**Plean Forbartha Áitiúla Chomhairle Ceantair
an Iúir, Mhúrn agus an Dúin 2035
Newry, Mourne and Down District Council
Local Development Plan 2035**

Draft Plan Strategy Representation Form

**Comhairle Ceantair
an Iúir, Mhúrn
agus an Dúin
Newry, Mourne
and Down
District Council**

Please complete this representation form online and email to **ldp@nmandd.org** or alternatively print and post a hardcopy to: -

**Local Development Plan Team
Newry, Mourne and Down District Council
Downshire Civic Centre
Downshire Estate, Ardglass Road
Downpatrick BT30 6GQ**

ALL REPRESENTATIONS MUST BE RECEIVED NO LATER THAN 5PM ON MONDAY 22 SEPTEMBER 2025

Section A | Your Details

Q1 Are you responding as individual, as an organisation or as an agent acting on behalf of individual, group or organisation? *Please only tick one:*

- ✔ **Individual** *(Please fill in the remaining questions in this section, then proceed to Section B)*
- ☐ **Organisation** *(Please fill in the remaining questions in this section, then proceed to Section C)*
- ☐ **Agent** *(Please fill in the remaining questions in this section, then proceed to Section D)*

Q2 What is your name?

Title ■

First Name ████ Last Name ████

Address ████████████

████████

████████████

Email ████████████

Q3 Did you respond to the previous Preferred Options Paper?

☐ Yes ✔ No ☐ Unsure

Section B | Individuals *(if different to Q2 above)*

Address: as above

Town: _____ Postcode: _____

Section C | Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you.

If you are responding on behalf of a group or organisation, please complete this section.

Organisation / Group Name	n/a
Your Job Title / Position	n/a
Organisation / Group Address *(if different to above)*	n/a
Address	n/a
Town	**Postcode**

Section D | Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you.

Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title	n/a		
First Name	n/a	**Last Name**	n/a
Address	n/a		
Town		**Postcode**	

Q4 Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP? (*please select one item only*)

☐ **Agent**   ☐ **Client**   ☐ **Both**

Section E | Soundness

The draft Plan Strategy will be examined at Independent Examination in regard to its soundness. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section I.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be unsound having regard to the soundness tests in Section I. It is important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the draft Plan Strategy should also state whether they wish to be heard orally at the Independent Examination.

Section F | **Type of Procedure**

Q5 Please indicate if you would like your representation to be dealt with by (*please select <u>one</u> item only*):

✔ **Written** *(Choose this procedure to have your representation considered in written form only)*

☐ **Oral Hearing** *(Choose this procedure to present your representation orally at the public hearing)*

Unless you specially request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only. Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those dealt with by oral hearing.

Section G | **Is the draft Plan Strategy Sound?**

Your comments should be set out in full. This will assist the Independent Examiner in understanding the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

If you consider the draft Plan Strategy to be Sound and wish to support the draft Plan Strategy, please set out your comments below.

My comments in this submission focus on the proposed Settlement Hierarchy (SETT1).

I do find the proposed Settlement Hierarchy to be broadly sound, however I present some apparent errors, issues and omissions in the evidence supporting it (Tech Supps 1 & 7B).

I contend that these should be checked and corrected if necessary, as this would increase the robustness of the evidence base and the conclusions and decision making that can arise from it.

I also explore half a dozen topic areas where I suggest that the implementation and effectiveness of the Settlement Hierarchy (and the strategies and polices which it underpins) could be undermined either due to misalignment of other NMDDC policies, or of the policies and practices of third party organisations (the Roads Service, Royal Mail, Translink, and EONI). I present some suggestions as to how the issues could be addressed.

Section H | **Unsound**

In this section we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note:
If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately. Complete this page in relation to one part of the draft Plan Strategy only.

Q6 If you consider that the draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

Development Plan Practice Note 6 Soundness (infrastructure-ni.gov.uk)

Please note if you do not identify a test(s) your comments may not be considered by the Independent Examiner.

Section I | Tests of Soundness

Procedural tests

P1 Has the plan been prepared in accordance with the Council's Timetable and the Statement of Community Involvement?
☑ Yes ☐ No

P2 Has the Council prepared its Preferred Options Paper and taken into account any representations made?
☑ Yes ☐ No

P3 Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?
☑ Yes ☐ No

P4 Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?
☑ Yes ☐ No

Consistency test

C1 Did the Council take account of the Regional Development Strategy?
☑ Yes ☐ No

C2 Did the Council take account of its Community Plan?
☑ Yes ☐ No

C3 Did the Council take account of policy and guidance issued by the Department?
☑ Yes ☐ No

C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining council's district?
☑ Yes ☐ No

Coherence and Effectiveness tests

CE1 The plan sets out a coherent strategy from which its polices and allocations logically flow and where cross boundary issues are relevant is it in conflict with the plans of neighbouring Councils.
☐ Yes ☑ No

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.
☐ Yes ☑ No

CE3 There are clear mechanisms for implementation and monitoring.
☐ Yes ☑ No

CE4 The plan is reasonably flexible to enable it to deal with changing circumstances.
☑ Yes ☐ No

Section J | Which part(s) of the draft Plan Strategy are you commenting on?

Your response should clearly relate to the relevant section, paragraph or policy of the draft Plan Strategy. If you consider more than one part of the draft Plan Strategy is unsound, please number your issues clearly and provide this information in the same running order following your original comment (i.e. relevant Policy, Section or Proposals Map).

Relevant Policy number(s)	Strategic Designation SETT1 - Settlement Hierarchy
(and/or)	
Relevant Section/Page Soumber	Section 5 (pages 64 - 73)
(and/or)	
Proposals Map	Map 3 - the Settlement Hierarchy

Section] | Which part(s) of the draft Plan Strategy are you commenting on?

Please give full details of why you consider the draft Plan Strategy to be unsound having regard to the test(s) you have identified above. Please be as clear and concise as possible.

I consider the Settlement Hierarchy as presented in the Draft Plan Strategy to be broadly sound, however when reviewing Technical Supplement 7B ('Strategic Settlement Appraisal'), I did appear to identify some errors, queries and omissions in the presented evidence. This could constitute a weakness under Coherence & Effectiveness test CE2 ("...founded on a robust evidence base"). Whilst it is likely the majority of these issues would not materially alter the overall strategic approach I do think it would benefit the Plan to have them corrected, lest any of them undermine the decision making process or confidence in it.

Additionally when considering the overall coherence and effectiveness of the Settlement Hierarchy (and the strategies and plans which would flow from it), I have explored half a dozen topic areas (settlement 'welcome signs', Roads Service directional signage, Royal Mail postal addresses, Translink bus route provision, and EONI electoral polling station provision) where I contendthere may be weaknesses when viewed under tests CE1, CE2 and CE3. I make some suggestions for 'clear mechanisms for implementation' which may in part address these issues.

As this submission form does not contain sufficient space, I have supplied my material in an attached document ("Consultation Response: ███████ - SETT1 Settlement Hierarchy.docx").

If you consider the draft Plan Strategy to be unsound, please provide details of what change(s) you consider necessary to make the draft Plan Strategy sound.

- review of errors, inconsistencies and omissions in the evidence base (i.e Tech Supps 1 & 7B) and correction of these of these if they are indeed found to wrong. Corrected PDFs of Tech Supps 1 and 7B could then be published.

For the topic areas of settlement 'welcome signs', Roads Service directional signage, Royal Mail postal addresses, Translink bus route provision, and EONI electoral polling station provision, in my document "Consultation Response: ███████ - SETT1 Settlement Hierarchy.docx" I have set out some suggestions for changes there, under the subheadings 'Solutions (Suggested changes in the Plan)'. (There is not sufficient space to list them all here!)

Section K | Monitoring

Do you consider there are clear mechanisms for implementation and monitoring of the draft Plan Strategy?

Yes ☐   **✓ No**

Do you have any comments?

In general I do have concerns that there are insufficient mechanisms and resources for the implementation and monitoring of the plan. In particular,

it is my understanding that the NMDDC Planning Service does not currently undertake proactive monitoring (i.e. planning officers to not make routine proactive inspections and surveys of the district, to check for unauthorised development and other activities contrary to the policies in the Plan.) Instead the department relies on reports received from residents and other third parties. Residents are often reluctant to get involved in what may be a potential dispute or 'spying on their neighbours', and furthermore residents often lack the skills and experience necessary to search and understand the reference material on the planning portal.

The statistics published in the NMDDC Performance Improvement Plans are also concerning - eg https://www.newrymournedown.org/media/uploads/performance_improvement_plan_2025-26.pdf indicating that the Planning Service has been consistently failing over several years to meet the various targets set (on processing times, etc). The Performance Plan gives a pledge to improve, but does not provide any actual mechanisms, detail or budgetary changes by which this this could be achieved. I feel it would be rash to ignore these performance statistics.

Section L | Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)

Do you have any comments on the SA?

no

Section M | Habitats Regulation Assessment (HRA)

Do you have any comments on the HRA?

☐ Yes   ☑ No

If you have indicated Yes, please set out your comments on the HRA below:

Section N | Equality Impact Screening Report (EQIA)

Do you have any comments on the EQIA?

☐ Yes   ☑ No

If you have indicated Yes, please set out your comments on the EQIA below:

Section O | Rural Needs Impact Assessments (RNIA)

Do you have any comments on the RNIA?

☐ Yes   ✔ No

If you have indicated Yes, please set out your comments on the RNIA below:

Consultation Response:
SETT1 Settlement Hierarchy

I am submitting this write-up as an addendum to my Draft Plan Strategy Representation Form, as there is not enough space on the form to fit all the material below!
This document is available on my personal Google Drive at
https://docs.google.com/document/d/1cloJY4LMLzY4mDWz-7qKrdtzmikphwc03E5OK32VwCM/edit?usp=sharing

Table of Contents

1. Corrections & notes on settlement data in Technical Supplement 7B

Technical Supplement 7B (Strategic Settlement Appraisals), published at https://www.newrymournedown.org/media/uploads/appendix_7b_strategic_settlement_appraisal.pdf is 198 pages long and naturally it contains a large amount of factual detail on settlements in the Newry, Mourne & Down district, which has been used to inform the decision making process for the draft **Strategic Designation SETT1: Settlement Hierarchy** (which is in turn set out in Technical Supplement 1 at https://www.newrymournedown.org/media/uploads/technical_supplement_1_-_settlement_hierarchy_and_strategic_settlement_evaluation.pdf, and then in pages 64 - 73 of the Local Development Plan 2035 Draft Plan Strategy at https://www.newrymournedown.org/media/uploads/nmd_local_development_plan_(ldp)_v11_(24324)_final.pdf)

The large majority of the factual detail in Tech Supp 7B appears to me to be correct, but I have noticed some instances of what appear to be errors. Whilst few of these would materially change the decisions arrived at in the strategy, collectively they could be argued to to undermine the reliability of the evidence base. Coherence & Effectiveness test **CE2** requires the Plan be '...*founded on a robust evidence base*', so it would be desirable if the potential errors I have listed below could be double-checked and corrected if necessary. Page references below are to Tech Supp 7B, with material quoted from that document given in '*italics*'.

