

# Swords/ Airport to City Centre BRT Consultation Submission

For Coach Tourism and Transport Council of Ireland (CTTC)



**Final Submission**

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## 1. Introduction

### 1.1. Background

Transport Insights, on behalf of our client, the Coach Tourism and Transport Council of Ireland (CTTC), welcomes this opportunity to respond to the current public consultation for the proposed Bus Rapid Transit (BRT) scheme from Swords/ Airport to the City Centre.

### 1.2. Coach Tourism and Transport Council of Ireland

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

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

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

### 1.3. About Transport Insights

Transport Insights is an Irish based transport planning consultancy. With a core team of internationally experienced consultants, we provide innovative, effective and deliverable advice and cost effective, sustainable solutions. Since establishment in early 2013, our client list has expanded to include business groups, asset managers, developers, transport operators, local authorities and national government agencies in Ireland and internationally. Recent Transport Insights' experience includes:

- Advice to domestic bus operators in relation to the National Transport Authority's autumn 2013 proposals to directly award bus contracts to Dublin Bus and Bus Éireann (September – October 2013);
- Strategic advice to Cork City and County Councils in relation to the National Roads Authority's ongoing N40/ South Ring Road Demand Management Study (March 2014, ongoing); and
- Demand forecasting, financial and economic appraisal advice for a planned €400+ million renewal programme on Bucharest's Metro system (September – November 2014).

## 2. Current Scheme Proposals – CTTC Observations

### 2.1. Overview

CTTC members welcome the opportunity to respond to the National Transport Authority's proposed BRT scheme from Swords/ Airport to the City Centre. CTTC members are supportive of capital investment in public transport, and support the potential role of BRT within an integrated transport network. In addition, in the context of the Swords BRT corridor, they recognise the shorter term potential of certain BRT features to deliver faster journey times in a cost effective and affordable manner. CTTC members have, however, major reservations in relation to the nature of the Authority's current BRT proposals for the Swords/ Airport to City Centre corridor.

The scope of the main technical document – the *'Route Options Assessment Report'* has been to inform the identification of the preferred alignment for the proposed scheme, however information and analysis presented in the document suggests significant further work is necessary to test the robustness of the rationale for the scheme. It also appears to flag up questions in relation to the scheme's value for money and impacts on existing commercial bus operations. These concerns are elaborated upon in the remainder of this submission.

### 2.2. Need for the Proposed Scheme

The document notes that the proposed Swords/ Airport to City Centre BRT scheme was included in the NTA's Integrated Implementation Plan 2013 to 2018 on the basis of it providing an interim solution along the corridor:- *"While including the proposed scheme in the Integrated Implementation Plan 2013-2018, the NTA Plan also states that while BRT does not have sufficient capacity to serve this link over the longer term, it would provide an interim transport solution in the shorter term, pending the development of a higher capacity rail solution, such as a metro, on this corridor."* The need for the proposed scheme has not however been outlined within the consultation documents. Specifically, no evidence is presented in relation to the:

- levels of current and future demand by mode along the corridor in the absence of the proposed scheme; and
- specific operational performance challenges facing public transport (overcrowding, delay, unreliability etc.) and private transport modes (poor journey times and journey time unreliability).

Without a clear exposition of the current transport challenges facing the corridor and how these are likely to evolve over time, the need for the proposed scheme is unclear. Furthermore, demonstrating

the extent to which the proposed scheme would address these challenges would provide tangible evidence of the proposed scheme's appropriateness - this is, at present, unclear.

### 2.3. Spatial and Land Use Planning – Regional Planning Guidelines and Fingal Development Plan

The *'Regional Planning Guidelines (RPGs) for the Greater Dublin Area (2010-2022)'* and the interrelated *'Fingal Development Plan (2011-2017)'* set the planning policy for the Greater Dublin Area and Fingal respectively. Both the *'RPGs'* and the *'County Development Plan'* are supported by the Authority's *'Greater Dublin Area Draft Transport Strategy for the Greater Dublin Area 2011 to 2030'*. Within the RPGs, Swords is designated as a Metropolitan Consolidation Town, and the Guidelines state that the 2011 population of 43,000 could reach 100,000 within 25 years (according to the current Swords Masterplan). The County Development reaffirms this level of future growth – *"in the long term, pop. of Swords could grow to 100,000 depending on Metro North."* As such, the designation of Swords as a Metropolitan Consolidation Town in the *'RPGs'*, and the achievement of the level of population growth as envisaged within both the *'RPGs'* and the *'Fingal County Development Plan'*, is predicated upon delivery of Metro North.

