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* <u>one</u> *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 sustainable transport strategy (TRS1),
the transport policies (TRA1–TRA11), and their evidence base (Tech Supplement 5)
I am strong strongly in support of the aims of TRS1 but I discuss what I perceive to be some
weaknesses in the evidence base, and in the effectiveness of the transport policies to
achieve the strategic aim.

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)
(and/or)

Transport: TRS1 and policies TRA1 thru to TRA11

Relevant Section/Page Soumber
(and/or)

pages 123-126; pages 270-286

Proposals Map

Section J | 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 find myself strongly in agreement with the aims and objectives of the TRS1 Sustainable Transport itself. However I examine the evidence base (as presented in Technical Supplement 5 and the various other documents it references, such as the Greenways Strategy), and highlight what I perceive to be some omissions and dubious conclusions in the evidence.

I examine policies TRA1 - TRA11 and some supplementary topics, and consider whether they are coherent and effective and if there are clear mechanisms for implementation which could deliver the aims of the TRS1 strategy.

As this submission form does not contain sufficient space, I have supplied my material in an attached document (" Consultation Response: ▓▓▓▓ - TRS1 Transport Strategy.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 Supp 5 and docs docs it references) correction of these of these if they are indeed found to wrong or material omissions. A corrected version of Tech Supp 5 could then be published.

In considering the coherence and effectiveness of TRA1 to TRA11, and some supplementary considerations relating to journey types, Translink bus stops and railways 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?

The large majority of my comments on Plans TRA1 - TRA11 are highlighting points on which I consider them to be insufficiently sustainable and at odds with the overarching sustainable transport policy TRS1. This is essentially the same considerations which the Sustainability Appraisal seeks to make, although I have made my comments in narrative form and not taken them through the exhaustive evaluation/scoring methodology used in the S.A.

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:

I confess I am not hugely familiar with the exact methodology typically used in Equality Impact Screening, so forgive me if am an not answering this section in right way, however it seems to me that the TRS1 Sustainable Transport Strategy is sound in regards Equality Impact, as by enabling a modal shift away from private car and towards more public transport, it makes transport much more accessible to those with disabilities which might prevent them owning and driving a car.

One particular evidential point I feel it is worth highlighting here is the provision of Bus Shelters. Translink have been dogged in declining to provide bus shelters with seats at the majority of their bus stops, and NMDDC has by slow to exercise its statutory powers to provide bus shelters. This surely disadvantages passengers who are infirm and less able to stand. Likewise the passenger facilities at Translink's Downpatrick and Newcastle bus stations are currently only open to passengers for approx 30% of the timetabled service hours (see Assembly Written Question AQW 14411 22-27). Neither of these is NMDDC Planning Service's fault, nor directly addressable through planning policies, but I think it is a situation which must be considered in the evidence base.

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:
TRS1 Transport Strategy

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!

Table of Contents

1. Notes on evidence base (Technical Supplement 5 and the documents it references)

Technical Supplement 5 (Transport), published at https://www.newrymournedown.org/media/uploads/technical_supplement_5_-_transportation%281%29.pdf is 34 pages long, however it refers out to several other documents (for example, '*Northern Ireland Changing Gear: A Bicycle Strategy for Northern*' and '*Exercise, Explore, Enjoy – A Strategic Plan for Greenways*'), including them (to quote section 1.1) "in the evidence base that has been used to inform the preparation of the Newry, Mourne and Down Local Development Plan 2035, draft Plan Strategy" .

As such, any errors, omissions or dubious points in Tech Supp 5 and the various documents it collates risk weakening the evidence base, and should be challenged under Coherence & Effectiveness test **CE2**, which requires the Plan to be '*...founded on a robust evidence base*',

In the section below I have highlighted some points that I feel require examination on that basis. (I have tried to keep the discussion in this section simply to points of evidential fact as per CE2, and avoid straying into wider points that touch upon coherence and effectiveness, although inevitably there is some overlap with CE1 and CE3 tests.)

District Profile

4.1 (page 16) "*parts* [plural] *of the <u>National Cycle Network</u> also pass through the District*"
I feel it is important to be clear that following Sustrans' scrappage of over a quarter of the National Cycle Network on safety grounds in 2020 (e.g. see https://www.theguardian.com/travel/2020/jul/19/national-cycle-network-sustrans-cuts-quarter-uk-routes-safety-grounds) that only **one** NCN route now passes through the Newry, Mourne & Down district, namely NCN9: this is none other than the towpath of the (inland) Newry Canal. This *is* a good quality traffic free cycling and walking route. But the term 'network' is misleading: it does **not** directly connect to any other cycle routes (for instance, it does not connect to the DfI's cycle paths along Carbane Way in Newry built in 2022, which pass across it on a bridge with no way down between the two). NCN9 provides a *linear* route between Newry and Portadown/Craigavon. Within NMD district, it links just two settlements (Newry and Jerretspass). A single linear route is not a 'network'. **All other parts of the former National Cycle Network within NMD have now been de-designated**, there is no longer any 'network' – so former links from the border to Bessbrook to Newry; from NCN9 to Tandragee and Armagh, to Belfast, Comber, Killyleagh, Dowpatrick, Strangford, Newcastle etc etc are all gone. This includes portions of route NCN9, and all of routes NCN91, NCN99, and RR20.