Towns

Newcastle

(p.34) <u>Transport Test</u> -
 "*Currently, Newcastle town does not have cycle lanes and cyclists must use the main vehicular road networks.*"
 I do not believe this is entirely correct: there is a mixture of painted cycle lanes and segregated-use pavements along both sides the A50 Castlewellan Road (extending as far north as Burren Meadow) and along both sides of the A2 (as for north as Dundrum Industrial Estate). These were formerly part of Sustrans National Cycle Network route NCN99 before Sustrans de-designated them on safety grounds in 2020 (see https://www.theguardian.com/travel/2020/jul/19/national-cycle-network-sustrans-cuts-quarter-uk-routes-safety-grounds).
The DfI Public Mapping Portal (https://dfi-ni.maps.arcgis.com/home/index.html) includes a DfI Cycle Infrastructure Map (https://dfi-ni.maps.arcgis.com/apps/webappviewer/index.html?id=20156f3224654b56a23d86e21e323c17) which illustrates the provision; in addition to this, I believe the Council permits cycling on the seafront promenade walk? (although this is not explicitly stated on any signage).
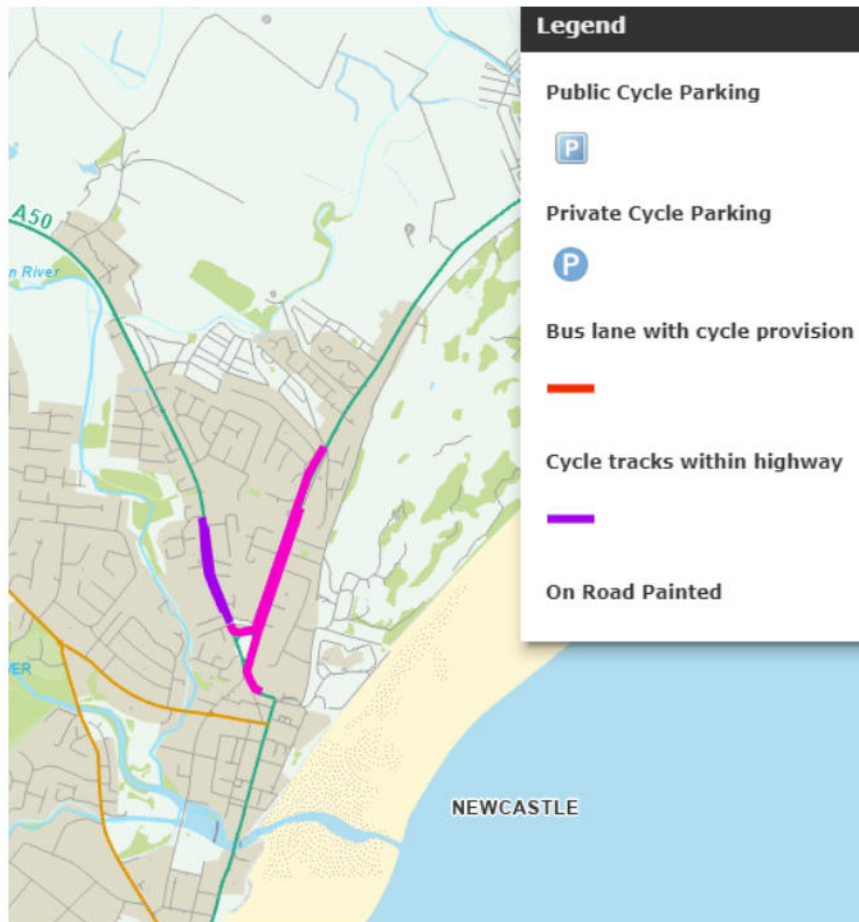
Screenshot from DfI Cycle Infrastructure map, showing provision for Newcastle

Villages

Bessbrook

(p.55) - Transport Test -
"*There are a number of bus stops within the settlement but no cycle lanes are in operation. Within the current Banbridge/Newry & Mourne Area Plan (BNMAP) reference is made to [the] possibility of the disused tramway track bed being used for transport or recreational purposes.*"

The former Bessbrook Electric Tramline between Millvale Road and Craigmore Road has *already* been converted into a high quality traffic-free shared use cycle & footpath! This was formerly designated as part of Sustrans' National Cycle Network route 9 (planned to run from Belfast > Newry > Dublin) but de-designated on 'safety grounds' by Sustrans in 2020. The decision making process behind this de-designation remains opaque (perhaps it was considered too short on its own to be retained, after the connecting on-road sections between it and the Newry Canal towpath were de-designated). I am not certain which body is responsible for maintenance of the path but DfI mapping does not list it as an adopted footway, so I would expect it is maintained by NMDDC.

The route can still be seen indicated on OSNI 1:50,000 mapping (ringed in blue on the screenshot below):
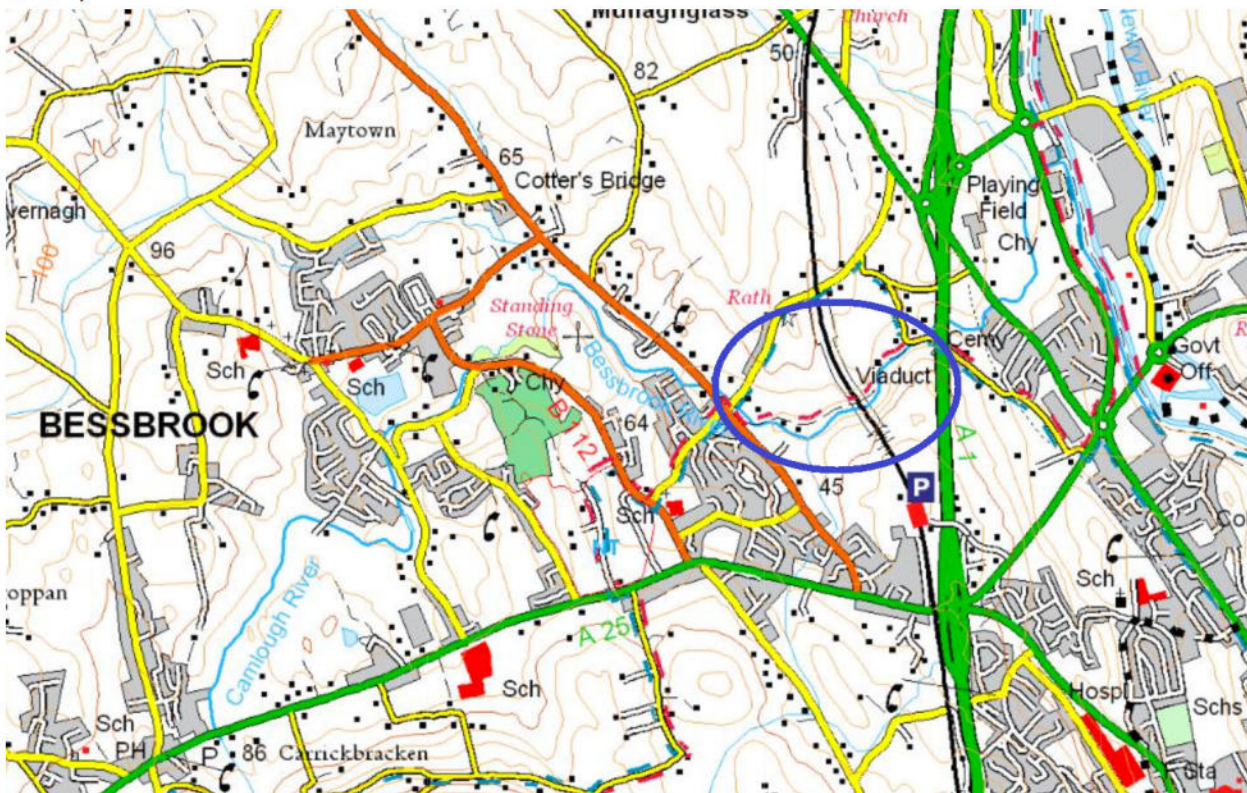
It can also readily be seen on OpenStreetMap (on the CycleMap layer
https://www.openstreetmap.org/#map=16/54.19203/-6.36817&layers=C) - see screenshot overleaf

Draft Plan Strategy - Consultation Response - SETT1 Settlement Hierarchy - submission by ███████
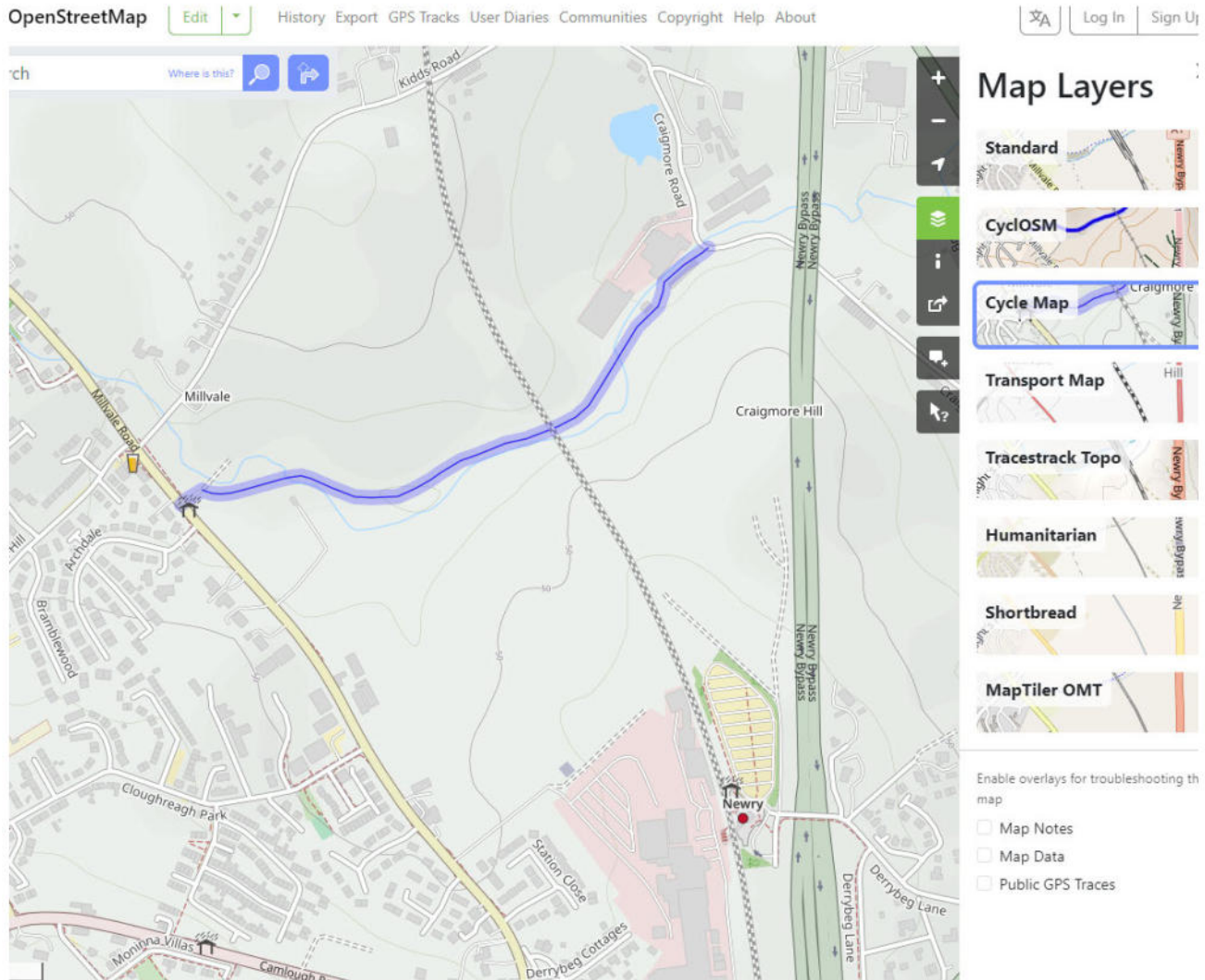
Traffic-free Shared-use cycle/footpath in Bessbrook.

