

Draft Clare County Development Plan 2023-2029
Planning Department
Clare County Council

Submission Ref: S2-1002

28th March 2022

Dear Sir / Madam,

Re: Clare Draft County Development Plan 2023 – 2029

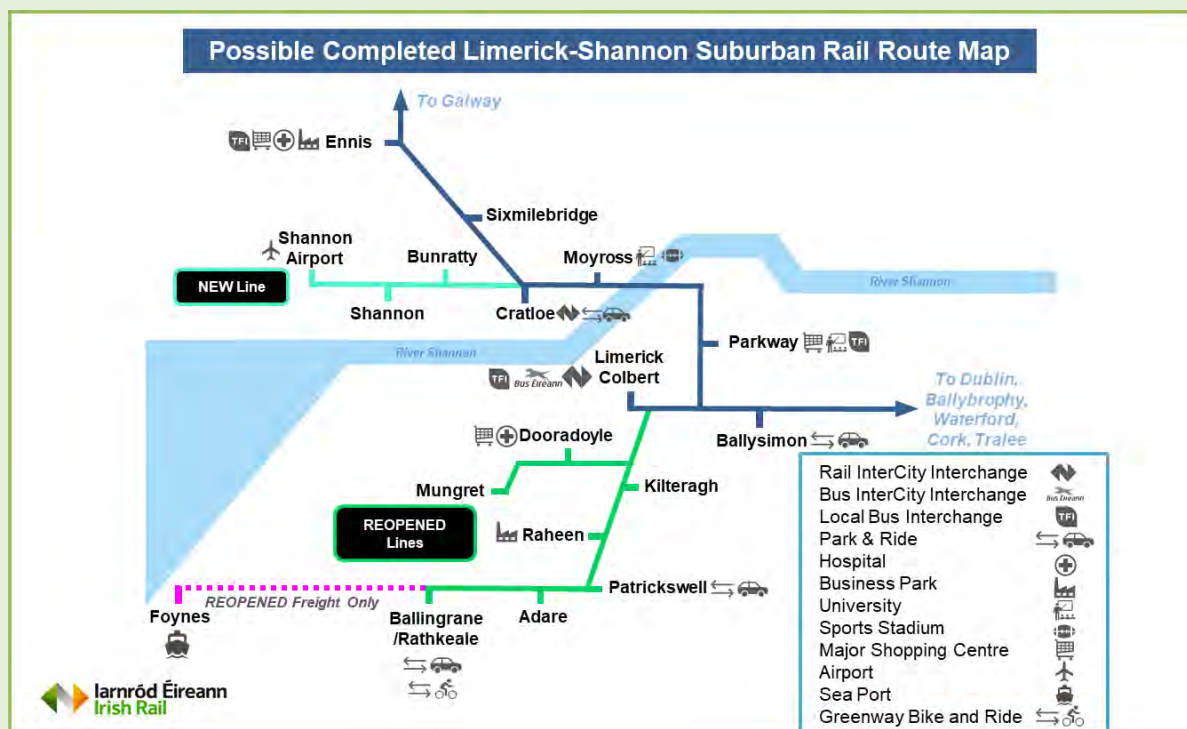
Iarnród Éireann welcomes the opportunity to provide a submission at the preliminary consultation phase of the new Clare County Development Plan [hereafter, “the Development Plan”] for the period 2023-2029. The new Development Plan comes at a critical juncture for the County in its adaptation to the challenges and opportunities of the ‘new-normal’ that emerges as a result of the COVID-19 pandemic. Iarnród Éireann welcomes the strategic aim of the Council to integrate land use and transport policies to achieve the delivery of a high quality, climate resilient and sustainable transport network for Clare, during the period of the Development Plan. This places a requirement on both the transport and settlement strategies to be mutually consistent, as per National, regional and local transport and spatial planning policy.

Submission Summary

- Iarnród Éireann welcomes and supports that the Council seeks to integrate land use and transport policies to achieve the delivery of a high quality, climate resilient and sustainable transport network for Clare, during the period of the Development Plan.
- Iarnród Éireann believe rail is fundamental to achieving the state’s aim to halve emissions by 2030 and achieve net-zero emissions by 2050.
- Iarnród Éireann believe there are significant opportunities for Clare to achieve a large number of its economic development, sustainable mobility, and climate change targets through sustained investment in its rail network.
- **A possible enhanced and expanded rail network for the Limerick-Shannon Area could be completed by 2030, with minimum disruption during construction** as the land required to construct it is in railway ownership. The possible network is seen in Figure 1.
- Rail can be the backbone of a transformative sustainable integrated transport network for the Limerick-Shannon Metropolitan Area. To enable this, Iarnród Éireann can facilitate the following key deliverables:

- The **creation of a vital new rail link to Shannon Airport and the Shannon Free Zone international business park** to enhance sustainable international connectivity and accessibility to Limerick City and County, along with the broader Mid-West region as a whole. This new rail link would stimulate and support greater prosperity, competitiveness, and attractiveness in Limerick and the Mid-West region.
 - The **creation of a high-quality suburban rail system over new, existing, and currently disused lines**, with a **redeveloped Colbert Station Integrated Transport Hub** at its centre.
 - Facilitating **greatly enhanced Intercity connections** to Dublin, Galway, and other key regional cities.
 - **Re-opening of the Foynes Line for rail freight to Shannon-Foynes Port** to support the sustainable mobility of goods against a background of increasing emissions, road congestion, and HGV driver shortages. The re-opening of the rail line to Shannon-Foynes Port could be completed in line with the requirements under the TEN-T regulation to connect the Tier 1 port by road and rail by 2030.
- Rail supports compact urban growth along its corridors which can greatly help reduce car dependency and subsequent emissions. Rail investment also supports the regeneration of areas with a rail stations proven to be one of the focal points of civic areas when development is planned appropriately.
 - Investment in the Mid-West regions rail network significantly supports the Government's objective of achieving balanced regional growth and development.