Private Car

4.12 (page 19) "*Given the high level of private car ownership recorded in the Census, it will remain the dominant mode of travel over the plan period.*"

I find this statement problematic. Firstly, it is, needless to say, entirely at odds with the stated aims of Strategic Policy TRS1 (Sustainable Transport), which seeks modal shift away from private car use. But even on an evidential basis (as opposed to a policy basis), its reasoning appears flawed:

- Because a household *owns* a car, it does not necessarily follow that their car must be their preferred mode of travel for all types of journey. For instance, car trips cost money in fuel/electric charging, and preclude the driver from consuming alcohol. There are numerous use cases where a car owner might choose an alternative mode – e.g. commuting to work on attractively-priced public transport if it was reliable and cheaper than running a car; cycling to work as good exercise and a way to manage stress; using public transport to travel to and from a pub, restaurant or nightclub, so they can have a drink; walking or cycling to school.
- The plan period is to 2035. A typical car will only remain roadworthy and economical for 10 or a dozen years. Therefore, a considerable proportion of the cars currently owned by residents in 2025 will not be owned by them throughout the plan period: they will have to be replaced before 2035 if their owners are to continue making car journeys. Replacing and financing a car is a high cost undertaking and many residents would be delighted to have viable alternatives to it. It is worth pointing out that a notable proportion of households in the district do *not* have access to a car (almost 20% – see DfI Newry, Mourne & Down Local Transport Study, 2021 https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/nmd-local-transport-study-with-annex.pdf), and in a significant number of cases this will be because they cannot afford one.

Public Transport

4.13 (page 19) "*Ulsterbus operates services from <u>bus stations</u> in Downpatrick, Kilkeel, Newcastle and Newry…*" There is a confusion here between **bus depots** and **bus stations**.

Translink's bus <u>stations</u> within the district are: Newry, Newcastle and Downpatrick (i.e. offering passenger facilities - waiting area, toilets, information boards, ticket desk, waiting room - and interchange between routes).

Translink has operational bus <u>depots</u> in Newry (at a different location to the bus station), Kilkeel, Ballynahinch, Downpatrick and Newcastle (the latter two sharing the same site as the respective bus stations). These provide storage and maintenance facilities for their fleet, rather than passenger facilities.

4.15 (page 19) "*A <u>number of private firms</u> operate bus services across the District, most notably Aircoach which provides a stop on its services between Belfast and Dublin Airport*"

The statement '*a number of private firms*' is vague, and probably indicative of the fact that although such firms are licensed centrally by the Dept for Infrastructure, no attempt is made to provide a comprehensive and integrated information source on them for passengers (i.e. routes, timetabling, pricing), meaning they integrate poorly with Translink service provision. Section 4.15 of Tech Supp 5 would be of more use if it presented a thorough and complete list of this 'number of private firms'. It would be interesting to learn why these private firms have been granted licenses to run particular private routes on a commercial basis, and why those routes are not operated by Translink.

4.16 (page 19) "*The only rail station in the District is <u>at</u> Newry*". This may seem a pedantic point but it is actually highly relevant to how convenient Newry station is for passenger use: The station is *called* 'Newry' but it is not *at* Newry. It lies between Newry and Bessbrook and for much of its operational life (1880 to 1942) it was called 'Bessbrook' station. This is why it requires a shuttle bus between itself and Newry city centre! The actual Newry train station was in Edward Street. Wikipedia is a useful reference source on this topic (https://en.wikipedia.org/wiki/Newry_railway_station).

Car Parking

4.17 (page 20). The evidence here only looks at Council-provided carparks in four settlements (Newry, Downpatrick, Newcastle, Warrenpoint). The Council currently operates 43 off-street carparks (see https://www.newrymournedown.org/car-parking). These include car parks in the towns of Ballynahinch, Castlewellan, Kilkeel and Saintfield, and in the smaller settlements of Ardglass, Crossgar, Rostrevor – no consideration of these is presented. This seems a significant omission in the evidence.

Walking and Cycling

4.24 (page 22). Tech Supp 5 makes little attempt to collate evidence of existing cycling provision. This seems to be quite an omission in the evidence base. Indeed, it may well be indicative of the rather fractured nature of the current provision (with some infrastructure provided by the DfI Roads Service seemingly with little consultation with NMDDC or residents, some routes purveyed by Sustrans with little accountability to anyone, and some routes nominally under the stewardship of NMDDC but poorly maintained or promoted).

To deliver quality cycle routes and infrastructure for the future, and deliver the modal shift to active travel that the Plan aspires to, we must consider the evidence base of existing provision and learn lessons from it. This must include input from cyclists who have used existing routes and will thus have valuable opinions on them, although also conversely it is important to take evidence from local residents who live near existing infrastructure and routes, but *don't* currently use them, to understand why that is.

I would recommend the 'Waymarked Trails' online map (https://cycling.waymarkedtrails.org/), which uses OpenStreetMap data, as currently the most comprehensive compendium of cycle routes in the district. 'OpenCycleMap (https://www.opencyclemap.org/) is another useful visualisation of the same dataset.

I will attempt a brief summary of cycling provision in the district below:

Built cycling infrastructure provided by the DfI Roads Service

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 (although this appears to have some omissions in its data).
Provision includes:
- **Delamont Country Park towards Killyleagh** (A22)
  (https://www.openstreetmap.org/relation/11630830) – this is useful shared-use path alongside the A22 Downpatrick Road; the intention appears to be add a spur from what was at the time Sustrans Regional Route RR20 (Comber to Downpatrick to Strangford, which at this point was

routed along Shore Road) to Delamont Country Park. Sustrans have since de-designated RR20 on safety grounds in 2020. I suggest this path would be considerably more use if it actually went all the way to Killyleagh, providing residents with a traffic-free way to cycle to Delamont.

- **Clough towards Dundrum (A25)** (https://www.openstreetmap.org/relation/15698185) – this is a high quality shared used path that would be great if it extended the whole way from Clough to Dundrum, however it only gets about a third of the way, instead depositing cyclists at Ardilea Road. Again, that road was formerly part of Sustrans National Cycle Network (NCN99) but was de-designated on safety grounds in 2020. Nevertheless, Ardilea Road does connect to the Dundrum Coastal Path greenway.

- **Shared use pavements/cycle lanes in central Newcastle** (https://www.openstreetmap.org/relation/8594925) – formerly part of Sustrans NCN99 route before being de-designated on safety grounds in 2020. As things stand, I suspect this set of lanes is too short and isolated to really be much use to cyclists – within minutes of joining it, they will simply have to rejoin the carriageway.

