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Sent: Friday 8 February 2019 14:20
To: rses
Subject: Submission in respect of the draft RSES, with specific reference to the so-called 'western rail corridor'

Submission to the NWRA on the draft RSES, with specific reference to the topic of the so-called 'western rail corridor' and the facts and myths around same.

Draft Regional Policy Objective 115 states that '*(a) it shall be an objective to deliver the Athenry – Tuam – Claremorris – Sligo rail (sic) to an appropriate level of service and to a standard capable of facilitating passenger and freight transport. (b) It shall be an objective to progress through pre-appraisal and early planning the extension of railway from Athenry – Tuam – Claremorris – Sligo*'.

The objectives with regard to rail are dependent on the outcome of the pending rail review that is to be conducted on behalf of the DTTs. These objectives therefore pre-empt government policy in this area and cannot be included in the final document in their current form.

It needs to be pointed out that the WDC report on rail freight found no case for additional freight capacity on the so-called 'western rail corridor'. It therefore follows that freight needs cannot be part of any plan or business case to build a new railway on this route. RSES need above all to be realistic, based on available facts and on data, and not on vague political promises to build railways everywhere.

This is supposed to be among other things an economic strategy, grounded in available data and not in vague aspirations. Most of the freight carried by road in this Region cannot be moved to rail and the tonnages currently on road cannot and should not be quoted in support of a case for rail. Collection of milk from farms, deliveries of chilled and dry food to supermarkets, delivery of concrete and other construction materials, deliveries of cars to dealerships, movement of livestock, animal feed and fertilisers to farms, fresh meat from factories, delivery of parcels etc. cannot be done by rail, and these numbers should not be used to support a case for a new railway.

Most of the new industries that set up in the Region have no requirement for rail freight either. In one industrial estate in Roscommon Town, for instance, none of the businesses use rail freight, despite their proximity to the rail line. In Boyle town, none of the major employers use rail freight either, again despite their proximity to a railway station with goods capacity. Increasingly, the output from modern industry in the western world will be exported on a fibre optic cable, not on a railcar. Because of the small size of this island, coupled with the lack of heavy industry and with good motorway access to ports, most industrial output is carried by road in Ireland. Where road transport is the preferred option for this freight, it is used because of cost benefit and because of a reduction in the number of times material has to be handled compared to rail. It is also the only option for perishable goods and high-value goods. One Major producer of high-value products in the Region sends out the finished product in small truckloads because of insurance reasons – the value of a full load would be too high a risk for insurers and insurance would not be available at all if the goods were sent unattended by rail. These are the realities.

One major industry in Ballina creates most of the demand for rail freight in the Region, and that company is satisfied with the current rail infrastructure. In any event, that industry, like many other multinational employers, can choose to leave at any time if a lower-cost location makes better economic sense for them. It is not good policy to establish duplicate services for industries that may not be sustainable in the long term. If we are to invest in infrastructure in order to retain people in the Region, we need to make that investment based on what is sustainable. Increasingly, heavy industry will not be part of the employment prospects for this Region, and the need for rail freight will decline, if anything.

Successive studies have shown no case for passenger demand either on the line north of Athenry. North of Tuam, the population density of less than one person per kilometre is not enough to sustain a rail service, and the

scattered population in that part of the Region cannot be serviced by rail, by its nature. Successive governments have clearly stated that there will be no repeat of the debacle that was the investment in the Ennis-Athenry line, a route that is among the three most subsidised routes in Ireland, currently standing at around 44 euro per passenger journey. Attempts to massage the figures on this route by including the busy Athenry-Galway commuter route have cut no ice with the Department of Transport, even if gullible voters still believe the hype from a small number of politicians who have hung their colours on the rail lobby mast to the exclusion of logical and sustainable transport policies.

However in the albeit unlikely event that some future government decides to spend most of a billion euro on the Athenry-Collooney line, and also decides to provide Irish Rail with the substantial annual subsidy needed to sustain it, it makes no sense either to allow the railway alignment to be lost to future public ownership through neglect and adverse possession, or indeed through loss to the needs of road projects as has happened in other areas. Best practice in other areas including Ireland is for the asset to remain in the ownership of CIE Properties as at present, but licensed to local authorities for other interim or complimentary uses on the strict basis that the primary use of rail is always paramount in the event that a decision is made to build a railway.

