

Public Consultation on Draft National Planning Framework

To: Department of Housing, Planning and Local Government

Email to npf@housing.gov.ie

November 1st 2017

From: The **Western Rail Trail Campaign**

This submission is a response to the Draft "National Planning Framework: Ireland 2040 Our plan" released for public consultation by the Department of Housing, Planning and Local Government.

This submission focuses on how to deliver on four of the National Policy Objectives published in the **Draft National Planning Framework plan**

Page 43: National Policy Objective 6 "Support regeneration of cities, towns and villages of all types and scale in order to accommodate changing roles and functions and enhanced levels of amenity and design in order to exert a positive influence on their surrounding area".

And

Page 73 National Policy Objective 23 Facilitate the development of a National Greenways Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.

And

Page 104 **National Policy Objective 48** Support enhanced public transport connectivity between large urban areas in Ireland and Northern Ireland.

And

Page 105 National Policy Objective 51: Support the coordination and promotion of all-island tourism initiatives through continued cooperation between the relevant tourism agencies and Tourism Ireland.

The Western Rail Trail campaign strongly believes that all four of the above National Policy Objectives identified in the draft National Planning Framework can be achieved if the policy recommended by the Western Rail Trail Campaign is adopted in full and is named and identified as a key project in the National Planning Framework policy document.

Objective of this submission

The objective of this submission is to lay out an alternative use for the land bank capital holdings of Irish Rail on the network of already closed railway lines for which there are no plans to re-introduce train services. It addresses the key issue of what to do with railway lines classified as closed by Irish Rail which are part of the capital land bank held by Irish Rail.

In particular the submission focuses on the land bank held in ownership by Irish Rail which constitutes the officially classified as closed railway line from Athenry to Claremorris and onwards to Collooney in county Sligo.

The **Western Rail Trail (WRT) campaign** is the umbrella name given to a union of community groups in the West of Ireland campaigning for the alignment of the closed railway line from Athenry in county Galway to Collooney in County Sligo to be utilised for the benefit of communities along the route as a greenway (walking and cycling trail) until such time as a railway, if ever, becomes possible. The entire 127 km route is referred to by the campaign groups as the **Western Rail Trail (WRT)**

In addition the WRT campaign supports, recommends and identifies a cross border opportunity for the Western Rail Trail to connect with the proposed greenway from Enniskillen to Sligo (Collooney) utilising the route of the closed (since the 1930s) Sligo North Leitrim Railway Line. This project would be supportive of the text written on page 104 of the draft National Planning Framework document which states the following:

Page 104 of current draft National Planning Framework states this: “Over the life of Ireland 2040, increased transport connectivity, including bus and rail services, between the main cities, to the north-west region and along the border region allied to development **and promotion of cross border blueways, greenways and walking trails will harness the potential of the island.**”

Specifying the Enniskillen to Sligo greenway as a named project written into the finalised plan would support this statement and support the National Policy Objective 48 also detailed on page 104 of the draft plan.

The implementation of The Western Rail Trail greenway will reflect government policy in respect of a national cycle network and sustainable transport it will also protect the ownership of the closed railway route in public ownership until such time, if ever, that a railway becomes possible, should European TEN-T Transport policy be amended. At present the railway will not be re-opened due to the fact the route is excluded from routes identified for development by the European TEN-T policy. The greenway is the best proposal to protect the route in perpetuity in public ownership in the event that railway is ever going to be re-opened.

The Western Rail Trail will help fulfil four of the policy objectives highlighted in the Draft National Planning Framework plan mentioned above: Objective 6, 23, 48 and 51.

The Western Rail Trail project should be specified and identified as a named project in the Final National Planning Framework policy document.

The voluntary groups supporting the WRT include:

- Sligo Greenway Co-Op Ltd
- Sligo-Mayo Greenway Campaign,
- Swinford Vision for the Future
- The Kiltimagh Greenway Group,
- Tuam Greenway Group,
- Athenry Revival Group
- Athenry Tourism.

Previous submissions from the Western Rail Trail Group have been made to the DTTAS and NTA in regard to the Western Rail Trail, this document represents an amalgam of previous submissions plus new submission material consolidated. In particular the detailed appendices attached to this submission should be read in detail by the Department in consideration of the National Planning Framework.

A full list of individuals, businesses and organisations which supported a pre-budget submission of October 2015 may be found in that budget submission, which is attached as an appendix to this submission. Since the pre-budget submission of October 2015 additional political support has been gained with the official backing of the Sligo Greenway concept from Sligo County council which has incorporated the principle of a greenway along the route of the closed railway in the Draft Sligo Development Plan 2017 – 2022. In addition support has been gained from a number of TDs elected in the General Election of February 2016 from the constituencies of Sligo/Leitrim South Donegal and Galway East. Since 2015 there has also been a massive increase in public support and expressions of public opinion in favour of the idea of the Western Rail Trail.