Figure 1: Possible Limerick-Shannon Rail Network – showing New and Re-opened lines (incl. freight only)



- Resolving the flooding issues at Ballycar is of vital importance. A draft report on flood relief options at Ballycar has been prepared and issued by Consultant Engineers RPS to IÉ and stakeholder representatives from Clare County Council, the Office of Public Works (OPW), the Geological Survey

Ireland (GSI) and the National Parks & Wildlife Services (NPWS). It recommends a new preferred option of a technically viable drainage scheme that would (i) prevent flooding of the railway occurring whilst also (ii) including any flood mitigation measures downstream that would be necessary either directly or indirectly with this option. A solution in terms of funding for this preferred solution is essential to allow timely delivery of the scheme and should be prioritised by the Council.

- In summary, the benefits of the rail possibilities identified in this submission cannot be underestimated, with a significant number of positive long-term benefits flowing from the potential investment in rail - these are identified in full later within this submission.
- **Iarnród Éireann recommends that the final Development Plan should continue to support a requirement to undertake an immediate feasibility study to map timelines and phasing of the rail possibilities in this submission, including potentially a cost profile during the first year of the Plan.**

Importance of long-term planning and vision in the Development Plan

It is important to recognise at the outset of this submission, that interventions in the transport sector should be based on a long-term strategic vision for the sustainable mobility of people and goods. This is driven by the principle that structural reform of policies takes a considerable time to implement and must be the subject of detailed advanced planning. The Development Plan enables this capability of advanced long-term vision and planning by providing foundations to 2029 and beyond, therefore making it an important document for the desired growth of sustainable mobility in County Clare. The review of the Development Plan allows it to be reassessed in the current context as we move towards a more sustainable integrated transport system, advanced local mobility hubs, and maximisation of the dynamic impact between housing and transport, all of which can greatly contribute to the economic, environmental, social and cultural progress of the County. This is combined with the current challenges and opportunities climate change brings for County Clare. The steps taken to address our mobility issues today will be significantly important as the state aims to halve emissions by 2030. Iarnród Éireann believe rail will play an important role on our journey to achieving this and to achieving net-zero emissions by 2050. The benefits of a sustainable integrated transport system to Clare County includes;

- Providing a modern mobility system required to support the population and economic growth projected for Clare.
- Increased interchange between modes at mobility hubs.
- Integrated ticketing across all modes, ensuring simple interchange and improved experience.
- Enables and encourages modal shift from the private car to more sustainable public transport and active modes through quality of service and frequency.
- Reduces the levels of congestion in Clare by promoting and prioritising public transport and active modes over the private car.
- Improves the quality of life for citizens of Clare by reducing emissions caused by private cars, increasing accessibility, and growing the labour catchment for employers, and employment opportunities for the labour force.

- Ensures mobility and accessibility to amenities for an aging population, with the number of people over the age of 65 is expected to reach 1.4 million nationally by 2040.
- Communicates that Clare on a national and European level is committed to leading the sustainable mobility transformation in Ireland.

Current Rail Service in Clare

The Western Rail Corridor provides an important regional and intercity rail link connecting County Clare to Limerick/Dublin and to Athenry/Galway. There are currently 20 rail services per day on weekdays operating in County Clare. Services also stop at Sixmilebridge in County Clare between Ennis and Limerick Colbert.

Table 1: Current Rail Service Provision County Clare Per Day*

	Total	Galway-Limerick	Galway-Limerick Jctn	Galway-Ennis	Ennis-Limerick	Ennis-Limerick Jctn
Mon-Fri	10	2	2	1	4	1
	10	4	2	0	1	3
Sat	10	2	2	1	4	1
	10	4	2	0	1	3
Sun	9	3	1	0	4	1
	8	3	1	0	3	1

* Top row per day is as per the route description, bottom row is the reverse

How does investment in the railway align with National Strategic Policy?

Rail can play a very positive role in supporting the sustainable growth and prosperity of the County, as recognised in the Draft County Development Plan, notably;

- The rail line through Clare serves the key population centre of Ennis and other settlements, providing important local and regional connectivity
- Heavy rail can transport large volumes of passengers, more than other modes of transport, enabling potential dense developments to be catered for by reliable frequent services
- Heavy rail is the only segregated transport system in Ireland, avoiding congestion and conflicts associated with road traffic, providing greater punctuality
- The average rail passenger km creates approximately 28g of greenhouse gases (GHGs) vs. 102g for road vehicles, proving a step change in improving air quality levels. Expansion of the railway has a proven track record in attracting people away from the private car which has important decongestion and environmental benefits and can contribute to the decarbonisation of the transport sector, a key objective of the Climate Action Plan.

Investment in the railway is supported in National, Regional and Local policy. The RSES for the Region seeks to build a strong, resilient sustainable region to be achieved through eleven key components one of which is 'transforming our transport systems towards well-functioning, sustainable integrated public transport, walking, cycling and electric vehicles'. The Regional Spatial and Economic Strategy for the Southern Region specifically supports the delivery of enhanced rail services. The Development Plan should seek to harness these strategic objectives for Clare.