Further emphasising the criticality of Metro North, the *'Fingal County Development Plan'* states that only 4,010 residential units out of a total of 9,672 future units are located within zoned lands that are dependent on delivery of Metro North.

### 2.4. Metro North

Metro North emerged as key element of the Authority's *'Greater Dublin Area Draft Transport Strategy 2011-2030'*:- *"Metro North is a key project of the Strategy, designed to provide a high capacity public transport link serving the northern section of the city area and extending to the Designated Town of Swords. It also connects Dublin Airport, the main entry point into Ireland by air, to the city centre with a modern, high quality rail service."*

A Railway Application Order has been approved for Metro North, however as noted in the current *'Route Options Assessment Report'*, construction of the scheme was officially deferred upon publication of the Department of Public Expenditure and Reform's *'Medium Term Exchequer Framework'* in November 2011. The scheme remains a key element of the Authority's current Strategy, and the Route Option assessment Report states:- *"The need for the (proposed BRT) scheme is predominantly borne out of the need to provide a higher quality, higher capacity public transport*

*service, than currently exists, to serve the Swords corridor in the short to medium term in advance of Metro North.”*

The official status of the scheme is ‘deferred’, however based on our review of the current proposed scheme, it is considered likely that the current proposed BRT scheme could be a major contributory factor in a decision to change its status to ‘cancelled’ due to:

- significant feasibility challenges adding to the cost and time required to construct Metro North with the proposed scheme in place (e.g. along the R132 where the alignment of the proposed Metro North scheme extends from the Estuary Roundabout in the north to Airside Retail Park in the south, i.e. running along the same alignment); and
- insufficient transport demand to warrant both BRT and metro schemes along the same corridor, and negative implications for the latter scheme’s economic case.

## 2.5. Demand Forecasting, Economic and Financial Appraisal

Chapter 10 of the *‘Route Options Assessment Report’* provides an overview of demand and economic appraisal activities undertaken in support of the identification of the alignment of the proposed scheme. The report clearly states that this work has been undertaken in support of a *“comparative analysis of the route options”*, i.e. not as a basis for justifying the case for the scheme itself. It is noted elsewhere in this submission that a Preliminary Business Case would be expected to have been developed at this stage in the development of a transport scheme. In this context, we observe the following:

- **Model appropriateness:-** The full Greater Dublin Area (GDA) Multi-Modal Transport Model has been used as the basis for demand forecasting. This is considered to represent a potentially appropriate analytical tool, however as the model is strategic in nature, local area model validation would have provided greater confidence in the relatively small changes between the various scenarios analysed. This could also have implications for the overall economic case (and Business Case) for the proposed scheme, however prior to undertaking the required validation checks, the criticality of this issue is unclear.
- **Overall demand/ demand matrices:-** Future transport demand is derived from assumptions on the location, nature and scale of future development within the model. Land use data within the model is consistent with the *‘RPGs’* and *‘Fingal County Development Plan’* development aspirations/ allocations. As noted earlier, both of these are predicated on delivery of Metro North, with the population increasing from approximately 43,000 in 2011 to up to 100,000 in the longer

term. The *'Route Options Assessment Report'* states that BRT is *"to be designed however so that it could in the future, subject to demand, be increased to a capacity of 4,500 ppdph by using longer vehicles"*, however should Metro North not be delivered, this may require a review of the scale of development in Swords, potentially capping its ultimate growth at a much lower level.

