



Western Development Commission
Submission to Consultation
on
Rail Review 2016
to
National Transport Authority

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WDC Submission to Rail Review 2016

Introduction

The Western Development Commission (WDC) welcomes this opportunity to make a submission to the Consultation on Rail Review 2016 issued in November 2016 by the National Transport Authority along with Iarnród Éireann and the Minister for Transport, Tourism & Sport.

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region¹. It operates under the aegis of the Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. The WDC works in co-operation with national, regional and local bodies involved in western development to ensure that the Western Region maximises its full development potential.

One of the functions of the WDC is regional policy analysis. The WDC seeks to ensure that government policy reflects the needs and maximises the potential of the Western Region in such areas as infrastructure, natural resources, enterprise and regional and rural development. It also tracks the implementation of policies and recommends adjustments as appropriate. It is in this context that the WDC welcomes the publication of the Rail Review 2016 and the opportunity to submit its insights into the policy formulation process.

The WDC has examined transport issues impacting on the Western Region generally and rail in particular since its establishment. Previous WDC submissions on rail transport issues and the transport needs of the Western Region are all available on the WDC website <http://www.wdc.ie/publications/submissions/>

Most recently the WDC commissioned a report on Rail Freight and the Western Region². This report investigated the potential for new rail freight traffic in the Western Region and examined the extent to which new rail freight traffic might emerge if policy instruments change to support a greater modal shift to rail freight. The WDC also made a considered response to the Consultation on the Strategic Framework for the Investment in Land Transport³ (SFILT).

If there are any queries in relation to this submission please contact Deirdre Frost, Policy Analyst at deirdrefrost@wdc.ie.

Structure of this WDC Submission

First, the WDC sets out what it believes should be some general observations in considering the Rail Review and the preparation of a Rail Policy for Ireland. There are also some observations which are made in the context of the SFILT which informs some of the Rail Review.

This is followed by observations on some various points made throughout the Rail Review (listed according to Chapter heading and page number).

Finally there are responses to the specific questions outlined in the Public Consultation.

¹ Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

² <http://www.wdc.ie/wp-content/uploads/WDC-Rail-Freight-Study-Final-Report-18-12-15.pdf>

³ <http://www.wdc.ie/publications/submissions/#toggle-id-3>

1. General Observations

Short term needs, long-term impacts

Decisions made on rail transport now have very long term impacts. All investments will impact and influence our rail network for decades and therefore should take into account, as far as possible likely future conditions and strategies reflecting them (e.g. population growth, spatial strategies (NPF), energy efficiency in transport and climate change objectives, regional balance, changing work practices). It will be harder to meet long term goals and the full range of policy objectives, if the wrong decisions are made now. Whatever the urgent short term considerations, the long term implications of all investments must be considered carefully.

There is an understandable tension between short term financial considerations and the long term priorities and potential of the rail network. It is important that the long term objectives are central to policy choices that are made.

The rail network and regional development

Rail as a transport mode is a key enabler and facilitator of economic development. However this is not its only function. Other policy objectives such as regional development, sustainability and social inclusion are also impacted by decisions on investment in the rail network.

The WDC recognises that investment in transport infrastructure will not achieve regional growth by itself, but quality transport infrastructure **is** a necessary element of any strategy for regional growth. Improved journey times can reduce peripherality and improve accessibility, thereby supporting regional economic growth.

Transport accessibility

Transport investment in Ireland has often been considered on a mode specific basis without much consideration of investment in other transport modes. In the last decade there has been very significant investment in the motorway network, however there are no motorways serving the West and NorthWest, north of the M6 from Dublin to Galway (see TII map below).



There have been some investments to the interurban network such as the N5 and N4 but there are many poor sections which remain on these routes and the journey times to these regions have not improved to the same extent as those regions served by motorways.

Therefore these regions have become relatively less accessible compared to other regions with greater improvements in the road network. It should also be noted that air accessibility between Dublin and regional airports has also declined over this period, arising from the withdrawal of PSO

supports on the Sligo and Galway services (with the resultant closure of Galway and Sligo airports to commercial services).