The development of the railway in Clare aligns with and strongly supports the following National Strategic Outcomes (NSO's) in Project Ireland 2040;

- NSO 1: Compact Growth
- NSO 2: Enhanced Regional Accessibility
- NSO 4: Sustainable Mobility
- NSO 8: Transition to a Low Carbon and Climate Resilient Society

The population of Clare is expected to grow to 137,000 by 2031. While the timeline for this growth may be impacted by COVID-19, both economically and in terms of population, it will require public transport improvements and further integration, as well as the delivery of large-scale regeneration projects for the provision of new employment and housing. It is important that supporting infrastructure is in place to support these large-scale developments, and an integrated public transport network for Clare is a crucial element of this.

Ireland's growing population and economy has resulted in increased journeys and thus emissions, with an unsustainable quantum of private cars. The Government is committed to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime. Now is the opportunity to ensure that Clare makes the transition to more sustainable modes of transport, with public transport investment being central to this.

Priorities for Development and Improvement to the Rail Service Offering in Clare

There is an opportunity in Clare to increase the rail mode share over the next Development Plan period and Iarnród Éireann is planning for a major expansion of the railway as set out in our transformative [Iarnród Éireann Strategy 2027](#). Iarnród Éireann is planning to significantly improve and upgrade our commuter, regional and Intercity offering by providing additional capacity, higher frequency of service and improved journey times across our range of services. The Iarnród Éireann 2027 Strategy strongly supports and complements the modal switch to sustainable modes objectives of the Council as set out in the Draft Development Plan and the objective to improve and integrate rail services across the region. Iarnród Éireann welcomes Objective CDP 11.6 to support the improvement of rail infrastructure and services in the County including integration with other modes.

The major strategic focus for Iarnród Éireann of relevance to the new County Clare Development Plan is on the development of an enhanced suburban services, introduction of a new Shannon Rail Link, as well as improved rail links to other regions, including to the Capital Dublin and Galway City. While the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) provides proposed transport objectives for the Shannon Area for the period 2020-

2040, there are opportunities which Iarnród Éireann believe could be included and expanded on in LSMATS to transform transport in the LSMA and Clare County.

1. Implementation of the Final Limerick-Shannon Metropolitan Area Transport Strategy

The implementation of LSMATS [“the Strategy”] is a principal priority at national, regional, and local policy level. LSMATS provides a platform for wider public transport development in LSMA and is driving the long-term mobility objectives for the key Shannon Area. The implementation of LSMATS and its rail objectives are supported by Iarnród Éireann. The draft LSMATS objectives for heavy rail development during the period 2020-2040 include;

- Conduct a review to examine the improvements in journey times and investment in high-speed rail between Belfast, Dublin, Limerick Junction and Cork.
- Examine the feasibility of a dual-track between Limerick Colbert Station and Limerick Junction and facilitate its implementation if feasible.
- Implement the design solution to alleviate the flooding at Ballycar in the short-term.
- Investigate opportunities for public Transport Oriented Development along metropolitan rail lines.
- Investigate the potential for rail freight in support of the proposed Regional Freight Strategy to be created as part of LSMATS, including the reinstatement of the line between Limerick and the Port of Foynes; and,
- Electrification of rail lines and investigate the potential for new stations, including a station to support the Park and Ride at Ballysimon over the long-term.

It is noted that based on the initial timescales released, the Strategy envisages improvements to the rail network in the LSMA largely in the latter part of the Strategy’s implementation. Iarnród Éireann believe that there is an opportunity to deliver rail enhancements identified in the draft LSMATS in the short-term for passengers in the LSMA, particularly beginning the electrification of existing lines which is noted as a long-term objective up to 2040. The environmental and operational benefits of electrification could be brought forward to deliver incremental benefits over the majority of the Strategy’s lifetime. Potential new stations along existing rail corridors could be developed to provide access from current and future developments without significant construction impact.

Iarnród Éireann welcome Objective CDP 11.3 that the Council will implement the draft Limerick-Shannon Metropolitan Area Transport Strategy (LSMATS) over the Development Plan period.

2. Shannon Rail Link

Shannon will be a key economic driver within Clare County and will accommodate significant job and population increases within the lifetime of the Development Plan. The RSES for the Southern Region sets an ambition to create a rail link between Limerick City and Shannon Airport. This is also supported in the Mid-West Regional Planning Guidelines (2010-2022).

The Shannon Area’s connectivity is vital for the continued development of, not only Clare County, but also the broader Mid-West Region. It is the location of one of Ireland’s largest multi-sectoral business parks in the Shannon Free Zone, within which is one of the largest concentrations of North American companies in Ireland outside of Dublin.

