

Planning Department  
 Clare County Council  
 New Road  
 Ennis  
 Co. Clare

16th November 2020

Dear Sir / Madam,



**Re: Preparation of a new Clare County Development Plan 2022 – 2028: Stage 1 Pre-Draft Consultation**

Further to your invitation on 30 September 2020, Iarnród Éireann welcomes the opportunity to provide a submission to the Stage 1 Pre-Draft consultation phase of the new Clare County Development Plan [hereafter, “the Development Plan”] for the period 2022-2028. The Issues Paper prepared provides a useful overview of the challenges and opportunities facing Clare County through the period of the Development Plan and beyond.

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 presents an opportunity to develop the foundation, and begin the implementation, of a sustainable integrated transport system for Clare. This transport system, and the connectivity it brings, will be essential to enhance the national objective of balanced regional development.

**Introduction and Background**

Project Ireland 2040, launched by the Irish Government in 2018, comprises of the National Planning Framework (NPF), which sets out a spatial strategy for the next 20 years, and the National LSMATS (NDP), which sets out an investment strategy for the first 10 years of the National Planning Framework; 2018-2027.

These documents are supported by the Regional Spatial & Economic Strategy (RSES) for the Southern Region. The Southern Region RSES, of which County Clare is included, became effective on the 31st January 2020 and is a 12-year strategic regional development framework to guide the expected change in population and economic growth across the region to 2040. The RSES includes the Limerick-Shannon Metropolitan Area (LSMA) and it is a key objective to optimise the use of the rail network. It is this objective which forms the basis of this submission to the Pre-Draft County Development Plan consultation for County Clare. This submission will outline Iarnród Éireann’s priorities and possible expansion opportunities, with the objective of improving and optimising the existing rail network in the LSMA, and why they should be considered for inclusion in the Development Plan.

**Key Benefits of the Railway to Ireland’s Economy, Society and the Environment**

Rail is one of the most sustainable and environmentally friendly modes of land transport, is segregated from road and is a high capacity public transport mode with the capability to deliver high frequency services. The key benefits of the railway in a national planning context are;

- Rail is a key enabler of economic growth
- Rail is a key enabler of compact growth
- Rail attracts private car users

- Rail is a fast and productive way to travel
- Rail is the safest form of ground transport
- Rail enables mobility and is socially inclusive
- Rail is the most environmentally sustainable form of land transport
- Rail supports growing Eco-tourism
- Rail supports European, national and regional policy objectives
- Rail is a high capacity/high frequency mode and is segregated from road
- Rail offers excellent direct access to urban centres and city centre business districts

In expanding the railway, Iarnród Éireann's current infrastructure investment priorities are largely focused on the roll-out of the major rail projects contained in the National Development Plan. This will deliver very significant improvements in rail over the next decade.

In recent years Iarnród Éireann has been among the fastest growing railways in Europe with a record patronage of 50 million journeys recorded in 2019. The record investment programme in our network however continues to pay dividends. Rail modal share is increasing and many of these newly generated rail trips arising from the investment in the network are from car users. This trend is very encouraging and is compatible with policy at all levels including the Department of Transport (DoT) Transport Policy 'Smarter Travel: A Sustainable Transport Future'. Iarnród Éireann welcomes the modal shift objectives contained in the Issues Paper aimed at moving away from single car occupancy use to public transport and we would like to see it strongly endorsed in the new Clare County Development Plan.

In the Programme for Government (PfG) published in June 2020, the Government committed to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime. Now is the opportunity for Clare County to ensure that there is a transition to more sustainable modes of transport, with rail being central to this.

#### **Possibilities for Expansion and Enhancement to the Rail Service Offering in County Clare and the LSMA**

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.

The possibilities for investment in rail in County Clare and the LSMA are determined by a number of factors including the;

- Need to provide balanced regional development across the State
- Need to provide additional capacity to meet population growth and to encourage modal shift.
- Need to serve an expanding commuter belt including the growing Limerick-Shannon Metropolitan Area
- Need to ensure the Shannon Area, including the Shannon Free Zone, has improved access to sustainable high-quality transport due to its importance to the Mid-Region's economic development and projected population increase
- Need to address bottlenecks / pinch points in the system
- Need to upgrade facilities in line with modern customer expectations and to provide for the appropriate levels of comfort / service
- Need to decarbonise transport and reduce emissions particularly road-based emissions in line with the objectives of the Climate Action Plan.

The Strategic Issues Paper identifies a number of specific key challenges for the County which the railway can play a major and supporting part in addressing, these being noted in Table 1 below.

**Table 1: Key Challenges and heavy rails role in addressing them**

Key Challenge	Major Role	Supporting Role
Growing the Limerick-Shannon Metropolitan Area Town of Shannon, the Key Town of Ennis and other settlements throughout the County to achieve compact growth	✓	
To improve mobility/accessibility for all, within and through the County in a sustainable manner	✓	
Reducing our carbon footprint and achieving the national target of zero emissions by 2050	✓	
Building on the provision of high-quality employment and economic opportunities at appropriate and sustainable locations		✓
Accommodating the needs of an ageing population		✓
Living sustainably without compromising future generations		✓

Below is a brief outline of Iarnród Éireann's priorities and possible expansion opportunities, with the objective of improving the existing rail network in the LSMA and Clare County, and why they should be considered for inclusion in the Development Plan.