The Report states that *"Opening year demand matrices for 2018 were derived based on linear growth between the 2006 and forecast year of 2033 demand matrices developed by the NTA."*

This approach is considered unsatisfactory as:

- A linear interpolation of growth between 2006 and 2033 would imply that 44% of the growth between both years having been delivered by 2018;
  - As a result of the recent recession, and near complete halt in new development activity from 2008 onwards, this level of growth by 2018 appears implausible; and
  - Transport user (economic) benefits are derived primarily from journey time savings - reduced journey times on public transport, and traffic decongestion. If the level of future development along the corridor is lower, transport demand would be lower and so will the economic benefits of the proposed scheme. As such the level of economic benefits in 2018, and in each year to 2032 are likely to be lower than currently forecast.
- **Modelling of BRT demand:-** The *'Route Options Assessment Report'* states that *"the modelling parameters used to define the Swiftway service are more comparable to rail based modes than bus."* While the validity of this assumption is considered appropriate for a comparative assessment of options within this report, for Business Case purposes presenting the evidence in support of this assumption would be beneficial.
  - **Appraisal period:-** A 30-year appraisal period has been selected in undertaking the economic appraisal for the scheme *"as set out in relevant guidelines for major transport schemes."* Relevant Irish guidance<sup>1</sup> states that *"An evaluation period of 30 years should normally be used, where the life of the asset is 30 years or more"*. Furthermore UK guidance<sup>2</sup> states that *"The analyst should set out the evidence justifying the chosen appraisal period."* In light of the Authority's assertion that the proposed BRT scheme shall perform *"an interim transport solution in the shorter term,*

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<sup>1</sup> Guidelines on a Common Appraisal Framework for Transport Projects and Programmes, Department of Transport, May 2007.

<sup>2</sup> TAG Unit A1.1, Cost-Benefit Analysis, January 2014

*pending the development of a higher capacity rail solution, such as a metro” the rationale for a 30-year appraisal period is unclear.*

- **Modelled years:-** Despite appraising the scheme over a 30 year period, it appears that only two future years have been modelled – 2018 representing the assumed Opening Year and 2033 representing an assumed Forecast Year. It is unclear how demand and benefits beyond 2033 have been derived, however in light of the passenger demand implications of future delivery of Metro North on a similar alignment to the current proposed BRT scheme, this could have a major bearing on the economic case for BRT. Conversely if a decision is made to progress with the proposed BRT scheme, it could have major adverse implications of the economic case for Metro North.
- **Benefits breakdown:-** No apparent breakdown of economic benefits by type has been provided. To provide greater confidence in the economic outputs, it would be helpful to set out a disaggregation of benefits for public transport users (some or all of enhanced journey times, reduced headways, improved reliability, reduced crowding etc.) and private transport modes (decongestion), and the basis for these estimates (e.g. journey time savings of x minutes on public transport from Airport to City Centre and Swords to City Centre, reduction of y no of vehicles kilometres as a result of mode shift, reduction of z minutes in vehicular journey times along the corridor).
- **Financial appraisal:-** This does not appear to have been undertaken to date, with the ‘Route Options Assessment Report’ stating *“It is proposed to undertake a financial appraisal of the preferred scheme in terms of internal rate of return etc. as part of the Preliminary Business Case once the costings, fares etc. are finalised.”*

The analysis to date has focussed on comparative analysis of options, rather than the overall scheme justification, and as noted in Section 10.2.18 of the ‘Route Options Assessment Report’, a series of other benefits have yet been quantified. In the context of the apparent absence of an (absolute) economic and financial appraisal for the scheme, the concerns highlighted above reinforce CTTC member concerns in relation to the Authority’s proposals.

## 2.6. Scheme Business Case

The Authority's Guidelines<sup>3</sup> recommend development of a Preliminary Business Case as part of the Scheme Concept and Feasibility phase of scheme development. Despite the scheme having clearly advanced to the subsequent Option Selection phase, the *'Route Options Assessment Report'* indicates that this will be *"prepared as part of the next stage of the project."* In the context of the issues highlighted in relation to the future delivery of Metro North (Section 2.4), and under Demand Forecasting, Economic and Financial Appraisal (Section 2.5), the absence of a Business Case at this stage in the proposed scheme's development represents a major risk to the scheme's viability.

