



All-Island Strategic Rail Review – Consultation on Draft Report

Response by the Consumer Council

29 September 2023

CONTENTS

1.	EXECUTIVE SUMMARY	2
2.	ABOUT US	3
3.	RESPONSE TO CONSULTATION	5
4.	CONCLUSION	9
5.	CONTACT DETAILS	9

1. EXECUTIVE SUMMARY

The role of the Consumer Council is to promote and safeguard the interests of all consumers in Northern Ireland. We welcome the opportunity to respond to this consultation on the Draft Report of the All-Island Strategic Rail Review.

Our full response is set out in Section 3. In summary:

- The Consumer Council supports the goals and objectives and welcome the potential of up to 700,000 more people living within 5km of a railway station.
- Consumer engagement will continue to be crucial to understand what their priorities are and what policy interventions could drive consumer demand for an enhanced rail network.
- Service availability, cost and ability to integrate with other modes of transport will be key to passengers switching from road to rail.
- The focus on decarbonisation throughout the draft report is welcome.
- There should be an increased focus on accessibility. Making rail infrastructure and services truly inclusive and accessible should be a specific recommendation.
- We support the recommendation to deliver direct airport rail links for Dublin, Belfast, and Shannon and to improve existing rail-airport connections. This would provide a wider choice of transport options and widen opportunities for consumers.
- It is positive to see a recommendation committing to invest in improving integration within rail and between rail and other transport but we would welcome further, detailed information on plans for integration with other forms of transport. This is particularly important in the context of rural consumers and the “final mile” between the station and the consumer’s final destination.

2. ABOUT US

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

We are an insight-led, evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

Our non-statutory functions educate and empower consumers against unfair or discriminatory practices from financial services to private parking charge notices. Our interpretation of The Order gives us powers to tackle financial exclusion in Northern Ireland by working with The Executive, UK Government and regulators to influence policy and empower consumers through education and increased awareness.

Article 5(1) of the Order requires the Consumer Council to: “consider and, where it appears to it to be desirable, make recommendations with respect to any matter affecting road or railway passenger transport services and facilities in Northern Ireland and services and facilities provided for passengers travelling to and from Northern Ireland.”

We undertake this function by working in partnership with the NI Government, Translink, Northern Ireland air and ferry port operators, airlines, ferry companies and other stakeholder organisations. We handle complaints against transport service operators and use these, along with research, to inform our recommendations.

We are a designated super-complaints body set up under the Enterprise Act 2002 and the Financial Services and Markets Act 2000 Order 2013. Under both these Acts, the Consumer Council can, if we believe a market in UK is, or appears to be, significantly harming the interests of consumers, raise a super-complaint on behalf of consumers to a number of regulators including the Civil Aviation Authority (CAA).

We are also a designated body under the Rural Needs Act 2016 and Section 75 of the Northern Ireland Act 1998. In this role, we aim to ensure government policies recognise consumer needs in rural areas and promote equality of opportunity and good relations across a range of equality categories. Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

We use a set of eight guiding principles (Figure 1) developed by the United Nations to:

- assess where the consumer interest lies; and
- develop and communicate our policies, interventions and support.

These provide an agreed framework through which we approach regulatory and policy work.

Figure 1: Guiding Principles



The principles ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

They serve and protect consumers and set out the minimum standards expected from markets when delivering products or services, including in digital markets, in Northern Ireland. They also frame our policy position and approach to resolving consumer disputes with industry, offering a straightforward checklist to analyse and validate outcomes, in particular vulnerable groups.

In considering the interests of consumers, (including those who are disabled or chronically sick, of pensionable age, low incomes and live in rural areas), we have viewed this consultation through the lens of four of the Consumer Principles:

- **Access** - can consumers get the goods and services they want?
- **Choice** - does the proposal provide a choice for consumers?
- **Fairness** - are some consumers unfairly discriminated against?
- **Representation** – do consumers have a say in how goods or services are provided?
- **Safety** - does the proposal impact on consumer health, welfare or safety, or wider sustainability?

3. RESPONSE TO CONSULTATION

3.1 Consumer Engagement

It is unclear from the document as to how much consumer engagement has already taken place beyond the feedback received from the initial consultation. It will be crucial throughout the lifetime of implementing the recommendations to have a strong understanding of consumer attitudes. Consumer engagement 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.

Consumer Council research found 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.¹ It is therefore important also to understand consumer attitudes to win over “hearts and minds” towards increasing the use of railways.

