

Forward Planning

Wicklow County Council

Station Road

Wicklow Town

30<sup>th</sup> August 2021

Dear Sir / Madam,

**Re: Draft Wicklow County Development Plan 2021-2027 Public Consultation**

Iarnród Éireann welcomes the opportunity to provide a submission to the Draft Wicklow County Council (WCC) Development Plan 2021-2027 Public Consultation [hereafter “the Development Plan”]. 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 Development Plan Strategy’s three cross cutting themes, Healthy Placemaking, Economic Opportunity and Climate Action, all of which rail can play a key role in delivering.

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 2027 and beyond, therefore making it an important document for the desired growth of sustainable mobility in Wicklow. 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 Wicklow.

Iarnród Éireann welcome the updating of the 2021-2027 Development Plan to align with current National and Regional policy, which has developed significantly since the previous Development Plan, concentrating on facilitating

compact growth and the alignment of it with public transport infrastructure developments. As the Council is aware, its transport policy at Tier 2 level planning is driven by the National Transport Authority's Transport Strategy for the Greater Dublin Area (2016-2035), which is currently undergoing statutory review. Iarnród Éireann believe it is imperative that the Development Plan ties in with the resultant revised Transport Strategy for the Greater Dublin Area<sup>1</sup>, which will provide a framework for the planning and delivery of transport infrastructure and services in Wicklow which are captured in the wider Greater Dublin Area (GDA) over the period to 2022-2042. The Transport Strategy for the Greater Dublin Area provides the backbone for investment in other sectors in Wicklow and the GDA due to the dynamic impact of transport planning with spatial planning. The update of the Transport Strategy for the Greater Dublin Area also comes at a time of a review and update of the National Development Plan and an update of the Climate Action Plan, the outcomes of which will be important to feed into the Development Plan.

Iarnród Éireann supports the Council's intentions to, in line with national and regional policy, identify appropriate locations to accommodate compact growth and to consolidate development. Iarnród Éireann strongly believe this should particularly focus locations close to high capacity public transport nodes and in existing settlements where vacant or brown field sites offer potential for re-development.

The impact of a significant population growth by 2040 under the National Planning Framework, the changing lifestyle habits as a result of COVID-19, and the impacts of climate change, necessitate a rethink of how citizens of Wicklow and Ireland live. The Council has an opportunity in this Development Plan to continue to facilitate a mindset shift for Wicklow towards a more substantial sustainable mobility system integrated into a compact spatial planning framework for housing and commercial development.

The remaining parts of this submission will take the shape of Iarnród Éireann's core objective, progress we have made, and our priorities for the future.

### **Iarnród Éireann - Core Objective and Benefits of Rail**

It is Iarnród Éireann's core objective to provide safe, accessible, and integrated rail services for Ireland, that contribute to sustainable environmental, economic, and social development in an efficient manner. It is this key objective that informs our views regarding the future expansion of the suburban rail network within Wicklow County and the wider GDA. By its nature and interrelationship with the wider Intercity rail network, many of the measures proposed for the GDA rail network will have significant spin-off mutual benefits for regional / Intercity rail services and the wider national economy.

It is our intention to deliver the following objectives over the Development Plan's period:

- To continue to put the Customer at the heart of our business
- To maximise the railway's contribution to long term sustainable spatial development patterns
- To facilitate and encourage economic growth at both a regional and national level

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<sup>1</sup> The GDA includes the local authority areas of Dublin City, Fingal, Dún Laoghaire- Rathdown, South Dublin, Meath and Wicklow.

- To contribute to the attractiveness of Wicklow as a location to live and do business in
- To contribute to and be compatible with all local, regional, and national land-use transport planning policies
- To improve rail connectivity and integration in Wicklow and the wider GDA
- To facilitate a significant modal shift from the private motor car to public transport and thus to contribute to a significant reduction in road congestion and carbon emissions in line with policy objectives e.g. Smarter Travel, Climate Action Plan
- To maintain and renew rail infrastructure and assets to the highest safety standards
- To deliver the appropriate quantum of rail capacity to satisfy future needs which will be an attractive value proposition for our customers.

