

Western Inter-County Railway Committee Submission to the National Planning Framework – March 2017.

The Western Inter-County Railway Committee is a joint committee of 5 local authorities in the West of Ireland committed to the establishment of a rail service between Limerick and Sligo via Clare, Galway and Mayo.

From Cllr. Michael Connolly, Chairman, Moyloughmore, Moylough Co. Galway

1.

We attach a copy of the recent submission made by the Western Inter-County Railway Committee to the National Transport Authority regarding the Rail Review as Appendix 1.

Our Rail Review submission was prepared with the National Planning Framework process in mind and is founded on the principles of the NPF and is aimed at addressing the questions posed in the NPF consultation process.

2. The National Planning Framework process gives rise to a series of emerging policy choices.

2.1 Where the additional future population will live.

- There is a growing debate surrounding the relationship between the Greater Dublin Area (GDA) and the rest of the country. It is critical to the quality of life and sustainability of the nation that the population is spread throughout the country in a strategic fashion where individual local communities, towns and cities can prosper in a self-sustaining fashion, with due cognisance of the role and importance of the capital city.
- This form of balanced regional development will require an even spread of centres of excellence in public services, which in turn will serve as a basic attraction to private sector indigenous and foreign direct investment.
- Ireland is a relatively small island on the global scale, a small dot on the world map. It makes no sense for us to continue to segment our country into east/west, or sub-sections such as south east, northwest when it comes to settlement and infrastructure investment strategies.

On the island of Ireland, perceived distances are large between centres of population because we have allowed the perception to grow that the fastest land transport available to us is 120kph in a car or 100kph on a bus. We pay scant attention to the fact that railways have the capacity to move people at speeds up to 400km/h. In Italy Frecciarossa 1000 is the fastest train in Europe. It is an advanced model suitable for long-distance passenger service on high-speed lines. Interoperability, safety and comfort are among the major features of the train. Intercity passenger trains all over the UK travel at maximum speeds of 210kph. London to Birmingham is the same distance as Dublin to Galway. With three intermediate stops the journey takes 1hr:25 mins compared with 2:30mins by motorway.

Dublin to Galway takes 2:15mins by rail and 2:15mins by motorway.

Consider if one could travel in Ireland

- from Dublin to Sligo-Galway or Limerick in less than 90 minutes.
- From Limerick to Sligo or Westport in less than two hours or
- Galway to Limerick or Castlebar is less than one hour.

Speed of travel would reduce the size of the country in relative terms and render centres of excellence more accessible to a wider spread of population. i.e. Sligo would be within an hour's journey from Mullingar. Castlebar would be within an hour's journey from Athlone; Galway would be within an hour's journey from Castlebar and Limerick would be within an hour's journey from Cork, Waterford and Killarney.

- This ease of connectivity would accommodate the needs of business, tourism, students, an ageing population, and leisure seekers.
- It would spread the attractiveness of housing in a more dispersed structure, and support the creation of connected and sustainable communities, where future jobs will be located.
- An enhanced European level of commitment to rail transport will also make public amenities more accessible and provide a means to grow carbon friendly rail freight traffic to and from Ports.
- Railways are therefore a strategic infrastructure that must be prioritised.
- There are obvious environmental benefits, including reducing greenhouse gas emissions and adapting to the consequences of climate change as well as transitioning to a low carbon sustainable economy and society.
- The governance structures of our national transport infrastructure will need to adapt to address these national challenges. The National Planning Framework process is a key opportunity to influence the spatial pattern of development throughout Ireland for the benefit of the Country as a whole, over the next twenty years and beyond. **The opportunity to make our railways a core element of this framework must not be lost.**

3. Peoples Health and well-being.

Investment in a European standard of national railway network will support the creation of sustainable communities that have good social interaction. Such a high speed national railway network will allow communities to demonstrate resilience and a shared sense of civic pride and active participation in shaping their local environment. It will reflect greater policy integration and joined up investment decisions across the parallel planning and health policy sectors and help to make sustainable and active travel more attractive alternatives to the private car.

This fostering of an improved 'quality of life' offer for people through place-making and design will then be applied to every city, town and village in Ireland; Improving living environments for all. Social disadvantage will be tackled and prevented rather than being facilitated thus ensuring that healthy-living options are available within communities in the form of access to sports and recreation facilities, amenities and green areas as well as walking and cycling facilities that can also assist in offering alternatives for travelling to school and work.

Car dependence will be reduced through this plan-led development that can anticipate the needs of a community and make provision for that community.

We must be prepared to make dramatic changes in our public transport strategy now so that a 'healthier places' legacy can be handed over to the next generation of Ireland's citizens. Public Service Obligation bus services must complement rather than compete with railway services.

4. A Place-making Strategy

The potential for a nationally significant step-change in the promotion of the four regional cities through co-ordinated planning and investment would be long term and transformational but seriously flawed as it excludes Sligo and essentially compounds the segmentation of our country into two zones – the secondary *Northern zone* designated as primarily a recreation area for the primary *Southern Zone* where productivity is falsely perceived to be singularly generated.

Little would one think that natural gas, tourism attractions, food production, fish landings, food processing, healthcare and pharmaceutical products, baby formula and beverage production serving the needs of Europe and the Middle East come from the *Northern Twilight Zone*.

The fundamental segregation of the West and Midlands north of Galway must change in response to this consultation process if the NPF is to maintain credibility.

On the other hand we support the concept and objectives of the Atlantic Economic Corridor, to which there is a commitment in the Programme for Government. It is noteworthy that there is not a single reference to the Atlantic Economic Corridor in the entire NPF Discussion Document.

The development of the Atlantic Economic Corridor from Derry to Kerry to Waterford is the clear method of developing strong regional complements to Dublin and address the whole city-region concept, including interactions between settlements.

