementation plan. While the aspirations and objectives set out in the draft Plan are laudable and generally deserving of support, they do not provide a sufficient level of detail as to what is planned for the next six years in terms of investment and action and what the outcome of that investment and action is likely to be. The Institute accepts that these are very uncertain times which impose genuine constraints. Notwithstanding this, it should surely be possible to provide a greater level of detail as to what the Authority plans to do over the next six years. It is accepted that there might be greater precision in the earlier years and lesser precision for the later years.

It also appears that greater detail is required to comply with the requirements of the 2008 Act. For example section 13(2) requires the Plan to include an infrastructure investment programme identifying the key objectives **and outputs** to be pursued over the period of the Plan. It further requires an integrated service plan identifying the key objectives **and outputs** to be pursued by the Authority in relation to the procurement of public passenger transport services over the period of the Plan. There is at least an arguable case that the level of detail provided in the draft Plan is not sufficient to comply with these statutory obligations.

It is a matter of serious concern to the Institute that there are no proposals in the draft Plan relating to freight and goods distribution. This deficiency needs to be addressed in a substantive way in the final version of the Plan. The success of the GDA economy, as the driver of both regional and national growth, requires efficient goods distribution and freight systems.

The Institute wishes to express its disappointment at the short period allocated for public consultation on the draft Plan. The shortness of the period and the fact that it covers the prime holiday period makes it very difficult for organisations, particularly those who rely on voluntary effort, to respond effectively.

Chapter 2 Travel in the Greater Dublin Area

The Chapter contains a lot of useful information relating to travel in the Greater Dublin Area but it would be helpful to consider if further conclusions can be drawn from the available data which would assist in determining the content of the Plan. For example, what are the policy implications of the suggested relationship in the POWCAR data between reduced

congestion and journey times on the one hand and increased car usage on the other? We have also seen a very substantial drop in public transport use since the recession began and it would be helpful to analyse the various reasons for this. This additional commentary is necessary so that we can clearly understand the drivers of public transport use and assess whether investment itself will be enough to regain and increase its market share. Or does investment need to be accompanied by traffic demand management measures in the immediate future? The draft Plan is notably and disappointingly silent on this topic.

The draft Plan does not provide any demand analysis. It is therefore difficult to assess the investment proposals in the later chapters as we have no concrete information on the scale and location of future travel demand or on the sensitivity of demand growth to external factors. It would be helpful at a minimum to summarise the findings of the demand analysis carried out for the draft Transportation Strategy, Vision 2030, and for any other more recent studies. It would also be useful to indicate the extent to which these demand analyses can still be relied on given the length and depth of the current economic crisis and to consider whether any fundamental structural changes have taken place which could invalidate the findings of previous demand studies.

Chapter 3 Transport Challenges and Objectives

The Institute broadly agrees with the analysis of the transport challenges and broadly supports the objectives set out in this Chapter. In particular we strongly endorse the warning in Section 3.1 that, while the economic downturn has temporarily alleviated congestion, renewed economic and employment growth can lead to a speedy deterioration in traffic conditions in the absence of targeted investment. There is strong evidence from previous experience to support this warning. Indeed past experience shows that we have been caught out by the speed with which very serious congestion can return when economic growth resumes. This happened in Dublin at the end of the 1980s recession and in southeast England towards the end of the twentieth century. It is usually too late to start planning and implementing new investment when growth has already started because of the lengthy lead time which such projects necessarily involve. In such circumstances traffic growth will always outpace an investment response.

Chapter 5 Overall Infrastructure Investment Programme

We commented earlier on the need for explicit written Ministerial guidance on the multi-annual funding arrangements. We note with concern that the investment projections for 2017 and 2018 are simply a forward projection of the 2016 planned provision of €150 million, in effect a reduction in real terms following on from a period of exceptionally deep reductions in capital expenditure. Our concern relates specifically to the comments we have just made on Chapter 3, namely that congestion will always outstrip the capacity of investment to respond to it. With economic and particularly employment growth expected to resume (hopefully strongly) during the period covered by the draft Plan, it is essential that some prudent advance investment is made to avoid congestion again becoming a very serious problem in

the GDA, potentially before the end of the Plan period. In that context it is also important that timely funding is provided now for the planning and design of projects required to respond to renewed growth. It is understandable in current circumstances that funding for planning and design has been sharply reduced but this now needs to be reversed as we exit from our economic and financial difficulties. Otherwise we will not be ready to respond and we will not have a shelf of projects ready to go as funding becomes available. In the light of these concerns, the Institute recommends that the draft Plan be amended to make more explicit financial provision for planning and design.