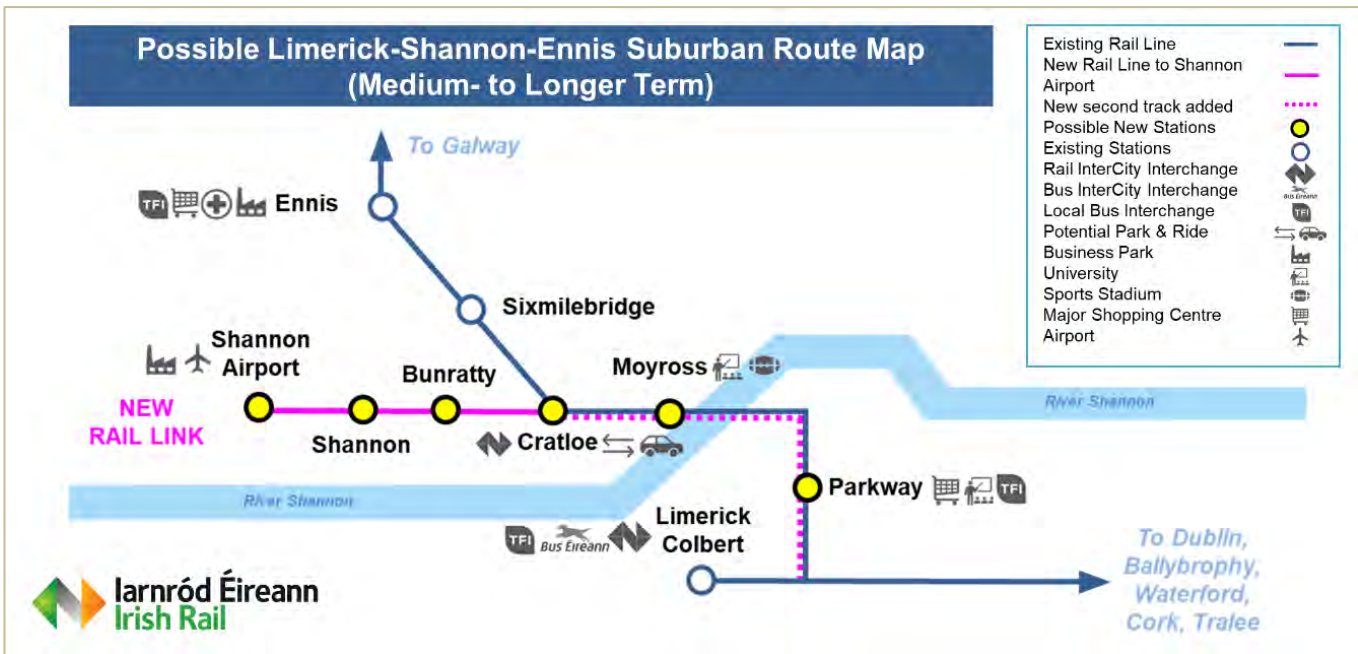
The mobility and connectivity of this region is crucial for the Mid-West as Shannon International Airport forms a key gateway from international markets to the LSMA.

Iarnród Éireann believe that there is a possibility for this connection to be made by rail in the medium to longer term. The possible line would diverge from the Limerick to Ennis line at a possibly re-opened Cratloe Interchange Station and continue west towards Shannon Airport. The line from Cratloe Interchange Station could also serve the popular tourist town of Bunratty and Shannon town, before terminating at Shannon Airport.

The possible new rail link to Shannon Airport and the Shannon Free Zone could benefit from additional stations on the existing rail line from Limerick to Ennis. Possible new stations on the line would include Moyross Station, serving the residential area of Moyross, Limerick Institute of Technology and Thormond Park. The other possible new station in this section would be Parkway Station, which would serve University of Limerick, and also Parkway Shopping Centre. A schematic of how a possible new Shannon Airport rail link integrates with the existing network is in Figure 2.

This new rail link to Shannon Airport would not hinder the existing services to the Key Town of Ennis, which is also important to the development and growth of Clare. By installing an additional second track between a possible new Cratloe Interchange Station, and the Dublin mainline into Limerick Colbert Station, the service levels to Ennis could be maintained and potentially increased at the same time as the introduction of the possible Shannon Airport rail link, greatly in.

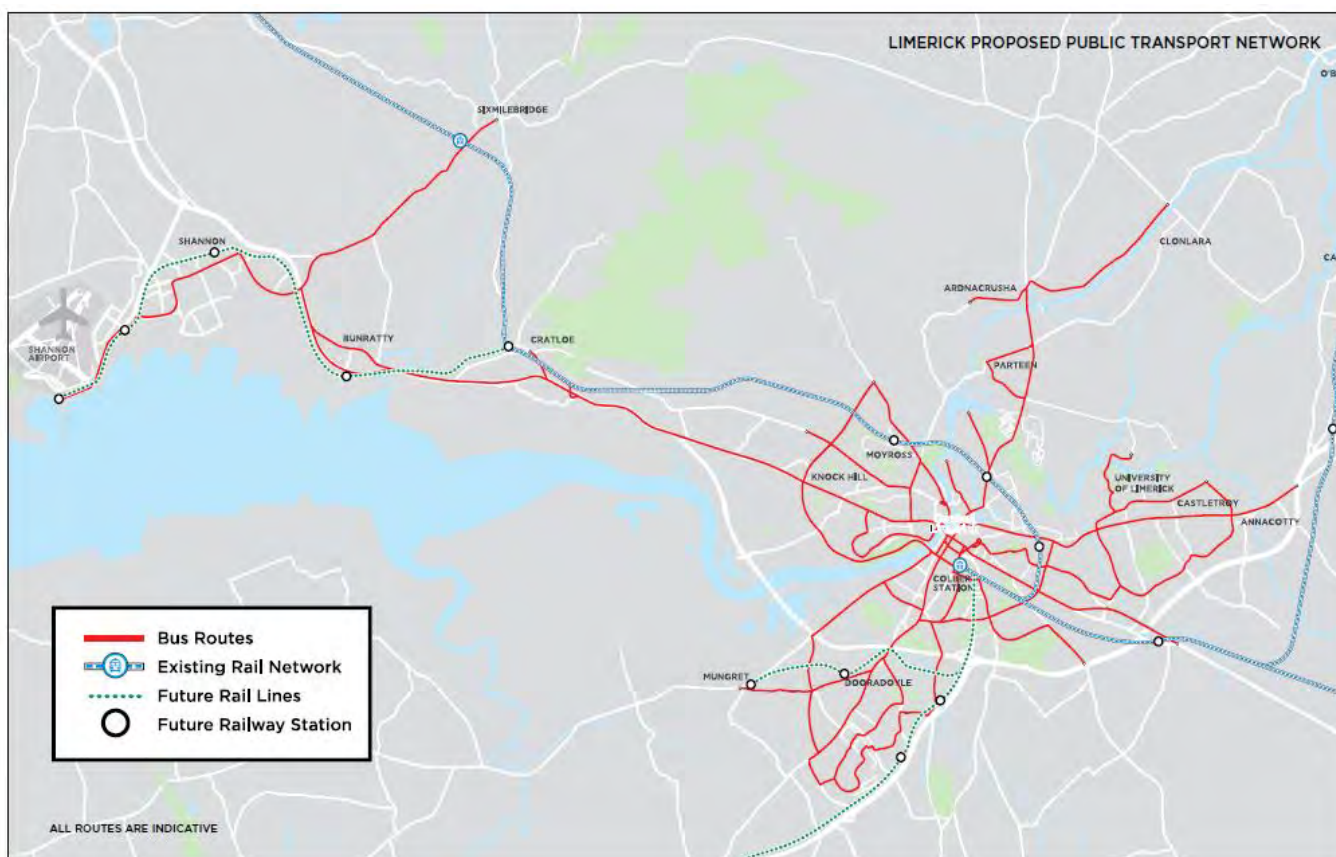
Figure 2: Schematic of Shannon Airport to Limerick City Possible Rail Line