Governance structures need to be strengthened for example by implementing the commitment in the Programme for Government to creating geographic balance on all state boards and including Limerick to Derry in the Ten-T Core Rail route map.

There is a need for a more tailored approach to regional development as a one size fits all approach hasn't worked. The necessity is to increase human capital in order to maximise the potential of the regions and reduce disparities. The discussion document rightly identifies collectively harnessing of shared strengths, combining assets and providing coordination to improve regional performance as opportunities. We would also support

- Aligning regional clustering with regional place making.
- Strengthening regional cities and towns as drivers of growth for the urban and rural areas of the regions.
- Aligning development with the need to transition to a sustainable, low carbon economy and society.

In regard to Leadership, governance and the role of the Regional Assemblies, the levers for effective regional development include regard being taken seriously by Government Departments and state agencies of democratically adopted Regional Planning Guidelines.

It is regrettable in the extreme that the consensus achieved between the Border, West and Mid-West Regional Planning Guidelines in their collective call to introduce an inter-city rail passenger service and capacity for a proven rail freight demand on the Western Rail Corridor between Limerick and Sligo was ignored and totally disregarded by successive governments and their agencies. Such actions on the part of Government and their agencies fosters a deep suspicion at regional level that regional opinions and democratically adopted statutory plans are in fact a box-ticking exercise on the part of the Centre.

The reaction by those responsible for adoption of the National Planning Framework to our call once again for the introduction of a modern, efficient intercity rail service and inter-regional railway infrastructure will be closely watched and will define for us how serious this process is and whether it is any different to the tiers of consultation that have taken place in the 42 years since this Committee was first formed.

The Western Rail Corridor and its future extension from Sligo to Letterkenny and Derry is a key strategic issue (i) across local authority boundaries or (ii) on an inter-regional basis, that the Regional Assemblies can co-ordinate to ensure more effective sub-regional and regional outcomes.

Funding is available through the Ten-T Programme referred to in the Programme for Government and as recently indicated, from the European Investment Bank.

5. Ireland's Unique Environment - Sustainability

We agree with the concept of the interdependence of rural and urban areas, which serve to supplement and complement each other, rather than compete; but this is just rhetoric unless modern high speed transport is available between regional towns in all directions – not just towards Dublin. Buses are simply incapable of providing high speed public transport. We are fortunate to have a framework of publicly owned railway alignments throughout the country with the exception of Donegal, North Leitrim, Cavan and Monaghan.

The prospect of re-introducing railways to these areas, perhaps as part of a cross-border initiative, is no longer just a possibility - it is an absolute necessity if these areas are to become a vibrant part of the European economy. Railways are also an essential component of a vibrant tourism industry – try telling Killarney, or Westport that this is not the case.

The Western Inter-County Railway Submission, as attached, to the Rail Review specifically addresses how the NPF can capture (in a national, strategic policy context) the range and quality of resources that exist in rural areas that could be leveraged to support national economic growth, climate action objectives and the development of local communities? It identifies solutions to maintaining population in those rural areas where decline has been experienced – supporting the role for towns and villages in rural areas in catering for Ireland's future growth?

Connecting Places through Infrastructure

The discussion document refers to the importance of a co-ordinated approach to national infrastructure on both sides of the border. It points to examples in the past, such as investment in safety enhancements at the City of Derry Airport; the Irish Government commitment to contribute to the upgrade of the A5 Dublin-Derry/Londonderry road in Northern Ireland; the Dublin –Belfast railway line and proposed 'greenway' walking/cycling routes, such as along the Ulster Canal.

The Western Inter-County Railway Committee supports the creation of a cross-border railway from Sligo to Donegal with a connection to the recently upgraded Derry-Belfast railway. This project needs the support of the Irish State and its neglect in the past must be addressed as part of the NPF.

Issues common to both jurisdictions include increasing energy demands, ongoing need to upgrade transport networks and a requirement for fast and effective broadband, especially for business users. It is therefore important that where relevant, infrastructure interventions strategically

complement both the NPF and Northern Ireland Regional Development Strategy to help realise the key drivers common to both. This will require regional and local leadership.

The entire Irish railway network should be electrified in time for the replacement of the current inter-city and commuter diesel fleets in ten to twenty years time, with electric rolling stock. Such a dramatic initiative will serve to mitigate the massive EU carbon fines, estimated at between €500m and €1bn annually, starting in less than 5 years. Our carbon saving targets can only be seriously addressed through transport initiatives and the railways are proving literally a golden opportunity to address same – with the added bonus of possibly providing a power distribution network.

We agree with the opportunities identified in the Discussion Document pointing to the need to look beyond administrative boundaries for effective development of regions by working together through structures such as the North West Gateway Initiative and the North West Strategic Growth Partnership in partnership with local government (Donegal-Derry/ Londonderry & Strabane); Greater alignment of infrastructure planning which underpins the objectives of both the NPF and Regional Development Strategy in Northern Ireland to address mutual cross border spatial challenges; The potential for cross-border or all-island clustering of economic activity and how best the NPF can help build the long term economic resilience of areas along our borders; Joint thinking and management approaches to environmental management and protection.

Modern railway infrastructure is a key to exploiting these opportunities.

Commitment in the NPF Document to Investment in a new cross-border railway in the Northwest or through mid-Ulster counties will indicate how the NPF aims to facilitate co-ordination between settlements that share connections across the border between Northern Ireland and Republic of Ireland. Railways are a mechanism to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension and can be examples of best practice.

