



All Island Strategic Rail Review: consultation

Consultation response by The Consumer Council

21 January 2022

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1. Executive Summary

1.1. The Consumer Council welcomes the opportunity to respond to the All Island Strategic Rail Review. We recognise the policy objectives of the review as being desirable outcomes for consumers. The key points we wish to make are:

- Consumers must be engaged with from the outset, and throughout, on any action that results from this review.
- There must be a cost benefit analysis of any proposals that result from this review and the allocation of costs must be just and fair to consumers.
- Any proposals coming from the review must contribute to the decarbonisation of transport.
- Rural accessibility to rail must be addressed within an integrated transport network.
- There must be a coordinated and joined-up approach across all levels of government in Northern Ireland and the Republic of Ireland.
- The project should be guided by best practice from other jurisdictions.
- Changes to travel patterns caused by Covid-19 must be considered.

2. About us

2.1. The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland (NI). The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

2.2. The Consumer Council welcomes the opportunity to respond to the Department of Infrastructure (DfI) and Department of Transport (DfT) consultation on the All Island Strategic Rail Review.

3. Consumer Engagement

3.1. Consumers are at the heart of the rail network across the island of Ireland. They pay for the network in both fares and government taxes in the form of rail subsidies. The amount they use the railways determines its success.

3.2. Currently Northern Ireland is highly car dependent, with over 70% of all journeys made by car, and 82% of the total distance travelled per person is by car. Therefore a significant change in travel behaviour will be required to increase the use of the railways. This will require “buy-in” from consumers. Our research shows that lower fares can make public transport more attractive but unless it is also convenient consumers will continue to favour private vehicles. Improvements in infrastructure that can increase the convenience of rail will therefore play a part in making public transport more attractive to consumers.

3.3. However convincing consumers to abandon their cars will not be easy. Recent research by the Consumer Council¹ found that 75% of Northern Ireland residents with access to a vehicle reported that a car or van is a more convenient method of transport over bus or rail services. Furthermore

¹ Older persons transport and Covid, February 2021.

our research shows that of those older people (55+) with access to a car, 46% say there is nothing that would encourage them to use public transport instead of a personal vehicle.

- 3.4. Throughout the lifetime of any action/projects that come out of the review, it will be important to have a strong understanding of consumer attitudes and to undertake consumer engagement. This will provide robust information to assess the appetite of consumers for an enhanced rail network and their willingness to pay for it. It will provide an understanding of their priorities and what policy interventions could drive consumer demand for an enhanced rail network.
- 3.5. Consumer engagement needs to be a two way process. It should gather the views and experiences of consumers whilst at the same time making it easier for consumers to embrace change by demonstrating the benefits of, and providing leadership towards, an established policy goal.

4. Accessibility

- 4.1. It is essential that public transport services in Northern Ireland offer transport options which are easily accessible to everyone. The Consumer Council recently explored the views of consumers on buses and trains being accessible for everyone.² The findings show:
 - Accessibility (for people with reduced mobility/older/disabled passengers) was important to most respondents (78%).
 - Those with a disability were more likely to use public transport at least monthly (64%) compared to those who do not have a disability (51%).
 - 96% of respondents said it was important for them that everyone (including older people, disabled people, people with prams and young children) are able to travel easily on buses and trains.
- 4.2. It is therefore important that engagement should take place with organisations that represent Section 75 groups, rural dwellers, people who are disabled or chronically sick and those on low incomes to ensure to ensure their needs are met.

5. The cost and benefit of increased connectivity

- 5.1. While the benefits of making specific line improvements (for example reopening certain regional lines or enhancing existing lines) may only provide direct benefits to a limited group of consumers, there will also be wider economic and social benefits to be accrued to Northern Ireland. These wider benefits will be seen in better connectivity between regions and cities, which will boost economic activity, create jobs, increase tourism and connect people. We strongly support these objectives as they will benefit all Northern Ireland consumers.
- 5.2. The extent of these benefits needs to be quantified as far as possible in a cost-benefit analysis, the results of which should be made public. Policies, projects and infrastructure developments must be seen to benefit consumers and those that can be undertaken at low or no cost should be prioritised. The cost of enhancing the network must avoid an unfair or disproportionate financial burden to consumers, particularly those in vulnerable circumstances.