- **Castlewellan towards Newcastle (A50)** (https://www.openstreetmap.org/relation/15698229) - this is a high quality shared use path alongside the A50 between Castlewellan and Newcastle. Built in the last couple of years, it would be great except it stops half way! This is exasperating as it is a pleasantly scenic route and offers relatively short journey time by bike, and would make a genuinely useful safe cycling route between the two towns if it didn't inexplicably stop half way.

- **Shared pavements in Kilkeel** (https://www.openstreetmap.org/relation/15921199) – these are along part of Mourne Esplanade / Knockchree Avenue. Perhaps they are intended to function as a link to Kilkeel High School and Kilkeel leisure centre/ Mourne Esplanade amenities, however they peter out before really connecting to wider residential areas across Kilkeel.

- **Cycle Paths in Newry** – there are now quite a few of these in the city, including a short link alongside the Newry River from Dublin Bridge to the Greenbank Trail (https://www.openstreetmap.org/relation/14328438), a traffic-free path from Cloghoge roundabout to the old Dublin Road (https://www.openstreetmap.org/relation/16253852) and most recently, good quality shared use paths alongside Carnbane Way (A28) and Craignmore Way (A27), providing a route around the ring-road from Mourne Country Roundabout - Carnbane Roundabout - McCann's Corner and seemingly leading to Derrybeg Lane (and thus to Newry Train Station). Whilst these paths are good quality, they as yet fail to link up into a comprehensive network across the city, and notably they fail to connect to the two excellent greenways (Newry inland Canal towpath, NCN9, and Newry Ship Canal towpath, Carlingford Greenway)

- **Signed route Saintfield - Carryduff on minor roads** (https://www.openstreetmap.org/relation/8555072). This one crosses over from NMD district into the LCC district. It is an example of 'signage-only' cycle infrastructure: the DfI have signed a (fairly direct) route for cyclists between Carryduff and Saintfield along unclassified minor roads, as an alternative to the A7 trunk road (which features a 60mph national speed limit and appreciable traffic volumes, but only one lane in each direction, with little opportunity for motor vehicles to overtake cyclists: basically a hostile environment). The route uses 'fingerpost' signage mounted on poles, which is prone to getting bashed round to point the wrong way if not maintained.

- **Shared use path alongside the A1** (Sheepbridge to Lough Brickland) (https://www.openstreetmap.org/relation/14311027) – delivered in tandem with the A1 dual carriageway upgrade, this one does seem like 'box-ticking provision', and either end of the route

fails to connect to anything accessible by cyclists, and cycling adjacent to 70mph traffic on the A1 is unpleasant. The route is half in NMD district and half in the ABC district. The most charitable suggestion I can make is that perhaps it is intended for cyclists who might drive to the Lough Brickland amenity carpark by private car, bringing their bike on a rack.

- **Painted cycle lane along the A2 dual carriageway** (Newry to Warrenpoint) – the DfI have signed and painted cycle lanes in the hard shoulders of this dual carriageway in either direction, which features considerable volumes of traffic include port-bound HGVs moving at 70mph mere inches away from the painted cycle lane. It is hard to take infrastructure like this seriously.

In summary, I would characterise the cycling infrastructure provided by the DfI to date as fractured and disconnected. The newer examples are of good quality but grossly compromised by stopping in the middle of nowhere – it is hard to understand the reasoning behind this. The worst examples appear to border on the insanely dangerous, unsurprisingly it is rare to ever see any cyclists using them.

**NMDDC-curated tourist/recreational routes, way-marked on minor roads**

- **Carlingford Greenway** – an excellent 18km traffic-free route devised in collaboration with Louth County Council, connecting Newry with Omeath and Carlingford Marina. However the recent resurfacing by NMDDC of the northernmost end (Newry Ship Canal towpath) with coarse aggregate was an example of woeful misappreciation of the practical needs of cyclists (eg https://www.newry.ie/articles/news/council-committed-to-improving-greenway-between-albert-basin-and-victoria-lock) and I would argue is a strong example of where the evidence currently presented in Tech Supp 5 glosses matters from which lessons need to be learnt.
- **Mournes cycle routes** – there are 7 of these in the Mourne AONB. The waymarking is well-maintained by the Mourne Heritage Trust on the Council's behalf, with discrete 'brown sign' cycle route markers on wooden bollards at all junctions, making the routes easy to follow. Routes 1, 2 and 3 loop out from Castlewellan, Routes 4, 5, and 6 loop out from Kilkeel, and Route 7 runs in a loop between Rostrevor and Hilltown. Whilst the routes take in much epic and superb scenery, in practical terms they are not for the faint-hearted or inexperienced, incorporating some very challenging climbs such as up Slivenaboley Road to the Windy Gap, and ascending Dree Hill from Finnis. As Castlewellan, Rostrevor and Kilkeel all feature cycle hire businesses aimed at tourists and visitors, this provides a starting base for tackling their routes.
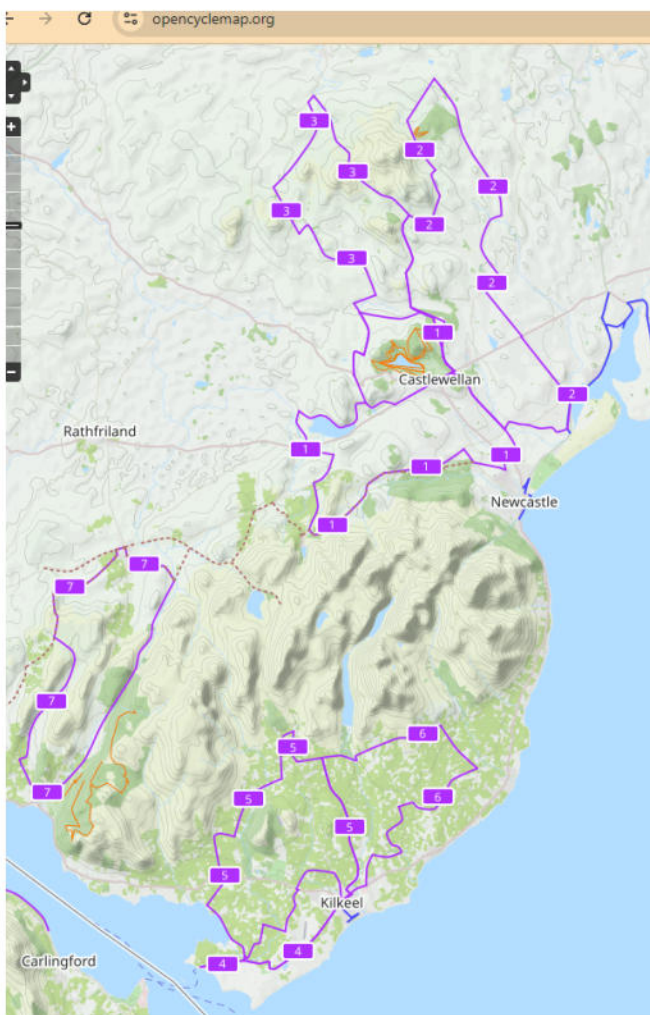
NMDDC's Mournes cycle routes on OpenCycleMap