6. Equipping Ireland for Future Development

Investment in completing the Western Rail Corridor from Galway to Mayo and Sligo, together with the creation of a new railway alignment between Sligo, Letterkenny and Derry will ensure best value for money and efficiency in terms of infrastructural expenditure and realise the significant potential of existing embedded infrastructure. It will also address the need to identify nationally strategic infrastructural priorities; promote the 'packaging' and sequencing of spatially related infrastructural projects on a phased basis to achieve optimal outcomes; identify where large-scale strategic urban extensions or new settlement types may be appropriate and what social infrastructure may be required; enable greater policy integration and joined up investment decisions across planning and transport policy sectors, which are proven to help to make sustainable and active travel more attractive alternatives to the private car; and consider the availability of public and state lands for exemplar projects.

The completion of the Western Rail Corridor between Galway and Sligo serving Shannon and Ireland West Airports as well as Knock Shrine is a nationally important infrastructure project for Ireland that requires delivery over the next twenty years.

It will make the best use of existing infrastructure and can be planned to match future demand. With the impending carbon fines facing Ireland of between €500m and €1bn, capital spending on this new infrastructure can be sequenced in a way that is affordable and equitable, while taking account of savings in Carbon fines.

Response from Western Inter-County Railway Committee 13/1/17

The Western Inter-County Railway Committee is a joint committee of 5 local authorities in the West of Ireland committed to the establishment of a rail service between Limerick and Sligo via Clare, Galway and Mayo.

Questionnaire

1. What do you think is rail's particular strength in terms of its contribution to transport in Ireland?

Our rail network was constructed at great expense and represented the highest standards in engineering capability at the time. Countries all over the world are today expanding and upgrading their railway networks to exploit their capacity to provide their citizens with the latest standard and most environmentally sustainable form of land transport known. In Ireland we appear to lack the vision for rail transport that we admire in other nations. We appear to believe that a country facing into a population of 10 million in the next 30 years is too small to justify a rail network. The Western Inter-County Railway Committee fundamentally challenges this perspective and believes the negative approach reveals a central strategy that appears to permeate successive Governments which is to consolidate the lop-sided growth of Ireland based on a Greater Dublin Area which has an insatiable appetite for public investment that is contrary to the concept of balanced development.

The fact that Dublin City's congestion requires solutions such as an underground DART railway costing €500 million per km is readily accepted by economic commentators while spending €2m per mile restoring a rail service between two west coast cities brought an avalanche of criticism, and ill-informed comment on the projects promoters and the actual project's performance.

The most serious mis-information was a statement widely repeated that the Galway-Limerick train service had not met the passenger projections contained in 'the Business Case, when it had actually exceeded its targets.

This Business Case was only released to the Western Inter County Railway Committee in November 2016 – ten years after it was produced and it revealed that the passenger targets referred to therein were for 200,000 passengers being carried on Galway-Limerick train services within five years of opening.

The fact that 279,000 passengers were carried on Galway-Limerick train services in 2015 was misrepresented by unfounded suggestions that the target of 200,000 was in respect of part of the route.

Furthermore the target was exceeded during a period when nationally rail passenger numbers fell.

The Galway-Limerick train service surpassed its projections in 2015 despite the line being closed during December due to flooding. We can't imagine another scenario where an intercity mainline railway would remain closed for 5 months without dramatic remedial works being planned or indeed taking place. But such is the indifference to this intercity railway that it was left closed for five months until the flooding

subsided. We are not aware of any works being undertaken at Ballycar in Co. Clare since then, to avoid a recurrence.

The passenger projections for the Galway-Limerick train service according to the Iarnrod Eireann Business Case was 200,000 within five years. According to Iarnrod Eireann the numbers carried on Galway – Limerick train services in 2015 – five years after opening – were 279,000.

The additional passengers projected, over the Galway-Limerick route, through bridging the gap between Athenry and Ennis were projected at 100,000, according to Faber Maunsell, who carried out the projections for Iarnrod Eireann.

Iarnrod Eireann confirmed that in 2015, 102,000 trips were undertaken over the new section. The line was only operational for 11 months in 2015 due to the flooding referred to above.

Therefore it is clear that the passenger projections on the overall route and on the new section have been exceeded despite the fact that the service promised in the Business Case was not delivered, i.e.

- Five services introduced instead of seven daily services in each direction as promised
- No Clock-face timetables
- Delays of 1-2 hours at junctions for connecting services to the second and fourth cities in the state – Cork and Waterford
- Not a single train achieves the promised 1:50 minute journey time from Galway to Limerick in spite of the fact that the renewed section of the route was constructed to an 80mph standard rather than the envisaged 60mph.
- Integrated transport measures with licenced bus operations were not introduced – but rather a licenced bus operation was introduced simultaneously with the new train service in direct competition.

The passenger projections for the Galway-Limerick train service were exceeded in spite of the flaws identified in the Cicero Report commissioned by West On Track, the community organisation promoting the restoration of passenger and port focussed freight services on the Western Rail Corridor.

Despite the Cicero Report being presented in May 2016 to the relevant authorities not a single recommendation has been addressed i.e.

Better trains – Iarnrod Eireann admit that the current rolling stock is amongst the oldest fleet and do not provide the economies of scale for maintenance compared to the newest fleet. The rolling stock used is predominantly old commuter stock and not suitable for an intercity service.

Faster speeds – The average journey speed on the 73 mile journey between Galway and Limerick is 35mph in spite of 15 miles of track being 90mph; 35 miles of track being 80mph and 25 miles of track being 60mph.

Improved Punctuality – The National Transport Authority publish data quarterly on train punctuality. Iarnrod Eireann have ‘punctuality targets’ for all passenger services, except Galway-Limerick; Limerick-Waterford, and Limerick-Ballybrophy, coincidentally the three routes targeted for closure by the Rail Review.

Customer-centric timetabling was never delivered.

Competitive Fares – The Rail Service in Galway and Limerick is excluded from the LEAP Card

incentives. On 78 services surveyed by Cicero between Athenry and Ennis in November 2015, not once were tickets checked on the trains.

Product Development - engagement with the tourist sector was not even attempted.