### **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.
- 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.

The Development Plan should support the implementation of the final LSMATS objectives for the period of the Development Plan and beyond to 2040.

## 2. Limerick-Shannon Metropolitan Area Rail Enhancement Possibilities

### Shannon Airport to Limerick City 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).

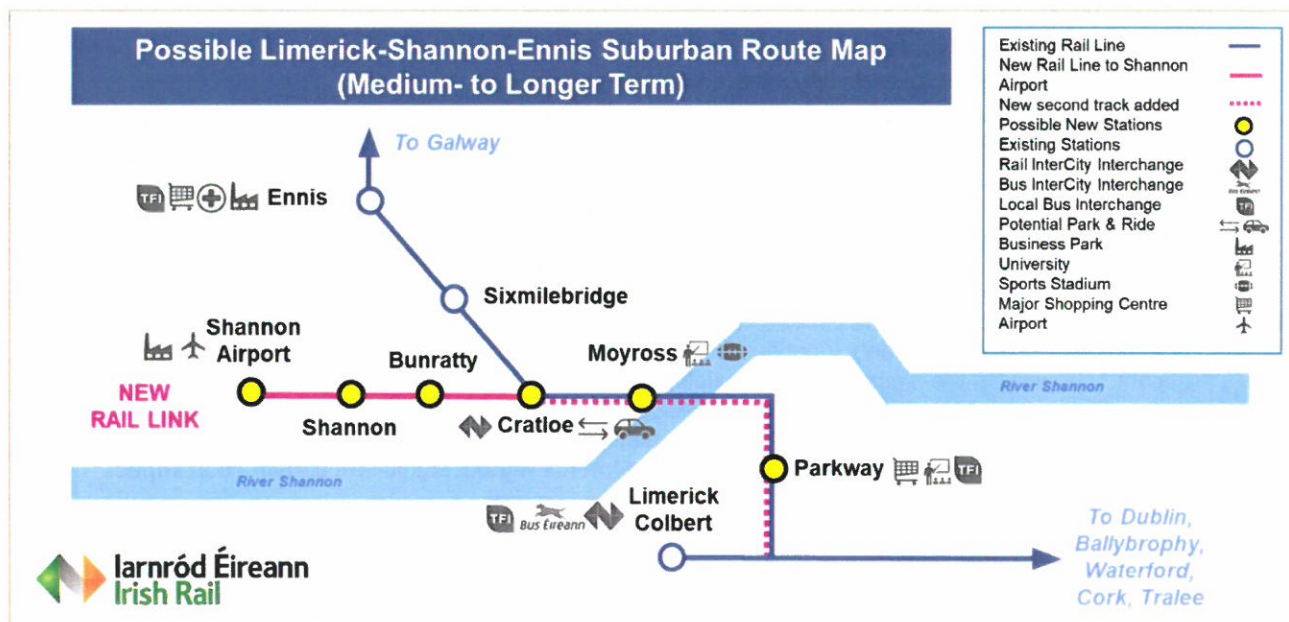
The Shannon Area's connectivity is vital for the continued development of, not only Clare County, but also the broader Mid-West Region. It is the location of one of Ireland's largest multi-sectoral business parks in the Shannon Free Zone, within which is one of the largest concentrations of North American 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 1.

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 1: Schematic of Shannon Airport to Limerick City Possible Rail Line**



It is important to acknowledge that a rail link to Shannon Airport was the subject of a feasibility study in 2007, and that this concluded not to progress with the development of the rail link at the time. However, the current National and European policies create a different environment for a similar appraisal to be undertaken. There is now a growing

need for more sustainable transport to support the growing population and economic activity of the Shannon Area, Clare County, and the wider Mid-West, coupled with the critical issue of tackling climate change.

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.

### 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 2.

**Figure 2: 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.

All potential rail enhancement possibilities are subject to Business Case evaluation and peer review under the Public Spending Code of the Department of Public Expenditure and Reform (DPER) and shall be in compliance with the guidance of the Common Appraisal Framework (CAF) for Transport Sector Capital Projects & Programmes from the DoT.

### **3. Existing Suburban and Intercity Rail Service Enhancement Options**

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 on 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 IÉ 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 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.

### **4. 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.

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). This 2020 study builds on previous reports of 2011 and 2015, and after considering all various options, 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.

Iarnród Éireann believes the report meets the desired objective to identify the most appropriate technically feasible drainage solution to address the flooding at Ballycar. The indicative costs for the proposed solution is €14.7m and for this project to proceed a funding source will need to be identified. The report will be issued when it is finalised with the stakeholders. This is anticipated to be before the end of this year. 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, in line with the draft LSMATS.

## **5. 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 46% 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.

### **Benefits of the Rail Possibilities and Enhancements 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.

### **Concluding Remarks**

To conclude this submission, it is important to acknowledge that the ongoing COVID-19 pandemic has caused wide-ranging challenges and uncertainly throughout society on a global, European, and national level. It has altered 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.

Although it is not yet possible to determine the full impact on the public transport sector, in the short to medium term, COVID-19 impacts will include a reduction in the number of people in employment, migration to remote and home working and a switch towards more individual modes of transport. In this new environment, the immediate priority for Iarnród Éireann will be to rebuild customer confidence in our services and develop flexibility in our longer-term rail developments plan to allow us respond quickly to emerging threats and opportunities.

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,

A handwritten signature in black ink, appearing to read "Jim Meade", with a stylized flourish at the end.

Jim Meade

**Chief Executive**



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

