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Ireland**
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Chambers Ireland All-Island Strategic Rail Consultation Submission

January 2022

Are your policy priorities for rail adequately captured within the Consultation Document?

Our primary interest is in intra-urban/commuter transport which is not among the foci of this consultation

Our other significant areas of interest relate to **inter-urban transport**; linking up our cities and towns through reliable, regular and reasonably-priced rail options – and **international connectivity**; ensuring that ports (air and sea) are adequately provided for to facilitate transport to our population centres at scale.

Connections to airports are important to our network's members as the ease of travel to a location is a key determinant in attracting foreign direct investment. But, in terms of passenger transport more broadly, there are strong environmental, spatial, and economic reasons to facilitate a modal shift towards rail from private vehicles like cars. If, on the urban infrastructure side, we succeed in making the shift towards active and public transport (which our cities and towns need) then, for the people living and working in urban areas, inter-urban transport needs will be the primary cause for retaining private vehicles.

Private vehicles involve large ongoing financial costs, so the owners are incentivised to maximise their use of their vehicles. This usage has enormous social, economic and environmental externality costs. Secondly there is the very large embodied-carbon, cost associated with each new vehicle, particularly those that rely on heavy internal combustion engines or energy intensive battery storage. Very often a new vehicle is only more carbon efficient than an existing vehicle if it is likely to see a very large amount of usage over its lifetime. Local, personal intra-urban transport is unlikely to be of such a significant volume that it will be more carbon efficient to upgrade an existing vehicle to a new vehicle.

Therefore, an important long-term goal for the all-island rail network is that it will enable individuals that are living in urban areas to avoid owning a car. For regional and rural areas there may not be the population density to justify the investment that would be required to facilitate mass-public transport rail and they will have to continue to rely on (hopefully more environmentally friendly) privately owned cars and other public transport options. However, it is important to recall that there is a feedback loop to this, areas with low population centres have not been able to grow because of inadequate infrastructure and transport links, the lack of regional investment has precluded regional growth.

From the perspective of an all-island business representative organisation that has a public-transport first policy we know how inadequate the connections are across the island, and not just for those that are based in regional towns. Functionally it is very difficult for anyone to commute from any of the seven principal cities to another, and return in the same day, unless the individual is using a car. For those based in regional growth-centre towns such a return trip by public transport can be impossible. For those that don't drive these journeys often require overnight accommodation and so limit employment and business opportunities. For as long as door-to-door travel by public and active transport is slower, less frequent, and more costly at the margin than using a privately held vehicle then the primary mode of transport will continue to be the car. Fast, efficient, and frequent rail has a hugely important role to play in solving this problem.

The economic hinterland of a location is the area which can be reached within 90-minutes of travel, when we consider the island from that perspective it is less of an integrated all-island economy and more a dislocated economy extending over an extended and poorly integrated archipelago.

The importance of freight rail connections to seaports has historically been underweighted in the Irish transport system, the need to load containers onto trucks at

our major ports inhibits the potential for our island to become a trading hub, poised as it is between Europe and the rest of the world (RoW) , while also being in an ideal location for mixed loads of RoW->EU and RoW->GB destination goods to be landed and forwarded to their eventual destinations. We have significant deep-water resources that are underutilised which could help reduce congestion at EU and GB ports if large container ships can land here and have their cargo shipped onwards to secondary EU and GB rail-connected ports through Ireland/Northern Ireland distribution and logistics hubs that are themselves rail connected with ports.

In 100 words or less, what is the desired role of rail in your area of interest/geography?

The delivery of reliable, regular, and reasonably priced alternative to relying on private vehicles would be enormously beneficial to the wider business community and would also (in combination with an electrification of the rail network) afford individuals to lead less carbon intensive lifestyles. This reduction in CO₂ demand would support the island's transition to net-zero emissions (cognisant of the fact that there will need to be some form of carbon sequestration process to compensate for unavoidable emissions, therefore every tonne of CO₂ that is not emitted of benefit to the economy).

In 100 words or less, what are the key gaps in rail provision in your area of interest/ geography?

Intra-urban connectivity is poor and expensive. Typically, it is slower than using a car, and the marginal cost is often higher when using rail as the cost of a rail ticket can exceed the fuel cost of a car.

Intra-urban connectivity is also so infrequent that it is effectively unreliable. Should one be delayed in commuting to a station and then they often have to wait two hours for the next train. If this happens even once, they do not rely on trains again.

International connectivity for passengers and freight is another fundamental gap.

How would you rank the importance of Goals 1-6 (outlined on page 5)?

- 1 Contribute to Decarbonisation
- 2 Foster Economic Activity
- 3 Improve All Island Connectivity Between Major Cities
- 4 Encourage Sustainable Mobility
- 5 Enhance Regional and Rural Accessibility
- 6 Achieve Economic and Financial Feasibility

Please list specific investment options you would expect to be considered

As an all-island body which represents the major cities, important regional towns, and rural areas it is a challenge for us to nominate specific projects that ought to be carried out at pace, however certain general principles should be considered.

Decarbonisation: The shift towards electrification should occur with the utmost alacrity.

Track Parallelisation: To allow for greater frequency, and higher speed, trains tracks should be laid to facilitate inter-urban expresses that would allow for the major cities to be connected more quickly and more reliably.

International Connectivity: Integrating airports into a broader set of national rail connections will greatly enhance the attractiveness of our cities and towns as locations for Foreign Direct Investment.

Freight Connectivity: Connecting our rail networks to our ports will be an important element in minimising the costs that have been imposed on our businesses by Brexit and will also be key to integrating our island economy into wider EU trade/value/ and distribution networks.