This is linked to the Consumer Principle of representation.

3.2 Increasing the use of public transport

Service availability, cost and ability to integrate with other modes of transport will be key to passengers switching from road to rail.

In our recent research consumers said that they should not be dissuaded from using their cars until they have viable public transport alternatives. The frequency of rural services, and services between major towns and Belfast, needs to be improved. Public transport needs to be flexible to people’s needs, rather than putting people to inconvenience by having to fit their journey needs around inflexible services. It also needs to be affordable for all.² Consumers want investment in better infrastructure and improved public transport networks but these must be frequent, conveniently located and reasonably priced for them to switch from using their private car.³ A new rail network will not work if it does not meet these requirements.

This is linked to the Consumer Principles of access and choice.

3.3 Decarbonisation

It is notable that decarbonisation is an overarching objective throughout the draft report. The time horizon for the Review covers the period from this year to 2050 to align with both jurisdictions’ stated goals of achieving net zero carbon emissions by this milestone.

The Consumer Council Corporate Plan 2021-24 identifies decarbonisation as a key consumer priority.⁴ Decarbonising Northern Ireland's transport sector is important to not only assist in tackling climate change but also to improve air quality.

In Northern Ireland:

¹ [Older persons transport and COVID - Consumer Council research](#)

² [Decarbonisation of Transport 2023 - Consumer Council research](#)

³ [Future of Transport - Consumer Council research](#)

⁴ [Consumer Council Corporate Plan 2021-24](#)

- Transport accounts for 33% total greenhouse gas emissions,⁵ and the biggest contributor is the private car.⁶
- Transport emissions rose by 3% in 2021 which was reflected most in private car use.⁷
- Most journeys continue to be made by private car (69%) whilst overall walking, cycling and public transport use has barely changed.⁸
- Around 900 deaths per year are attributable to air pollution.⁹

The recommendation to include an electrified intercity network, as well as to provide hybrid and electrified stock in the medium term, is particularly welcome. In our response to the original consultation, the Consumer Council emphasised that electrification was likely to be the main way of decarbonising the majority of the network.¹⁰ We would also urge a firm commitment to the use of hydrogen fuels as early as possible.

This is linked to the consumer principle of safety.

The document acknowledges that effort is needed to encourage the modal shift towards public transport. Recent Consumer Council research found that, whilst the car continues to be the dominant mode of travel in Northern Ireland and many rely on it, a significant number of consumers are starting to think, plan or have already started using public transport for the first time.¹¹

3.4 Accessibility

Certain disabled persons rely on trains for the better access they provide for those in larger size wheelchairs, partially sighted people and people with guide dogs. The lack of toilet facilities on buses can also be a large factor for people with disabilities choosing to travel by train. The widening of the network will therefore provide more choice for disabled travellers.

It is, however, crucial that rolling stock and rail infrastructure is step free, inclusive and accessible to all. Whilst the report states that there are opportunities for “improving accessibility of the railway, particularly for those with mobility needs”, we are concerned that there is no specific recommendation on improving accessibility.

A firm commitment to making the service truly inclusive and accessible is necessary. Engagement should also 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.

This is linked to the Consumer Principles of access, choice, fairness and representation.

⁵ [Energy Strategy for Northern Ireland](#)

⁶ <https://www.belfasttelegraph.co.uk/news/environment/climate-change-northern-irelands-love-affair-with-the-car-is-poisoning-very-air-we-breathe/41433769.html>

⁷ <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/NI%20Greenhouse%20Gas%20Statistics%201990-2021-Report.PDF>

⁸ [The Travel Survey for Northern Ireland 2021](#)

⁹ [Air Pollution and Mortality on the island of Ireland - TCD news](#)

¹⁰ [All Island Strategic Rail Review Consultation - Consumer Council response](#)

¹¹ [Decarbonisation of Transport 2023 - Consumer Council research](#)

3.5 Airport and Ferry rail links

We welcome the recommendation to deliver direct airport rail links for Dublin, Belfast, and Shannon and to improve existing rail-airport connections. This would provide a wider choice of transport options and widen opportunities for consumers. Our research has found that consumers think transport links to airports in Northern Ireland are poor, with many contrasting the ease of travel to Dublin airport with difficulties getting to Belfast International or Belfast City airports. Just 39% of consumers agreed that there are good public transport services to airports in Belfast and Derry/Londonderry.¹² Comments from focus groups included:

“You can get a direct bus from the city to Dublin airport, but if you are going to Belfast airports it is more awkward. Take Belfast City Airport, you can get a train to Sydenham but it is still a trek to the airport from there with you cases up and over the footbridge.”