Hilltown

(p.73) - <u>Transport</u> *"There are no pedestrian crossings or traffic lights located within the settlement"*
I believe this statement is out of date: there is now a pelican crossing on Hilltown Main Street.
This can readily be checked on <u>Google Maps Street View</u> where it appears to have been in place since at least 2019. I have included a screenshot below.

Small Settlements

Alnamaken

(p.90) Simply on a point of settlement naming: whether rightly or wrongly, the Royal Mail database spells the name this settlement as **Altnamachin** (see https://www.royalmail.com/find-a-postcode)

Annacloy

(p.92). Simply on a point of settlement naming: the western node of Annacloy is commonly referred to as **Teconnaught**. For example this naming convention is used in NMDDC's own *Annacloy & Teconnaught Village Plan* published in 2018, http://www.newrymournedown.org/media/uploads/annacloy_and_teconnaught_village_plan_2018.pdf

Ballyhornan

(p,99) Again on a point on settlement naming - one of the five nodes that are considered in Tech Supp 7B as 'Ballyhornan' is referred to separately as **Bishopscourt** on Roads Service destination signs - e.g. see the Google Maps Street View screenshot below

Ballynoe

(p.105-106) - *"The settlement consists of two nodes, the northern most node grows from the Ballynoe, Erenagh and Grangicam crossroads and then generally extends northwards in a linear development pattern along the western side of the Ballynoe Road. The southernmost node grows from the junction of the Ballylucas and Ballynoe Roads and generally extends in a northerly direction."*

This is just a point re: settlement naming – consulting Ordnance Survey maps past and present (for instance on https://apps.spatialni.gov.uk/PRONIApplication/), it is the 'southern node' that is consistently (throughout the 19th & 20th century) labelled as a small settlement called 'Ballynoe'; the 'northern node' appears to largely be a post-war development and is consistently labelled as **'Marshallstown'**. For example, the OSNI 1:10,000 from circa 1960s/70s/80s:
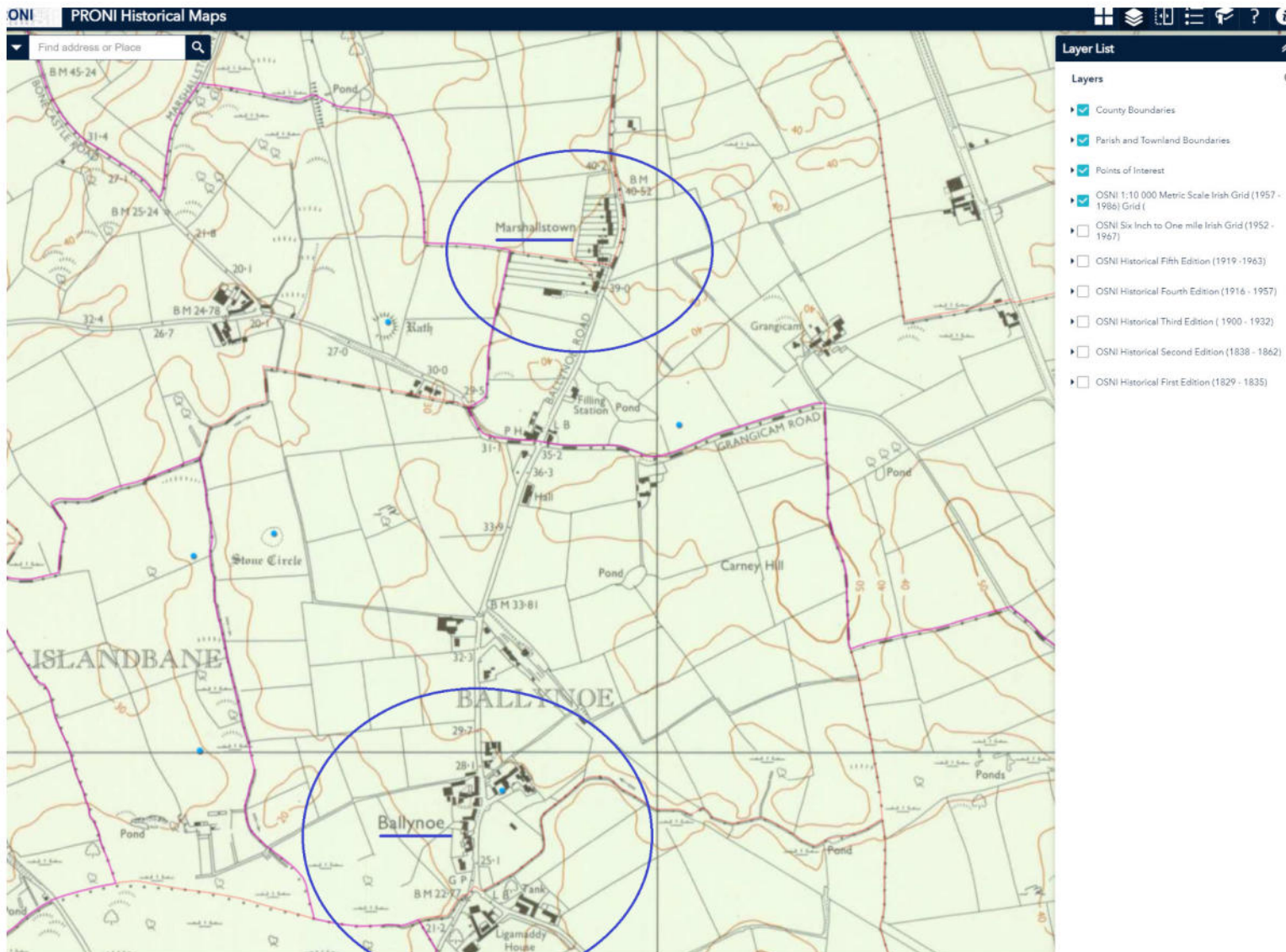
Clonvaraghan

(p121) - reference is made to the '*small hardware store/petrol station*'.
This appears to have ceased trading a few years ago; only a post box remains in use at that site.

Transport: Ulsterbus service 18 previously served Clonvaraghan however there appears to have been a revision of the No.18 route some years ago, it now passes straight along the B175 Ballylough Road and does not make the detour Clonvaragh. (The bus stops at Clonvaraghan are now for school services only).

Creggan

(p.126) - Transport "*A search of Ulsterbus timetables shows that Creggan is not listed as a stop on the Newry-Crossmaglen service. A lay-by typical of a bus stop exists on the main road but there are no signs or bus shelters associated with it.*"

I believe this is incorrect: the layby mentioned does have an associated bus shelter on the other side of the carriageway, the stop is called 'Newry Road' (ATCO code 700000003852 - see https://bustimes.org/stops/700000003819 or the https://www.translink.co.uk/journeyplanner) and is served by the No.42 Newry - Crossmaglen Ulsterbus service.

Dechomet

(p.132) Transport Test: "*There is a bus shelter within the settlement and bus route 27 connects Dechomet with Ballynahinch*".… "*Dechomet does not have a speed limit or footpaths…*"

The DfI have now designated a 40mph speed limit zone along the B7 Rathfriland Road through Dechomet. I believe this was introduced within the last 2 years.
I am not aware of any bus shelter with Dechomet itself (although there are two further north along the B7 road, at the junctions with Slievenaboley and Aughnaskeagh Roads respectively.
It is worth noting that Translink's No.27 bus service only serves Dechomet once per day at present (at approx 7:30am, weekdays during school terms only), so a very limited service - it is not possible to make a return trip to Ballynahinch on the same day!

Drumaroad

(p.134) Resource Test: "*Drumaroad has limited resources consisting of a church, primary school, nursery, playground and shop & post office (temporarily closed).*"

Sadly, Drumaroad Post Office and shop closed permanently in 2021 (see https://www.postofficeviews.co.uk/national-consultation-team/drumaroad-bt31-9pq-183713/supporting_documents/Drumaroad%20BT31%209PQ%20%20Information%20Letter%20Update.pdf)

Dunnaval / Ballyardle

(p.140) - a query re: settlement naming: **Ballyardle** does not appear as a settlement name on OSNI mapping, just as a townland and road name. The proper name 'Packolet' is given but this looks more likely to apply to the large house/estate there (No.1 Ballyardle Road).

Environmental Capacity Test - "*Dunnaval/Ballyardle is located within the Ring of Gullion Area of Outstanding Natural Beauty (AONB).*"
This looks like a typo: Dunnaval is within the <u>Mournes</u> AONB, not the Ring of Gullion AONB.

Finnis

 (p.142) Transport Test: "*Finnis has no bus or train station but is served by route 27 which connects Ballynahinch with Dechomet*" - it is worth noting that the No.27 Ulsterbus only calls at Finnis and Dechomet with a single early morning service, weekdays during school term times only. It is not possible to make a return journey between Finnis & Ballynahinch on the same day (without walking to/from Dromara - roughly a half hour walk along the B7 road, although there is a pavement most of the way)

(p.143) Conclusion: "*Finnis is a compact clustering of a Church, its hall, a primary school, a community building and a <u>public house</u>*" - the James King pub at Finnis (sited at 136 Rathfriland Road) appears to have closed some years ago.

Glasdrumman (Co. Armagh)

(p.144) - nobody seems to be able to agree on how to spell this one :) The sign on the primary school calls it 'Glassdrummond' (see Google Maps Street View screenshot below), as does its website https://www.stbrigidspsglassdrummond.com/, and the church's website https://www.uppercreggan.co.uk/glassdrummond-history.php.
OSNI mapping goes with 'Glasdrumman Road'.

Greencastle

 Technical Supplement 1 still lists Greencastle as a 'small settlement' and does not (page 20) flag it for de-designation back to open countryside, however Tech Supp 7b (p.151) recommends that it should. So there is **a definite discrepancy there that needs corrected.**

Kilclief

 (p153) A point re: settlement naming: The housing development along Bishopscourt Road is also labelled '**Ballycottin**' on some OSNI maps.
'Transport' - "*A scheduled bus service serves the settlement*" - as far as I can tell from Translink's published data, currently there are not any scheduled Translink passenger bus services at Kilclief.

Killeen

(p.159). Welcome signs at the village use the spelling 'Killean' rather than 'Killeen'

 Transport - "*The settlement is served by a bus route 43 (Newry– Carrivemaclone–Forkhill). There are limited buses serving Killeen along this route*" as far as I can tell from Translink's published data, there are not currently any scheduled Translink passenger services to Killeen. The No. 43a Ulsterbus stops at Killean Bridge on the old Dublin Road.