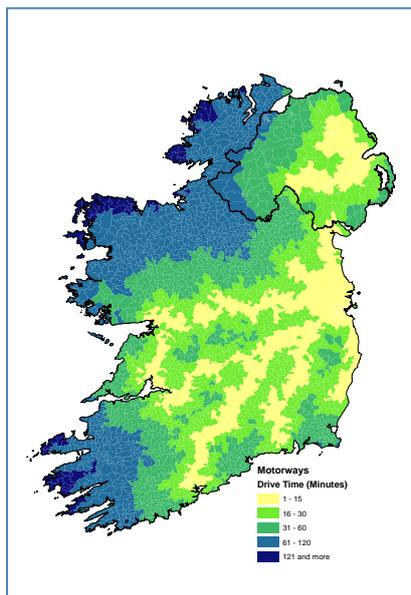
Bus services too are under increasing pressure and there have been service level reductions on some services in the Western Region, with fewer stops, thereby reducing transport options to users who require them.

Therefore the rail network and services to the West and North West **are relatively more important** to the transport needs of the region than the actual passenger numbers may suggest.

Work done by E. Morgenroth on transport and accessibility across the regions illustrates the impact of recent investments and the relative 'inaccessibility' of parts of the West and North West regions. The maps below illustrate the accessibility to motorways and railway stations.

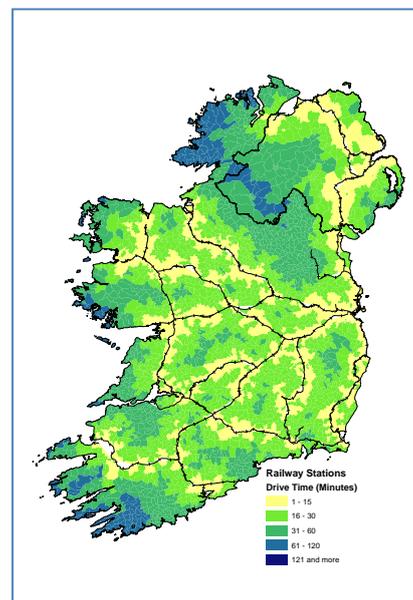
The importance of the railway network in serving most regions of Ireland except the Border and Northwest, is illustrated in the map on drive time to the nearest railway station, (see below). Of course accessibility to railway stations is one element, factors such as service levels and stations served are also important considerations.

Drivetime to the Nearest Motorway Junction



Source: E. Morgenroth, ESRI, 2016

Drivetime to the Nearest Railway Stations



Source: E. Morgenroth, ESRI, 2016

The proposal to reduce rail journey times on some routes and not others is in direct response to the improvements in the road network on those same routes and the relative competitiveness of rail versus road. For example proposed investment in rail is now focused on those routes with better road access (motorways), to stay competitive, the cumulative effect of little funding for both road and rail on some routes (to the North West) is rarely evident from a broader, transport accessibility point of view. This thinking is also evident when considering proposed electrification of some lines.

It is also not often considered but from a spatial and economic efficiency point of view, Ireland is, compared to some countries at an advantage in terms of the delivery of transport infrastructure and services. Its geographic land mass which is relatively compact and low lying is without the challenges of other countries such as those with mountainous terrain. Though not as widespread as before, the railway is still fairly extensive and this is an advantage that should be capitalised upon in terms of the delivery of transport services nationally.

Current travel patterns, future travel patterns

The assumptions regarding future commuting patterns seem to be based on the view that the current concentration patterns will be intensified and do not make reference to spatial planning under a new National Planning Framework. There also appears to be little consideration of the extent of longer distance commuting.