- **Poets' Trails** - there are 3 of these in the Slieve Gullion AONB (South Armagh). They form loops centred on Forkhill, Mullaghbawn and Creggan respectively (the latter's loop crossing into County Louth). Whilst they take in some amazing scenery, sadly in contrast to the Mournes loops, the Council has failed to maintain signage on these Poets' Trails. This makes wayfinding difficult – in their present state, it is unlikely that cyclists could follow these routes without a map (which is here: https://www.visitmournemountains.co.uk/ dbimgs/The-Poets-Trails-and-other-walks.pdf). The start points also lack cycle hire businesses.
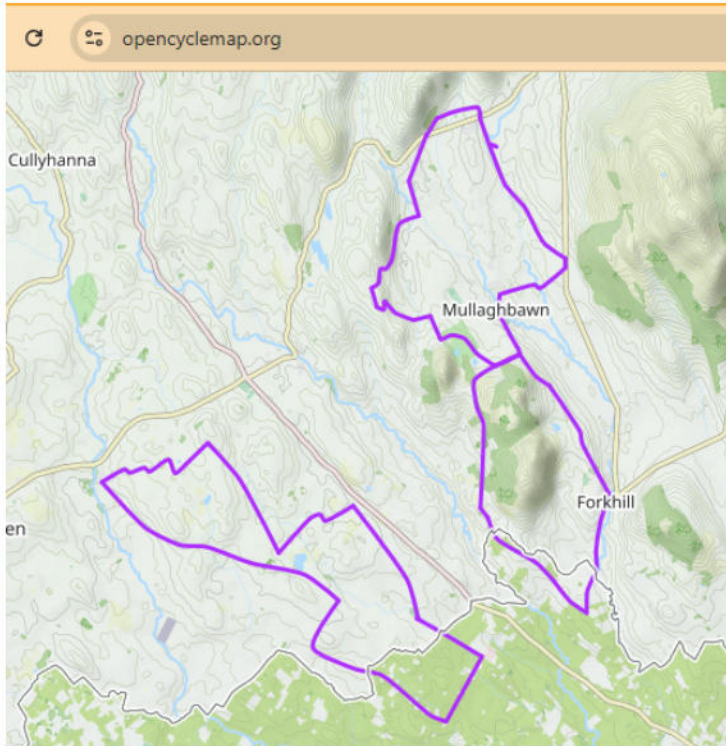
NMDDC's Poets' Trail routes on OpenCycleMap

Mountain biking

Section 4.24 states '*Dedicated routes for mountain biking etc exist in several of the country parks within the District*' – again, this lacks evidential detail. I believe the routes referred to are in Castlewellan Forest Park and in Kilbroney Forest park, and were well waymarked. However my understanding is that several of these routes have been impassably blocked by fallen trees since Storm Éowyn (Jan 2025). This raises concerns that such infrastructure is insufficiently robust against extreme weather brought on by climate change, and the Council's failure to reopen the routes in timely fashion appears to be evidence of failure to allocate sufficient funds to mitigate the effects of climate change.

Sustrans National Cycle Network routes

Sustrans (https://www.sustrans.org.uk/) is a charity dedicated to the promotion of active travel, and appears to receive not inconsiderable public funds as a consultancy in that regard. This may appear questionable given that in 2020, they found it necessary to scrap over a quarter of their 'National Cycle Network' on safety grounds, which seems to call into question their alleged expertise at delivering safe high quality cycling and walking infrastructure.
Over a quarter of routes were lost UK-wide, but in the Newry, Mourne and Down district (and Northern Ireland generally), the impact of Sustrans' safety-related de-designations was more akin to decimation.

As discussed above, only NCN9 now remains (i.e. the towpath of the Newry Inland Canal, which is owned by NMDDC in any case). All other Sustrans routes have been reclassified as simply suggested recreational routes for cyclists on public roads. Much of the route signage (which was installed by the DfI Roads Service) remains, with the red route numbers covered over with square of brown paint instead. However this appears to have been done inconsistently, and there are still numerous places on the former NCN routes where the signage remains in place, enticing cyclists to their doom. Sustrans appear to have washed their hands of resolving this situation.

The de-designated routes can still be seen on Sustrans' online mapping at https://explore.osmaps.com/?lat=51.641136&lon=-2.923634&zoom=8.4445&style=Standard&type=2d& overlays=os-ncn-layer indicated with dashed lines. They are chiefly to be found in the Lecale/Strangford AONB area.