Lislea

(p.168) - Transport "*Although there is a bus shelter on Hall Road adjacent to Redmond's Close, Lislea does not appear in any published timetable*" - I don't think that is correct: Lislea's two bus stops ('Lislea Post Office' and 'Hall Road' are served by Translink's No.42 Ulsterbus service (Newry - Crossmaglen)

Raholp

Just a settlement naming point: another node of this small settlement appears to have the name **Roneystown**, which is a cluster of dwellings on the public right of way (Lecale Way) heading south to Ballystokes. See the OSNI map screenshot below:
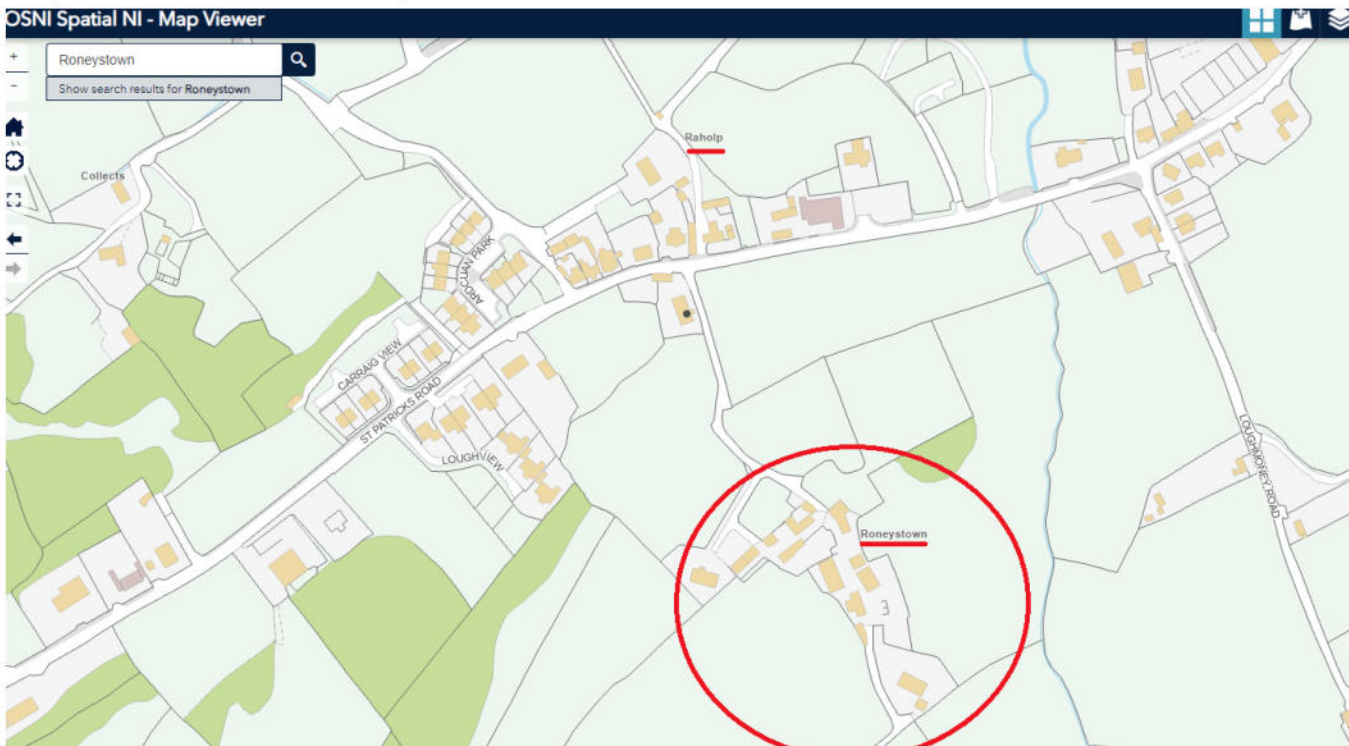
2. Settlements not considered in the Technical Supplement 7B data

There are a number of small settlements in the Newry, Mourne & Down district that are *not* considered in Technical Supplement 7B. They are all small and it is likely that if they were evaluated by the methodology used in that document, they would struggle to make the 'small settlement' tier, and would be classed as open countryside. Nevertheless, in order to avoid doubt in the robustness of the evidence base (consistent with Coherence & Effectiveness test **CE2**), I feel it is desirable that their existence should be acknowledged, evidence for them considered, and a verdict on their status made explicit. Otherwise it is not clear if they have simply been omitted by error.

Triggers for my including them below include:

- The Council has installed settlement name signs for them at the settlement limits.
- The DfI Roads Service has included mention of them on directional road signs.
- They are served by Translink passenger services (and given their own 'fare stage' in Translink route data). I note that it could be of particular relevance to other parts of the Draft Plan if Translink's route provision is not aligned with the current proposed Settlement Hierarchy.
- They are indicated on OSNI mapping.
- Royal Mail explicitly includes them in the 'locality' field of postal address in its Postcode Address File.

I have grouped them below by District Electoral Area; for quick ease of reference I have included links to them on Open Street Map.

Downpatrick DEA

Bright

https://www.openstreetmap.org/node/11093042451

More likely, 'Bright' should just be considered as a townland, but 'Bright Crossroads' on the B176 road is served by Translink's Ulsterbus 16a (Downpatrick - Killough - Ardglass - Ballyhornan), and Bright appears as a destination on Roads Service signs (e.g. see Google Maps Street View screenshot below from the B1 road)

Ballyculter (aka 'Churchtown')

https://www.openstreetmap.org/node/11198467389

Ballyculter is served by Translink route 16e (which makes an explicit detour from its Downpatrick-Strangford route along the A25 to reach it). It has a small cluster of dwellings, a telephone box, a post box, and Ballyculter Parish Church. A village welcome name sign has been erected by the (former Down County?) Council on Churchtown Road (see Google Maps Street View screenshot below)

Ballyhosset

https://www.openstreetmap.org/node/12388235342

A small cluster of dwellings at Ballyhosset crossroads on the B1 road, served by Translink Ulsterbus 16f (Downpatrick - Ardglass). It appears as a destination on Roads Service signs (see Google Maps Street View screenshot below).

# Ballee

https://www.openstreetmap.org/node/12382357339
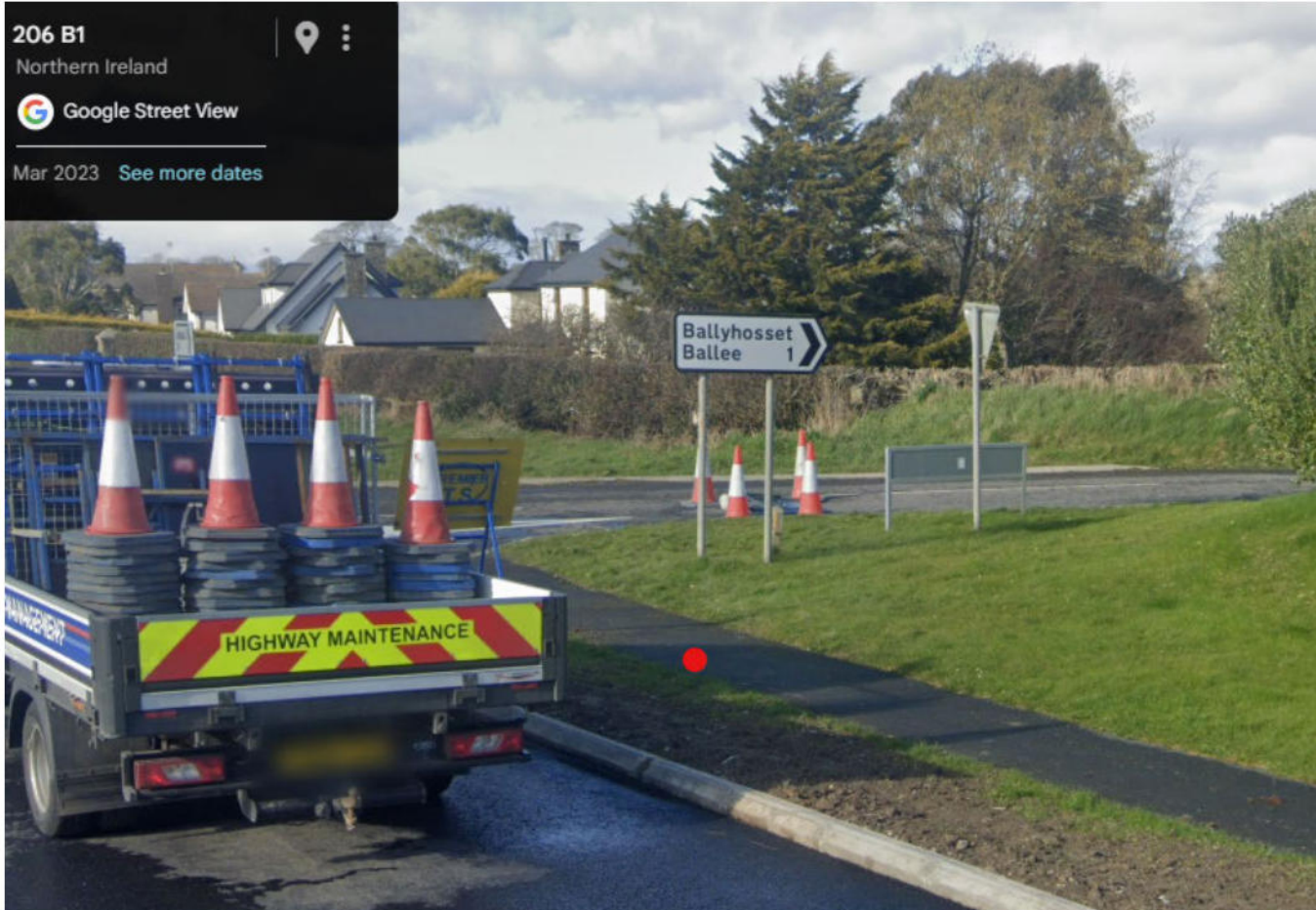
More likely, Ballee should just be described as a townland with a church, but it appears as a destination on Roads Service route signs (e.g. see the Google Maps Street View screenshot from the B176 Bright Crossroads, below)

Minerstown

https://www.openstreetmap.org/node/10098046572

A small cluster of dwellings on the A2 Minerstown Road, it features a pub and caravan park. The Roads Service have included it as a destination on road signs (eg. see the Google Maps Street View screenshot below).