Iarnród Éireann believe that for the Shannon Area, including Shannon Town, Shannon International Airport, and the Shannon Free Zone to maintain its growth, mobility and competitiveness, a re-appraisal of a rail link to Shannon Airport should be an objective in the Development Plan in the short-term, with a medium to longer-term objective for its implementation.

In its submission to the Pre-Draft phase, Iarnród Éireann highlighted that a rail link to Shannon Airport was the subject of a feasibility study in 2007, and that while this concluded not to progress with the development of the rail link at the time, a review of study should be undertaken. Iarnród Éireann welcomes Objective CDP 11.7 in the Development Plan to work in conjunction with Iarnród Éireann, the National Transport Authority (NTA) and other key stakeholders to carry out a review of the existing feasibility study as it applies to the proposed Shannon Rail link, taking account of and being informed by the N19 national road upgrade. We will work closely with the Council and the NTA on this strategically important rail link review. The importance of this link is also evidenced by its inclusion in the revised National Development Plan 2021-2030, as can be seen in Figure 3 below which is Map 9.4 extracted from the Plan.

Figure 3: Proposed Limerick (Shannon) Public Transport Network – National Development Plan 2021-2030



Iarnród Éireann believe that a future rail link to Shannon Airport in the longer term could be an important economic driver for the entire region and for the Shannon Area, including Shannon Town, Shannon International Airport, and the Shannon Free Zone to maintain its growth, mobility, and competitiveness.

3. New Limerick-Shannon/Ennis North-South Suburban Rail Service

As well as the appraisal and possible establishment of a rail link to Shannon Airport, Iarnród Éireann believe that the medium- and long-term future of the entire LSMA's transport needs can be met through the concept of a rail based high-quality North-South Commuter service, delivered over time. This will connect all areas of the LSMA and extend the reach of rail through high-quality suburban rail services over our existing and currently disused lines, with Colbert

Station Integrated Transport Hub at its centre. There are a number of options available to improve the suburban rail service offering in the LSMA. These include:

- Re-opening the Foynes Branch line to Adare and/or Mungret
 - Launching a new suburban service to Adare and/or Mungret
 - Possible four new stations
 - Direct curve added to Foynes branch from Colbert Station via old alignment, providing a through connection directly to Galway via Colbert Station
- Possible new station and Park and Ride at Ballysimon and/or Lisnagry
- Potential turnback and/or passing loop at either Sixmilebridge or Cratloe
- Possible three new stations on the Ennis/Galway line as mentioned earlier (Cratloe, Moyross & Parkway)
- The location of the possible new stations, and the amenities they serve, can be seen in Figure 4.

Figure 4: Possible Expanded and Enhanced Commuter Rail Network – Station Location & Amenities



****Metropolitan Boundary refers to Limerick’s Metropolitan Boundary**

Note: Shannon Rail Link alignment is not exact and is for demonstration only

Additional fleet will be required in the short to medium-term due to the current lack of availability of additional fleet for these enhancements. The cascading of fleet from the DART+ Programme to the Regions will begin from

potentially 2025. To operate a 3 trains per hour (per direction) service between Sixmilebridge or Cratloe and Adare, there is a minimum requirement of six 2-car sets.

4. Existing Suburban and Intercity Rail Service Enhancements

There is potential to improve the Intercity and Regional rail services in the area. This includes;

Ennis/Galway Service Enhancement Ennis services and improved journey times

There is potential for Limerick to Ennis rail services to operate every hour with half hourly services in the peak with improved journey times between the two destinations. This can be achieved through infrastructure works on the line, some of which include resignalling, a passing loop at Sixmilebridge and/or double tracking between a future Cratloe station and Limerick Colbert Station in the medium to long-term.

There is the potential to increase Galway services from Limerick over the short- to medium term, with a reduction in journey times possible along the Western Rail Corridor to Athenry possible through infrastructure enhancements such as the elimination of level crossings and potentially the easing of curves to increase line speed. The success of opening up services from Limerick to Galway via Ennis can be seen from the 531,000 journeys on the Limerick to Galway route 2019, exceeded half a million for the first time, and up 16% versus 2018.

Increased frequency - Dublin and Galway services

Iarnród Éireann is planning to improve Intercity service frequencies and journey times for customers travelling between the major cities/urban centres and the Capital. Intercity improvements include longer trains and additional services across all routes to increase capacity and offer an enhanced service frequency to passengers. This will be complemented by a clock-face timetable for Intercity routes to deliver a service pattern where services depart at regular intervals.