The punctuality of Galway-Limerick train services is by far the lowest in the country at 91.8% for the first nine months of 2016 compared to a national average of 97.5% (NTA).

This overview must pose serious questions for the strategic and operational management of our regional railway network.

2. How important do you consider the environmental contribution of rail to be relative to other transport modes?

2.1

- ▶ In 2005 Mayo Industries proposed to the Department of Transport Working Group, then examining the restoration of the Western Rail Corridor, that Rail freight operations between Mayo and the Ports of Dublin and Waterford be sustained and developed. Local promoters of the WRC proposed an initiative to Iarnród Éireann, who agreed to undertake a pilot project to charter freight trains to Norfolk Lines for the operation of a new rail freight service from Ballina to Waterford Port via the Greater Dublin Area - this was at a time when IE had apparently unilaterally decided to exit all except Tara Mines rail freight operations nationwide.
- ▶ The pilot was successful and approximately 11,000 chartered freight trains have operated since then, between Mayo and the Ports of Waterford and Dublin.
- ▶ In 2015 alone over 1100 chartered freight trains have operated and currently number about 26 trains per week.(3) These are the only inter-modal freight trains operating on the island of Ireland today.

That is a major achievement in light of the fact that Ireland is unique in having no rail freight subsidies or grants based on environmental or carbon savings contrary to the position in the UK and across Europe. (4)(5)

- ▶ If Mayo can generate 1100 freight trains per annum serving 2 Ports we suggest that the true potential of rail freight in Ireland is untapped.
- ▶ The success of Mayo rail freight proves the demand and justifies the investment in the more direct route along the Western Rail Corridor through Limerick and Tipperary to the Port of Waterford and the upgraded Port of Shannon/Foynes. This would have the added benefit of providing industries on the route with environmentally sustainable inter-modal rail freight access.

2.2

Rail freight is not yet a serious component of national transport policy and despite the successes of recent years there is no sign of it becoming part of that national policy. The NTA, SEAI or EPA appear to have no interest.

We offer the following in support of this view:

- ▶ IE rail freight returned a gross surplus of €1.3m in 2014 and only recorded a net deficit of €1.8m after Iarnrod Eireann applied Track Access Charges amounting to €3.1m. (1)

In Britain the Track Access Charge for these trains would be	€611,000
In France the Track Access Charge for these trains would be	€506,000
In Germany the Track Access Charge for these trains would be	€848,000
In Spain the Track Access Charge for these trains would be	€ 41,000

with a consequent net surplus return for Iarnrod Eireann of €700,000*(€1.3m – €611k); €800,000; €450,000 or €1.25m respectively. Track Access Charge rates are at the discretion of Iarnrod Eireann.

- Furthermore, analysis carried out by the Department for Transport in the UK shows a societal benefit from rail freight over road on journeys equivalent to those of Mayo rail freight amount to €2.2m per annum, while recently published research by the Imperial College London would suggest it is as high as €2.8m
- If Mayo rail freight constitutes two-thirds of total rail freight in Ireland and if UK Track Access Charges were applied;

the annual net surplus would be :	€0,700,000*
societal gain (Carbon/Environment) :	<u>€2,200,000** See Table 1</u>
total State Gain :	€2.900,000
Less State Subsidy : (@UK level)	<u>€0850,000</u>
Net State Gain :	€2,050,000
(return on state subsidy 3.4:1)***	

***Arup findings for Department for Transport (5) and those by Imperial College (2) would suggest returns of up to 4.27:1

Table 1**

Table 42: Cumulative cost impacts of grant withdrawal

Lorry miles, million per annum				
	Intermodal movements		Bulk moves	Total
Additional lorry miles	95.0		16.6	111.6
Impact to society				
	cost per mile, pence		Net cost per mile for transfer to road, pence	Total impact of additional road miles, £ million
	Road	Rail		
Environmental	31.5	7.4	24.1	-26.9
Congestion	52.4	0.0	52.4	-58.5
Tax impact	34.1	1.7	32.4	+36.1
Overall impact, £ million per annum ⁽¹⁾				
Environmental impact				-26.9
Congestion impact				-58.5
Overall societal impact				-85.4
Exchequer impact – increased tax income				+36.1
Exchequer impact – reduced grant expenditure				+19.2
Net impact				-30.0

(1) Benefits are shown as positive values, costs are shown as negative values

This demonstrates that even allowing for a saving in grant payments of £19.2m per annum for total grant abolition, there is a net worsening of the national position by £30.0m.

For both of the above scenarios, the congestion impact is based on an average congestion value. In reality, particular routes may have higher or lower congestion impacts than this. The congestion costs shown here could therefore be an under or over estimate of the actual impacts depending on which flows transfers to road with the grant removed or reduced. We do not have sight of the base data from the applications to know the relative BCRs of each flow and therefore its continuing eligibility. **Comparison Table produced by West On Track June 2015**

Lorry miles, million per annum				
	Intermodal movements		Bulk moves	Total
Additional lorry miles	2.5		1.1	3.6
Impact to society				
	cost per mile, pence		Net cost per mile for transfer to road, pence	Total impact of additional road miles, £ million
	Road	Rail		
Environmental	31.5	7.4	24.1	- 0.8676
Congestion	52.4	0.0	52.4	- 1.8864
Tax impact	34.1	1.7	32.4	+ 1.1664
Overall impact, £ million per annum ⁽¹⁾				
Environmental impact			£ - 0.8676 *	€1.2m
Congestion impact			£ - 1.8864	€2.6m
Overall societal impact			£ - 2.754	€3.8m
Exchequer impact – increased tax income			£ + 1.1664	€1.6m
Exchequer impact – reduced grant expenditure			£ 0	€ 0
Net impact			£ 1.5876	€2.2m

(1) Benefits are shown as positive values, costs are shown as negative values

Combined Environmental and Congestion value of Mayo Railfreight net of estimated foregone income tax revenue is €2.2m. In the UK this traffic would attract grant aid of £620,000 or €860,000 and provide a return of 4.4:1

* Mayo Railfreight saves 3000 metric tons of emissions annually. (WoT.)