The Institute considers that a greater proportion of the financial resources should be directed to bus investment, which the draft Plan itself acknowledges will continue to be the dominant mode of public transport in the GDA. That investment is needed to grow the bus market again to, and beyond, the patronage levels achieved in the early 2000s. The Institute would in particular wish to see a much stronger commitment to the implementation of bus rapid transit during the period of the Plan, something we comment further on in our response to Chapter 6. We note that over 35% of the planned investment expenditure is proposed to be allocated to light rail, most of it to a single project which will make a modest contribution to growth in public transport patronage and which has the potential to substantially disrupt and dislocate bus services during construction and permanently. By contrast, the bus mode which currently carries well over 100 million passengers per annum is only allocated 28% of the projected investment envelope.

Chapter 6 Bus Investment

We would have expected a draft Implementation Plan to have included much greater detail on the planned bus investment over the Plan period and particularly in the early years. We can broadly support the proposals in the Chapter but we consider that much more specific information is required as to the individual projects which it is planned to implement, the level of bus capacity which it is proposed to provide and relevant targets for patronage growth, percentage of population within the bus network catchment, bus speeds, service frequencies, size of bus fleet and so on. Without this type of information it is very difficult to evaluate the effectiveness of the proposed investment.

It is possible to go through virtually all the proposals in this Chapter and ask what precisely is planned. For example, what are the priorities for further development of the quality bus network? What “other urban locations” are priorities for enhanced bus priority? What are the priorities for improved interchange, bus hubs or bus focal points? What factors will be considered to determine appropriate locations for bus stops?

The Institute welcomes the inclusion of a section on investment in bus rapid transit. We are strong advocates of bus rapid transit and published a detailed policy brief on this topic in 2012. We also hosted a seminar, jointly with Engineers Ireland, in November 2012 which concentrated on the practical implementation of bus rapid transit in Ireland and we welcome the strong participation of Authority staff in that event. However the Institute is deeply disappointed at the vague language in this section which talks about progressing the implementation of three BRT routes. We strongly recommend that the final Plan contains a much stronger commitment to implement these projects and sets target dates, subject of course to compliance with the necessary statutory procedures. As mentioned earlier the financial framework needs to be revised to provide the necessary funding to meet these

stronger commitments. The existing commitment to implement them on an incremental basis is not acceptable and contrasts with the approach taken to rail-based modes.

Chapter 7 Light Rail Investment

The Institute is not convinced that Luas Cross City should be an investment priority at a time of very scarce resources and would much prefer to see investment directed towards buses as a quicker and easier way of providing additional capacity and enhancing the geographical reach of services. We also have serious concerns about the impact, during construction and permanently, of the Cross City line on the operation of bus services through the central area of the capital city.

We would welcome more specific information in the final Plan on the quantity of increased capacity which it is proposed to provide on the **existing** Luas network and the analysis underlying that proposed capacity increase, taking account of the fact that there is a surplus of trams at present.

By the end of the Plan period the Luas system will be almost 15 years in operation. Experience elsewhere suggests that premature wear of certain sections of track is almost inevitable on tramways due to combinations of curvature and gradients and unexpected aspects of tram running behaviour. Trams will also be approaching their mid-life. Is it therefore necessary to make provision in the Implementation Plan for increased renewal or heavy maintenance expenditure on both infrastructure and rolling stock?

Chapter 8 Heavy Rail Investment

The Institute strongly supports the completion of the City Centre Resignalling Project as a relatively low cost way of making more efficient use of the existing railway network and increasing its traffic carrying capacity. The various phases of the project have been underway for many years and it is important that it is brought to an early conclusion so as to derive the optimum benefit from the investment already made. We understand that the desire to minimise the inconvenience to the travelling public and the scarcity of specialist signalling expertise act as constraints on speedy implementation, but we urge the Authority to be more explicit about the target completion date for the project. By implication from what is said elsewhere in the Chapter the target date seems to be late 2015 or early 2016, but this should be confirmed in Section 8.4.