“You can travel direct to Dublin airport from Belfast for 15 euro but from Derry that only takes you as far as Ballymena or Antrim or you go on into Belfast and then back out again.”

This is linked to the Consumer Principles of access, fairness and choice.

We note the recommendation to develop a sustainable solution for first-mile last-mile rail access for Dublin Port. Whilst a rail link to Belfast Port was considered, it was rejected on the grounds that “developing new rail links would be very costly and disruptive and would encourage freight traffic to use parts of the railway that are already quite congested”.

Whilst we appreciate these arguments, Belfast Port is currently difficult to access by public transport and the need to encourage consumers to switch from private car to meet next zero carbon emission targets will require innovative solutions. Integrating different modes of public transport, including rail, into a seamless end to end journey, supported by digital booking and journey planning will be one of these solutions.

Regarding freight, the railway potentially provides a sustainable transport solution compared to roads and this review presents an opportunity to integrate Belfast Port into the all-island rail network.

3.6 Rural and regional accessibility

We note plans to reinstate the railway between Portadown, Dungannon, Omagh, Strabane, Derry/Londonderry and Letterkenny. This will provide people in these areas with more choice and better access to economic opportunities, health, education, and civic services. Consumer Council research found that 78% of respondents believed that the rail network should be expanded into other parts of Northern Ireland.¹³

In our response to the initial consultation we said that rural accessibility requires not just a rail connection but also an integrated network of affordable and convenient public transport that connects the railway station to the rural community. In this context, we are also pleased to see a specific recommendation to “integrate bus service and rail service timetables to connect communities where direct rail access proves to be unviable”.

¹² [Future of Transport - Consumer Council research](#)

¹³ [Future of Transport - Consumer Council research](#)

Given that not all rural services are cost effective, we believe the recommendation should go further and integrate other transport operators such as community transport and promotion of active travel to provide a comprehensive transport network that is convenient and affordable as well as sustainable. This is particularly necessary for the “final mile” of the journey as passengers are still likely to require another mode of transport to their final destination. Consumer Council research found that the public sector should play a prominent role in the development of “MaaS” – the integration of transport and transport-related services into a single, comprehensive, and on-demand mobility service.¹⁴ This is crucial for rural consumers - living in a rural area is the most common reason why consumers believe it would be difficult to reduce their use of private cars.¹⁵

Ongoing engagement with rural consumers will continue to be essential. It will be particularly important in instances where they could be negatively impacted by the development of new infrastructure running through integration of transport and transport-related services into a single, comprehensive, and on-demand mobility service 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.

This is linked to the Consumer Principles of access, fairness and choice.

3.7 Cost/benefit analysis

An eight-stage process was undertaken to develop a final package of recommendations. This included an initial multi criteria assessment of the packages against the Review’s Goals and Objectives. An economic appraisal was then carried out on the packages developed through the process and a breakdown of the monetised benefits and costs generated by this appraisal is included in the document.

Whilst it is useful to see the results, we note that some interventions could not be quantitatively assessed – these included actions relating to customer services. It is important that consumers are aware of exactly how they can benefit from the recommendations and that those that can be undertaken at low or no cost should be prioritised. We reiterate that the cost of enhancing the network must avoid an unfair or disproportionate financial burden to consumers, particularly those in vulnerable circumstances.

This is linked to the Consumer Principle of information.

3.8 Governance

We would reiterate our comments from the previous consultation response that there is a need for 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.

It will also be important to build on the experience of rail enhancement projects in other jurisdictions and be guided by international best practice. In this context it is positive that a

¹⁴ [Transport integration and MaaS \(Mobility as a Service\) – Consumer Council research](#)

¹⁵ [Future of Transport - Consumer Council research](#)

number of case studies are referred to throughout the document, for example Denmark's experience of implementing a rail review.

3.9 COVID-19

The document states that in 2022, both Iarnród Éireann and Translink recorded 70% of pre-pandemic demand. However, we believe that further consideration should be given to the impact that the change in travel patterns due to home working and the increase in online shopping are having on how people choose to travel in the future and the long term demand for transport.

4. **CONCLUSION**

The Consumer Council welcomes the opportunity to respond to the All Island Strategic Rail Review Draft Report and would welcome the opportunity to engage further with DfI and the DfT on this project.

5. **CONTACT DETAILS**

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



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