Recent Imperial College research values emissions at €590 per m/ton. (2)

This would increase the value of Environmental Impact to €1.8m and overall net value of Mayo Railfreight operations to €2.8m per annum.

Furthermore railfreight customers in Ireland are faced with track access charges of €9.80 per 1000 tonne/km compared with €1.93 in UK: €1.60 France and €2.68 Germany. (Source EU Comm. June 2014)

The EU has reported in 2014 that Ireland's Rail Access Charges @ €9.80 are 4 -5 times higher than those in Germany, France or the UK (6). That's a serious disincentive towards the use of rail freight. In 2014 Irish Rail increased their freight-tonne-kilometres by 10% and their Track Access Charge Income went up by 25%. (1)

- ▶ In France the Mayo rail freight operations would attract €1m in state subsidies and pay track access charges of €1.60 per 1000 tonne/train km. (7)
- ▶ In The UK the Mayo rail freight operations would receive up to €860,000 in state grants and pay track access charges of €1.93 per 1000 tonne/train km. (8)
- ▶ The fact that there are high prospects of rail winning a contract for the haulage of biomass to existing and planned power stations and that Ten-T EU funding of a new deep water Port at Foynes makes the NTA proposals developed by RB in the Rail Review even more unbelievable.

2.3

The Rail Review appears to display a disregard for the Regional Planning Guidelines.

Abstracts from Current Regional Planning Guidelines 2016

Border Region

- *Proposals in Northern Ireland to further upgrade the rail line between Coleraine and Derry will underpin shared investment.*
- *Significant improvements have been made to the services of the Sligo – Dublin line, with rolling stock now upgraded. There remains much scope for improvement in public transport provision in the Region, as it lags behind all other Regions in the country, and is therefore at a comparative*

disadvantage.

- *The further development of the Western Rail Corridor (WRC) is critical to the future potential of rail services in the North West.*
- *Donegal County Council has initiated feasibility work on the potential extension of the Western Rail Corridor from Sligo up to Letterkenny and into Derry City. This missing rail link would complete a loop for rail services around the island of Ireland, and would provide significant benefits to a catchment population of western counties in the Border Region.*
- *Balanced regional development is a cornerstone of the Guidelines. In order to achieve a balance of social, economic and physical development throughout the island of Ireland, it is important that the development of rail services in the North West is targeted for investment as a long term priority for the sustainable development of the Region.*
- *New rail services, as identified above, will provide an alternative mode of transport for the population of the North West, but may also provide an alternative for freight services around the island of Ireland. The implementation of the Balanced Development Model, and in particular the Atlantic Arc, should provide the basis for the development of critical mass required to justify such investment in rail services in the North West of the Island.*

West Region

Key investment priorities required to support the sustainable development of the region includes;

- *Support the opening of the entire Western Rail Corridor route from Athenry to Collooney.*
- *Support the development of commuter services on the Galway and Mayo Railway Lines.*
- *To investigate the potential for development of integrated transportation hubs in the Gateway, Hub, Linked Hub and other appropriate urban locations.*
- *Support the construction of new Railway Stations to facilitate commuter and freight services subject to a feasibility study being undertaken*
- *Support the proposals for the laying of dual track between Galway and Athenry and the sustainable development of new commuter stations along the new Western Rail Corridor as appropriate.*
- *Support the redevelopment of Ceannt Station and adjacent lands.*
- *Support the installation of freight handling equipment and extended passing loops at key rail stations to facilitate the greater usage of rail to transport freight generally subject to a feasibility study being undertaken.*

Promote and encourage appropriate and sustainable development patterns and densities that will support the provision and improvement of public transport services. In this regard, it should be the policy of all Local Authorities to promote development on serviced land in towns and villages, particularly those located along public transport corridors, in accordance with the Sustainable Residential Development in Urban Areas Guidelines, having regard to existing settlement patterns and form, adequacy of existing/planned facilities and services to facilitate the development of viable and effective public transport networks

Mid-West Region

- *Pending future decisions on the Shannon Airport rail link, Planning Authorities should ensure that construction or other activities that would compromise its development do not take place.*

- *Upgrading of the Rosslare-Waterford– Limerick railway has strong potential to bring significant flows of business, visitors and tourists into the Mid-West Region.*
- *It is adopted Government policy to develop the Western Rail Corridor. This work should continue and provision should be made for stations or halts at all settlements along the line particularly at Crusheen in County Clare. Consideration should also be given to the provision of a halt at the Ennis Information Age Park.*
- *The Limerick/Nenagh/Ballybrophy rail line can provide an important transportation link between the North Tipperary/South Offaly area and Limerick. In particular, if enhanced and developed, the line can make a substantial contribution to sustainable commuter travel in these areas as well as carrying freight.*
- *There is a significant rail network within and around the greater Limerick City area. Consideration should be given to how this network might be used to provide for the transport of goods and people within and around this area in a way that will assist sustainable transport and reduce traffic congestion.*
- *A feasibility study should also be undertaken in relation to the re-opening of Kilmallock station.*
- *The 26-mile railway line that exists between Limerick City and the port of Foynes, which is currently held on a 'care and maintenance' basis by Iarnród Éireann, should be upgraded and used for freight traffic.*
- *Given the strategic importance of the Limerick-Shannon Gateway as both an economic hub and an international gateway, specific consideration is given to freight movements within the Mid-West Region, and between the Mid-West and other regions.*

The apparent disregard for Regional Planning Guidelines is deeply disappointing.

2.4

The NTA role in Rail freight transport is not clear. It commissioned studies on the subject of freight transport during the Dublin Transportation Authority era but has made no reference to the subject in a national context since becoming the NTA.