Also since 2015 The Kiltimagh Greenway Group has been established to focus on a particular issue in regard to the Western Rail Trail on the closed railway in the vicinity of Kiltimagh, this particular issue has been the subject of a separate submission to the Department by the Kiltimagh Greenway Group.

The WRT campaign groups, individuals, businesses and organisations call upon The Department of Housing, Planning and Local Government to recommend and adopt the following 7 key recommendations as policy to be written into the new **National Planning Framework** policy.

1. The route of the closed railway line from Athenry county Galway to Collooney in County Sligo is a vital state asset which must be protected from loss to the state. Portions north of Claremorris are at imminent risk of being lost to public ownership through adverse possession and need to be protected from squatting.

2. The international best practice for protecting closed railway alignments in public ownership is to utilise the routes as greenways (walking and cycling routes), until such time, if ever, that reopening as a railway is feasible.
3. If converted to Greenway, the route would remain in the ownership of Irish Rail on the strict proviso that if a railway order is ever issued, a railway henceforth would take legal precedence on the route. Irish Rail publically endorses this methodology of protecting closed railway alignments; most recently in the case of the closed Navan-Kingscourt line in Meath.
4. The route of the WRT would become an integral part of the National Cycle Network – helping fulfil government policy to complete an integrated, fully connected National Cycle Network. Connectivity of a cycling network is critical for tourism.
5. The WRT would fulfil one of the objectives of the 2014 CEDRA report on Ireland’s rural economy. CEDRA identified unused rural pathways and railways as assets with huge capacity for development in rural areas (CEDRA page 68). This project proposal needs to be clearly identified in The National Planning Framework Policy to help achieve one of the objectives mentioned above, namely on **Page 43: National Policy Objective 6** “Support regeneration of cities, towns and villages of all types and scale in order to accommodate changing roles and functions and enhanced levels of amenity and design in order to exert a positive influence on their surrounding area”.
6. TEN-T Transport planning strategy formally passed by the EU parliament, November 2013, identified rail and road infrastructure projects to be funded in Europe as far ahead as 2030. The railway line from Athenry to Collooney was not included as a core route in TEN-T European Transport policy. Only core routes included in the TEN-T policy are likely to receive EU structural funding. Utilising the route as a greenway until European TEN-T Transport is reviewed again for the period post 2030 will ensure the route is protected as a potential rail route in the ownership of Irish Rail until 2030. Irish Rail are on a public record of stating that greenways are an acceptable way of protecting routes in the event they may be needed as railways again in the future. There could be no better way of protecting the closed railway route in public ownership from Athenry to Collooney so that if TEN-T Transport policy is changed in 2030 when it will be reviewed then the route will have been protected in public ownership by a greenway.
7. Over 20 million Europeans take cycling holidays each year, few if any of them come to Ireland because we lack the necessary infrastructure. The WRT, creating connectivity between a Dublin-Galway Greenway , a Collooney-Enniskillen greenway, and the Great Western Greenway would provide a critical mass of trails to attract this market segment.

Based on the above, The Western Rail Trail Campaign submits to the Department of Housing, Planning and Local Government that the following Four objectives be incorporated into the new National Planning Framework policy in order to achieve the 7 key policy recommendations above

1. **Formation of a coherent national authority responsible for converting closed railways to greenways:**
In Appendix 3 of the NTA 2016 Rail Review Report published in August 2016 the following recommendation is made in reference to closed railways: *“Iarnród Éireann proposes that the DTTaS facilitates the transfer of all bridges on abandoned lines to the relevant Local Authority (LA) and the abandonment of all closed lines. This proposal will reduce the estimated funding requirement for maintaining closed and abandoned lines by €3m per year.” (see Appendix 3 NTA Rail Review Report August 2016)*

The recommendation of the Western Rail Trail Campaign is as for all abandoned and closed railway lines, to be transferred in ownership to a new National Central Authority which will be responsible for the conversion of the closed railway lines into a greenway network to integrate with the national cycle network.

To build a national cycle network, a National Authority is needed similar in aims and objectives to the National Roads Authority which manages centrally the development of the national road network (for example the motorway network). Transferring closed railway lines into the ownership of relevant local authorities through which closed and abandoned railway lines pass through could result in a piecemeal approach to converting closed railway lines into a greenway network as part of the National Cycle Network. Transferring ownership of closed and abandoned railways, either to a newly formed National

Cycle Network Authority, or potentially as an additional part of the NRA would ensure a cohesive strategy is put in place to ensure the valuable land bank is used in a cohesive manner to be part of the national cycle network. A strict provision should be made on the transfer of all closed and abandoned railway lines that any development work would not pre-empt the future use of such routes as railways in the future if this proves a possibility. Placing a greenway on such routes would guarantee this position.