Iarnród Éireann believe that heavy rail can play an essential role in supporting the sustainable growth and prosperity of Wicklow and the GDA, and by extension the growth of the wider regions and national connectivity, providing numerous benefits notably:

- It is a key enabler of local sustainable transport in Wicklow with DART services serving Bray and Greystones, along with outer suburban services between Dublin Connolly and County Wexford serving Kilcoole, Wicklow, Rathdrum, and Arklow. Intercity services to Rosslare Europort also stop at all the aforementioned stations further enhancing the rail options for passengers. This corridor therefore enables inter-regional and Intercity service connection possibilities which are important for connectivity and accessibility on a national level from Wicklow.
- The current rail network in Wicklow is an underutilised asset that can be developed with little construction impact on the heavily congested road artery of the M11/N11, providing a continued step change in mobility with limited disruption to traffic flows.
- Rail can operate comfortably within a mass transit system, transporting large volumes of passengers, more than any other mode, enabling potential compact dense development growth to be catered for by reliable frequent services.
- Rail is largely segregated from other transport modes in the national transport network, avoiding congestion and conflicts associated with road traffic, providing greater punctuality and reliability for citizens of Wicklow.
- Rail can provide a step change in improving air quality levels in Wicklow as the Council aims to address climate change and emissions - the average rail passenger creates approximately 28g of CO<sub>2</sub> per passenger kilometre vs. 102g per passenger kilometre for road vehicles.

### **Current Rail Development in Wicklow**

The existing Iarnród Éireann rail network plays an important role in the public transport provision in Wicklow as the South Eastern line passes through it, providing DART, outer suburban, and Intercity rail services

Iarnród Éireann is committed, subject to funding, to further expand and integrate the railway network, in accordance with national, regional, and local policy, in collaboration with WCC, the Department of Transport, and the National Transport Authority (NTA). Iarnród Éireann's development of the network in Wicklow is driven by the objectives of

NTA's 'Transport Strategy for Greater Dublin Area 2016-2035' and the NTAs 'Integrated Implementation Plan 2019-2024'.

Since its adoption in February 2016, Iarnród Éireann has made significant progress on the rail objectives contained in the NTAs Transport Strategy for the Greater Dublin Area [hereafter "the Strategy"]. In terms of the Strategy's rail specific objectives, the majority are included in the NTA's Integrated Implementation Plan 2019-2024. The Integrated Implementation Plan 2019-2024 supports the delivery of the wider Strategy. It sets out the central infrastructure investment programme and overall funding provision over the six years. The priorities in the Integrated Implementation Plan align with the objectives and priorities set out in the Strategy, focused on improving public and sustainable transport across the region.

### **1. DART+ Programme**

The DART+ Programme represents the largest heavy rail investment scheme in the history of the State, providing a transformational increase in capacity and frequency of the existing system between Dublin City Centre and the areas of Greystones, Maynooth, Celbridge, Dunboyne, and Drogheda. The DART+ Programme, or simply DART+, is a cornerstone project of the Strategy and the Government's Project Ireland 2040 vision. DART+ is a central pillar in a future integrated sustainable transport system serving Wicklow, the GDA, and the wider Eastern Region<sup>2</sup>. DART+ provides a transformational upgrade change to the future public transport network in two ways; firstly, through infrastructure improvements, including electrification, removal of level crossings, a new depot, and other works, and secondly; through additional rolling stock, combining to double the peak passenger capacity of the heavy rail system into Dublin City Centre from approximately 25,000 passengers per hour in 2019 to over 50,000 by 2028.

DART+, when completed, will have significant benefits to rail passengers from Wicklow offering a higher frequency, integrated rail connections to the heart of Dublin city centre with enhanced interchange possibilities with other existing modes (Luas, bus, Intercity & Suburban rail), as well as the new MetroLink, which will provide end-to-end sustainable transport options to Dublin Airport for Wicklow citizens. Improvements in services south of Greystones are unlocked through DART+. This is discussed later in this submission under our 'Priorities for the future in Wicklow'.

In terms of progress, the DART+ Programme is at Preliminary Business Case stage, a significant milestone to progress its implementation. Development is continuing on each of the infrastructure elements of DART+; DART+ West, DART+ South West, and DART+ Coastal, along with the procurement of new DART+ carriages to maximise the growth in capacity made available through the infrastructure enhancement. The DART+ Coastal infrastructure element is split into two separate sub-elements of DART+ Coastal North and DART+ Coastal South, the latter serving Wicklow County.

It is essential that the Development Plan supports the implementation of the full DART+ Programme. The extent of the DART+ Programme and the various elements are summarised in Appendix A.

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<sup>2</sup> The Eastern Region refers to the area encompassed by Dublin, Louth, Meath, Kildare, and Wicklow.

## **2. Station Improvement/Other Enhancement Programmes incl. Accessibility**

Work is continuing on our Accessibility Programme. Minor upgrade works were substantially completed to 54 stations across the rail network by the end of 2018. During this period Iarnród Éireann also progressed planning and design for more significant upgrades (accessible footbridges typically), at a lesser number of stations, including Connolly Platforms 6/7. The objective of the current Accessibility Programme is to prepare preliminary designs and progress planning and statutory processes for significant accessibility upgrades across 15 stations on the Iarnród Éireann network, 7 of which are within the GDA. The scope will include full compliance with accessibility standards, notably the Technical Specification for Interoperability (TSI) for Persons with Reduced Mobility. These improvements are essential for the inclusivity and mobility of Persons with Reduced Mobility within the transport network, while recognising that the recommended enhancements would improve access for all users, to some degree.