## 2.7. Impact on Commercial Bus Operations

The proposed BRT scheme operates along the same corridor as existing commercial bus operators, including Swords Express and Aircoach. Swords Express currently operates 100 daily departures on weekdays, carrying 640,000 passenger per annum. As a CTTC member, Swords Express have been consulted by Transport Insights in relation to their expectation of likely impacts on their operations. From the information provided by Swords Express, the following key impacts have been identified:

- Severe disruption to their services during the construction phase, including increased delay and access restrictions to certain stops along the alignment of the proposed scheme. At present, these impacts do not appear to have been quantified, nor does a Construction Phase Traffic Management Plan appear to have been developed to mitigate these impacts.
- The proposed BRT route is to operate on the same corridor as that which is currently used by Swords Express in relation to 39 (out of 48) of its services to the City and 44 (out of 52) services from the City on weekdays.
- 14 Swords Express bus stops are to be relocated, increasing walking times – of up to 800m – from key residential and commercial areas and bus stops.
- A further 5 Swords Express bus stops are to be removed, with no plans for replacement.
- The proposed alignment of BRT within the median of the R132 will result in a loss of existing bus lanes, undermining the capacity of Swords Express to operate a fast and reliable bus service.
- Impaired ability to operate an 'express' brand of bus service.
- Increased passenger confusion, dissatisfaction and journey times.

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<sup>3</sup> Guidelines for the Management of Public Transport Investment Projects Delivered by Conventional Procurement, Table 3.2: Deliverables Required at each Project Gate

- Increased operating costs arising from increased journey times as a result of the proposed loss of bus priority.

In light of the above, it appears that the current proposed scheme is deemed likely to have a severe adverse impact on Swords Express operations, substantially reducing its attractiveness relative to both its present offer, and relative to the proposed BRT scheme. As a result, Swords Express has requested that the Authority provide base and forecast future (do-minimum and do-something) passenger link flows for each operator - Dublin Bus, Swords Express and Aircoach - along the corridor of the proposed scheme.

Based on their bus industry knowledge, and familiarity with the market from Swords to the City Centre, Swords Express has also highlighted the following:

- The lack of evidence in support of an asserted transport deficit along the corridor, and related concerns in relation to the robustness of the 2018 BRT demand forecasts in the vicinity of Swords. These concerns appear to be backed by issues raised under the Demand Forecasting, Economic and Financial Appraisal heading of this submission.
- Concerns in relation to the ability to achieve a target BRT journey time of 35 minutes from Swords to the City Centre in light of the proposed shared use of infrastructure with conventional buses, Luas and taxis.
- Concerns in relation to the size and design of proposed new shared stops – 24m in length, and the inability of such stops to accommodate more than one stopping bus at any one time.
- The absence of revenue projections and breakdown of cost estimates – again this has been noted earlier in relation to the absence to date of a financial analysis for the proposal.
- Concerns in relation to a possible breach of EU State Aid rules should a direct award contract be issued to Dublin Bus to operate the services, and a related need for any future subsidy requirement to be independently investigated before the project is granted Government funding.
- The lack of information in relation to reconfiguration of Dublin Bus services following introduction of BRT gives rise to concerns in relation to the deliverability of the required changes.
- The need to change the focus of planning towards:
  - enhancements to existing bus services and infrastructure (including signal prioritisation and off-vehicle ticketing) in the short-term, which can be implemented at a fraction of the cost to the current proposed scheme; and
  - mass urban transit schemes such as light rail or metro (Metro North) in the longer-term.

Swords Express has also highlighted the lack of any direct engagement to date between the Authority and the management of Swords Express in relation to the implications for its service operations, staff and the ongoing viability of its business.

## 2.8. Consideration of Alternatives

The consideration of alternatives to date has been undertaken in the context of future delivery of Metro North. As noted above, CTTC members would question the deliverability of the proposed Metro North scheme if the current BRT scheme proposal were to progress. Should Metro North not progress, the appropriateness of BRT on this corridor needs to be reviewed, with consideration given to higher-capacity options such as light rail. The ongoing Fingal/ North Dublin Transport Study commissioned by the Authority appears to represent a timely opportunity to do so (see Section 2.10 for further details).