These planned improvements will make the rail mode more attractive including for private car users. Track and civil engineering works are planned to considerably improve line speeds on key rail corridors including Dublin-Limerick. It is a strategic objective of Iarnród Éireann to increase the frequency of Intercity services between Limerick and Dublin with the possibility of a 30-minute interval at peak times, subject to demand. Potential dual tracking of the line between Limerick and Limerick Junction will improve the service levels and journey time between Limerick and Dublin. With potential enhanced service frequency envisaged on the Limerick-Ennis line, as previously indicated, there will be greater opportunities to interchange and connect between the higher frequency regional and Intercity services at Limerick Colbert station.

The final Development Plan should support increased services on the Limerick to Galway line and support the enhanced Intercity and Regional service interchange opportunities at Limerick Colbert Station which could be provided to Ennis suburban rail services.

5. Resolving the Flooding Issues at Ballycar

As mentioned earlier in this submission, the draft LSMATS has set out a short-term objective to design and implement the upgrade of the section of rail line at Ballycar to alleviate flooding.

Flooding of the Ballycar Lough at Newmarket on Fergus is a long-standing perennial problem which causes significant disruption to rail services from Ennis to Limerick. Flooding occurs due to prolonged sustained rainfall coupled with the natural constriction to the outflow stream of the Lough, which is located between a swallow hole and spring. This constriction restricts outflow and thus causes flow backup and associated flooding in the vicinity of the Lough, as a consequence of periods of sustained heavy rainfall and the Lough being categorised as a very slow response type catchment. The railway track at Ballycar Lough between the 16 and 18 mileposts has flooded significantly on a number of occasions in the past, most notably in the years of 1994, 1995, 2005, 2008, 2009, 2014, 2015/2016, 2018 and 2020. This is despite the track having been raised several times historically.

In December 2020 a report was compiled by consultant RPS following the study by a stakeholder group that included Iarnród Éireann, Clare County Council, the Office of Public Works (OPW) and the Geological Survey Ireland (GSI). The terms of reference for the group was to identify the most appropriate technically feasible drainage solution to address the flooding at Ballycar and this was done. Funding considerations were not under the remit of the study and the indicative costs for the drainage scheme is €16.7 million including VAT. In order for the project to proceed a funding source will need to be identified. In this respect it should be noted that Iarnród Éireann is only one of a number of stakeholders with an interest in the project.

When a funding source is identified this will permit the project to progress with the steps involved including the appointment of a consultant and the progression of the project through preliminary and detailed design.

Iarnród Éireann believe that progress towards resolving the flooding issues at Ballycar should be a short-term objective of the Development Plan to progress, in line with the draft LSMATS however it is acknowledged that actual delivery of the scheme will be determined by the duration of consultations, the outcome of negotiations on land acquisition, the time to complete environmental assessment and obtain statutory approvals and permissions, design, tendering and construction.

Iarnród Éireann strongly believe that the implantation of a solution to the flooding issue is essential and should be expedited by the Council in terms of delivery and securing of funding.

6. Electrification

The environmental consequences of the unsustainable quantum of private cars on Ireland's road network will require action, in particular the air pollutant emissions and greenhouse gas emissions produced. Ireland has set a target to develop a low/near zero carbon emission transport network by 2050. Heavy rail has a pivotal role to play based on the unique ability of electrified rail services to move large numbers of people quickly and safely. Heavy rail has reduced its overall emissions by 48% since 2005, significantly ahead of the EU 2020 target of 20%. There is an opportunity to continue this trajectory.

Intercity electrification forms part of a long-term Iarnród Éireann strategy to de-carbonise the heavy rail network and provide the benefits of significant journey time savings, improved reliability, enhanced passenger quality and lower operating costs. The Limerick to Dublin mainline is a high-potential line for this investment. The draft LSMATS envisages an electrified rail network for the LSMA in the future, and this is also an objective for Iarnród Éireann. There are major sustainability benefits to be gained by electrification of rail services on existing lines in the short to medium term. Iarnród Éireann recommends the Development Plan supports the short-term implementation of electrification of the existing services to Ennis from Limerick, and the medium-term electrification of Intercity services to Galway. Iarnród Éireann will also include the outcomes on future electrification from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.

7. Re-introduction of Rail Freight

The Rail Freight market is expected to grow across Europe, and globally, over the coming decades. In the European Union, rail freight trends are anticipated to align with EU strategic objectives around the sustainable movement of goods with several ports along Europe's western seaboard having recently invested in intermodal infrastructure. The current level of rail freight market share across Europe is approx. 18%, whereas the market share in Ireland is 1%.


Iarnród Éireann believe the case for rail freight is increasing, given the context of climate change and environmental targets Ireland must achieve, both nationally and internationally. This is also set against a context of increasing road congestion. While the absolute future travel patterns post-COVID are unknown, there will still be a necessity and demand for sustainable freight transportation across Ireland and rail can play an important role. Iarnród Éireann have developed a [Rail Freight 2040 Strategy](#) in the context of;

- The Governments Project Ireland 2040, National Development Plan, National Mitigation Plan, Climate Change Action Plan, Climate Action and Low Carbon Development (Amendment) Act 2021
- The Strategic Masterplans of Ireland's Port Authorities
- Increasing Road Congestion
- Pressure on road freight markets e.g. driver shortages, Brexit
- Policy, demand, and sectoral analysis being undertaken to establish demand and opportunities for rail freight

Rail Freight 2040 has been developed around five key pillars which are summarised in Table 2. These pillars focus on internal and external aspects of the rail freight business and when pursued as part of a cohesive strategy will result in a wide ranging transformation of rail freight in Ireland.