## **3. Other Fleet Enhancements**

In terms of addressing the short term demands on heavy rail services, approval of the business case for 41 intermediate intercity railcars (ICRs) was obtained in 2019. When delivered, the additional fleet will allow for improvements in capacity and frequency on commuter services in the GDA as well as on Intercity services.

## **4. Network Development**

The Strategy anticipated that a number of additional stations will be opened or added to the network in developing areas which have a sufficient level of demand to support the provision of a train station. Iarnród Éireann have progressed the planning and development of a number of new stations to add access to the network, these are:

- Woodbrook DART station on the South-East Line
- Pelletstown station on the Maynooth Line, which will be completed in 2021,
- Kishoge station on the Kildare Line

## **5. East Coast Railway Infrastructure Protection Programme: Dublin-Rosslare Rail Corridor**

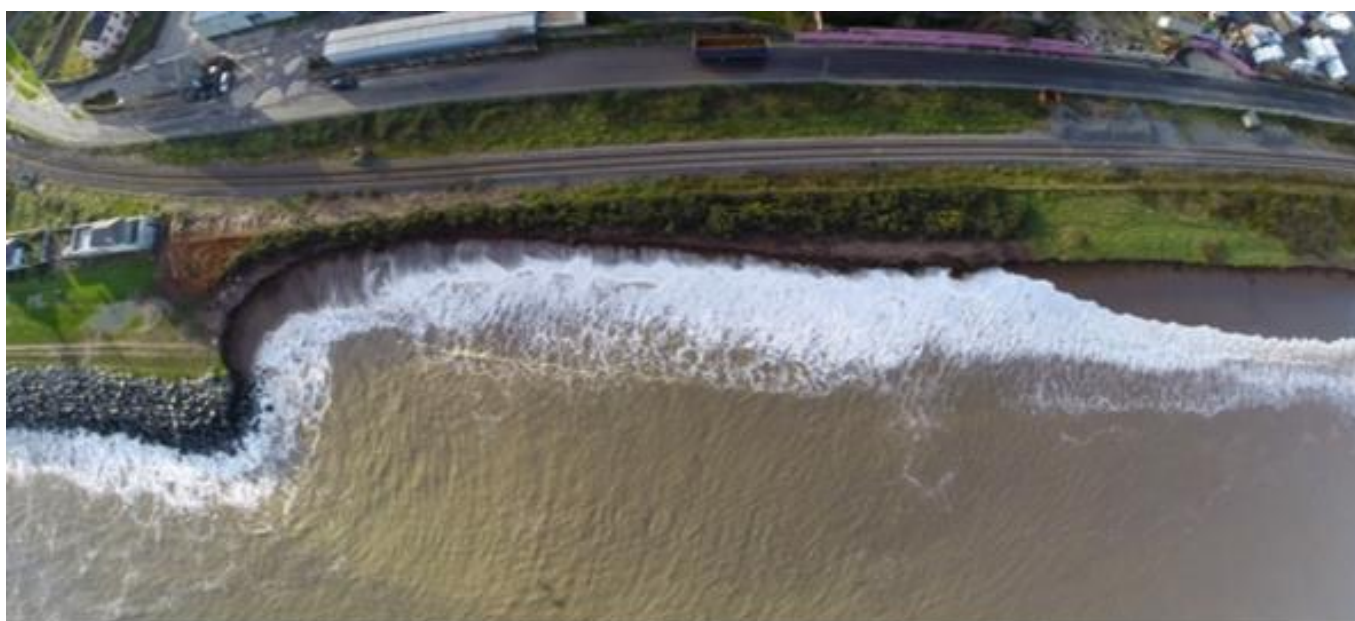
Iarnród Éireann welcomes the inclusion of Objective CPO12.13 in the draft Development Plan, in which the Council, as part of a wider objective to improve Dublin-Rosslare services, aims to “ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss”. Below is a brief description of this critical project, including the problem it aims to address, its impacts, and the current status of progress.

### **The Problem**

The Dublin-Rosslare rail line [the “Rosslare Line”] is a critical rail corridor on the Iarnród Éireann network serving one of the principal transport routes on the eastern side of the country along the N11/M11 corridor. DART, suburban, and Intercity services operate along the corridor providing essential mobility and access between key population centres and Dublin. Rail passenger volumes have been growing significantly on the Rosslare Line over the past decade and rail is a popular mode choice for many people living in the towns and settlements served by the railway. There are over 21 million DART passengers and circa 385,000 suburban/Intercity passengers who regularly depend on the railway line along the east coast.