The role of the private sector in meeting the challenges presented by future growth along the corridor, through for example, enhanced commercial express services from Swords to the City Centre and Dublin Airport to the City Centre should be examined. Such services could play a valuable interim role in meeting future demand along the corridor – in particular as noted earlier, demand forecasting undertaken by the Authority to date appears to overestimate peak period demand. The *'Route Options Assessment Report'* acknowledges the potential role of these services in accommodating demand growth between Swords and the City Centre as follows:- *"It was considered that the routes proposed in Option 1 and 2 (Swords to City Centre) are already covered to some extent by private operators providing 'point to point' services through the Port Tunnel and the level of service can be enhanced in the future by additional capacity provision if necessary."* It does not appear however that the potential role of such services has been examined. Furthermore, it does not appear that the operator of these services – namely the Swords Express - has been consulted to ascertain their interest and capacity to enhance service provision to meet future forecast transport demand. In the absence of demonstrating that these services cannot meet the scale of future along the corridor, the case for substantial exchequer investment as current proposed is unsubstantiated.

## 2.9. Operation Proposals

It is understood that, following completion of the proposed scheme, the Authority intends to directly award the contract to operate services to Dublin Bus. In the absence of the Authority completing a financial analysis for the proposed scheme within the context of the Preliminary Business Case, the rationale for this proposal is unclear, and its timing appears premature. In addition to the severe impact on existing commercial operations along the corridor arising from the proposed scheme, private operators would be precluded from tendering to operate the services. It is noted that based on current

forecasts (the robustness of which are questioned in Section 2.5 of this submission), future BRT passenger demand per kilometre is likely to be similar to existing Luas operations, with the latter services operating without a state subvention. Even were a state subvention requirement to emerge as an output of the financial analysis, the absence of full route specific financial transparency within Dublin Bus operations risks placing this operator at an unfair commercial advantage in the market. This is particularly concerning in the context of the Authority's upcoming plans to launch competitive tendering in the bus market in Dublin.

## 2.10. Fingal/ North Dublin Transport Study

It is noted from the Authority's website<sup>4</sup> that a transport study is presently underway in relation to the north-south corridor connecting Swords and the City Centre, and that the Authority's proposed BRT scheme along this corridor has prompted its commissioning.

The overall objective of the study is *"to identify the optimum medium term / long term public transport solution connecting to Dublin City Centre, which serves the key destinations in the General Scheme Corridor, including, in particular, Dublin Airport and Swords."*

Furthermore, it is noted that *"The study will identify and assess all feasible public transport options to service north –south radial movement in the General Scheme Corridor in the horizon year of 2035."*

While the detailed scope of this study has not been published, It is apparent that the proposed BRT scheme is included as part of future do-minimum scenarios, i.e. its future delivery is assumed, and not forming part of the wide range of options to be assessed by the consultant team. This assumption, while consistent with the Authority's Integrated Implementation Plan 2013-2018, should it impede or preclude delivery of Metro North it would appear to be inconsistent with the Authority's Greater Dublin Area Draft Transport Strategy 2011-2030.

It is recommended that the Authority review the assumptions underpinning this study, and expand upon its scope, as follows:

- Include consideration of short, medium and longer term transport demands and identification of priority challenges along the corridor from Swords/ Airport to the City Centre (and not just the medium-long term as appears to be presently within scope).

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<sup>4</sup> <http://www.nationaltransport.ie/news/fingal-north-dublin-transport-study/>

- In line with best international practice, include only those schemes within future year do-minimum scenarios that have full funding commitment, i.e. do not take them as a given, but instead objectively assess them alongside other options. In the absence of a Detailed (or even a Preliminary) Business Case, full funding commitment has not yet been secured for BRT, and it should therefore be excluded from future year do-minimum scenarios.
- Consider all options to address the identified priority challenges along the corridor. This should include the options listed on the Authority's website, and BRT. Furthermore increasing the population of Swords from 43,000 to 100,000 would massively increase transport demand on the north-south corridor transport to the City Centre. Should the cost to the exchequer of supporting this level of future population growth be considered unaffordable, the scale of planned future development in Swords may need to be revised.

Should the Authority proceed as proposed above, it is likely that an alternative cost-effective solution to address short, medium and longer term transport demand along the corridor may emerge, rather than delivery of two separate schemes as appears to be currently proposed.