Rossglass

https://www.openstreetmap.org/relation/4589399
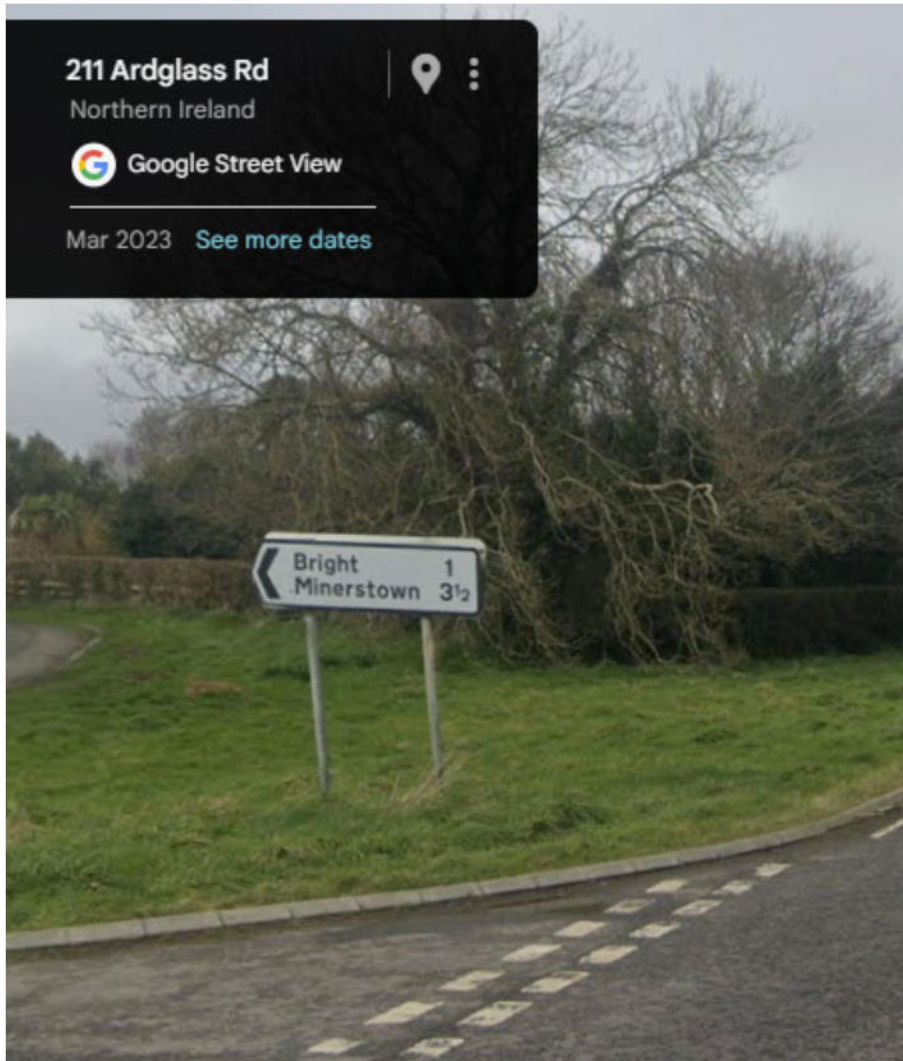
Situated on the coast, where the brown-signed 'Rossglass Scenic Loop' tourist route leaves the A2 road, Rossglass sports a cluster of dwellings and church, plus a beach where the Council has installed amenity information boards.

Scaddy / Pikestone

https://www.openstreetmap.org/node/11198455943, https://www.openstreetmap.org/node/11495709741

Two nodes at the Scaddy Road / A22 junction; features dwellings, farmsteads and an Orange Hall. Pikestone is served by Translink Ulsterbus No.14 (Downpatrick - Killyleagh - Shrigley)

Scollogstown / Ballylucas

https://www.openstreetmap.org/node/267762844

A small collection of farmsteads, dwellings & Rathmullan Parish Church, it is the destination for Translink Ulsterbus route 15d.

The Mournes DEA

Cabra

https://www.openstreetmap.org/node/354507491

Cabragh is probably best considered a townland than a settlement, however in proximity to the crossroads of Cabra Road / Kinghill Road with the A25 (Castlewellan Road), there are two small residential developments (St Anne's Terrace and St John's Terrace), St Mary's RC church, and notably NMDDC's Cabra Community Centre, which does imply a focus for the surrounding rural area. Royal Mail uses 'Cabra' as a locality name in postal addresses for the settlement. Ulsterbus services operate along the A25 between Castlewellan and Rathfriland.

Rowallane DEA

## Shrigley

https://www.openstreetmap.org/node/4037491595
Shrigley is covered in Tech Supp 1 **but appears to have been entirely omitted from Tech Supp 7.**
I presume this was due to an error when compiling the document?

Listooder

 https://www.openstreetmap.org/node/267763170
Perhaps better considered a townland than a settlement (although there is a cluster of dwellings at
Rademon church). However the Roads Service have signposted Listooder as a destination on road
signs (e.g. see Google Maps Street View screenshot below). It is not clear from Tech Supp 1 whether
Listooder was considered to be synonymous with Drumaghlis (which was explicitly downgraded to open
countryside) or is considered a different settlement.

Toye
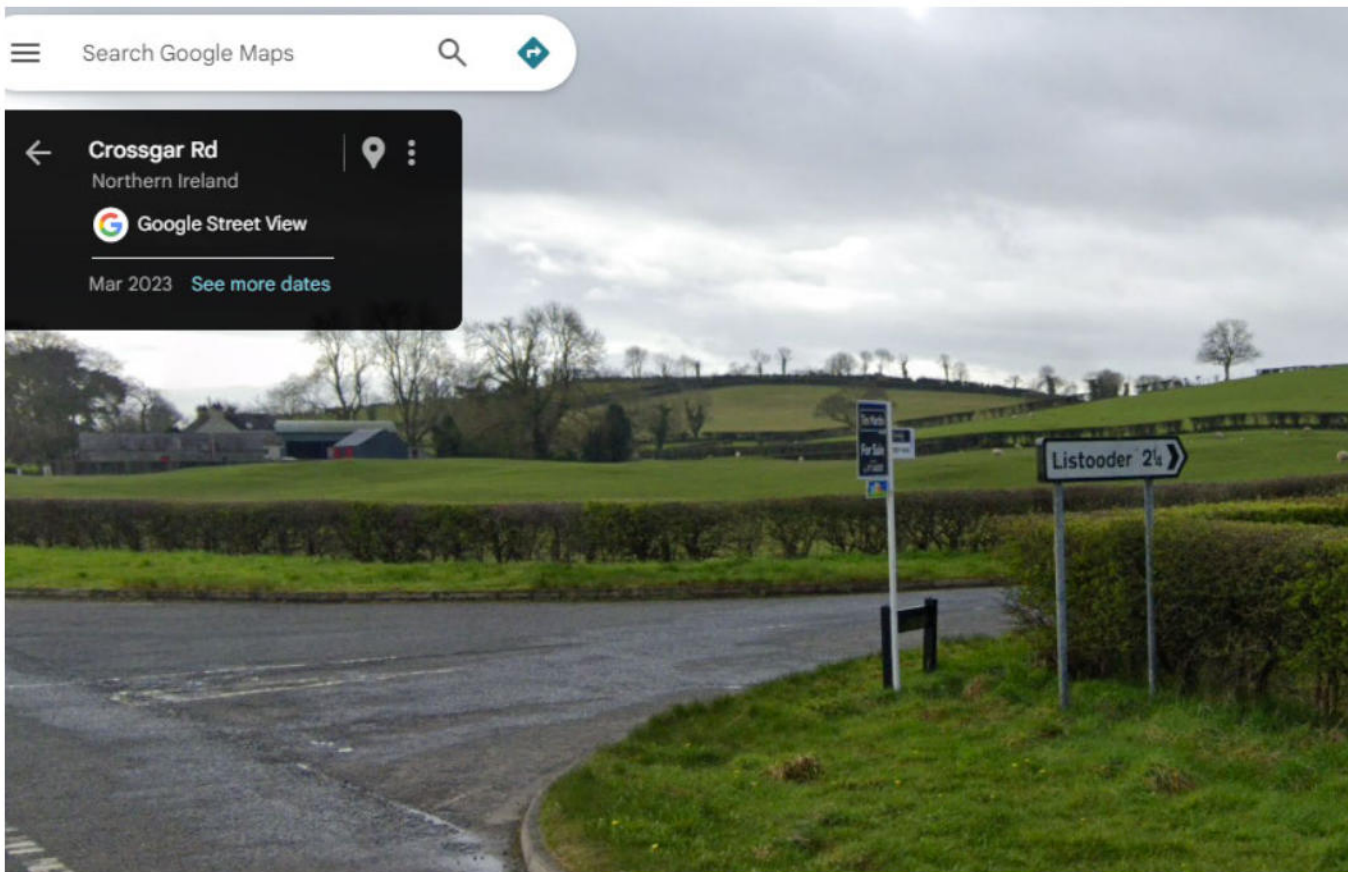
https://www.openstreetmap.org/node/4037491652 a cluster of residential dwellings on the A22, with an
Orange Hall. Served by the Translink Ulsterbus No.11. Royal Mail uses the locality name 'Toye' in
postal address for the settlement.

Slieve Croob DEA

Annadorn

https://www.openstreetmap.org/node/11153263341

Annadorn is a small settlement along Buckshead Road, containing several dwellings, with a former primary school (converted to a residential dwelling) and an auto-spares business. Annadorn Dolmen is a State Care Monument nearby. In particular, it is consistently signposted by the Roads Service as a destination, and the Council have erected welcome signs on the boundaries along Buckshead Road (see Google Maps Street View screenshots below)

Village welcome sign for Annadorn

Dunmore

https://www.openstreetmap.org/node/267762822

Dunmore is a townland, but is signed (from the B175) by the Roads Service as a destination. It's not clear where the intended destination was/is meant to be - there is a residential development ('Mountain Terrace') on Dunmore Road, with St Colman's RC church nearby; further along Dunmore Road (at its crossroads with Drumkeeragh & Carnreagh Roads) there is the former Guinness Primary School, which is served by the Ulsterbus No.27a.

The Spa

https://www.openstreetmap.org/node/2406235556

The Spa is covered in Tech Supp 1 but **appears to have been entirely omitted from Tech Supp 7.** I presume this was due to an error when compiling the document?

Slieve Gullion DEA

Ballsmill

https://www.openstreetmap.org/node/267762726

Ballsmill is a small residential settlement close to the County Louth border, with a post box and Council-maintained picnic/amenity area. It contains an information board for the 'Poets' Trail' cycling/hiking route which passes through it, and a bus shelter (although I think this is only served by Translink school bus services at the moment).

Lisnalee

https://www.openstreetmap.org/node/11694051806

Lisnalee is small housing development on the B133 with a Council-maintained play park

Tullydonnell

https://www.openstreetmap.org/relation/5219223

Tullydonnel is a small housing development with a Council-maintained play park, adjacent to the A29 New Road.

3. Coherence and Effectiveness of the Settlement Hierarchy

Defining a Settlement Hierarchy is an intrinsic and foundational component of the overall Local Development plan - the implementation of several policies is predicated on it — including, at top level, the SP2 Place Shaping, the Regional Development Strategy (RDS), the Spatial Growth Strategy (SGS1). As Table 1 on page 9 of the Draft Plan seeks to illustrate, the majority of the other strategies and policies in the plan make use of the Strategic Settlement Hierarchy in deciding the kinds and magnitudes of residential and commercial developments that are appropriate, and the provision of services and amenities that are desirable or required — few of the policies can avoid reference to the Settlement Hierarchy. As the Draft Plan states 'Small Settlements will act as a focal point for the rural community where consolidation of the built form can provide opportunity for individual dwellings and/or small groups of houses and small rural businesses.

In my view, therefore, for the Draft Plan to be 'coherent and effective', it is very necessary that the Settlement Hierarchy be well defined and understood, not only by the NMDDC planning department, but also by residents and businesses in the district, and by third party agencies whose functions are essential to achieving various aims of the plan (not least, but not limited to, Translink and the DfI Road Service).

With the present Draft Plan I have some concerns that:
- Particularly with the small settlements, many of these are obscure and lack formal recognition in the wider community across the district (beyond their immediate local residents) and among third party bodies. Conversely, many of the small settlements I list above that have been excluded from consideration in Tech Supp 7B may currently be recognised by people in the district and third party bodies.
- The current policies and practices of some third party bodies (such as Translink, the Roads Service and Royal Mail) may not be well aligned with the defined Settlement Hierarchy. This raises the risk that the services and works carried out by these bodies may not work in harmony with aims and objectives of the Local Development Plan.

As such, I feel the above could weaken the coherence and effectiveness of the plan across tests **CE1**, **CE2** and **CE3**.