Table 2: Iarnród Éireann Rail Freight 2040 Strategy – Five Key Pillars

Five Key Pillars of Rail Freight 2040 Strategy		High-level description
Enhancing connections with seaports		Irish port traffic accounts for over 90% of annual imports and exports. The importance of port freight traffic underlines the need for modern and effective freight infrastructure to facilitate the movement of goods and materials in and out of the island of Ireland. Central to Rail Freight 2040 are initiatives to have all Tier 1 Ports connected to the rail network. This degree of connectivity will establish an expansive freight network which provides the options and resilience required by modern supply chains and potential customers.
Addressing Rolling Stock Requirements		<p>The expansion of rail freight services will be facilitated by the identification of new markets and customers as well as improvements in operational efficiencies. Servicing this will require new fleet with a large proportion of the existing stock near life expired, necessitating high levels of maintenance and limiting the ability to serve new customers.</p> <p>Investment in new rolling stock would be sequenced to take place on agreement for new traffic flows thus linking cashflow requirements to committed business contracts. The core requirements consist of:</p> <ul style="list-style-type: none"> • Investing in the intermodal wagon fleet • Investing in new bulk wagons • Investing in bi-mode locomotives
Developing intermodal port network		To realise the potential demand for rail freight services additional infrastructure is required to provide an attractive network of facilities and a freight service offering which is a viable alternative to road, for existing and potential new customers. In time, this investment will provide an expansive network of inland rail freight terminals establishing rail freight in each of the regions and providing strong national coverage.
Network developments		The connection of industrial sites directly to the rail network has the potential to realise large volumes of repeat business and establish long standing relationships with large organisations. This offers greater resilience within the network which increases the attractiveness of rail freight to customers. This includes:

		<ul style="list-style-type: none"> • Connecting to industrial sites • Development of passing loops • Dedicated freight paths
<p>Policy initiatives</p>		<p>The utilisation of rail freight in Ireland lags significantly behind that of other European countries. A lack of supporting policies has hindered the growth of the sector and led to a drastic decline in the volume of goods and materials transported by rail over the last two decades. While investment in new infrastructure and rolling stock is needed to increase rail freight services in line with European norms, there are also a number of policy initiatives required to establish a more favourable environment for rail freight and put in place the supports necessary to realise the potential for the sector in Ireland, including:</p> <ul style="list-style-type: none"> • Support for environmental benefits • EU funding • Track access charges (TAC's) • Incentive programmes • Alternative sources of funding (e.g. private finance) • Policy input • Re-establishing cross border services

A key element of the infrastructure investment is a series of intermodal rail freight terminals across the country to improve access to the rail network for goods which can be seen in Figure 5. We are investigating the possibility of a strategic rail freight terminal to the West of Dublin to act as a key interchange between Dublin Port and the movement of goods to regional destinations across the island of Ireland. To capitalise on the high volumes of traffic between Dublin and the South-West a Strategic Freight Terminal will also be developed at Limerick Junction to facilitate intermodal traffic, a hub for distribution activity and support of businesses across the wider region.

Iarnród Éireann welcome Objective CDP 11.24 to support the use of the existing rail system for the transport of appropriate materials where feasible.

Figure 5: Rail Freight 2040 Freight terminal network



Iarnród Éireann believe that Clare County Council should consider the findings of Iarnród Éireann's Rail Freight 2040 Strategy when finalising the new Development Plan, and it should support the continued operation and enhancement of rail freight services. Iarnród Éireann will also include the outcomes on rail freight from the all-island Strategic Rail Review by DoT/DfI(NI) described later in this submission as part of this priority once they are known.

8. Accessibility Programme

Iarnród Éireann is progressing with its Accessibility Programme. The Development Plan should support the further expansion of our Accessibility Programme. By providing more accessible stations on the rail network, it enables and encourages journeys that would otherwise have to be taken by road-based transport, onto the rail network. This has sustainability benefits in terms of the reduction of emissions that result from it, while also ensuring that all who wish to use the railway and can avail of its benefits in terms of frequency, reliability, and journey times.

9. Customer Information Services

Iarnród Éireann is developing a Customer Information Services (CIS) Strategy Report to create a strategic implementation framework for the development of enhanced information systems and information flow to our customers, staff, and third parties. Key amongst these requirements is the ability to provide reliable real time passenger information that is accessible to all, co-ordinated across the network in stations and on trains, and that is consistent across all media.

The development of Customer Information Services (CIS) should be supported by the Development Plan when developed and finalised as it is a vital customer experience capability required to both attract and retain customers using sustainable rail services and a wider integrated sustainable public transport network.

10. Development of Multi-Modal Interchange Strategy

Iarnród Éireann aims to develop a multi-modal interchange strategy which will enable more sustainable end-to-end journeys to be made by rail. The multi-modal interchange strategy will include the provision of facilities within Iarnród Éireann's stations and local environs to provide for ease of interchange between rail and all other modes, prioritising those that are sustainable – cycling, electric charging, wayfinding, and shared mobility. Iarnród Éireann's multi-modal interchange strategy, when implemented, facilitates compact growth along railway corridors due to the improved sustainable mobility offering at each station. Commercial and residential developments can be supported through improved interchange with active mode parking infrastructure, and car park spaces (including electric vehicles), increasing the attractiveness of rail and increasing the rationale for the location of compact developments.

By providing more sustainable interchange and electric charging, along with bicycle and vehicle parking facilities at stations, it enables and encourages journeys that would otherwise have to be taken by road-based transport onto the rail network. It enhances the appeal of zero emissions active modes onto low emissions rail services.