The RSES in current draft format are adopting the same stance as the previous RPGs, focussing almost to an obsessive level on a railway that most enlightened observers know won't be built because it makes no sense, while diverting the focus away from the real needs to the Region from a transport and infrastructure perspective. Population numbers are dropping in many parts of the Region as a result of other trends including an increase in farm size that results in a drop in customers for local services. These services need to be bolstered by rural tourism in order to sustain them for the local population, and thus break the cycle of population fall leading to closure of services, leading to population fall etc.

The leveraging of the strip of land that is sometimes known as the 'western rail corridor' (or with increasing frequency as 'the Western Rail Trail') for the benefit of the population of the Region should form part of the RSES, but couched in terms that describe what is real and what is achievable. There is little point in doing what was done in the previous RPGs, defining a sole objective as rail usage to the exclusion of all other potential for what is a valuable strip of land that bisects three counties.

The RPGs must acknowledge best practice elsewhere, in places where redundant rail lines are recognised for their immediate potential as well as for future rail or other transport needs. 'Live' rail lines also lie in alignments that are often underutilised, and this spare capacity can provide a route for corridors for energy and trunk broadband, as well as for tourism and leisure use. In the USA for instance the 'rails with trails' initiative has identified thousands of miles of rail alignment that can carry tourist trails within the alignments without compromising passenger or leisure user safety. Some small examples of this practice are to be found in Ireland already, but this concept needs to be extended. Lightly used or closed lines can readily be leveraged for other parallel uses.

Live and redundant/disused rail alignments can also provide space for the transmission of natural gas for food processing and domestic use, for DC underground HV transmission links, and for broadband trunk lines, all without compromising current or future rail needs. The door must not be closed in the new RSES to any use of a publicly-owned asset that can provide economic benefit to the community. Above all, allowing these assets to fall out of public use because of a fixation on one sole use of the asset at some time in the distant future represents flawed economic thinking.

There has been an element of so-called 'groupthink' in Local Authorities and regional bodies in the past that has locked up assets to the detriment of the Region. 'Groupthink' is defined as 'the practice of thinking or making decisions as a group, resulting typically in unchallenged, poor-quality decision-making.' This collective rationalisation closes out all logical discussion of an issue, and results in the group blindly following the accepted logic of the group to the exclusion of rational thinking. 'Groupthink' perfectly defines the debate on the rail issue in the Region to date, and has already resulted in the loss of investment, jobs and people from the Region. The Deise Greenway in Waterford is a good example of investment that was lost to the North-west because of this mind-set; lobbyists had secured a promise of funding for the Western rail Trail before funding was given to Waterford for the Deise project, but a failure of western County Councils to apply for this funding led to it being used elsewhere. The difference in Waterford was that only a minority of Councillors was opposed to investment in alternative and interim uses for

redundant or closed lines, and they were almost all eventually persuaded of the value of logical thought around the issue.

Most people agree that a railway would be 'nice to have' on this route, in case we ever decided to use it, and as long as the capital cost and heavy ongoing subsidy comes from central government and has no impact on capital spending or other in the Region. However planners should be aware of the unlikelihood of rail on this route over the lifetime of the proposed RSES, and the need to have an alternative approach in the likely event that the politically-motivated rail review (that appears to have been designed solely to block the development of tourism infrastructure) finds no case for rail. We own the asset that is the rail alignment, the sleepers and rails that lie on it do not comprise a railway and are described by Irish Rail as having scrap value only. These rails and sleepers will have to be removed in any case in the event that a railway is ever built; why not remove them now and use the route as a greenway (a project with a payback time of as little as two years) while waiting for a railway to happen? We are supposed to be rational, civilised beings, but we pay homage to rusting rails as if they had some mystical status. These old rails are just a scrapheap, albeit one spread out over a long distance and retained only for political advantage by a small number of elected representatives.

It won't be a greenway that stops rail on the 'western rail corridor', it will be simple economics. Neither will the presence of a greenway on an alignment have any impact on a decision around future rail use. An insistence that rails are not removed until Irish Rail is ready to build a railway is illogical, foolish and will leave us exactly where we are now at the end of the period covered by the pending RSES. Tying stupid thinking into a policy document like this is just compounding the error that was made in the previous RPGs.

Yours sincerely

John Mulligan