In Ireland, railway infrastructure is susceptible to climate change impacts due to the close proximity of railway lines to dynamic natural features such as coastlines, peatlands, estuaries, and rivers. Natural processes such as erosion, surge levels, wave overtopping, fluvial and pluvial flooding combined with increased extreme weather cycles due to climate change, are exerting ever more pressure onto exposed sections of the network. These challenges are particularly prominent on the Rosslare Line due to its exposed coastal characteristics for large sections of the route. Storm surges and sea level rise, overtopping and damage of sea defences, ingress of sea water onto track and lineside equipment and coastal erosion of the track corridor presents serious challenges to the future operability of the railway and major inconveniences to passengers.

**Figure 1 – Advanced Coastal Erosion on the Dublin-Rosslare rail corridor – Murrough South (after a storm event)**



## **Impacts**

The impacts of coastal erosion on the east coast of Ireland from Dublin County, through Wicklow County, and on to Wexford County are increasingly evident with large swathes of land being lost on an annual basis. Some areas have seen encroachment through an accumulated loss of coast of up to 30 meters in the last 10 years alone resulting in large losses of land and habitats. The erosion rates have increased significantly within the last 20 years compared to the previous 100 years. Incursions have reached such an extent that the existing railway line between Dublin and Rosslare is at real and looming risk of loss to the impacts of climate change.

A range of reactive interventions continue to be routinely undertaken to prevent coastal losses in the short term and to offset the encroachment, however these interventions offer only immediate protection for a limited timescale and do not address the fundamental and underlying impacts of climate change along the entire east coast rail corridor. In 2018, Iarnród Éireann and Wicklow County Council commissioned a Coastal Erosion study to identify the impact of climate change effects on this stretch of coastline. This study examined projected effects up to the 2100 horizon year. The study identified key areas where immediate intervention and long-term intervention is required. The

consequential economic, environmental, and social cost of a lack of sustainable intervention on the Rosslare Line will be extremely detrimental to counties on the east coast, with the outcomes unimaginable for future generations.

### **Preferred Alleviation Programme**

To address the very imminent threat to the operability of the Rosslare Line, a number of critical areas requiring urgent intervention on the route have been established for targeted intervention. These designated coastal rail sections represent an urgent need for intervention with varying degrees of criticality and priority, but all of which need to be addressed within the next 7 years to protect the very existence of the south-east rail corridor and the surrounding environment and habitats.

### **Expected Benefits of the Programme**

The programme of interventions proposed will ensure that Iarnród Éireann has the capability to continue to provide sustainable rail services along this key rail corridor for the foreseeable future. It will enable Iarnród Éireann to expand services as planned along the east coast corridor through Wicklow towards Rosslare Europort. The programme is consistent with national policy commitments to strengthen and improve the role of the railway and the future benefits to society, the economy and the environment will be multi-generational.

The project is currently at Strategic Assessment Stage of the Department of Public Expenditure and Reform's (DPER) Public Spending Code. A detailed Cost Effective Analysis of the individual project Coastal Cell Areas is being undertaken to determine the full range of incremental socio-economic costs and benefits associated with the planned critical interventions required, in line with Public Spending Code and the Department of Transport's (DoT) Common Appraisal Framework guidance for Transport Sector Capital Projects & Programmes.

It is of utmost importance to Iarnród Éireann that the Rosslare Line continues operating for generations to come. It is fundamental to the sustainable development of Wicklow County, the wider Eastern Economic Corridor, and the achievement of a number of National Strategic Outcomes under the Government's Project Ireland 2040 plan. It should not be left until the effects of climate change take hold, including the coastal erosion as far as the railway before protection measures take place. Continued support and engagement from Wicklow County Council regarding the optioneering and solutions to address climate change impacts on this coastal route and the development of a long-term strategy along this coastline is welcomed. To this extent, Iarnród Éireann would also welcome collaboration with the Council in the sharing of statutory processes to enable this critical infrastructure to progress. Iarnród Éireann would welcome further engagement with the Council on this matter.

### **Iarnród Éireann Priorities for the future in Wicklow**

Iarnród Éireann will now outline its priorities for key expansion projects and enhancements to the rail network to 2027. Further detail on these plans and our wider company strategy can be found in our recently published [Iarnród Éireann Strategy 2027](#) document. Also 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)) are have awarded the contract to commence 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. The Development Plan should consider and support the outcomes of that study.

In looking ahead, Iarnród Éireann believe that the following high-level measures should be a priority for the Development Plan:

- Priority should be given to Public Transport and Active Travel schemes, with a particular focus on high capacity modes, such as rail, which are carbon efficient.
- Continue to expand heavy rail as a high capacity high frequency mode choice in Wicklow with proven ability to attract private car users, as part of a wider GDA integrated mass transit system.
- Promote Transit Orientated Development (TOD) with mixed-use high-density development at key rail nodes and along key rail corridors.
- Develop new rail stations in line with emerging spatial planning policy, subject to business case evaluation.
- Support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance, and improvement to a high level to ensure a high quality of rail frequency, safety, service, accessibility, and connectivity across Wicklow and the GDA.
- Develop an integrated, user friendly, and highly connected public transport network.
- Expand park and ride capacity at strategically located rail stations to encourage modal shift.