In the case of the Western Rail Trail route from Athenry to Collooney, instead of the closed and abandoned railway being transferred in ownership to Galway, Mayo and Sligo county councils to do as they see fit with this asset, it would be more effective for the land ownership of the route to be placed with a National Authority which could then work in co-operation with the relevant local authorities to use the asset as a greenway as an integrated part of the National Cycle Network.

2. The National Planning Framework policy should support an immediate feasibility study for a greenway along the route of the closed railway line from Athenry in County Galway to Collooney in County Sligo by the end of Q2 2018 with the potential to connect this route to Northern Ireland via a greenway from Sligo/Collooney to Enniskillen.
3. The study would examine connectivity between the **Western Rail Trail** and the Great Western Greenway in Mayo, the Dublin–Galway greenway at Craughwell/Athenry and the proposed Enniskillen-Sligo Greenway in Sligo. It's frame of reference would be similar to other such feasibility studies already completed on closed railways in the ownership of Irish Rail, for example the feasibility study on the Navan/Kingscourt railway. Such a simple framework network would immediately help fulfill **National Policy Objective 23** *To Facilitate the development of a National Greenways and Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.*

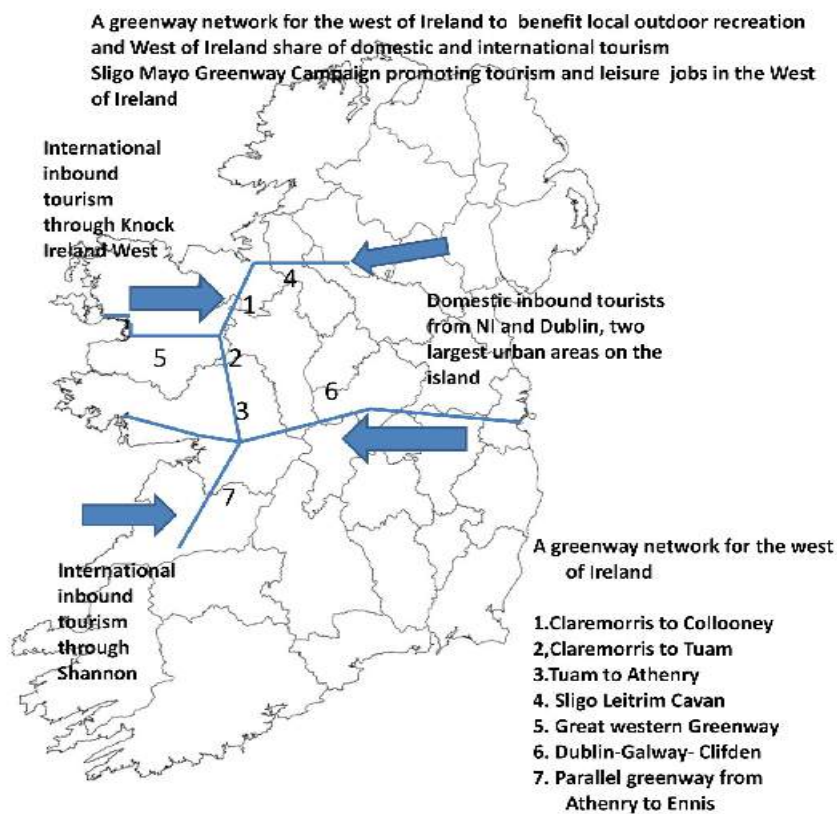
The aims and objectives of the Western Rail Trail project should be named and highlighted in the new National Planning Framework policy document as a named project within the policy document as part of the way to achieve Policy objective 23.

4. The study should include a cost benefit analysis in respect of: rural tourism economics, job creation, health benefits, disabled access, local amenity value, sustainable transport, prevention of pedestrian fatalities, VAT, PRSI and income tax intake and social welfare savings as a result of economic activity associated with the WRT.
5. The Western Rail Trail group also recommends that a policy of utilising existing railway routes with parallel greenways may be a way of achieving policy objective 23. The feasibility of a parallel greenway alongside the railway line from Athenry to Limerick would see the Western Rail Trail running from Sligo to Limerick. This idea could be achieved very cost effectively and would result in a new greenway looking like the picture below:



The Western Rail Trail project believes that if the above recommendations are adopted and implemented a national cycling/greenway network would be quickly achieved maximising the use of closed railway routes in a cost effective way without jeopardising their future use as functioning railways should the European TEN-T Transport policy be amended.