The multi-modal interchange strategy has the potential to promote the concept of Mobility-as-a-Service (MaaS) in the longer-term as digital platforms could be linked to sustainable mobility providers at either end of rail journeys as

the interchange capability improves. If the railway does not enable better integration with other modes, passengers may lose out on benefits, and rail may lose prominence in the wider transport system as a result.

Iarnród Éireann believe the Council could consider supporting the implementation of the multi-modal interchange strategy when developed in its final Development Plan.

Benefits of the Planned Enhancements and Rail Possibilities Outlined (Suburban, Regional and Intercity)

The possible rail options presented in this submission would generate a number of key benefits for County Clare, the LSMA and to the wider Mid-West Region including;

- Maximises the use of the existing railway network and assets in the LSMA.
- Re-opening of markets to rail.
- Opening new markets to rail.
- Connection to the main international airport for the Mid-West Region at Shannon.
- Connection to one of Ireland's largest multi-sectoral business parks at Shannon.
- Connection to the key tourist town of Bunratty.
- Greater rail catchment in the LSMA across existing lines.
- Enabling and encouraging compact urban growth.
- Encourages connectivity, population, and commerce in the Shannon Area and Clare County.
- Increased level of frequency between Limerick and Ennis / Galway.
- There will be limited need for Compulsory Purchase Orders (CPO) on property along the majority the established and reinstated routes if enhancements prove viable.
- Minimal disruption to surrounding area during construction along the established routes.
- Job creation to aid COVID-19 economic recovery.
- Increased contribution from County Clare and the LSMA to the carbon reduction targets set at the European level and in the Climate Action Plan.
- Brings sustainable rail/road Park and Ride into the LSMA rail network
- Promotes compact growth to take place along new, established, and reinstated rail corridors.

Appendix A sets out the full strategic vision for a the long-term a new North/South Limerick to Ennis/Shannon Airport Suburban Network.

Level Crossings

Iarnród Éireann works to reduce risk at level crossings, and to eliminate level crossings where possible on a risk-prioritised basis. We would welcome the continued support of Clare County Council where it is identified that opportunities exist to eliminate level crossings, in order to enhance safety on both the rail and road network, and to local residents and landowners.

Local Transport Plans

Iarnród Éireann welcomes Objective CDP 11.3 to implement Local Transport Plans for Ennis and Shannon and we would request that the Council consult with us during the development of these plans.

New Stations

Iarnród Éireann notes the Council's support in Objective CDP 11.6 to develop new rail stations on the Western Rail Corridor, including a potential new station at Crusheen. Iarnród Éireann will keep the case for a railway station at Crusheen under review in line with future demand trends, but at present there is no provision for a station within the current funding profile. The Council should note that the delivery of any new rail infrastructure necessarily involves a multi-agency approach in the planning, design, funding and construction of a scheme. There are also strict Government enforced conditions in place surrounding the release of funds for capital infrastructure projects which must be adhered to by all agencies wishing to draw down public funds. These are set out under the Public Spending Code drawn up by the Department of Public Expenditure and Reform.

In general, therefore before Iarnród Éireann can receive public funding to proceed with any rail infrastructure scheme the following conditions must be met:

- the proposal must be fully supported by relevant transport strategy & planning policy (National Transport Authority /Department of Transport/An Bord Pleanála approval as required)
- the proposal must have a robust Business Case in line with current Government Public Spending Code & sector specific Common Appraisal Guidance for transport related projects (available from the Department of Transport website)
- full demand assessment of each scheme using the appropriate modelling tool is required as an input to the Business Case
- the project must be fully funded by 3rd party finance

All Island Rail Review

In the context of wider national rail policy and development, it is worth the Council noting that the Department of Transport (DoT) and the Department of Infrastructure (Northern Ireland) (DfI(NI)) have commenced an [All-Island Strategic Rail Review](#) with faster Intercity connectivity, improved regional connectivity, and rail freight forming key elements. Iarnród Éireann will prioritise the outcomes of this Review as part of its future plans upon completion of the study.

Property Issues

In line with normal planning procedure any future measure or proposal by the Council which may impact on the property of the CIÉ Group must be fully discussed and agreed with the CIÉ Group Property Division in advance.

Protected Structures

Iarnród Éireann note that there are no railway structures proposed to be added to the protected structure list.

Concluding Remarks

To conclude this submission, it is important to acknowledge that the ongoing COVID-19 pandemic has caused wide-ranging challenges and uncertainty throughout society on a global, European, and national level. It continues to alter some aspects of the way we live our lives and move about. It is likely to have an impact on the population and economic targets projected as part of the Project Ireland 2040 initiative, the levels of which, as of yet, are unclear.

From the perspective of developing a sustainable integrated transport system, COVID-19 does present an opportunity to change habits, and the promotion and priority of sustainable transport can be a key driver for the recovery of growth, thus making the Clare County Development Plan a key strategic document for the Mid-West Region. The development of a sustainable integrated transport network for the Clare County and the Limerick-Shannon Metropolitan Area can be a springboard to economic recovery through the jobs it creates during its implementation, and it sustains post-completion. This is crucial for the Mid-West Region to maintain competitiveness internationally and promote regional balance in the national recovery.

Notwithstanding the tremendous challenges ahead due to the COVID-19 pandemic, I hope that this gives you a good indication of the potential rail developments that could be delivered by Iarnród Éireann over the next County Development Plan period and beyond. This can significantly enhance rail access within County Clare and adjoining Regions in the future.

Iarnród Éireann looks forward to working with you to achieve the positive outcomes the Development Plan will bring for Clare.

Yours sincerely,



Jim Meade

Chief Executive

Appendix A – Long-Term Vision for the North/South Limerick to Ennis/Shannon Airport Suburban Network