The Public Transport Regulation Act amended the 2008 Act and states at Section 10 that the NTA functions include: "*the development of an integrated transport system which contributes to environmental sustainability and social cohesion and promotes economic progress, and increased use of the public transport system, while providing value for money.*" Rail freight would appear to fit into this definition. So is the NTA aware of the environmental, social and economic benefits of rail freight?

It is very unsatisfactory that the NTA do not hold a statutory responsibility for strategic transport planning outside the Greater Dublin Area, despite their title. We are not surprised therefore that a €10.3 billion Transport Strategy has recently been produced by the NTA for the Greater Dublin Area while their proposals for regional Ireland include closure and abandonment of 175 miles of existing railway serving 17 regional towns; 3 cities and the Europort of Rosslare and the abandonment of a further 250 miles of 'closed' railways which Irish Rail unilaterally withdrew services from in recent decades. These recommendations come at a time that the Government has committed to undertake an independent assessment of one of these routes between Athenry and Claremorris. The Rail Review appears to be pre-determining the outcome of such an independent review.

3. What in your view is rail's contribution to Irish society relative to other modes of travel? Consider issues such as accessible services for the mobility impaired, social inclusion and the Free Travel Scheme.

The Western Rail Corridor is a key strategic economic corridor and it would be a travesty to ever contemplate destroying it.

Re-vitalising the *Missing Link* from Athenry to Claremorris to rail freight and passenger standard will:

- ✓ Cost about €2m per mile.
- ✓ provide a shorter route to the Ports of Waterford (30 miles shorter); Cork (80 miles shorter) and Foynes (135 miles shorter) for growing western freight exports.
- ✓ decongest existing intercity routes where freight restricts passenger train paths.
- ✓ meet current customers schedules requiring day-time transport.
- ✓ satisfy industry expectations of a loop transport system
- ✓ remove the current necessity for freight trains from Mayo to Waterford Port to be shunted through the Greater Dublin Area where they have no business.
- ✓ provide capacity to grow new rail freight flows in Mayo, Galway, Clare, Limerick and Tipperary, contributing to the sustainability of the threatened Limerick Junction to Waterford route.
- ✓ strengthen the business case for new inter-modal freight distribution inland hubs and
- ✓ deliver a bonus of an extended west coast route for commuter, regional and special tourist/heritage traffic all the way from Cork/Kerry to Limerick – Clare - Galway and Mayo in pursuit of economic growth on the Atlantic Economic Corridor and Wild Atlantic Way.

The EPA has indicated that Ireland is at significant risk of not meeting its EU 2020 emissions targets but has nothing to say about the value of railfreight unlike their counterparts elsewhere in the EU.

Prof. John Fitzgerald recently suggested carbon fines may exceed €500m per annum. Investment and pro-active policies towards rail freight can mitigate the scale of such fines and send a message of our intent to address the issue to the relevant authorities.

The EPA and Sustainability Energy Authority of Ireland (SEAI) appear to be silent on the value of Rail freight.

The Environmental Bonus

- Rail freight generates 80% less CO2 emissions compared with road transport. (10)
- Based on current UK Department for Transport formulae, the combined environmental and congestion value of Mayo Rail freight operations is €2.2m. If recent findings of Imperial College research is applied this figure rises to €2.8m.(2)
- Using Roadnet Technology methodology it is possible to calculate that the savings generated in carbon emissions from Mayo Rail freight operations amount to 3000 metric tons per annum. (11)
- Each Irish freight train takes up to 36 articulated lorries off the roads and there are trials underway by Iarnrod Eireann at present to increase freight train sizes to 54 TEU's or 1500 tonnes.

It is time in our view to clarify national policy on rail freight.

Credit is due to the Western Development Commission for breaking the silence and formally addressing the potential for growth in what is a very sustainable, commercial and professional sector.

The Committee welcome the commitments in the new Programme for Government that the Department of Communications, Climate Action and Environment in conjunction with the Department of Transport will now address the carbon emissions issue, and urgently address rail freight policy in an open and frank manner.

Sources (1) Irish Rail Annual Report 2014

(2) "Unlocking the hidden Value of Carbon offsetting", Imperial College, London University, 2013.

(3) IWT 6 trains weekly Ballina to and from Dublin Port
DFDS 1 train weekly Ballina to and from Waterford Port
Coillte 2 trains weekly Ballina to and from Waterford
Coillte 1 train weekly Westport to and from Waterford

(4) CERRE Centre on Regulation in Europe: Development of rail freight in Europe: Case Studies France; Case Study UK; 11 December 2014

(5) Department for Transport: Review of Revenue Support Freight Grant Schemes (UK) ARUP; 21 March 2014

(6) European Commission: COM(2014) 353 final; Report from the Commission to the Council and the European Parliament; Fourth report on monitoring development of the rail market: 13.6.2014:p27

(7) CERRE Centre on Regulation in Europe: Development of rail freight in Europe: Case Studies France; Case Study UK; 11 December 2014: Footnote p.20

(8) Department for Transport: Review of Revenue Support Freight Grant Schemes (UK) ARUP; 21 March 2014: Table 42

(9) Department for Transport: Review of Revenue Support Freight Grant Schemes (UK) ARUP; 21 March 2014 p.95

(10) modeshiftcentre.org.uk

(11) Railnews.co.uk 2008: modeshiftcentre.org.uk 2012: wspgroup.co.uk 2014: Department for Transport: Review of Revenue Support Freight Grant Schemes (UK) ARUP; 21 March 2014; and Roadnet Technologies (US) formula.

4. Rail could play a much greater role for commuter travel in Dublin (in 2011 7% of commuting to work or education was by rail) and in Cork (1% in 2011). What policies and measures are required in your view to increase use of rail by commuters in these cities?