We note the proposal to re-open the Phoenix Park Tunnel enabling Kildare suburban services to access the city centre. However we have a concern that the increasingly complex configuration and mix of services through the central area will eat away at the additional capacity which will be provided by the City Centre Resignalling Project. The network will have to accommodate two intercity services to Belfast and Rosslare, north and southbound DART services with at least a 15 minute frequency throughout the day and higher peak frequencies, outer suburban services from Dundalk, Drogheda, Maynooth and M3 Parkway, services on the southeastern corridor and now from Kildare. There is also the Iarnród Éireann proposal for a rail link to Dublin Airport which, if implemented, would still further

complicate the service pattern and to which we refer again later in the submission. This varied mix of services, coupled with complex conflicting movements in the vicinity of Connolly, will present a substantial operating challenge. Even the current much simpler and less intensive service pattern works far from perfectly. When a service is delayed there can be significant knock on effects on other services. For example some inbound Enterprise services from Belfast are already causing persistent delays to certain DART services from Malahide.

Routing Kildare trains through the flat junctions at Connolly is likely to be challenging, even with upgraded signalling. Intensified train services through the city centre could present passenger safety problems on platforms, particularly at Tara Street. There may be scope to use the existing Docklands station for some Kildare services but this would require changes to the existing track layout and junction connections. The original planning permission for the Docklands station was for a limited period? Has that permission been extended or ideally made permanent?

It would be helpful if the Plan could provide more information on the plans for use of the Phoenix Park tunnel. What type of service configuration is planned – is it simply an extension of the current Kildare suburban services into the city centre? How will transit times to the city centre compare with the existing arrangements using bus or Luas? The running time from Islandbridge to Tara Street and Pearse stations is unlikely to be much faster than the current arrangements, leaving a transfer-free journey as the only significant benefit. Will Kildare services no longer serve Heuston? Serving the main station platforms would no longer be practical for operational reasons and the existing Platform 10 is remote from the main station and other public transport services.

We support the proposed closure of level crossings on the suburban rail network which will be of benefit to both road and rail traffic. Is there also scope for reducing gate closure times in the southeastern corridor through resignalling? We also support the upgrading of the Central Traffic Control system and the upgrading of on-board communications systems.

We welcome the acknowledgement that the existing on-board communications system is not operating satisfactorily and strongly suggest that any further investment by the Authority should be tied to robust performance targets for all passenger communications and information systems and significant penalties for non-performance in the rail public service contracts. There are currently too many examples of failures in communication and information including non-operational visual and audio information, wrong or conflicting station and on-board destination information and sometimes poor or non-use of on-board PA systems. One of the real communications successes has been the use of Twitter to convey speedy information on delays and disruptions and answer customer questions.

We note the proposal to electrify the suburban lines as far as Balbriggan and Maynooth as part of the overall DART Underground programme and understand the operational benefits which could result from that decision. The final version of the Plan should comment further on the timing of this work because the DART Underground tunnel project is currently on hold until at least post-2016 and because electrification will make some diesel rolling stock redundant before the end of its economic life. We understand that a significant volume of diesel rolling stock, including all of the 2700 class and some of the 22000 class, is already mothballed because of the fall in traffic and retrenchment due to the *Iarnród Éireann's*

difficult financial position. The level of mothballed rolling stock could increase quite substantially as a result of early electrification. There is also an urgent need for a lay-by at the end of the northern DART line at Malahide if further electrification of that line is not proceeding in the immediate future.

The draft Plan makes no reference to the Iarnród Éireann proposal to develop a rail link to Dublin Airport. The final version of the Plan should set out the NTA's current position on the proposal, stating whether it accepts it, rejects it or wishes to consider it further and outlining the reasons for its position. Greater clarity on the NTA's stance would be of particular value from a land use planning perspective. If the proposal has not been rejected, it would be important to ensure the continuing protection of the proposed alignment in the relevant local authority development plans. It would also assist the Dublin Airport Authority in its planning for the airport and its surrounding economic zone. Any further consideration of the Iarnród Éireann proposal would have to take account of the longer term capacity impacts on the Northern rail corridor as residential development and economic growth resumes and the implications for services on the Howth branch. Consideration may have to be given to at least partial third-tracking in the longer term to avoid capacity and operational problems and, based on the precautionary principle, it would be important to establish the practical feasibility of this in advance of committing to the Airport service.