Level of Rail Investment in context

The research undertaken as part of the SFILT⁴ process noted that rates of investment in land transport are lower in Ireland than elsewhere. This is a key observation which should inform transport policy generally and rail policy in particular. The comparison with other EU countries on relative rail and road investment is useful. It illustrates the relatively low funding of rail in Ireland (approximately 18% in Ireland), compared to most West European countries, where rail's share of land transport investment has been increasing in line with EU policy (currently 40%). It should be noted that compared to other countries Ireland has invested a lot less in land transport (both road and rail). The level of investment in rail compared to road is particularly low as comparison with the evidence from European countries shows. There is always a need to ensure value for money in transport investment, but evaluation must be holistic and consider the full range of benefits and costs including environmental benefits (including rail freight).

Performance measurement

The rail statistics suggest it is not performing as a transport mode. However it is not clear that this is the case. Comparison with costs and passenger levels in European countries would be very useful. The context of the continuing contraction of funding levels for the rail sector in Ireland, fare increases and service reductions will impact on passenger demand.

The true costs of rail vis a vis the road network are not examined at all. The true economic costs of road based travel and the environmental benefits of rail use need to be assessed.

It would be important to sweat the rail asset, especially in the context of providing modal choice and its superior environmental record compared to the car. There is little consideration of the long-term benefits of rail (both passenger and freight) in the context of a growing population, climate change and low carbon objectives.

⁴ A Strategic Framework for the Investment in Land Transport p19-21

2. Comments on Rail Review document

The following comments are listed in the order in which they occur throughout the text and there is associated reference to section heading and page number in the Rail Review Document.

Section 2.2. p. 16

In noting the increase of 5% in passenger numbers since 2015, it is worth also noting that this is higher than the population growth rate.

It is noted that intercity growth was more moderate (than DART and commuter) – as disposable incomes remain challenged in areas outside of Dublin. This illustrates that patronage levels are price sensitive and reduced fares can incentivise greater rail travel.

Section 2.2. p. 17

The relatively high patronage levels on the Dublin-Sligo line (the third highest passenger numbers after Dublin-Cork and Dublin-Galway lines), illustrate the importance of the line as a transport mode serving the route to/from Dublin and the North West region.

The Role of Rail. Section 3.2, p.21

In noting the benefits of rail, especially for business travel, the benefits of working while travelling by train should be noted. This is a huge benefit cited by intercity business travellers to/from Dublin and the Western Region.

Section 3.2, p.22

The point is made that the larger city regions outside of Dublin are now the focal points for internationally mobile investment. It should be noted however that it is not only the larger city regions. There have been significant investments in smaller centres too, some examples from 2016 include; Fort Wayne in Castlebar 26th Sept 2016⁵, Coca Cola in Ballina, 1st Sept 2016⁶, Jazz Pharmaceuticals, Co. Roscommon, 2nd August 2016⁷.

Section 3.4. Rail Freight

Given the importance of the Western Region as an origin/destination for rail freight traffic flows in Ireland, the WDC welcomes the view that *'Any rail lines that could support the development of rail freight in the future, where passenger services do not exist, should be protected in the interim while the business case for that investment is developed'*. (p.24). The WDC also believes that Government policy should actively support further rail freight traffic, as outlined in the WDC report *Rail Freight and the Western Region*⁸ and that this should be considered as a matter of priority.

Chp 4. Potential for Future Growth

Section 4.2 Future Trends. p.25

The first bullet states that 'The State is increasingly urbanising'.. It is more accurate to say that the State is increasingly **suburbanising**. Census 2011 shows that there is a greater rate of population growth in towns and villages and suburbs adjacent to the main city centres compared to the city centres themselves. This trend has also been observed in the Preliminary results from Census 2016.

⁵ <http://www.idaireland.com/newsroom/fort-wayne-metals-ireland/>

⁶ <http://www.idaireland.com/newsroom/coca-cola-company/>

⁷ <http://www.idaireland.com/newsroom/jazz/>

⁸ <http://www.wdc.ie/wp-content/uploads/WDC-Rail-Freight-Study-Final-Report-18-12-15.pdf>

As noted in a presentation on the National Planning Framework by the NPF team at the Department of Housing, Planning, Community and Local Government, '*[population] growth is increasingly happening outside our key cities and towns*'.