The Western Inter-County Railway Committee suggests;

a) the National Transport Authority be given statutory responsibility for strategic transport planning outside the Greater Dublin Area

b) now that a €10bn Transport Strategy for the GDA has been completed by the NTA and endorsed by Government, a similar strategy for the population outside the GDA be prepared by the NTA.

c) a much improved commuter service could be introduced in Galway if

- the City Centre located Ceannt Station is developed as a rail and bus interchange,
- the line to Athenry is doubled, and
- the railway north of Galway to Mayo via Tuam is re-opened for passenger/commuter transport.

d) The Draft Transport Strategy for Galway should be amended to reflect these three factors so that it be consistent with the Regional Planning Guidelines.

5. What initiatives do you recommend to increase rail patronage, particularly on intercity services (e.g. shorter journey times, lower fares, more frequent services)?

The Western Inter-County Railway Committee recommend that:

a) the National Transport Authority would review bus licensing to avoid parallel bus services in direct competition with upgraded Intercity Rail services such as Galway- Limerick; etc.(other than direct services to Airports); but rather focus on providing bus services to communities that have not access to the railway, and bus services to connect with rail services.

b) bus operators be given PSO assistance to service such routes.

c) the commercial operators should also be encouraged to provide rail services where Iarnrod Eireann are unable or unwilling to do so.

d) in regard to the further improving the highly successful Phase One of the Western Rail Corridor service between Galway and Limerick, the full implementation of the service as described in the Iarnrod Eireann Business Case should take place without further delay.

e) construction of Phase 2 of the Western Rail Corridor between Athenry and Claremorris, postponed due to the economic crisis, be immediately recommenced.

f) in order to encourage use of licensed bus services, TII and Department of Transport co-finance the provision, by local authorities, of illuminated bus shelters at all licensed bus stops and park & ride capacity at bus-stops outside villages and towns.

g) faster train speeds with all routes being upgraded to 90-100mph.

h) the rail passenger network be entirely electrified over the next 25-30 years.

Potential Growth Traffics

Research carried out by the Western Development Commission shows there is commercial interest in new rail haulage of Timber; Inter Modal Container; Biomass; Wrapped Waste; Fuel oils, Bulk and Meat Products.

The EU accepts that rail freight subsidies, grants and low track access charges generate a positive return. ARUP in a report prepared for the UK Dept. for Transport find a benefit to cost ratio of 4,27:1 (9) in environmental and congestion cost impacts for every £ of grant expenditure.

- ▶ The view that potential now exists for substantial rail freight growth is shared by the paying customers.
- ▶ Re-laying, rather than destroying, the 33 mile unused railway between Athenry and Claremorris will enable this growth. One thousand one hundred annual freight trains to and from Mayo rely at present on a single congested track to Portarlinton that is 130 miles long and carries Galway, Roscommon and Mayo passenger traffic also.

6. Should fare policy include consideration of time of journey (peak/off-peak), the type of person travelling(e.g. adult/student, etc.),the booking method or timing (internet/in station, on-the-day/in advance)? Why?

Yes, because the NTA is spending almost €30m on a Customer First Programme at present to do just this.

7. If funding is limited, what parts of the rail network (DART, Dublin Commuter Services, Intercity Services, Cork Commuter Services, Regional services) do you consider should be prioritized for funding? Why?

The case for rail investment is equally justified throughout the country, and especially where the infrastructure already exists - if we have a real commitment to balanced development throughout the state.

If funding is limited it must be shared equally between the 50% population within the GDA and the 50% in the rest of the country.

8. What is your opinion on the relative advantages of rail and of bus in providing the core public transport service in regions of low population density? Why?

Rail passenger services other than commuter services provide links between cities and towns throughout the state. Dublin is the focus of most journeys at present. The Review's reference to 'Regions of low population density' suggests an image of intercity services operating to desert or mountainous regions, marshlands, or areas that have not yet been 'developed'. There are no such regions of low population

densities in Ireland. Our rail system terminates in places like Sligo, Ballina, Westport, Galway, Limerick, Tralee, Cork, Waterford, Wexford/Europort and Belfast/Derry. National policy is to grow population in all these regions through inward and indigenous investment, tourism, centres of excellence in third level education and health – the best little country in which to do business, creating opportunities for our children to practice their chosen professions in their native place.

Less than 50% of the population live or work in the GDA.

9. How do you think the rail funding gap should best be addressed for the future? You may wish to include some or all of the following: reducing costs (through further efficiencies and/or reducing the size of the network), increasing revenues (e.g. through fare increases and/or Government taxes and/or other investment). Try to be specific in your suggestions.

Once again the question leads the response of suggesting a reduced network. This is a negative perspective.

Research undertaken for the Committee found that Europe's railways absorb €36 billion of public subsidies a year (almost as much as they earn from fares), according to the European Commission's bi-annual report on the European Rail Market. That's €72 per head of population in Europe between Public Service Obligation (PSO) and Multi Annual Contract (MAC).

According to the Commission's report the total amount of reported State grants for 'rail infrastructure managers' varies according to various sources from which it can be estimated and the gaps in data series, but remains overall around € 18-21 billion in 2012, approximately €40 per head of population.

According to Irish Rail's annual Report 2015, management of infrastructure is funded under EU regulation by a 5-year, Multi-Annual Contract (MAC) from the Department of Transport Tourism and Sport, and track access charges from passenger and freight rail services.

The 'Railway Infrastructure Manager' MAC payment in EU works out at approximately €20bn/ or €40 per capita., while the 'Railway Infrastructure Manager' MAC payment in 2015 to Irish Rail was €113m or €24 per capita.

The 'Railway Undertaking' PSO payment at €16bn in Europe amounts to €32 per capita while the 'Railway Undertaking' PSO payment in 2015 to Irish Rail was €98m or €21 per capita.