Iarnród Éireann as part of its submission will now outline its priorities for key expansion projects and enhancements to the rail network in Wicklow and the GDA. This section aims to outline why they should be considered for inclusion in the Development Plan.

Despite the impact the public transport sector and the wider economy and society is experiencing with COVID-19, it is imperative that the momentum shift towards sustainable public transport is not lost and that the important development of our public transport network and expansion of rail services continues. Iarnród Éireann believe that these proposals provide the opportunity to strengthen the Development Plan so that it will be fit for purpose well into the future.

### **1. Further DART Network Extensions and Enhancements**

The DART+ Programme will transform the capacity of the rail corridor in Wicklow and the GDA. Iarnród Éireann believe that the revised NTA Transport Strategy for the Greater Dublin Area to 2042 should include provision for a further expansion and enhancement of the DART network in the GDA and wider Eastern Region. The first element of this is the interconnector tunnel known as DART Underground. The DART+ Programme as defined in the Transport Strategy for the Greater Dublin Area '2016-2035' also incorporates the DART Underground Project, which is defined as "an underground rail link through the city centre, allowing DART services to travel through the tunnel, enabling passengers to connect with DART services across the network". DART Underground will facilitate a new sustainable North to West transport link in the key Dublin city centre areas. This will reduce congestion in Dublin city centre as DART+ service levels will now reach new parts of the city directly and without interchange from the surrounding areas, including Wicklow, further enhancing the appeal of the service.



The completion of DART Underground will further expand the electrified network while removing the remaining operational bottlenecks in the Dublin City Centre DART network post-DART+ implementation, particularly on the Northern Line. Passengers will benefit from the creation of additional paths on the Northern line, faster penetration to the key City Centre areas and additional capacity for through running trains on the Maynooth Line to the South-East Line (towards Bray/Greystones). It can facilitate a further modal shift to sustainable public transport as desired by the Development Plan by providing an even more attractive alternative to the private car.

Iarnród Éireann strongly believe that DART Underground is essential in the medium to long-term for the continued development of the rail network for the GDA, post completion of the DART+ Programme as defined in the National Development Plan. The DART+ Tunnel Route Alignment Options and Feasibility Study, currently being undertaken by the NTA, will provide the basis for the progress of an Emerging Preferred Route for a revised DART Underground tunnel. Iarnród Éireann will work with the Authority to ensure that the optimal solution is found for inclusion of the updated Transport Strategy.

The second element of development for the DART is the expansion of the network boundary itself. Iarnród Éireann want to build on the DART+ Programme by extending the DART network further to all areas North, South, East, and West of the GDA incrementally to continue to support compact growth along established rail corridors, promote Transit Oriented Development (TOD). These extensions are also proposed in the context of the environmental consequences of the unsustainable quantum of private cars on Ireland's road network requires 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.

The DART+ Programme and any subsequent network extensions when implemented will also facilitate improved access to/from Wicklow and the Regions. Iarnród Éireann will look at further extending the electrified area across each of the lines and providing enhancements as below:

**a) South Eastern Line**

- Extending electrification between Greystones station and Wicklow station, providing relief to the congested N/M11 through the enablement of greater modal shift with improved service levels. This electrification will also facilitate additional services at Kilcoole station, providing enhanced sustainable mobility options for residents in the areas of Kilcoole and Newcastle.
- To facilitate the above, further infrastructure upgrades to facilitate the expansion of services between Bray-Greystones could be included. The Council's aim under objective CPO 12.22 of draft Development Plan, which states its desire to "continue to work with Iarnród Éireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular, to facilitate all options available to increase capacity through Bray Head and along the coastal route south of Greystones", is welcomed. The development boundaries under CPO 12.23 are also welcomed in this regard.

#### **b) Northern Line**

- Providing four-tracking from Connolly northbound to Clongriffin/Malahide and/or possibly additional tracks further north of Malahide to boost capacity for DART services along with Intercity/Enterprise services between Dublin and Belfast.
- Extending electrification or battery electric services to Dundalk to expand the catchment of lower emission services.

#### **c) Maynooth/M3 Line**

- Providing double-tracking and electrification between Maynooth station and Kilcock station to the west<sup>3</sup>. This provides the dual benefit of boosting the reach of higher frequency DART services while also facilitating more Intercity and outer commuter services through double-tracking.
- Extension of the line from M3 Parkway to the large town of Navan. Iarnród Éireann welcome the reappraisal of the Navan rail Line extension from M3 Parkway by the NTA which is currently ongoing as part of the Transport Strategy review to 2042.