4.3 Proposed Measures to Improve Rail Services

The WDC welcomes the various proposals to improve rail services. The WDC feels that improvements should be made across all services and not just prioritising those routes serving the Greater Dublin Area.

No. 7. Improve the passenger environment at stations

Improved car parking facilities (increased capacity where needed) and reduced charges, will increase the attractiveness of rail vis-a vis road for those commuting to city/town centre locations. This will also help alleviate congestion on the key road routes into urban centres and obviate the need for additional car park spaces in city centre locations.

No. 11 Co-ordinated policy support.

The WDC agrees with the need for co-ordinated policy support to improve the viability of the rail network. The WDC does not agree that the withdrawal of services for the least well performing sections of the network should be an initial policy response. Additional funding is required, especially in the context of the efficiencies already generated by the Rail Operator and in the context of the significant recent cuts in exchequer support.

The proposed measures to improve rail services as outlined should also be undertaken to enhance the attractiveness of rail versus road based alternatives. It is also important that changes /improvements to services are allowed time to take effect. Travel behaviour can take time to change and new service improvements need time to allow new travel patterns to become established.

The WDC agrees that the National Planning Framework that is currently being developed will be a very important overarching policy framework designed to influence population settlement patterns and the travel patterns arising from this. Therefore there should be no major decisions on route development - expansion or contraction, until the NPF is finalised.

4.4 Line Speed and Infrastructure

Improvements to line speeds would benefit all intercity routes and not just those serving the North, South and Mid-West.

Investment in transport is too often considered on a mode specific basis. The National Transport Authority should take a more holistic view of the impact of all transport modes on the relative accessibility of a region. The proposal to reduce rail journey times on some routes and not others seems to be in direct response to the improvements in the road network on those same routes and the relative competitiveness of rail versus road. For example proposed investment in rail is now focused on those routes with better road access (motorways), to stay competitive, the cumulative effect of little funding for both road and rail on some routes (to the North West) is rarely evident from a broader, transport accessibility point of view. This thinking is also evident when considering proposed electrification of some lines.

Section 5.3. Growth p. 36

The Rail Review notes that passenger journeys are expected to increase by 4.7m (11.4%) from 2016 to 2021. This is obviously an important short-term trend which will influence capacity requirements. There is however little discussion or recognition that the overall population is set to grow, with population forecasts predicting continuing increases in population up to 2046. In this context and given the important role rail travel can make in reducing carbon emissions, it seems the rail network

and its services should be positioned to play a greater role serving the transport needs of the country.

Section 6. Possible Funding Solutions p.41

Free Travel Scheme

The WDC agrees that funding of the Free Travel Scheme from the Department of Social Protection should keep pace with the increased travel journeys occurring on the network.

Network Reductions

The WDC is not convinced of the case to close lines as a means of reducing costs for several reasons.

1. As outlined on page 43, the savings to be accrued are very minimal, especially in the context of the overall funding gap.
2. Cash cost per journey is not the sole criterion for delivery of public transport services.
3. On the basis of the table on page 41 and the table identifying the four poorest performing routes, the WDC believes that proposed closures should not be based on evidence from trends over one year only. Transport is a long-term investment and travel behaviours and modal shift needs support to increase patronage levels. Patronage levels on the rail network have started to improve following the return to economic growth. However passengers have had to endure fare increases which have depressed demand also.
4. The WDC agrees that changes to the Ennis-Athenry section should only be considered after a full review of the WRC and when the NPF is published. Additionally the WDC believes that line speed and journey time improvements as well as improvements to the scheduling among other measures can help increase patronage on the service between the cities of Galway and Limerick.
5. The longer term role of rail, serving a population that is growing and with an increasing need to reduce carbon emissions, positions rail as an increasingly important travel mode. This can be realised with competitive pricing and other network improvements as outlined.

7. Conclusions

The Conclusions note that the Review predates the conclusion of the National Planning Framework and the National Mitigation Plan, which it should be noted are both likely to advocate greater use of the rail network, for both passenger and freight movements.