² Survey of public transport users, September 2021

6. Decarbonisation

- 6.1. Given that the UK is committed to a legally binding target of net zero emissions by 2050, decarbonisation should be seen as an overarching requirement for the Strategic Rail Review. The Consumer Council is unambiguous in its view that achieving this target is essential for long-term consumer protection. Decarbonisation is one of four consumer priorities we have identified in our Corporate Plan 2021-2024, and which we will address through annual forward work programmes.
- 6.2. While achieving net zero is essential for long-term consumer protection, reaching the target must not create undue consumer detriment and, if the outworkings of decarbonisation strategies such as the Strategic Rail Review prove unaffordable, it is unlikely the goal will be achieved.
- 6.3. We recognise that the transport sector is a key consumer of energy and has become the largest contributor to UK domestic greenhouse gas (GHG) emissions. In Northern Ireland it accounts for 33% of energy consumed and 23% of GHG emissions. Rail transport is an environment-friendly way to travel. Taking a train instead of a car for medium-length distances would cut the emissions produced by approximately 80%.³
- 6.4. The decarbonisation of transport by increasing the use of rail travel will require significant modal shift from private cars. It is important to acknowledge the high level of behavioural change that this will require of consumers, and the low levels of consumer awareness and understanding that currently exists regarding the impact the transition to low carbon technologies will have on their lifestyles. Encouraging behavioural shifts will require meaningful engagement with consumers, and public information and attitudinal change campaigns.
- 6.5. It is widely recognised that the infrastructure upon which rail operates presents an opportunity for further carbon reduction, by a balance of cost effective electrification that is coupled with targeted deployment of battery and hydrogen technology. The UK Government, in its strategy document Decarbonising Transport – A Better, Greener Britain, states that “electrification – a proven, existing technology – is likely to be the main way of decarbonising the majority of the network.
- 6.6. It goes on to say that “electrification does not merely decarbonise existing rail journeys; it has a clear record of attracting new passengers to rail, the so called ‘sparks effect’, thus also decarbonising journeys previously done by road.” Therefore if an enhancement of the all island rail network is to contribute as fully as possible to decarbonisation and also attract new passengers, it should consider electrification and the use of alternative fuels such as hydrogen.

7. Rural and Regional accessibility

- 7.1. We support the goal of the review to improve accessibility to give people in rural and regional areas better access to economic opportunities, health, education, and civic services. However, we note that inter-regional accessibility, connections between regional hubs, and rural accessibility, connections within rural areas or between rural areas and regional centres, are distinctly different goals that may not always align.
- 7.2. The consultation paper highlights the current low level of rail connection in Northern Ireland. However, rural accessibility requires more than just providing a rail connection. It also requires an

³ [Which form of transport has the smallest carbon footprint? - Our World in Data](#)

integrated network of affordable and convenient public transport that connects the railway station to the rural community. Our research shows that the low frequency of public transport services means it is not currently a viable or convenient option for many rural dwellers to depend on and this is contributing to the high level of car use in Northern Ireland.

- 7.3. It is important to consider the “final mile” of the journey, as building a train station will still require some form of transport to the final destination of most passengers. This should incorporate public bus or community transport in rural areas, towns, and cities, with additional prioritisation of active travel in towns and cities where distances are short enough to accommodate such modes of transport.
- 7.4. As not all rural services are cost effective, to achieve the rural network that consumers want will require integration of rail services with that of other service operators, such as public bus and community transport organisations. The review should therefore consider how existing and new forms of transport can be integrated into the rail network to provide a comprehensive transport network that is convenient and affordable as well as sustainable.
- 7.5. Rural transport accessibility must be a key objective of the review and engagement with rural consumers is also essential. This is of particular importance as rural consumers may not gain direct benefits from improvements schemes. In some instances they could be negatively impacted by the development of new infrastructure running through their locale but not directly available to them, and they may perceive the environmental impact of new infrastructure in their area as outweighing the regional benefits.

8. Governance

- 8.1. There must be a coordinated and joined-up approach across all levels of government in Northern Ireland and the Republic of Ireland and at central and local Government. A failure to coordinate and drive delivery could lead to consumer detriment. It is important that the objectives and indicators in any proposals coming from the All Island Strategic Rail Review and the DfI regional and sub-regional transportation plans align.
- 8.2. As the project develops it should examine the experience of rail enhancement projects in other jurisdictions and be guided by international best practice.

9. Covid-19

- 9.1. Transport is one of the sectors most effected by the Covid-19 pandemic. The review should consider the impact that the change in travel patterns due to home working and the increase in online shopping will have on how people choose to travel in the future and the long term demand for transport.

10. Conclusion

- 10.1. The Consumer Council welcomes the opportunity to respond to the All Island Strategic Rail Review. We recognise the policy objectives of the review as being desirable outcomes for consumers. We ask that the points we make are given consideration and would welcome the opportunity to engage further with DfI and the DfT on this project.

11. Contact Details

- 11.1. If you require more information please contact Richard Williams – Head of Policy (Transport), on 029 9025 1649, email: Richard.williams@consumercouncil.org.uk.



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