#### **d) Kildare Line**

- Providing four-tracking south of Hazelhatch & Celbridge station (the current outer limit of four-tracking and the DART+ Programme) to Newbridge and/or Kildare Station. This provides the dual benefit of boosting commuter capacity by implementing higher frequency DART services and providing further segregation between fast Intercity services and slower stopping commuter services.
- Providing additional stations to support land-use and demand

Iarnród Éireann believe that the above proposed future expansion and enhancements of the DART network will facilitate sustainable higher-frequency transport links to Dublin City Centre to/from Wicklow, internally within Wicklow, and throughout the Eastern Region. It facilitates further modal shift to sustainable public transport by providing an alternative to the car to more citizens. It will increase the length of electrified lines on the rail network further, so that a consistent, higher-frequency timetable can be operated across more of the network to the benefit of the GDA and Wicklow through the additional accessibility and mobility provided. The Development Plan should support the further expansion of the DART network to 2027 and beyond.

### **2. Increased passenger service levels: Dublin – Gorey / Wexford / Rosslare**

Iarnród Éireann is supportive of improving the level of rail services to and within Wicklow County outside of the DART network. The implementation of the increases in service levels would be facilitated, in part, by DART+. DART+ will unlock service frequency improvements for the South-East region through improved interchange opportunities with enhanced DART services at Greystones station. Both of the below priorities align with Objective CPO 12.24 which supports “the undertaking of a study to assess the feasibility of extending regular rail services to south Wicklow.”

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<sup>3</sup> Note: The DART+ Programme will see double-track and electrification between Maynooth Station and a new Maynooth Depot to the west.

### **Intercity Services**

The Dublin-Rosslare rail line is a key component of the Eastern Economic Corridor. 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 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. Iarnród Éireann's future plans for the Rosslare to Dublin services is to increase services towards a two-hourly all-day pattern, subject to demand levels. The introduction of this level of frequency to Wicklow, Rathdrum, and Arklow stations from Dublin will be dependent on the implementation of DART+ and the facilitation of an efficient interchange with enhanced DART+ services at Greystones station. Improving the service levels on rail will be a positive step towards developing the Eastern Economic Corridor to Rosslare Europort.

### **Outer Suburban Services**

Outer suburban services from Gorey Town will benefit from the increased number of Intercity services planned on the Dublin-Rosslare route mentioned above. More regular departures introduced by clock-face timetabling and infrastructure capacity enhancement as a result of DART+ will benefit the Eastern Region. It is Iarnród Éireann's long-term ambition to increase outer suburban services from Gorey to Dublin to every 20 minutes in peak periods and half hourly off-peak subject to funding and demand levels via an interchange at Greystones.

Iarnród Éireann welcomes that the Council aims to ensure that development takes place at appropriate locations and densities where they are most accessible by sustainable modes and along public transport corridors. Iarnród Éireann believe that the rail services levels proposed will support sustainable compact growth, both commercial and residential, along the rail corridor through Wicklow county.

### **3. Accessibility Programme**

As noted earlier in this submission, 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, or perhaps even no journey, 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 time.

### **4. 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 they are developed and finalised in 2021 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.

#### **5. Development of Multimodal Facilities - Sustainable Interchange Programme**

Iarnród Éireann's Sustainable Interchange Programme enables more sustainable end-to-end journeys to be made by rail. The Sustainable Interchange Programme includes 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 Sustainable Interchange Programme 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 Sustainable Interchange Programme 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 Development Plan should support the implementation of the Sustainable Interchange Programme, which facilitates a number of the outcomes desired in CPO 12.20 and 12.21 in terms of interchange facilities.

#### **6. Park and Ride Strategy**

Linked to the above priority, Iarnród Éireann also wishes to grow the number of strategic Park and Ride sites across the GDA. Iarnród Éireann has seen success of Park and Ride's at sites such as M3 Parkway and believe it is a model that can attract car users, but the benefits of it are contingent on the level demand. Iarnród Éireann is currently engaging with Councils and the National Transport Authority to develop a Park and Ride Strategy, which will be implemented in line with growing demand. The Development Plan should support the implementation of this Park and Ride Strategy when it is agreed by all parties.

#### **7. Electrification**

As noted earlier in this submission, 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 2006, significantly ahead of the EU 2020 target of 20%. There is an opportunity to continue this trajectory. Ireland has the lowest level of electrification across the EU27, meaning it is an area with significant expansion opportunities across the network and key tool to combat increasing transport emissions.