Appendix 2- The Role of Rail, Towards a National Rail Policy

Section 1.3 InterCity Travel. P.5

The observation that *'Sligo and Westport exhibit notable levels of patronage to/from Dublin'*, is not surprising given the relatively poor road network on some of these routes. Increased frequencies and improved journey times could induce further take-up.

Section 1.5 National Commuting Demand p.7

While commuting by rail is 'relatively' negligible outside of the Dublin area, this in part reflects the services available to commuters which are relatively limited. Commuting by rail to many urban centres is likely to increase following further population and economic growth and where the road network becomes congested and there is an attractive rail offering. This growth is also likely to be influenced by the forthcoming National Planning Framework.

Commuting by rail along existing routes can be supported by additional car parking facilities at train stations in the hinterland of urban centres. This would allow commuters from more dispersed settlements to 'park and ride'.

Section 1.6 Commuting and the Key Cities

Commuting into Galway p.9

1. The comment that 'commuting by rail is almost irrelevant', should be prefaced by the actual service availability. There is only one rail line serving Galway city, from the east, and therefore it can only serve a limited part of the Galway commuter traffic catchment.

The WDC conducted analysis of POWSCAR data on travel to work patterns for the seven principal labour catchments in the Western Region. In relation to the Galway city labour catchment the analysis noted that there were greater levels of commuting from the north of the city, than from the East and South⁹.

2. While Oranmore is the main feeder town, the rail station only opened in the latter part of 2013. As noted earlier, it takes time to build patronage on a new service. Additionally with further population and employment growth projected close to the station, further growth is likely.

The WDC POWSCAR analysis illustrates notes that many of those commuting into Galway city do from the rural hinterland. This illustrates the potential value of car parking at stations along the route and more competitive pricing as well as better connectivity to final destinations.

More recently the WDC undertook an analysis of rural dwellers commuting into IDA business parks in provincial centres. This highlights the importance of the labour supply living in rural towns and villages as a key component of the labour supply of large multinational employers¹⁰.

The potential for greater commuting by rail into Galway city seems to be too quickly disregarded. Though there is only one line currently serving the city, there is potential for greater patronage levels. Patronage levels could be increased with higher frequencies, more competitive pricing and where not currently available, better car parking facilities. Congestion on the road network is increasing and will increase further with increased employment levels.

The Limerick-Galway route is also important for students travelling between third level institutions in Galway and Limerick.

⁹ <http://www.wdc.ie/wp-content/uploads/wdc-travel-to-work-and-labour-catchments.pdf>

¹⁰ http://www.wdc.ie/wp-content/uploads/WDC_Policy-Briefing-no-6-Commuting-Final.pdf

3. Questionnaire

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

From a WDC and Western Region perspective, rail is particularly important in relation to the following;

Intercity

1. The Intercity routes serving the West to Dublin are a very important transport mode for those travelling to work (often but not only from the Regions to Dublin). It provides centre to centre, efficient travel with (generally) predictable journey times.
2. Passengers can work efficiently while travelling (generally more than any other mode).
3. Facilitates daily return journeys between the cities without risking driver fatigue, though service levels on some lines could be improved.

Commuter

4. The network supports commuting in the GDA and to other centres e.g Ennis to Limerick, Athenry & Oranmore to Galway. It is important to note that these commuter patterns are the only evident patterns as they are the only routes with rail commuter services. Some are also relatively recently established. Travel behaviours can take time to change so there is likely to be potential for greater commuter take-up on the newer routes.

Rail Freight

5. Three of the four rail freight services nationally, start or end in the Western Region. This replaces approximately 9,000 HGV road journeys per annum saving 2,300 tonnes in carbon emissions.

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

Overall the WDC considers the environmental contribution of rail relative to other transport modes to be very important and growing.

The WDC noted in its WDC Insights (February 2016), *Rail Freight: A More Sustainable Transport Option*, http://www.wdc.ie/wp-content/uploads/WDC-Rail-Freight-Insights-Feb_2016.pdf that reducing our carbon emissions must become an increasing focus of our transport policy.