### 3. Conclusions

#### 3.1. Key Concerns

CTTC members are fully supportive of capital investment in areas that enhance public transport infrastructure and services, and support the potential role of BRT within an integrated transport network. They have however major reservations in relation to the Authority's current proposals for the Swords/ Airport to City Centre corridor. Key issues of concern are:

- The ***lack of Preliminary Business Case*** for the proposed scheme, and apparent inconsistency with the Authority's own Project Management Guidelines, which recommend its development at the earlier Scheme Concept and Feasibility phase of scheme development.
- The ***need for the proposed scheme*** is unclear, with no evidence provided to demonstrate current and future demand along the corridor, and specific transport related challenges arising.
- The current proposed scheme is deemed likely to be a ***contributory factor in Metro North status changing from 'deferred' to 'cancelled'*** due to the significant feasibility challenges of subsequently constructing Metro North and insufficient transport demand to warrant both schemes.
- ***Concerns in relation to the demand forecasting approach underpinning scheme development to date*** – issues which would have been expected to have been addressed as part of a Business Case, had it been developed. Key concerns include:
  - The appropriateness of the current linear growth forecasting approach between 2006 and 2033 – in the context of the near halt in development from 2008 onwards, this assumption is considered implausible. As such, demand up to 2032 is likely to be less than currently forecast.
  - Apparent assumption that the levels of future development as envisaged within the '*RPGs*' and '*Fingal County Development Plan*' will be realised, i.e. population growth in Swords from 43,000 in 2011 to up to 100,000 in the longer term. Such growth is predicated on delivery of Metro North, and as no longer term demand modelling outputs have been provided, it is unclear that the implications of its delivery (delivered/ not delivered scenarios) have been considered in the demand forecasting approach pursued to date:
    - Should Metro North not be delivered, it may require a review of the scale of development along the Metro North corridor, capping its ultimate growth at a much lower level.

- Conversely, if Metro North is delivered, it would provide major competition for BRT, significantly reducing demand for the latter service.
- The demand forecasting issues raised above give rise to ***similar concerns in relation to the economic appraisal approach pursued to date***. In light of the Authority's assertion that the proposed BRT scheme shall perform "an interim transport solution in the shorter term, pending the development of a higher capacity rail solution, such as a metro" the rationale for a 30-year economic appraisal period is unclear. While appraising the scheme over a 30-year period is a valid approach, this is predicated on prior addressing of the demand forecasting issues identified above.
- In the absence of the Authority completing a financial analysis for the proposed scheme, ***the rationale for the Authority's proposal to issue a direct award contract to Dublin Bus to operate the services is unclear, and its timing appears premature***. The absence of full financial transparency within Dublin Bus risks placing this operator at an unfair commercial advantage in the market.
- The current proposed scheme is deemed likely to have a ***severe adverse impact on Swords Express operations*** during its construction and operational phases – a service which carries over 640,000 passengers per annum at no cost to the exchequer.
- ***The role of the private sector in meeting the challenges presented by future growth along the corridor does not appear to have been considered to date***. This could include, for example, enhanced commercial express services from Swords to the City Centre and Dublin Airport to the City Centre. Such options could play a valuable interim role in meeting increased future demand along the corridor.

### 3.2. Recommended Way Forward

In light of these issues, CTTC members recommend (and best practice would demand) that:

- Further scheme planning and design activities be halted pending completion of a Preliminary Business Case for the scheme; and
- Review short, medium and longer term transport related challenges along the Swords/ Airport to City Centre corridor in parallel, and consider the appropriateness of BRT alongside other options including enhanced bus services (Dublin Bus and private), light rail, metro and heavy rail. The ongoing Fingal/ North Dublin Transport Study may represent an appropriate opportunity to do, on the presumption that its assumption and scope are reviewed and expanded to include an assessment of all possible interventions.

Finally, CTTC also request that the Authority engage with existing commercial operators along the corridor of the proposed scheme to identify scope to enhance service provision in accordance with latent current and forecast future passenger demand. In the future, CTTC also emphasise the benefits of engagement with their members at an early stage in the planning of proposed transport schemes to identify commercially funded solutions, and where such solutions are not viable, in assessing the impacts on their operations.