I would like to suggest some 'clear mechanisms for implementation' (in line with test **CE3**) that I suspect might increase coherence and effectiveness:
- District-wide rollout of new consistently-branded 'welcome signs' at settlement limits on all road approaches to settlements
- Liaison between NMDDC and the Roads Service on consistent road signage to all settlements in the hierarchy
- Liaison between NMDDC and Royal Mail to ensure the settlement hierarchy is reflected in postal addresses.
- Liaison between NMDDC and Translink to consider appropriate provision of bus services in accordance with the hierarchy
- Liaison between NMDDC and EONI to ensure the settlement hierarchy has taken account of polling station provision.

I discuss these suggestions in more detail below.

Welcome signs at settlement limits

Background

It is common practice for district councils to install 'welcome signs' at settlement limits, on road approaches to each settlement. An example screenshot from Google Maps Street View is shown below
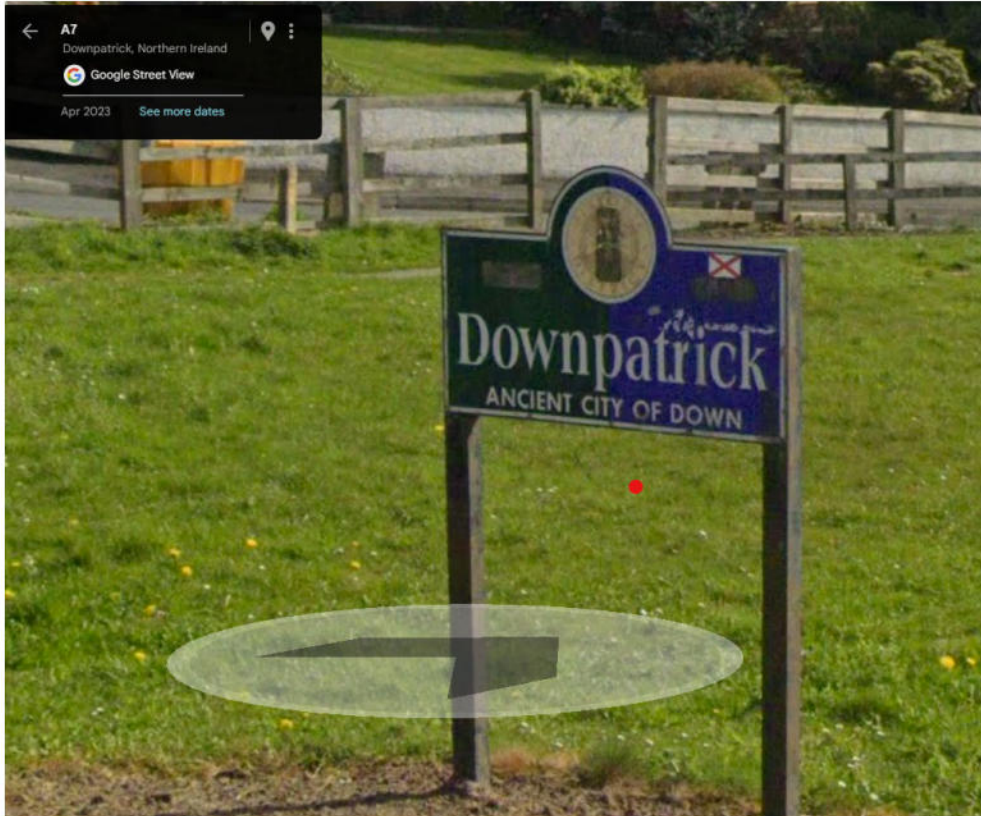
Example of a council-installed welcome sign at the northern settlement limit of Downpatrick.

This practice has several benefits, such as:
- Creating a stronger identity for the settlement
- Assists visitors to the settlement in wayfinding. This includes tourists and those attending to deliver goods or services, and may even assist emergency services, particularly in rural areas where mobile data signal coverage is weak.
- Assists with road safety by making motorists aware they are entering a residential area. This is particularly the case with small rural settlements.

NMDDC and its predecessor councils have published numerous 'villages plans' (collected at https://www.newrymournedown.org/village-plans) in which the provision of village welcome signs is a recurring proposal and commitment.

Problems

It appears to be the case that since the formation of Newry, Mourne & Down District Council in 2015, the Council has not installed any new welcome signage, failing to act on any of the commitments to this in its collected Village Plans. The existing welcome signs were all installed by NMDDC's respective predecessor councils (Down District Council, Banbridge District Council, Newry and Mourne District Council), and thus feature their old branding. There is no common visual identity for them across the current district (and UNESCO Global Geopark). As these signs are all over a decade old, many of them display signs of dilapidation from exposure to the elements or graffiti, and dozens of them are now missing (empty mounting posts being a telltale sign of this)

Example of a missing Welcome sign - northern approach to Ballyhornan - Google Maps Street View, **2023**
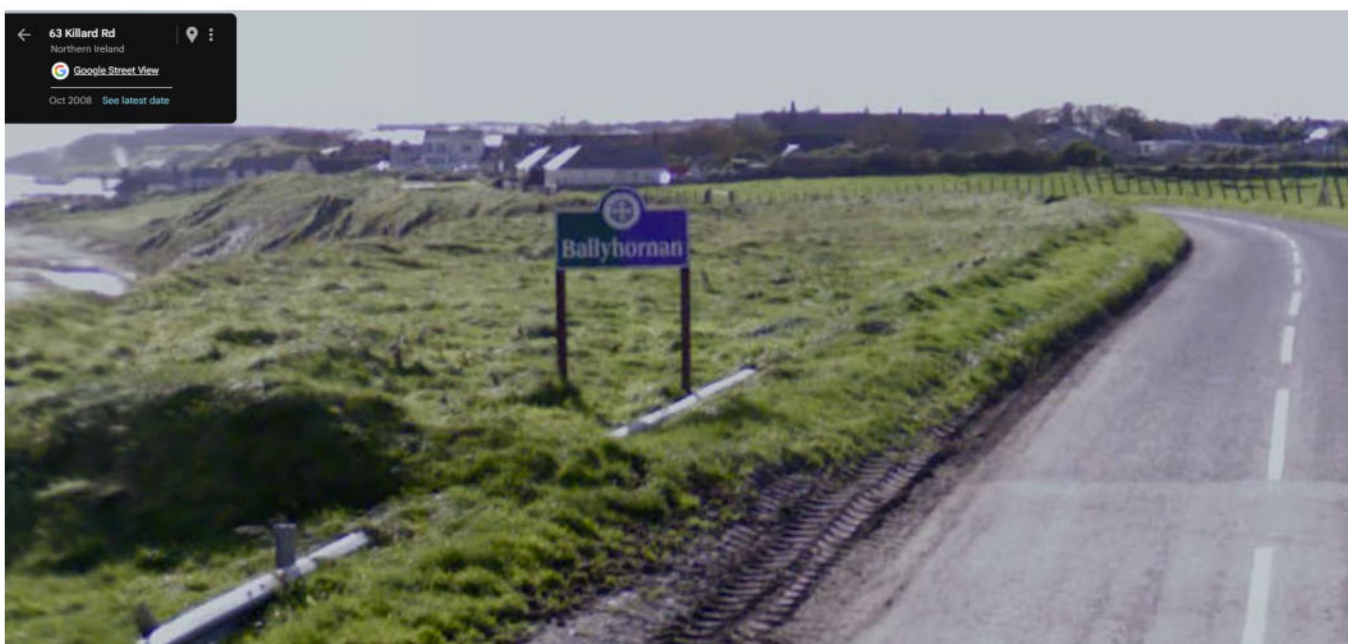
Welcome sign as originally installed - northern approach to Ballyhornan - Google Maps Street View, **2008**

Several of the smaller settlements appear never to have had any welcome signage at all: the following list is not exhaustive, but examples include: Altnamacken/Cortamlet, Ballykinler, Ballymoyer, Barnmeen, Cullyhanna, Dorsey, Glassdrumman/Mullartown, Glen.

Solutions (Suggested changes in the Plan)

As a 'clear mechanism for implementation' I would suggest that:

- As part of its Mourne, Gullion & Strangford UNESCO Global Geopark Interpretation Masterplan, NMDDC should formulate a district-wide design and branding for settlement welcome signs.
- NMDDC should install welcome signs on road approaches to all settlements in the SETT1 Settlement Hierarchy, at their defined settlement limits.
- NMDDC should inventorise these welcome signs and commit to annual inspection and maintenance of them.

Implementation of this would be entirely within NMDDC's purview and be of relatively modest cost. It would be a simple and effective way of making the Settlement Hierarchy evident on the ground, to residents, businesses and visitors. It would be particularly helpful for creating and strengthening awareness of the small settlements. It would be helpful for tourist wayfinding and for businesses/deliveries, and would assist with road safety.

The above approach would also be consistent with the approach taken by neighbouring councils - since their formation in 2015, Lisburn & Castlereagh City Council, North Down & Ards District Council, and Armagh City, Banbridge & Craigavon District Council have all consistently deployed welcome signs for their settlements. NMDDC's approach with dilapidated, missing and inconsistent welcome signs currently jars with the approach of its neighbours. (This is relevant to test **CE1**.)
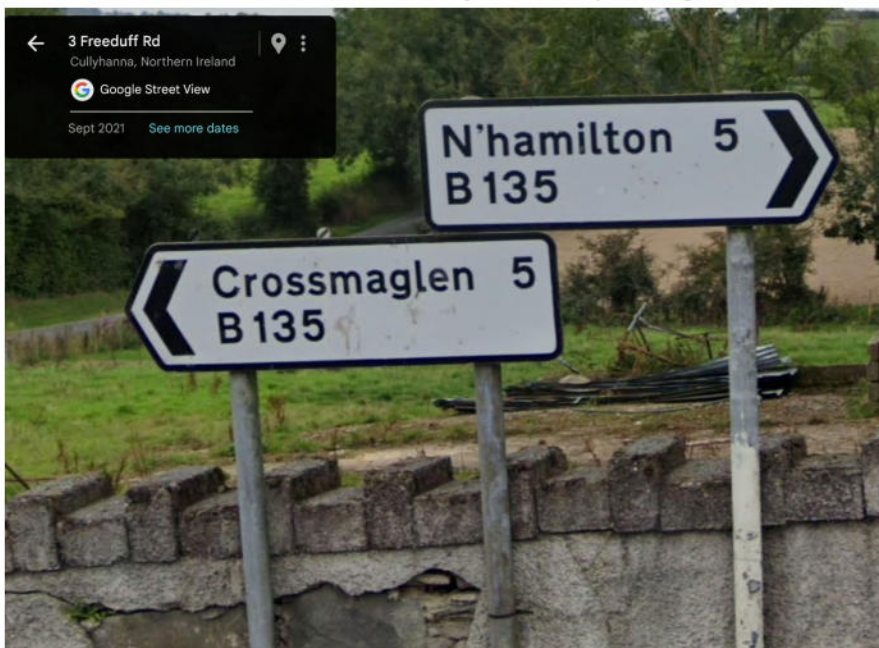
Roads Service directional road signs

Background

The Dept for Infrastructure's Roads Service (https://www.nidirect.gov.uk/contacts/dfi-roads) installs and maintains directional road signs across its adopted road network, to assign the wayfinding for motorists. The design for these was devised by the 'Worboys Committee' in the early 1960s, and has remained largely unchanged ever since:

- directional signs on trunk A-class routes use white lettering on a green background (with road numbers in yellow)

Example of Roads Service directional signs on a trunk primary route

- All other classes of road (primary, secondary and tertiary class) use white signs with black lettering. 'A' and 'B' road numbers are usually displayed for primary and secondary roads; 'C' route numbers are usually omitted (although are occasionally displayed).