The COP21 agreement and the preparation of a National Mitigation Plan for Ireland have focussed attention on reducing emissions. The return to economic growth has seen an associated increase in transport emissions and a return to congestion on key parts of the road network, both of which need policy consideration.

While agriculture is the single largest contributor of emissions in Ireland (33.3%), followed by transport (19.5%) and energy (19.1%), in the last fifteen years (1990-2014), transport has shown the greatest overall increase in emissions – by 120.9% over the period.

The increase up to 2007 is attributed to general economic prosperity, an increasing population heavily reliant on private car travel as well as rapidly increasing road freight transport. During the

recession there were five consecutive years of decline in transport emissions primarily attributable to the economic downturn, improving vehicle standards and increased use of biofuels. Emissions from transport have increased – by 2.5% from 2013 to 2014 – associated with the return to economic growth.

Shifting the balance between transport modes is one option to arresting the growth in transport emissions.

While emissions are an economy wide issue, within the transport sector one option for reducing CO2 emissions and relieving our congested road network is to support more freight traffic by rail. A report published in 2015 by the Western Development Commission (WDC), *Rail freight and the Western Region* notes that rail currently moves less than 1% of surface freight across Ireland. Most of this rail freight originates in the Western Region with three of the four rail freight routes originating there.

The WDC report <http://www.wdc.ie/wp-content/uploads/WDC-Rail-Freight-Study-Final-Report-18-12-15.pdf> identifies traffic which could be transported by rail and notes that Irish Rail plans to increase the rail freight modal share from 1% to 4% within four years. This projected 4% modal share by 2020 would reduce combined emissions from road and rail freight in Ireland by 3% or a reduction of nearly 35,000 tonnes CO2e4.

Rail freight, where available, offers several advantages over road transport. It generates less than a quarter of the emissions of road haulage, removes heavy goods traffic from the roads (each trainload can remove at least 18 truckloads from the road network) and it can provide an alternative and efficient route to market for business, avoiding congested routes and availing of the existing rail network. The availability of rail freight also provides a region with a locational advantage for those companies who need a transport mode that is reliable, cost effective and with lower emissions. Rail is particularly suited to high volume freight, carried over relatively long distances and for import/export via the ports.

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.

Regional Accessibility

Transport investment in Ireland has often been considered on a mode specific basis without much consideration of investment in other transport modes. In the last decade there has been very significant investment in the motorway network, however there are no motorways serving the West and NorthWest, north of the M6 from Dublin to Galway (see TII map below).



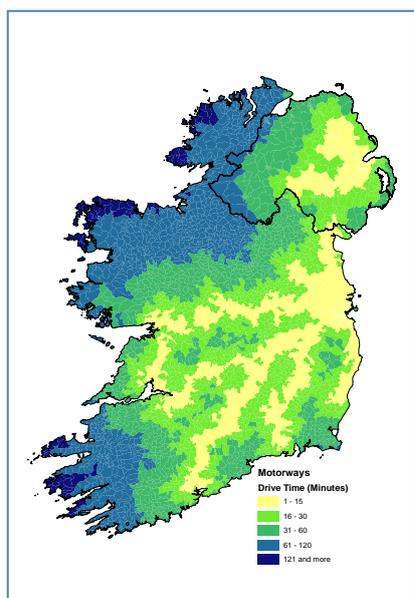
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Therefore these regions have become relatively less accessible compared to other regions with greater improvements in transport accessibility. It should also be noted that air accessibility between Dublin and regional airports has also declined over this period, arising from the withdrawal of PSO supports on the Sligo and Galway services (with the resultant closure of Galway and Sligo airports to commercial services).

Bus services too are under increasing pressure and there have been service level reductions on some services in the Western Region, with fewer stops, thereby reducing transport options to users who require them.