What could be achieved – quickly, cost effectively and utilising publically owned land to fulfil The Western Rail Trail will help fulfil four of the policy objectives highlighted in the Draft National Planning Framework plan mentioned above: Policy Objectives 6, 23, 48 and 51.



Appendices to this submission

Title of Appendix	Reason for attaching this appendix
<p>Appendix one:</p> <p>Pre-budget submission made to the Department of Transport Tourism and Sport in October 2015</p>	<p>This comprehensive submission provided details of support groups backing this campaign which still hold true in July 2017, it is part of the body of argument already submitted to the Department of Transport on this issue</p> <p>Some of the political representatives which supported this pre-budget submission did not win seats at the February 2016 General Election, however, support across the political spectrum of the February 2016 elected TDs has been committed to the Western Rail Trail initiative.</p>
<p>Appendix Two</p> <p>Sligo Western Rail Corridor Assessment of options June 2016 by Meehan Tully Associates</p>	<p>Published in June 2016, commissioned by Sligo County Council this independent assessment from Meehan Tully Associates came up with clear recommendation that a greenway on the closed railway option was the most cost effective option at this moment in time</p>
<p>Appendix Three</p> <p>Sligo county council draft county Development Plan 2017 - 2022. The full draft county plan can be found at:</p> <p>www.sligococo.ie</p> <p>Extract from Draft county Development plan 2017 – 2023:</p> <p>On page 147 under cycling and walking policies the following objective is set out:</p> <p>“O-CW-5 Seek the development of a footway and cycleway (greenway) on or alongside the disused railway line from Claremorris to Collooney insofar as such route does not compromise the reopening of the Western Rail Corridor, if reopening the railway line is deemed feasible.”</p>	<p>This appendix has been included to bring to the attention of the DTTAS that “official thinking” in Sligo at least has moved from the idea that a railway is ever going to re-open to one that says:</p> <p>Let’s have a greenway now and if the railway is ever feasible at least the route is protected.</p>
<p>Appendix Four: comments by senior government cabinet members 2013 - 2016</p> <p>Appendix 4A: Press release of January 2016 outlining Minister of Transport Paschal Donohoes view on a greenway</p> <p>Appendix 4 B: Press release of July 19th 2013 releasing statement made by then Minister of Transport and now Taoiseach Leo Varadkar’s view on the Western Rail Corridor.</p> <p>Appendix 4C The newly elected Taoiseach, Mr Varadkar also made clear his views in an interview on RTE current affairs programme elected Taoiseach Leo Varadkar on RTE political affairs programme Prime Time on February 27th 2014. https://www.youtube.com/watch?v=07kR1YDn9IM</p>	<p>This appendix shows the political will at a senior level supports the greenway.</p> <p>Numerous other press releases made by the Western Rail Trail Campaign have received extensive media coverage in the regional and national media, the Western Rail Trail campaign has driven the media debate on this issue since 2013. All of these press releases were sent to the department of Transport and copies can be supplied by the department.</p> <p>Mr Varadkars comments suggest any further talk of using the closed railway line as a railway are not going to happen under his charge. Mr Varadkar was very supportive of a greenway on the route when he was Minister for Transport see Appendix four.</p>