Sustrans route map, showing non-NCN routes in Lecale/Strangford AONB

Greenways and Disused Transport Routes

2.9 (page 7) "...*Proper utilisation of this resource will create additional opportunities for cycling and walking and serve as a tourism resource. U<u>he District currently has two Greenways,</u> the Newry Canal Towpath and the Carlingford Lough Greenway, which utilises both the towpath of the Newry Canal and part of the Dundalk, Newry and Greenore Railway and runs from the centre of Newry, through Victoria Locks to the Border. Proposals exist for additional Greenways along the former Newry to Armagh railway, and on the former Belfast and County Down Railway around Downpatrick.*"

4.25 (page 22) '*the District has <u>two </u>operational greenways that utilise the Newry Canal. Proposals exist for new greenways on former railway lines such as from Newry to Armagh and Downpatrick to Ardglass*'.

These sections rely heavily on the document '*Exercise Explore Enjoy - A Strategic Plan for Greenways*' at https://www.infrastructure-ni.gov.uk/publications/exercise-explore-enjoy-strategic-plan-greenways from 2016.
However the document 'Newry Mourne and Down Active Travel Masterplan' (published in 2020 https://www.newrymournedown.org/media/uploads/nmd_active_travel_masterplan.pdf is considerably more detailed on the subject, and I would argue mostly supersedes it as an evidence source on Greenways. Strangely, the Active Travel Masterplan does not seem to be referenced in Tech Supp 5. This seems a significant omission in the evidence base as presented.

Dundrum Coastal Path

Another omission is the **Dundrum Coastal Path,** https://walkni.com/mourne-mountains/dundrum-coastal-path/. For some reason this is not included in Tech Supp 5, but as a traffic-free route along a disused railway (part of the former BCDR line - see https://en.wikipedia.org/wiki/Belfast_and_County_Down_Railway), it surely fits the definition of a greenway? Thus I would suggest the District currently has **three** Greenways, not two!
The Dundrum Coast Path is at present owned and maintained by the National Trust. It is 3km long (although as it is a linear route, most users starting at Dundrum will experience it as a 6km there-and-back walk) and is used as part of the Lecale Way (a segment of the Ulster Way, https://walkni.com/walks/lecale-way/) and St Patrick's Way Pilgrim Walk (https://visitarmagh.com/trails/saint-patricks-way-the-pilgrim-walk/), both long-distance waymarked hiking routes.

(Arguably, the portion of cycle/footway between Bessbrook's Millvale Road and Craignore Road, which uses the former Bessbrook Electric Tramway and was formerly designated by Sustrans as part of NCN9, constitutes a <u>fourth</u> greenway…)

Problems with Greenway evidence

My discussion in this section strays into the realms of coherence and effectiveness (i.e. **CE1**, **CE2** and **CE3**) but as I see it, the problem ultimately stems from a lack of rigour and detail in the evidence itself, hence I include it in the discussion here.
In my view, the document '*Exercise, Explore, Enjoy – A Strategic Plan for Greenways*' struggles to function as a 'strategic plan'. I find it to be highly aspirational and lacking any serious consideration of practical implementation and potential difficulties. This is despite a cursory table of scorings and costings. Indeed, were I to be unkind, I might dismiss the document as largely armchair speculation by

an enthusiast (namely, the author of the https://nigreenways.com/ website), who has simply highlighted the routes of former railway lines on old Ordnance Survey maps, and said 'wouldn't it be nice if these were all turned into cycle routes?'

I find this approach to be fundamentally flawed: it is predicated on the notion that these old railway lines are still sitting there, as intact and continuous corridors, free of obstructions, waiting to be turned into greenways. This is manifestly not the case: since these railway lines were closed (predominantly in the 1950s), the large majority of the land in question has returned to private ownership; much of this land ownership is agricultural, but at several key locations, it has been put to light industrial or residential use, with several housing estates built upon it.

These criticisms that I make are also alluded to in the '*NMD Active Travel Masterplan*' - for example, page 58 of that document (in this case talking about the proposed Greenway on the former BCDR line between Comber, Downpatrick and Newcastle:

> "*An initial feasibility study was carried out by Doran Consulting. This found that there were* **significant challenges to delivery** *through some sections of the route, particularly through urban areas such as Downpatrick, Comber and Burren. Although the feasibility study looked at some alternative on-road options through these challenging areas, this wasn't examined in great detail…. The feasibility study recommends that alternative alignments through certain sections should be investigated further. Given the constraints identified around urban areas, a blended approach would need to be considered, with the greenway alignment using high quality low traffic roads, or protected cycle tracks through urban areas.*
> *This study also identified issues around land owner and stakeholder objections, particularly with objection from the Ulster Farmers Union, and railways.* **Doran consulting conceded that a limitation of their study was a lack of comprehensive landowner and engagement and recommended that this would need to take place if the project were to progress**."

Doran Consulting's point about engagement with current landowners is fundamental: there are likely **several hundred private landowners involved** along all the former railway lines, and to date no serious attempt appears to have been to even collate and list them, never mind ascertain if they would be willing to sell or lease the land back for the creation of a greenway. I must contend that this is a serious omission in the evidence base when proposing Greenways on former railway lines to be feasible.

It may be conceded that the routes of former railway lines will feature gentle gradients, and this factor does give them an advantage as walking and cycling routes. However if the land simply is simply not available for use, then that advantage becomes irrelevant. Hence Doran Consulting's advice that 'alternative alignments through certain sections be investigated': put more bluntly – when planning 21st century greenway infrastructure, there seems little point restricting the choice of route to land that was available for use in the 19th century. Significant portions of that land are no longer available! I feel the tenor of the evidence in Tech Supp 5 implies that said land *is* available, and that this is unwarranted.

Below I make a quick and non-exhaustive survey of some of the more obvious problems with the proposed Greenway routes. (The annotated map screenshots I have used are taken from https://openrailwaymap.org – obstructions are ringed in red.)

- ***Former Bessbrook - Newry Electric Tramway***

The parts of this former line which could be repurposed as a 'greenway' already have been! This is the section between Millvale Road and Craigmore Road.