The DART+ Programme will transform the capacity and emissions of the existing lines in the GDA. Iarnród Éireann believe that the Development Plan should include provision for a further expansion and enhancement of the DART network in Wicklow. This will build on the completion of the DART+ Programme.

Intercity electrification also forms part of Iarnród Éireann's long-term strategy to de-carbonise the rail network and provide the benefits of significant journey time savings, improved reliability, enhanced passenger quality and lower operating costs. The Dublin to Rosslare line has potential for this investment in the long-term. There are major sustainability benefits to be gained by electrification of rail services on existing lines, and this will only be further enhanced with the shift long-term towards renewable energy sources. Iarnród Éireann will include the outcomes on Intercity and inter-regional connectivity from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.

## **8. Rail Freight**

The current Transport Strategy for the Greater Dublin Area notes that "given the geographic size of Ireland and the proximity of Dublin Port to the various centres in the GDA, movement by road is, and will continue to be, the dominant mode of freight transfer in the region, and throughout the wider State." Whilst on the whole, this may be the case, Iarnród Éireann believe the case for rail freight is increasing, given the context of climate change and the 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 has 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
- The Strategic Masterplans of Ireland's Port Authorities
- Road Congestion
- Pressure on road freight markets e.g. driver shortages
- Policy, demand, and sectoral analysis being undertaken to establish demand and opportunities for rail freight

Iarnród Éireann believe Wicklow County Council should consider the findings of that report when they are made available. Iarnród Éireann will include the outcomes regarding rail freight from the all-island Strategic Rail Review by DoT/DfI(NI) as part of this priority once they are known.

## **Other Development Plan Points**

### **Protected Structures**

Iarnród Éireann has not received notice of any new structures to be added to the Register of Protected Structures and presume that there are no additions on railway property. Any proposals to add railway structures, including but not limited to bridges, to the Register of Protected Structures should be notified to the Senior Track and Structures Engineer, Iarnród Éireann, Pearse Station, Westland Row, Dublin 2 D02 RV00.

### **Proposals on rights of way**

It is noted in chapter 18 section 18.5 that Wicklow County Council again propose adopting Proposed Rights of Way PROW5 and PROW6. It is also noted that Tables 18.3 A and B states that PROW5 and PROW6 are subject to current legal challenge. The proposals for PROW5 and PROW6 in the 2021-2027 Draft Development Plan are ostensibly the same as those proposed for the 2016-2022 Development Plan as far as their impact on railway level crossings are concerned. With this in mind enclosed are CIÉ's/Iarnród Éireann's submissions of March and August 2016, the issues contained within being still relevant on this issue. Iarnród Éireann's objection to these Proposed Rights of Way being adopted still remains and the legal challenge is still pending. Iarnród Éireann would still seek for PROW5 and PROW6 to be removed from the Draft Development Plan until such a time as there are firm proposals concerning how pedestrians are to access the Proposed Rights of Way without using level crossings. Iarnród Éireann would welcome constructive engagement from the Council on this issue.

### **Reopened Stations**

It is noted under CPO 12.23 that Council aim to "ensure that possibilities for improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements."

Iarnród Éireann is not aware of plans presently to reopen any closed stations along the Dublin-Rosslare rail corridor through Wicklow or to progress developments which could potentially strengthen such business cases. That said, Iarnród Éireann would welcome engagement with the Council and any parties proposing such projects. It is important to point out that due to Iarnród Éireann's financial position we are unfortunately not in a position to self-finance any capital infrastructure works (including new and reopened stations) from our own funds and that we are entirely dependent on third party funding via the NTA or the Exchequer for any capital infrastructure works to the railway. Iarnród Éireann will itself ensure that no action is undertaken which would preclude any future reopening of stations in Wicklow. These will need to be funded by third parties and meet the conditions required in Appendix B, which apply to all rail infrastructure project proposals

### **Impact of COVID-19**

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 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, still remain unclear, but are reasonably expected to last a number of years.

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, Iarnród Éireann will continue to focus on rebuilding customer confidence in our services and develop flexibility and adaptability in our longer-term rail development plans 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, resetting people's method of travel and mindset, and the promotion and priority of sustainable transport by the Council can be a key driver for the recovery of growth, thus making its inclusion a priority in the Development Plan. The continued development of a sustainable integrated transport network for Wicklow and the wider GDA can be a springboard to economic recovery through the jobs it creates during its implementation, and it sustains post-completion.

### **Concluding Comments**

It is clear to us, that an essential pillar of any modern country is a sustainable public transport network, and the draft Development Plan provides a solid foundation to support an increase rail capacity on an incremental basis, facilitating commuter and Intercity rail passenger growth to support Wicklow and Ireland's growth ambitions to 2040 and beyond. This increase will have a dual benefit of boosting the wider recovery from COVID-19. Prior to COVID-19 the GDA transport network was struggling to facilitate the demands asked of it, if long-term economic growth is to be regained and sustained then investment in rail should be a priority.