Example of Roads Service directional signs on a 'B' class route

A rare example of the Roads Service including a 'C' road number on a directional sign.

Problems

The choice of destinations used by the Roads Service on their directional road signs at times appear to reflect legacy settlement patterns going back into the past century, and these choices are often not entirely aligned with the currently proposed Settlement Hierarchy in the NMDDC Draft Local Plan. This is particularly the case with the small settlements. Several settlements in the proposed hierarchy are currently not present on road signs; other settlements *not* included in the hierarchy are. The list below is not exhaustive, but examples include:

Settlements included in the NMDDC hierarchy, but not included on DfI road signs:	Settlements not included in the NMDDC hierarchy, but included on DfI road signs:
Ballymadeerfy Ballynoe Barnmeen Clonvaraghan Dechomet Dorsey Finnis Glasdrumman (Co. Armagh) Glen Mullaghglass Newtoncloghoge Sheeptown	Annadorn Ballee Ballyhosset Bright Dunmore Listooder Minerstown

This lack of alignment between the Roads Service signage and the Settlement Hierarchy has the potential to weaken the latter's coherence and effectiveness, and the implementation of policies which depend on the hierarchy. It may particularly impact wayfinding for tourist visitors and businesses delivering goods and services.

Solutions (Suggested changes in the Plan)

I would suggest that as part of a 'clear mechanism for implementation' of the proposed Settlement Hierarchy, NMDDC should liaise with the Roads Service, to align both parties' recognition of current settlements and route destinations. Road routes and road junctions leading to settlements in the

hierarchy should be reviewed and where signage is lacking, the Roads Service should be encouraged and assisted by NMDDC to identify suitable positions for new or additional directional signage to support the Settlement Hierarchy.

I appreciate that the DfI Roads Service is a Stormont departmental body outside the control of NMDDC, and is bound by its own operational and budgetary commitments, but it is surely appropriate that local and departmental government bodies should liaise closely with each other and seek to align their operations in the best interests of the public.

Postal addresses

Background

UK postal addresses generally take the form:

> Property number & street name
> Locality name (if needed)
> TOWN
> POSTCODE

Property numbers and street names are normally designated by local councils— in this case NMDDC's Licensing section (https://www.newrymournedown.org/postal-numbering-and-street-nameplates).

'Localities', 'post towns' and postcodes are defined by Royal Mail. The resulting addresses are maintained by Royal Mail in its 'Postcode Address File' (PAF)— https://en.wikipedia.org/wiki/Postcodes_in_the_United_Kingdom presents a useful overview of the subject.

Royal Mail have designated the following 'post towns' for addresses in the NMDDC area (see https://en.wikipedia.org/wiki/BT_postcode_area):

- ARMAGH (BT60) *(Whitecross & Tullyherron only)*
- BALLYNAHINCH (BT24)
- CASTLEWELLAN (BT31)
- DOWNPATRICK (BT30)
- DROMORE (BT25) *(Finnis and part of Dechomet only)*
- NEWCASTLE (BT33)
- NEWRY (BT34, BT35)

It can be seen that these align reasonably well with the NMDDC Settlement Hierarchy: Royal Mail have adopted both the Tier 1 settlements in the Hierarchy as post towns, and three out of the eight Tier 2 settlements.

Problems

The problematic field in the address format for many properties in the NMDDC area is the '**Locality**'. (*Formally, in the Technical Specification for the PAF—see https://www.poweredbypaf.com/wp-content/uploads/2017/07/Latest-Programmers_guide_Edition-7-Version-6.pdf—this element is called the 'dependent locality', and may be present with an additional 'double dependent locality' identifier— but for simplicity in the discussion below I have used the term 'locality' throughout*).

For the large majority of towns and villages in Tier 2 and Tier 3, there is no problem: Royal Mail has made use of the locality designation in way that will seem logical and intuitive to most people and businesses (that is, the name of the town or village is used as the 'locality', and then the appropriate post town and postcode is added - thus we have addresses such as '34 Main Street, Saintfield, BALLYNAHINCH BT24 7AB' or '40 Main Street, Dundrum, NEWCASTLE BT33 0LY'.

However, the situation with smaller settlements in the hierarchy is much less satisfactory. For these, Royal Mail often appear to be using the locality field in a way that is unhelpful or confusing. Some examples:

(a) ***Small settlements for which Royal Mail does not use the 'locality' field at all, only the post town.***
Examples include: Annacloy, Annsborough, Ballyholland, Ballynoe, Burrenbridge, Clonvaraghan, Drumaroad, Glen, Jerretspass, Maghera, Mullaghglass Raholp, Saul, and Sheeptown.

The result is that these small settlements "don't exist" from an official Royal Mail perspective. Obviously local residents may often add their settlement name to their address when quoting it to third parties, but this does not work online when, as often is the case, we are asked to select an address from a drop-down menu on a website or in an app, which is referenced to the Royal Mail PAF database.
In the worst cases, the absence of the settlement name from its official address may cause confusion, by implying that the address is physically within the settlement limits of the post town, when in reality it is geographically separated by quite an amount.
An example would be typical post address for Annacloy :
> e.g. 19 Rossconnor Park, DOWNPATRICK, BT30 9FS

There is no mention of the settlement name of 'Annacloy' in the official address at all. This is confusing as it gives the impression that Rosconnor Park would lie within the settlement limits of Downpatrick town, when it is actually about 5 miles away. This could present practical problems, e.g. for deliveries or tradespeople, or even attendance of the emergency services.

(b) ***Small settlements for which Royal Mail uses the name of a nearby town for the 'locality' field.***
Examples where Royal Mail have taken this approach include: Attical, Ballymardeerfy, and Dunnaval/Ballyardle (the locality used is 'Kilkeel'), Barnmeen (locality used is 'Rathfriland'), Creggan, Cullaville and Glassdrumman [Co. Armagh] (locality used is 'Crossmaglen'), Chapeltown, Coney Island (locality used is Ardglass).

Again, the result is that these small settlements "don't exist" from an official Royal Mail perspective. And also again, the resulting address may cause geographical confusion as to where the property really is.
For example, a typical post address for Attical is:
> 2 Tullamona Park, Kilkeel, NEWRY, BT34 4RX

There is no mention of the settlement name of 'Attical' in the official address at all. The implication is that the property is within the settlement limits of Kilkeel itself, when in fact Attical is nearly 5 miles away.

(c) ***Small settlements for which Royal Mail uses the 'locality' inconsistently for different nodes of the settlement**.*

Small settlements in this category include Ballyhornan, Ballyalton, Darragh Cross and Dechomet.

In some cases this can be simply explained because the settlement lies on the boundary of two post codes - so not only is the locality different on one side of a road, but the post town and postcode are too - Dechomet is in this category.

In other cases the explanation seems more likely to be due to poor administrative decisions by Royal Mail when onboarding new housing developments to the PAF database. For example, the majority of postal addresses in Ballyhornan use 'Ballyhornan' for the locality name, but addresses there in the Tullyronan development use 'Ardglass' as the locality, e.g. 1 Tullyronan, Ardglass, DOWNPATRICK, BT30 7SX.

(d) ***Small settlements for which Royal Mail's choice of 'locality' seems just plain wrong***

Examples of this are all addresses in Meigh and Drumintee, for which Royal Mail have assigned the locality of 'Killeavy' (a historical parish name).

e.g. a typical address for Meigh is '1 Tobar Blinne, Killeavy, NEWRY BT35 8WP

The NMDDC Settlement Hierarchy does not recognise any settlement called Killeavy.

(e) ***Rural addresses***

Outside of the Settlement Hierarchy, the NMDDC district contains a great many rural addresses in the open countryside. For many centuries, the traditional way to formulate an address for such properties was to include the name of the townland. Royal Mail currently does *not* make any use of townland names in formulating addresses. This may be contrasted with NMDDC's policy on postal numbering and street nameplates (https://www.newrymournedown.org/postal-numbering-and-street-nameplates) which asserts that *"The Council promotes the use of the townland name within the street nameplate"*.

I have not explored the subject exhaustively, but a perusal suggests that Royal Mail's assignment of values in the Locality field for rural addresses is inconsistent and counterintuitive in many instances.

In summary, Royal Mail's use of the Locality field in their Postcode Address File appears often to be poorly aligned to the proposed SETT1 Settlement Hierarchy. Obviously, postal addresses and address data are fundamental to a great many administrative and commercial matters, as well as part of the fabric of everyday life for residents, and the current discrepancies appear to be to be at best unhelpful to aims of the Settlement Hierarchy in many policy areas which flow from it, and often just plain confusing for most parties involved, not least residents and businesses.

Solutions (Suggested changes in the Plan)

Under the Postal Services Act 2000, maintaining the Postcode Address File is the responsibility of Royal Mail, UK-wide. This is a complex undertaking, and likely it would not be realistic to expect Royal Mail to significantly alter their normal working practices to the particular needs of the Newry, Mourne & Down district. Furthermore, my understanding of the PAF database structure is that there can only be

one 'dependent locality' per unique post code. (A unique postcode might typically contain between 15 and anything up to 100 unique addresses.) The implication of this is that if there were to be a request to change or add the 'dependent locality' field for a group of addresses which all shared the *same* post code, this would be relatively straightforward and non-disruptive. However if a request were to be made to change the 'dependent locality' field for some addresses within a postcode and not others, this would be problematic: Royal Mail would need to assign a new postcode, and their process would require them to undertake a consultation with all the affected addresses, and they would only proceed if no objections were received.

Whilst residents might well be in favour of having a more appropriate locality name added to their formal postal address, most people would likely find having to get a new postcode to be disruptive and inconvenient.

As such, the topic might appear somewhat intractable.

Nevertheless, I do feel the current mismatch in locality name as used by Royal Mail as opposed to the SETT1 Settlement Hierarchy is unhelpful and undesirable. I would advocate that NMDDC at least liaises with Royal Mail to raise the matter. It is likely that numerous 'quick wins' could be identified for some of the small settlements, where a suitable locality name could straightforwardly be added to all addresses in a set of postcodes, with little scope for objection.

# Translink bus service provision

Background

'Translink' (a brand name of the Northern Ireland Transport Holding Company) is the public transport operator in Northern Ireland (rail and buses), established under Transport Act (NI) 1967.

As discussed in the Draft Local Development Plan, only one settlement in the Newry, Mourne & Down district has a railway station (Newry); therefore the large majority of public transport in the district consists of Translink's Ulsterbus services.

Translink has published an Ulsterbus route map at https://trn-prd-cdn-01.azureedge.net/mediacontainer /medialibraries/translink/route-maps/ulsterbus/ulsterbus-route-map.pdf. It appears to show data from 2015, so contains a few discrepancies compared to current service provision (for instance, it still shows a service passing through Kilclief). An excerpt is shown below.