Aside from this, the obstructions are considerable: the route along Millvale Road has been covered with several recent housing developments, and south of the A27 road, the substantial 'Craigmore View' housing estate has just been built in the past couple of years! From there to the centre of Newry, the land has long since been repurposed during the latter half of the 20th century.
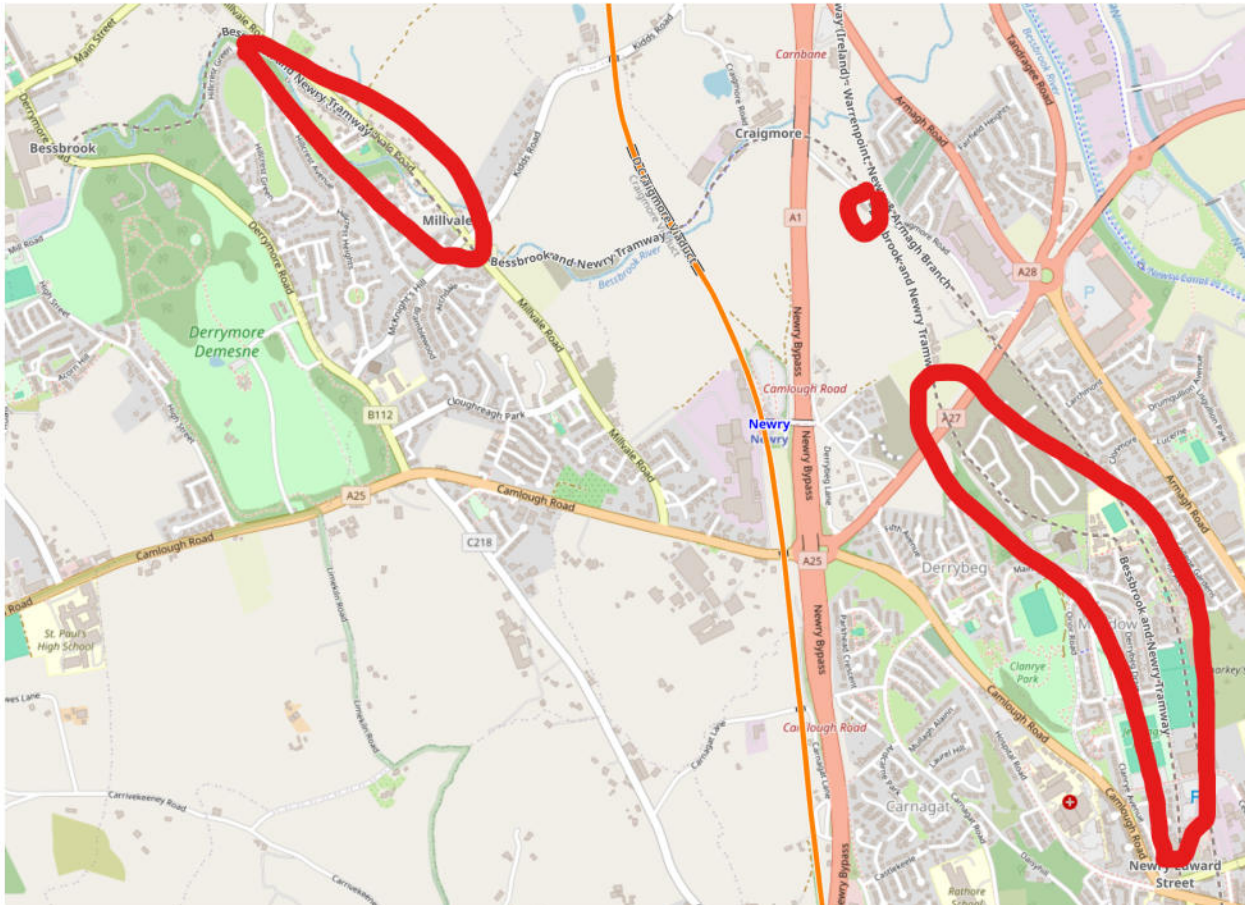
- **Former BCDR Mainline (Comber > Downpatrick > Newcastle), including branch to Ballynahinch**

The BCDR now features major obstructions to its corridor at every settlement it formerly served:

- The eastern flank of Sainfield sees the line completely blocked, both with light industrial use (Millpond Business Park) and the Old Coach Lane / Old Coach Way housing developments.
- The eastern side of Ballynahinch is built upon, from Ballynahinch Library, and Ulsterbus depot, and Windmill Gardens residential dwellings
- The western side of Crossgar has replaced the railway corridor with considerable residential developments (Edenvale, Station Park, etc)
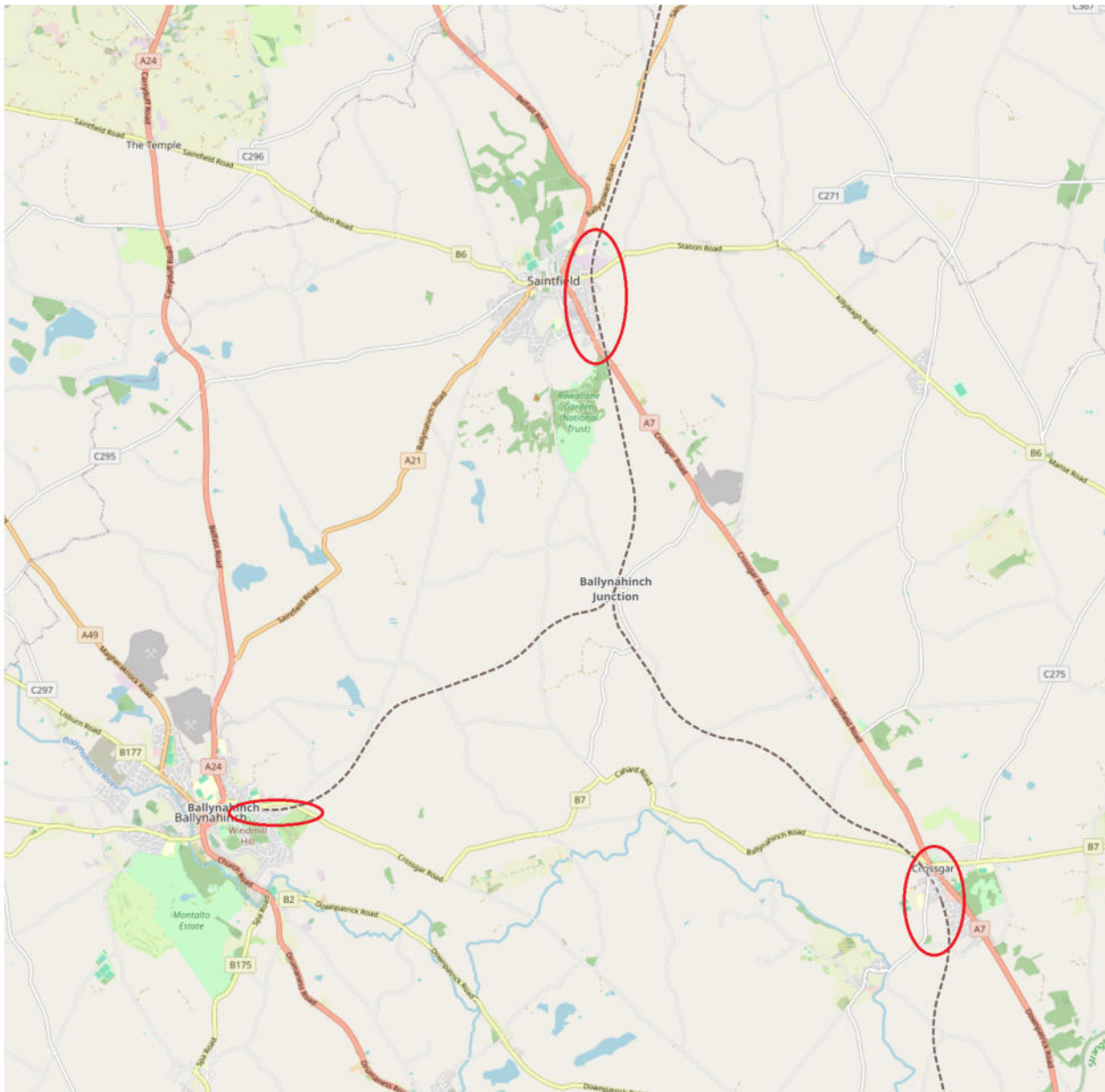
- At Downpatrick, the former line is of course still in use, now as 'heritage railway' (www.downrail.co.uk), between Inch Abbey, Downpatrick Bus Station, and the Racecourse