The priorities identified in this submission, combined with the active projects and programmes ongoing, such as the DART+ Programme, will allow rail travel to meet the potential it offers in facilitating the projected population growth in the National Planning Framework for Wicklow and the Eastern Region. It is essential that the pre-COVID-19 mindset shift towards public and active transport is not lost, and that the private car does not become the first choice for citizens in the recovery from the pandemic.

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

Yours sincerely,



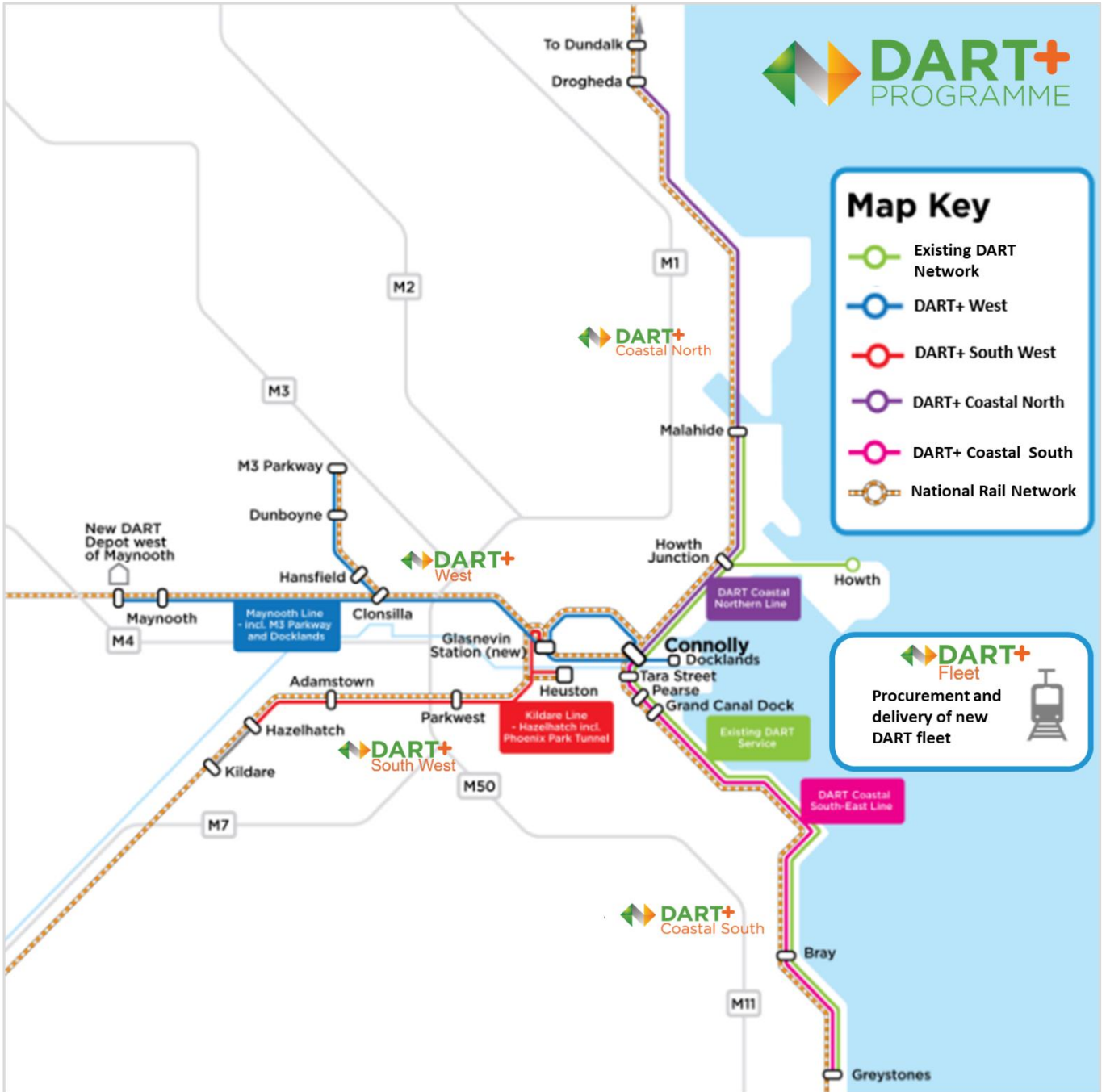
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Jim Meade

**Chief Executive**

Appendix A

Extent of DART+





## **Appendix B**

### *Conditions for Rail Infrastructure Scheme Funding*

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 National Transport Authority's Regional Modelling System or TII's National Transport Model (NTpM) is required as an input to the Business Case
- the project must be fully funded by 3rd party finance