The proposed SETT1 Settlement Hierarchy gave careful consideration to Translink's service provision when considering the appropriate Tiers for settlements.
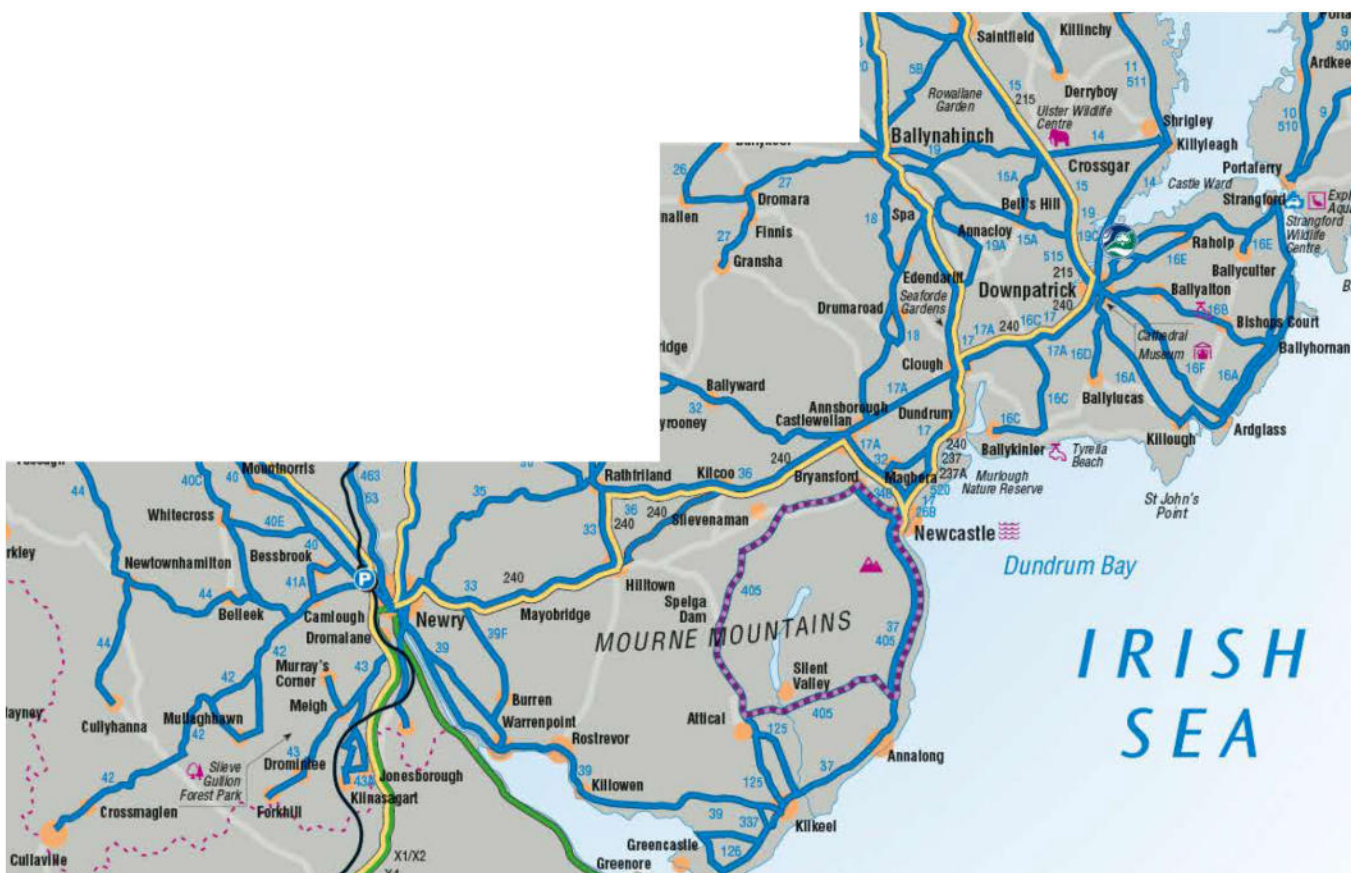
Problems

Translink's provision of Ulsterbus routes at times appears to be based on legacy settlement patterns, producing some route choices which seem anomalous in the present day.

The most striking examples of this are where Translink currently timetables services to named destinations which do not even appear in NMDDC's proposed settlement hierarchy. Examples include:

- Ulsterbus 16D runs from Downpatrick (via Ballynoe) to **Scollogstown/Ballylucas**. There is no settlement of note at Ballylucas. The 16D also omits some notable tourist destinations: it goes

right past (but does not stop at) Ballynoe Stone Circle, and it does not make the obvious extension to Tyrella Beach, an amenity which attracts large numbers of private cars to its NMDD-run carpark.

- Some variants of Ulsterbus 16E (Downpatrick to Strangford) make a detour to **Ballyculter**, despite there being no settlement of note there.
- Ulsterbus 27 is billed as running from Ballynahinch (via Dromara) to '**Gransha**'. Gransha is a townland with an Orange Hall, but could hardly be considered a settlement. The actual final destination of the No.27 is Dechomet.
- Some variants of Ulsterbus 43 (Downpatrick - Forkhill) make a detour to '**Murray's Corner**' despite there being no settlement of note there.
- Some variants of Ulsterbus 12 visit **Derryboye** despite there being no settlement of note there.

On the other hand, Translink has withdrawn services to some smaller settlements which NMDDC proposes *do* have a place in the Settlement Hierarchy. Examples include **Kilclief** (formerly served by Ulsterbus 16H from Downpatrick), **Clonvaraghan** (formerly served by Ulsterbus 18, Ballynahinch to Newcastle), **Leitrim** (now reduced to one visit per weekday evening from Ulsterbus 32, Newcastle to Banbridge, in one direction only!)

Clearly NMDDC has given careful consideration to Translink's service provision when formulating its settlement hierarchy, but I do not get the impression this consideration has been reciprocated by Translink.
For the Local Development Plan to achieve many of its aims, Translink's provision of public transport will need to play an integral role, and be aligned with the Plan both strategically and in detail. If these two public bodies do not communicate and cooperate effectively, many aspects of the Local Development Plan could be seriously undermined.

**Solutions (Suggested changes in the Plan)**

I would suggest that NMDDC should liaise with Translink and make them aware of the intended Settlement Hierarchy, and seek for Translink to take the Settlement Hierarchy and its broader aims into account when planning their service provision.

Consideration of electoral polling stations

Background

The Electoral Office for Northern Ireland (EONI, eoni.org.uk) is the independent body which 'assists the Chief Electoral Officer for Northern Ireland in running elections and compiling the electoral register'. This includes the selection of Polling Stations, and the assignment of each voter on the register to a particular polling station. There are currently three regular cycles of elections (General Elections for the UK parliament in Westminster, Regional elections for the NI Assembly at Stormont, and local elections for NMDDC). Ad hoc referenda are also sometimes held. Although an election of one kind or another may only occur every one or two years, they are important events for the community and generally attract a high voter turnout compared to other parts of the UK.

A dataset of the current polling station locations is presented at https://apps.spatialni.gov.uk/ ElectoralOffice/ElectoralOffice_PollingStations/index.htmlice - Polling Stations NI, a representative screenshot is pasted below:
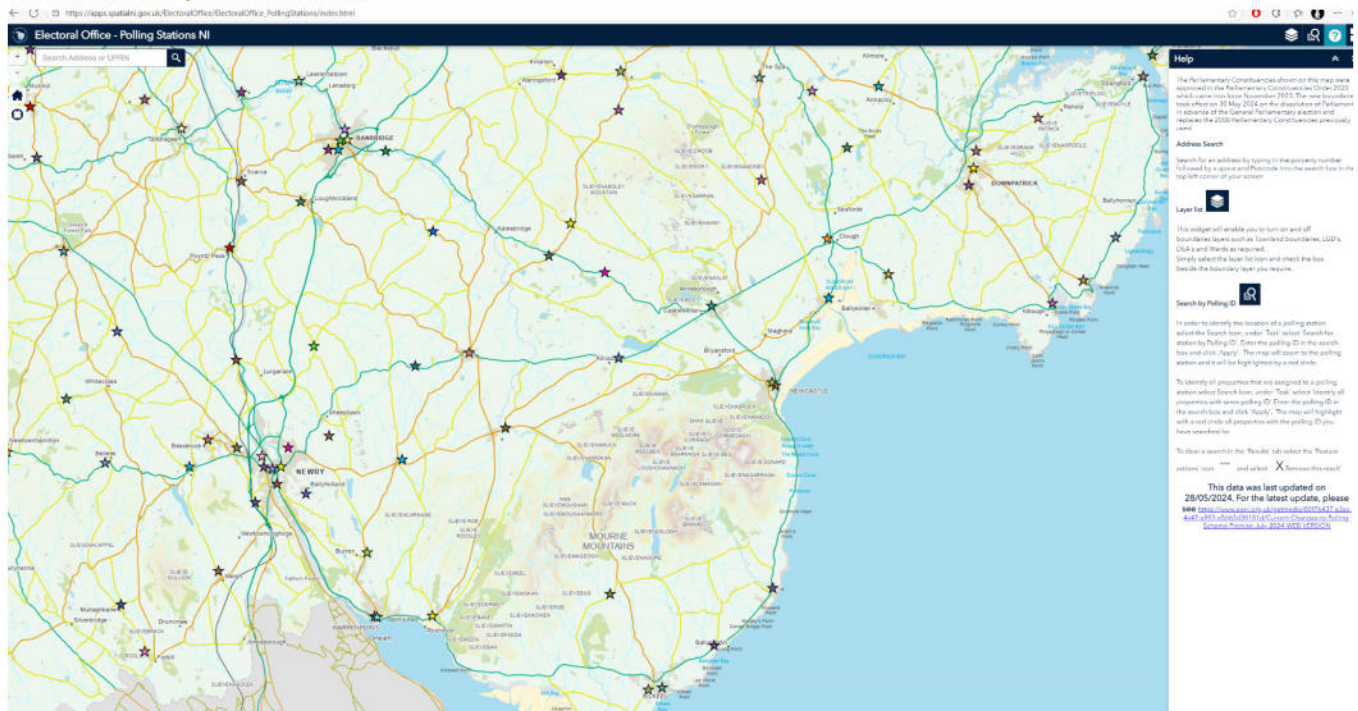
Problems

Polling Stations represent an important community focus at election times, particularly in rural areas. However the presence of a polling station in a settlement does not appear to have been considered when formulating its place in the Settlement Hierarchy.

I have not attempted an exhaustive analysis of EONI's current choice of polling station locations, but it can be seen from a perusal of the data that their choices are not always entirely aligned with the proposed Settlement Hierarchy. Some examples include:

- Chapeltown is allocated a polling station; Ballyhornan & Kilclief are not.
- A polling station is allocated between Derryboye and Raffrey; not in Darragh Cross.
- Listooder is allocated a polling station; Kilmore is not.
- Ballyward and Dechomet are allocated polling stations; Finnis, Lietrim and Clonvaraghan are not.

Voters may express confusion if their allocated polling station does not align with their expectation of their nearest settlement. This not infrequently may cause voters to turn up at the wrong polling station, and have to be directed to a different one by the electoral staff.

Solutions (Suggested changes in the Plan)

The selection of polling stations is an operational matter for EONI and influenced by various factors such as the availability of suitable buildings and the need to have comparable numbers of voters assigned to each polling station.
It is not for NMDDC to try and influence or interfere in EONI's processes, which must be seen to be impartial and independent.
Nevertheless, public bodies should aim to harmonise their approaches for the benefit of the public they exist to serve. I suggest it would not be inappropriate for NMDDC to at least advise EONI of its proposed settlement hierarchy, although in this instance I feel that the flow of information might be better in the opposite direction: namely that NMDDC to take heed of the distribution of EONI polling stations as part of its considerations in formulating the settlement hierarchy.