The research goes on to say that if European average rates of 'Infrastructure Manager' MAC grants were applied in Ireland, total MAC payments to Irish Rail annually would increase by €75m per annum. MAC payments of €113m in 2015 would increase to €188m per annum.

If European average rates of 'Railway Undertaking' PSO grants were applied in Ireland, total PSO payments to Irish Rail annually would increase by €52m per annum from €98m as in 2015 to €150m per annum.

PSO, and MAC payments to Irish Rail should be to be on a European scale – if we are to have a European standard railway.

This would give Irish Rail €338m per annum rather than the €211m PSO/MAC paid in 2015 – an

increase of €127m per annum.

This would bridge the funding gap referred to in the Rail Review.

The additional €154m annual income would be required to fund track/rolling stock renewals/while in turn increased passenger revenue would fund repayments of long-term capital investment in an expanded and modern high speed passenger and freight railway system.

Investment in a growth programme will generate new revenues from freight traffic and passenger patronage, increasing carbon savings, reducing accident and medical/insurance costs, creating modal change and increasing agglomeration and productivity at regional level.

When considering Gross subsidies, it must also be remembered that in 2015, Irish rail contributed €112.6m to the Exchequer in taxes.

If we are to invest in a European standard railway, there would have to be a matching mind-set change in the management of our railways that would see a progressive leadership at board and management levels, displaying an enthusiasm to build a modern Irish railway system for all of Ireland with a fundamental conviction in their capacity to deliver the best railway system in the world with which to do business. There will also need to be buy-in from trade unions and a collaboration with Northern Ireland administration and Translink - Northern Ireland Railways. This will be especially critical if connections are to be achieved in future with Northern Ireland through Donegal.

10. The social benefits of rail travel justify the funding of rail by a combination of Government subsidy and fares. What is in your view the acceptable level of subsidy per person-trip? Why?

The 'Railway Undertaking' PSO payment at €16bn in Europe amounts to €32 per capita. The 'Railway Undertaking' PSO payment in 2015 to Irish Rail was €98m or €21 per capita.

If European average rates of 'Railway Undertaking' PSO grants were applied in Ireland, total PSO payments to Irish Rail annually would increase by €52m per annum from €98m as in 2015 to €150m per annum.

PSO, and MAC payments to Irish Rail should be to be on a European scale – if we are to have a European standard railway. This would give Irish Rail €338m per annum rather than the €211m PSO/MAC paid in 2015 – an increase of €127m per annum as indicated at 9. above.

Free Travel must also be paid for in full. Free Travel generates an average income per journey from eight million FT rail passengers of €1.85. Average fare paying passengers pay €5.30 resulting in an under-payment to Irish Rail of €27m.

The estimate of 8 million Free Travel Scheme journeys by rail is based on the fact that the National Transport Authority accept that 22% of all licenced bus passenger journeys in the State were taken by FTS passengers. (NTA Statistical Bulletin 04/2016).

11. Should that value differ depending on the type of geographic market served, e.g. urban, intercity or regional / rural rail markets? Why?

International practice of differentiation should apply.

12. What are your views on the need for additional safety investment as outlined in the Rail Review and what enhancements do you suggest may be required to enhance safety and security for passengers?

Iarnrod Eireann operate one of the safest railways in the world and possess the skills and desire to continue doing so.

If we cannot afford a safe railway, we cannot afford a railway. The same can be said for the road and air transport systems.

13. What specific improvements (or other changes) to rail services would you like to see?

- a) On trains: Security
- b) At stations: Security
- c) On routes: All intercity routes to enjoy an equal standard of service.
- d) On timetables: Clock face
- e) To fares: as discussed earlier – incentive and maximum-use-based.
- f) To passenger information: a designated quiet carriage on every train
- g) To customer service: refreshment availability on every intercity service
- h) To freight transport: quadrupling of rail freight to 4%; introduction of state subsidies on par with EU standard; quartering of Track Access Charges from €10 per 1000/tonne/km to the EU average of €2.50 per 1000/tonne/km

14. What other general comments have you on rail?

1. Governance

- 1.1** Reconfigure membership of state boards including the National Transport Authority, Transport Infrastructure Ireland, Coras Iompair Eireann, and Irish Rail to reflect ‘geographic balance’ as promised in the ‘Programme for Partnership Government’.
- 1.2** Publish a Long-term Railway Strategy and budget accordingly. With EU standard funding as described at 10. above ongoing maintenance and a rolling programme of stock renewal will be funded. New Capital Works and network expansion should be funded by long term EIB borrowing.
- 1.3** Examine the viability of merging Transport Infrastructure Ireland and the Infrastructure Division of Irish Rail with governance provision to ensure balance between the demands of the differing modes. TII has responsibility already for what was formerly known as the Rail Procurement Agency and LUAS infrastructure.
- 1.4** Pro-rata Pay Per Ticket compensation measures with a bulk buying discount provision in respect of Free Travel. Irish Rail appear to be subsidising Free Travel.
- 1.5** A recent report for the Western Development Commission confirms that rail freight subsidies available in the UK and most other European states generate an economic return in environmental and carbon savings in excess of 4:1. There are no rail freight subsidies in Ireland.

Finally and critically we must implement the commitment in the Programme for Government and

- Apply to the European Union for the revision of the TEN-T CORE Network, including applying for the reinstatement of the cross border Western Arc.
- Without further delay provide for an independent costing and review of the Western Rail Corridor Phase Two between Athenry and Claremorris for passenger and freight use.

Cllr. Michael Connolly
Chairman
Western Inter-County Railway Committee 13th January 2017

Moyloughmore
Moylough
Co. Galway

The Western Inter-County Railway Committee is a joint committee of 5 local authorities in the West of Ireland committed to the establishment of a rail service between Limerick and Sligo via Clare, Galway and Mayo.