Chapter 9 Integration Measures and Sustainable Transport Investment

There is a dearth of detail in this Chapter which needs to be redressed in the final version. Most of the broad proposals in the Chapter can be supported but, as always, the devil is in the detail. For example it would be helpful to indicate which important cycle routes in the overall GDA cycle network will be prioritised for investment, what areas or types of locations will be targeted for improved pedestrian facilities and how and to what extent the Dublin bikes scheme will be extended. What are the priorities for multi-modal corridors? Repeated assessments have been carried out of the potential for bus-based park+ride and the draft Plan promises yet another assessment. It is way beyond time that a policy decision was taken – is bus-based park+ride appropriate for a large city like Dublin or not?

The provisions in this and other chapters relating to walking as a mode of transport are very disappointing and should be substantially strengthened and made more specific. According to the data in Chapter 2, almost 12% of people walked to work in 2011 and almost 33% travelled to education on foot. The Plan should propose concrete measures to maintain and increase this mode share. There needs to be a focus on the development of specific pedestrian networks, such as those providing access to public transport, shopping, educational facilities, hospitals and community facilities. There should be a clear statement of what constitutes an acceptable standard for pedestrian facilities in terms of physical standards, acceptable crossing times at junctions, placement of street furniture and so on. There should also be a clear hierarchy of pedestrian routes which will guide investment priorities. The focus of traffic management should be much more on the movement of people rather than vehicles and, if this happened, walking would be recognised as a much more important mode of transport.

There should to be greater attention to the needs of mobility impaired people using pedestrian routes. One simple example of this is the obstacle course encountered at the junction of O'Connell Street and Middle Abbey Street. People have to weave through tables

outside a pub, street furniture, a variety of junction boxes and a casual trading site, all of which seem to have been authorised in some un-coordinated way. As another example, pedestrian routes to public transport facilities, such as the main suburban rail stations, should be reviewed to improve accessibility and safety. Some of the dwell times at pedestrian lights accessing these stations are excessive and footpaths too narrow. The green time available at pedestrian lights is challenging for mobility impaired people. There also needs to be much greater enforcement of the law to protect pedestrians from increased and illegal cycling, parking and deposition on materials on footpaths.

The planned Luas-rail interchange at Broombridge is disappointing. For example, a pocket track tram terminal between the railway platforms would provide easier interchange on a level access basis.

Chapter 10 An Integrated Service Plan

The lack of detail in the draft Integrated Service Plan is extremely disappointing and seems to be non-compliant with the requirement of section 13(2) of the 2008 Act that it identify outputs. While we do not expect the Plan to set out a full service specification, it should provide much better information to the general public and operators on how the Authority expects services to develop and adjust over the period of the Plan. Guidance is required, at least in broad terms, as to the quantum of service to be provided, where and on what modes additional capacity should be provided, how services need to adjust to economic and demographic circumstances and changing travel patterns.

It would be useful to take each of the objectives and service review issues, which we fully support, and consider how the Authority might elaborate to provide greater guidance as to its thinking. For example, it is critically important to understand, in advance of the commencement of the main works, how the bus network will be reconfigured to minimise the adverse impacts of the Cross City Luas line both during construction and permanently?

There needs to be an analysis of the balance to be struck between cross-city bus routes and routes which terminate in the city centre, taking particular account of the relative impact on service reliability and accessibility. What service reconfiguration might take place once BRT routes have begun operation? Increasing concerns about the reduction in the number and convenience of bus stops in the city centre need to be addressed, particularly as the problem is likely to be exacerbated by the Cross City Luas. Some elaboration of the priorities for interchange is warranted. There also needs to be clarity on policy relating to bus-to-bus interchange as it has been worsened in recent times by some of the changes introduced.