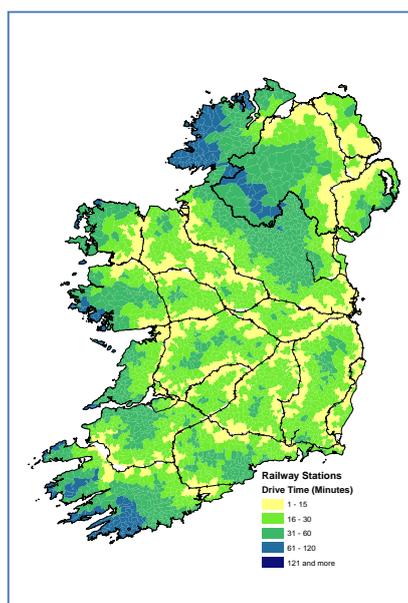
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Source: E. Morgenroth, ESRI, 2016

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Therefore the rail network and services to the West and North West **are relatively more important** to the transport needs of the region than the actual passenger numbers suggest.

The importance of the railway network in serving most regions of Ireland except the Border and Northwest, is illustrated in the map on drive time to the nearest railway station, also prepared by E. Morgenroth (see below). Of course accessibility to railway stations is one element, factors such as service levels and stations served are also important considerations.

The proposal to reduce rail journey times on some routes and not others is in direct response to the improvements in the road network on those same routes and the relative competitiveness of rail versus road. For example proposed investment in rail is now focused on those routes with better road access (motorways), to stay competitive, the cumulative effect of little funding for both road and rail on some routes (to the North West) is rarely evident from a broader, transport accessibility point of view. This thinking is also evident when considering proposed electrification of some lines.

Different Users

The rail network in regional Ireland, provides accessibility to many different types of traveller, especially intercity services for the aged, disabled & mobility impaired, as well as students, and business travelers, many of whom may have limited transport choices.

Business people can and do drive but many find the rail travel more efficient in terms of getting work done and reduced traveler fatigue. Higher frequencies and well timed services can increase patronage from this cohort.

There is a need to note the importance of transport generally and rail in particular, in accessing health services. Health services are increasingly concentrated in centres of excellence, especially for critical illness such as cancer and various specialist services. Often bus travel is not a suitable option or the preferred mode for those who are sick and needing to travel for specialist appointments.

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 WDC believes that there could be greater levels of commuting along existing lines into the various urban centers in the Western Region.

Though there is only one rail line serving Galway city, from the east, and therefore it can only serve a limited part of the Galway commuter traffic catchment. Nonetheless, Athenry and Oranmore are centres designated for further population and enterprise growth.

While Oranmore is the main feeder town, the rail station only opened in the latter part of 2013. As noted earlier, it takes time to build patronage on a new service. Additionally with further population and employment growth projected close to the station, further growth is likely.

The WDC POWSCAR analysis illustrates that many of those commuting into Galway city do from the rural hinterland. This illustrates the potential value of car parking at stations along the route and more competitive pricing as well as better connectivity to final destinations.

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

In the first instance, **more frequent services** especially on the Westport/Ballina and Sligo lines are required. Currently the very low frequencies especially on the Westport/Ballina line do not encourage take-up.

Lower fares, especially to encourage take-up for non business travellers.

Over the longer term, while there is likely to be greater demand for rail travel on the inter-city routes in line with economic growth, increased competition means that rail will have to improve its competitiveness, in terms of journey times and pricing, to maximise its potential for modal shift. This will require a **reduction in journey times**. As noted earlier, the Western Region has already seen a decline in relative accessibility compared to other regions, when considering the recent investment in the road network. The Western Region should not now be further disadvantaged by prioritising improvements to journey times outside the Western Region before those routes serving the Western Region.

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?

Fares are quite high compared to travel by car or bus on intercity services. Lower fares are needed, especially to encourage take-up for non-business users.

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?

All elements of the rail network need support, however a key consideration for all infrastructure investment, current and capital, should be the National Planning Framework and the need to support the overall objectives of the plan. While the process is underway, the final report is not likely to be complete until mid-2017. However it is likely to recommend that a greater degree of economic and population growth occur outside the GDA, in other population centres. It would be important to ensure that services on these routes are supported so as to ensure other policy objectives can be realised.