<p>Appendix 4 D : Link to interview of former Taoiseach Enda Kenny whilst he was Taoiseach stating on Regional Radio Station Mid West Radio in December 2015 in which An Taoiseach states that “The Western Rail corridor is not going to happen”</p> <p>https://www.youtube.com/watch?v=Gfv0EGFjxK0&t=17s</p>	<p>Enda Kenny Taoiseach on December 22nd 2015 states that “The Western Rail Corridor is not going to happen” and goes on to discuss the potential of a greenway on the route. We urge members of the DTTAS to listen to these comments</p>
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<p>Appendix five reports from Western Media newspapers.</p> <p>The campaign has achieved massive media presence and awareness in local western media the links below are some more recent examples of positive coverage in regard to the greenway campaign</p> <p>http://www.tuamherald.ie/news/roundup/articles/2017/06/28/4142302-greenway-trial-was-massive-boost-for-campaign/</p> <p>This report is about 700 people marching in favour of a greenway on the closed railway on the Galway section of the Western Rail Trail</p> <p>http://www.independent.ie/regional/sligochampion/news/coop-group-vow-to-keep-lobbying-for-greenway-35803557.html</p> <p>This report shows how the lobby group sligo greenway co-op are pushing for a greenway</p> <p>There are numerous other examples of positive media coverage for this campaign in the Western Print Media.</p>	<p>The campaign has had wide coverage in regional press, these .pdf files are just an example of the public support in local media for the Western Rail Trail campaign – this is for the Tuam section of the Western Rail Trail, numerous other examples could have been submitted</p>
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<p>Appendix Six: Report on rail freight commissioned by the Western Development commission on 17th December 2015. This report can be found at this link.</p> <p>http://www.wdc.ie/publications/reports-and-papers/</p> <p>Appendix 6 B) Press release response from Western Rail Trail to this report issued on December 18th 2015 showed that any argument for extensive freight on this line is wildly optimistic:</p> <p>The report highlights the number of freight trains per day going in and out of the West of Ireland at about 4 per day (4.3.17 page 46, 2 inbound trains 2 outbound), which is hardly enough to justify new railway lines. Extensive “bottom up” analysis for this report involved trade research with industry in the region showed that there is potential for about another 2 freight trains per day in and out of the region. The report also covered what is called “speculative freight increase” to a level of 10-14 freight trains a day by 2050. Speculation has to be taken for what it is, pure speculation, there is no realistic reason to accept that rail freight to and from the West of Ireland is going to increase fourfold anytime in the near to medium future.</p>	<p>It is important that the DTTAS looks at a report published by The Western Development Commission in December 2015 in regard to the Western Rail Trail concept</p> <p>There is a line of argument which the DTTAS may be made aware of that there is a case for rail freight to be re-introduced on the closed railway line from Claremorris to Athenry. Such a project would mean the closed railway line would have to be completely rebuilt at some considerable cost. The capital funding for such a project would be hard to find or justify, whereas the cost of a greenway would be a tiny fraction of such cost and bring in immediate revenue in tourism benefits.</p> <p>The report published by the Western Development commission clearly shows that there is no such demand for freight to justify this line re-</p>
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	<p>opening and any claims for 14 to 15 freight trains a day from the West of Ireland are wildly optimistic speculation and should be treated as suspect, a greenway on this route would bring immediate benefit to the communities on the route</p> <p>What needs to be looked at to help freight flows from the West of Ireland (primarily from Ballina, Westport and Claremorris in county Mayo) is for increased train lengths and more passing points on the mainline route currently used for such freight trains to the East Coast ports.</p>
<p>Appendix Seven: Support of the public in On line petitions</p> <p>Western Rail Trail has set up three separate petitions on change.org in relation to the Western Rail Trail, these petitions can be found on www.change.org</p> <p>Appendix 7A download of 2144 signatures on petition asking for greenway on closed railway from Sligo to Athenry</p> <p>Appendix 7B – comments made by petitioners on petition asking for greenway on closed railway from Sligo to Athenry</p> <p>Appendix 7C download of 834 signatures on petition asking for a parallel greenway next to the proposed Kiltimagh velorail in county Mayo</p> <p>Appendix 7D comments made by petitioners on the petition asking for a parallel greenway next to the proposed Kiltimagh velorail in county Mayo</p> <p>Appendix 7E download of 221 signatures on petition asking for a greenway on the closed railway from Swinford to Charlestown county Mayo</p> <p>Appendix 7F download of comments made on petition asking for a greenway on the closed railway from Swinford to Charlestown county Mayo</p>	<p>In March 2017 an on line petition was started on Change.org asking members of the public to support this motion, as at July 10th 2017 it had received 2144 signatures</p> <p>The closed railway line from Sligo (Collooney) to Athenry has been closed for over four decades and is lying in waste. There is very little hope it will ever be opened as a railway again. People along the route in small towns and villages in the West of Ireland want to see something happen. They have seen the success that greenways on old railways can achieve, a new facility re-inventing the closed railway will bring civic pride to these towns and villages, creating a public space to enjoy. It will also create many jobs in tourism, a proven fact as greenways the world over attract tourists. We are asking you to sign our petition to the Irish Minister of Transport Shane Ross to say please make this simple project happen.</p> <p>A second petition started in April 2017 asking for a greenway parallel with the proposed velorail at Kiltimagh in county Mayo attracted 834 signatures</p> <p>A third petition asking for a greenway on the closed railway from Swinford to Charlestown in county Mayo attracted 221 signatures in June/July 2017-07-10</p>

	A total of 3,200 signatures have been made on Change.org supporting the Western Rail Trail campaign
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End of list of Appendices submitted to Department of Housing, Planning and Local Government with the submission made by The Western Rail Trail Campaign on the Public Consultation process on National Planning Framework policy.

Brendan Quinn

Western Rail Trail Campaign, [REDACTED]

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