Better integration of bus schedules on overlapping routes, such as 46A/145 and 31/32 is needed to ensure a more even interval services between on particular corridors. There should be a clearer policy on the provision of bus shelters. Measures should be introduced to minimise the amount of empty running.

Are there key gaps in the service network, particularly in newly developed residential or employment areas, which need to be prioritised? What criteria are to be applied to the rationalisation of underperforming routes? What broad proposals are there for the development of an orbital bus route network? Are there specific priorities for the development of further cross-city bus routes? The bus fleet is currently dominated by double

deck vehicles. Are there any plans to reassess the vehicle mix in a period of lower demand and slower growth?

Regarding Luas, a published timetable would be welcome. While the platform displays and smartphone apps are very helpful, they do not facilitate advance journey planning by the occasional user. This is particularly so outside peak periods when services are less intensive.

The section on rail notes that the completion of the City Centre Resignalling Project will provide opportunities for the reconfiguration of intercity and commuter services. The Chapter should at least set out the principles which will guide the Authority's thinking on this. Among the issues which should be addressed are the further development of clockface timetables and the elimination of the bunching of services on particular corridors. An example of this is Malahide DART and outer suburban services to Drogheda/Dundalk being timetabled to depart within a few minutes of each other.

Chapter 7 identifies emerging peak capacity issues on both Luas lines but the Service Plan only proposes action on the Green Line. At a minimum this requires some further comment or elaboration.

Chapter 11 Integration and Accessibility

Regarding the Leap card, we would have welcomed some concrete proposals to introduce enhancements over the next six years rather than just a commitment to evaluate a range of possible enhancements. Consideration should also be given either to alternative arrangements for tagging on when boarding bus services or to an alternative fare structure which minimises the need to tag on. At present most card users have to interact with the driver to have their fare deducted from the card. This negates one of the key potential benefits claimed for Leap in Section 11.4, namely reduced dwell times at bus stops. One of the specific incentives for multi-journeys and interchange should be the implementation of a price cap and we would welcome a commitment to its introduction in the final version of the Plan.

Consideration should be given to greater use of the real time passenger information system to give wider travel information and alerts. For example information could be given on delays and disruptions to services across modes to help inform the travel decisions of transport users. This could cover topics such as road closures, accidents, railway signal failures or bridge strikes and other events which have a material effect on the operation or reliability of the transport network. Efforts to improve the reliability of the real time passenger information system should continue. For example, information provided at bus and rail termini can sometimes be unreliable because it appears to display the timetabled departure time rather than the expected actual departure time of services which start there. In the case of buses, the departure time ticks down to DUE and then the bus service information disappears and customers are unclear whether the bus is in fact operating. Out of service buses can also make phantom appearances on the system.

We strongly support the commitment to quite specific measures proposed to improve the public transport fares system, which is in contrast to the lack of specific proposals in much of the draft Plan. They will build on the very welcome progress which the Authority has made on simplifying and rationalising fares.

We would welcome an indication of the priorities for improved interchange in Section 11.5.

This Chapter should be enhanced to provide a wider perspective on accessibility. There should be increased attention to improving accessibility to public transport services. We referred earlier to the need to improve pedestrian access to suburban rail stations. Consideration also should be given to improved pedestrian access to bus services. Consideration needs to be given to the availability and accessibility of bus stops, particularly in the city centre where the number of bus stops on individual routes have been reduced and are likely to be further impacted by Luas Cross City. We also need to consider simple things such as the problems created for mobility impaired people by the increased operation of shorter DART trains. Despite the provision of short train marker plates on platforms, many short trains still proceed to the end of the platform requiring people to walk half the length of the platform and invariably pile onto the final carriage. Alternatively passengers go to the head of the platform, but the train stops short requiring them to rush back. Some networks, such as the Berlin and Munich S-Bahn and U-Bahn systems, provide information on how long the approaching train will be and it stops at a marked point on the platform. We quote this example not to target Iarnrod Eireann but to provide a simple example to illustrate how life could be improved for mobility impaired people and all public transport users with a little thought.

Chapter 12 Integration of Land Use and Transport

The Institute fully supports the policies enunciated in this Chapter to improve the integration of land use policy and practice with transport provision.