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 provides important intercity transport options (in addition to Bus) though bus services, especially Expressway services are also under pressure.

The cumulative effect of funding (or lack of) for both road and rail on some routes (to the North West) needs to be central to the policy making process. (see response to Q3 above also)

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.

- Reducing costs (through further efficiencies where possible).
- Increasing revenues (e.g. through Government taxes and/or other investment sources such as EU TEN-T funding, European Investment Bank etc).

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?

In order to make a considered assessment of this, there should be consideration of evidence and best practice from other countries across Europe and further afield. Evidence from modern comparator countries with similar levels of population density and across different modes would inform thinking and policy.

There is also a need to consider the subsidy per person per trip across different transport modes and measuring the full costs (for example build and maintenance of the road network and carbon emissions etc).

As noted previously, in the context of transport accessibility all transport modes and service provision need to be considered. This is especially true in the current context of concerns over the financial viability of national bus services.

11. Should that value differ depending of the type of geographic market served, e.g. urban, intercity

or regional / rural rail markets? Why?

If the level of subsidy is measured according to different geographic or spatial units; e.g. urban/ rural or based on different services with a different passenger profile, then the subsidy level will vary accordingly. Lower patronage levels on some services will probably indicate (all other things being equal), a higher per passenger per trip subsidy level.

Different levels of subsidy are to be expected given the different population densities across different geographies.

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?

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

a) On trains:

b) At stations:

Improve and increase car parking facilities, especially on routes into cities and towns including regional towns such as Sligo and Athlone, where there is additional demand to use 'park and ride' facilities but the lack of car parking militates against take-up.

c) On routes:

There is a need to improve intercity frequencies on some services especially the Mayo lines and Sligo.

d) On timetables:

Regular timetables encourage familiarity and more take-up. Timetables also need to enable return daily trips to the capital and regional cities for business meetings, hospital appointments etc.

e) To fares:

The fare structure should induce greater take-up. Some fares (such as business travel) are less price sensitive. Most other passenger cohorts will be price sensitive to a greater or lesser degree.

f) To passenger information:

g) To customer service:

h) To freight transport:

The largest rail freight movements originate in Co. Mayo and the opening of a new rail freight terminal within Dublin Port in July 2011 improved the economics of the rail services and increased the frequency of services. All of this is a major development towards reducing our carbon footprint

and providing a safer mode of transport. It is estimated that the Ballina-Dublin Port service will save up to 5.5 million road kilometres every year and will reduce CO₂ emissions by as much as 2,750 tonnes¹¹. This eases pressure on the road network and helps us reduce emissions from the transport sector.

The WDC report <http://www.wdc.ie/wp-content/uploads/WDC-Rail-Freight-Study-Final-Report-18-12-15.pdf> identifies traffic which could be transported by rail and notes that Irish Rail plans to increase the rail freight modal share from 1% to 4% within four years. This projected 4% modal share by 2020 would reduce combined emissions from road and rail freight in Ireland by 3% or a reduction of nearly 35,000 tonnes CO₂e⁴. The Environmental Protection Agency (EPA) forecast that transport emissions will increase by 12-22% on current levels up to 2025. Therefore even a relatively modest increase in the modal share of rail freight would make a meaningful contribution to reducing growth in emissions and probably more than any equivalent initiatives that road haulage could achieve in the same timescale (e.g. improved load factors, fuel efficiency and fuel mix).

As a more sustainable transport freight mode, especially for high volume goods, coupled with the changed business model operated by Irish Rail and the growth of revenue generating traffic, rail freight should be considered as a key element in the future land transport options for goods traffic.

The state needs to support this modal shift by exploring and instituting rail freight supports, as has occurred in other EU and non EU countries. The WDC understands that the Department of Transport has started considering a process to evaluate options. This should be progressed as soon as possible.

14. What other general comments have you on rail?

Please complete the questionnaire and email to railconsultation@nationaltransport.ie

or- submit by post to

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¹¹ Transport providers' estimates. <http://www.iwt-irl.com/railfreight.html>