- Whilst (as discussed above) the former line between the head of the Blackstaff River and Dundrum village *is* now converted into a greenway (the 'Dundrum Coastal Path'), the route through Dundrum itself is now obstructed by residential housing.
- There are considerable residential developments blocking the line on its approach into Newcastle
- None above considers isolated agricultural or residential buildings blocking the line in rural areas. Examples include the former Tullymurray Station (on the A25 Ballyduggan Road), now a private dwelling; the upgraded A25 also uses some of the former trackbed.
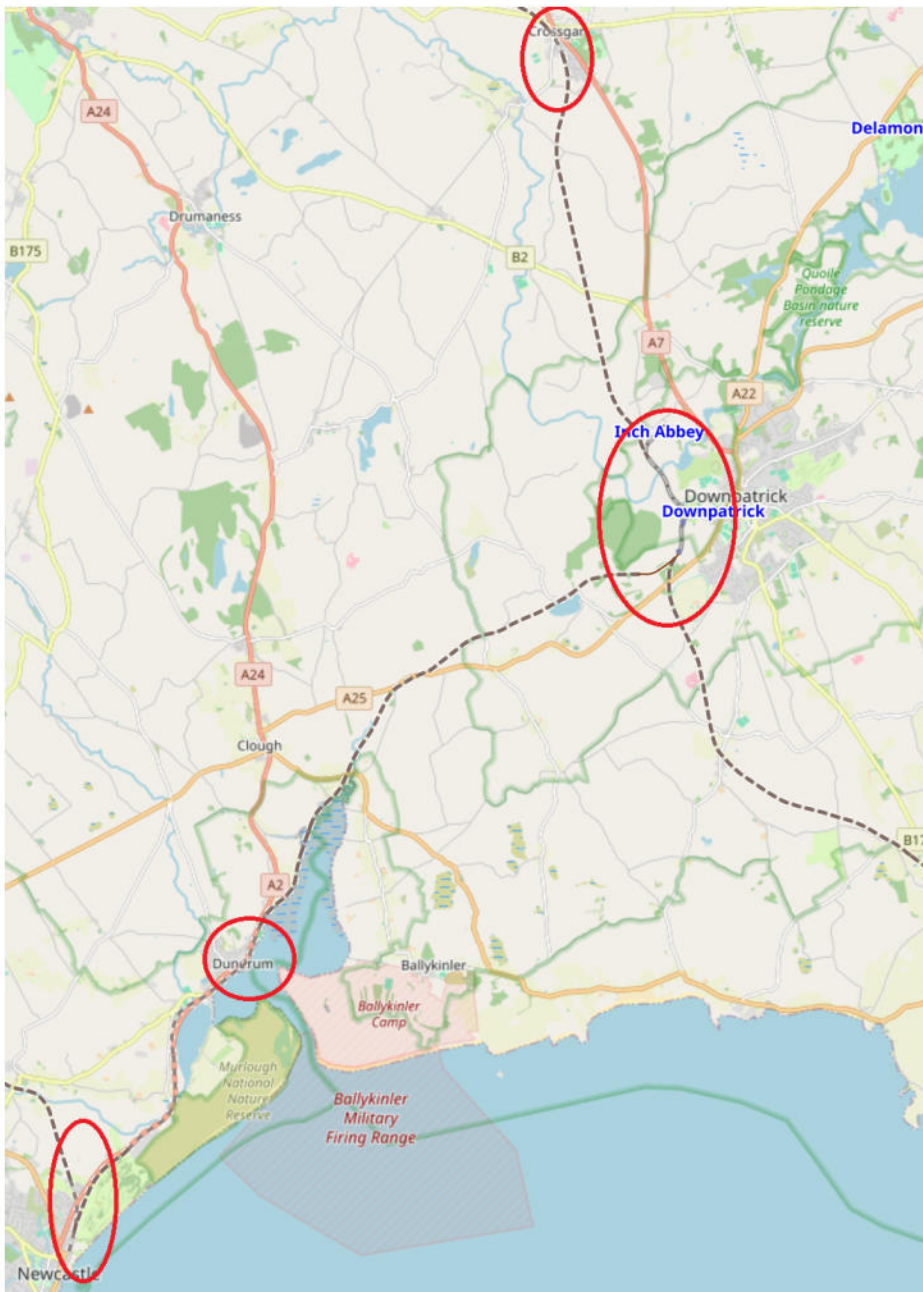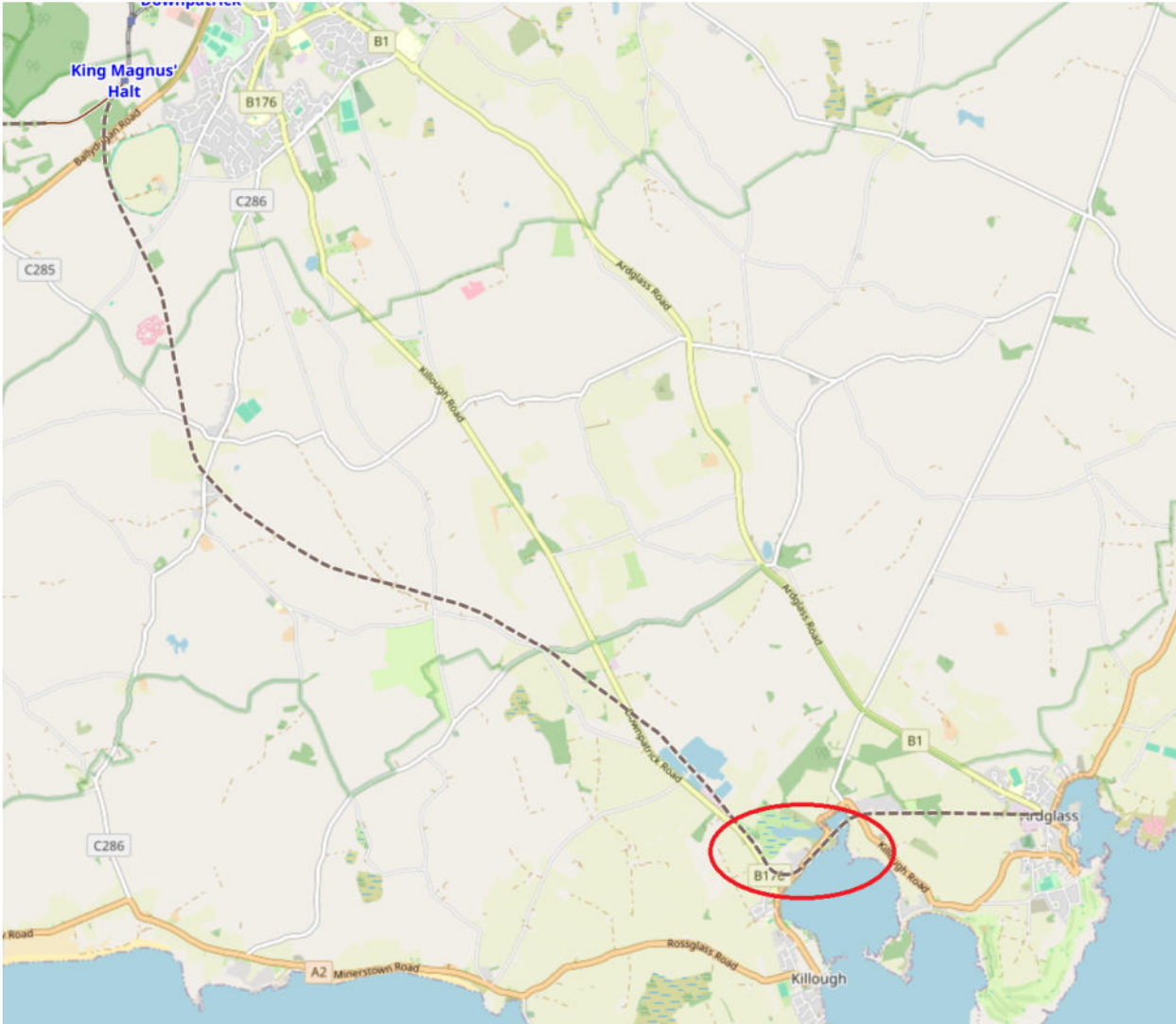
- **BCDR Ardglass branch**

Much of this corridor does remain free, but there is considerable blockage in the vicinity of Killough – an industrial site on the north-west side, and private dwellings on Station Road.

The former Ballynoe Station is a private residential dwelling, and the railway bridge across to Coney Island has long since collapsed.

- **BCDR - GNR(I) branch line Newcastle - Castlewellan - Banbridge**

Again, there are considerable blockages at every settlement this former line serviced:
- At Newcastle itself, there is considerable residential development from the site of the former Newcastle train station - Golf Links Road - Boulevard Park etc
- At Annsborough: between Station Road - Corry Wood Park - Mill Hill - industrial estate and housing estate
- Private dwellings at Clarkhill Road crossing
- Leitrim village: Old Railway Close housing estate
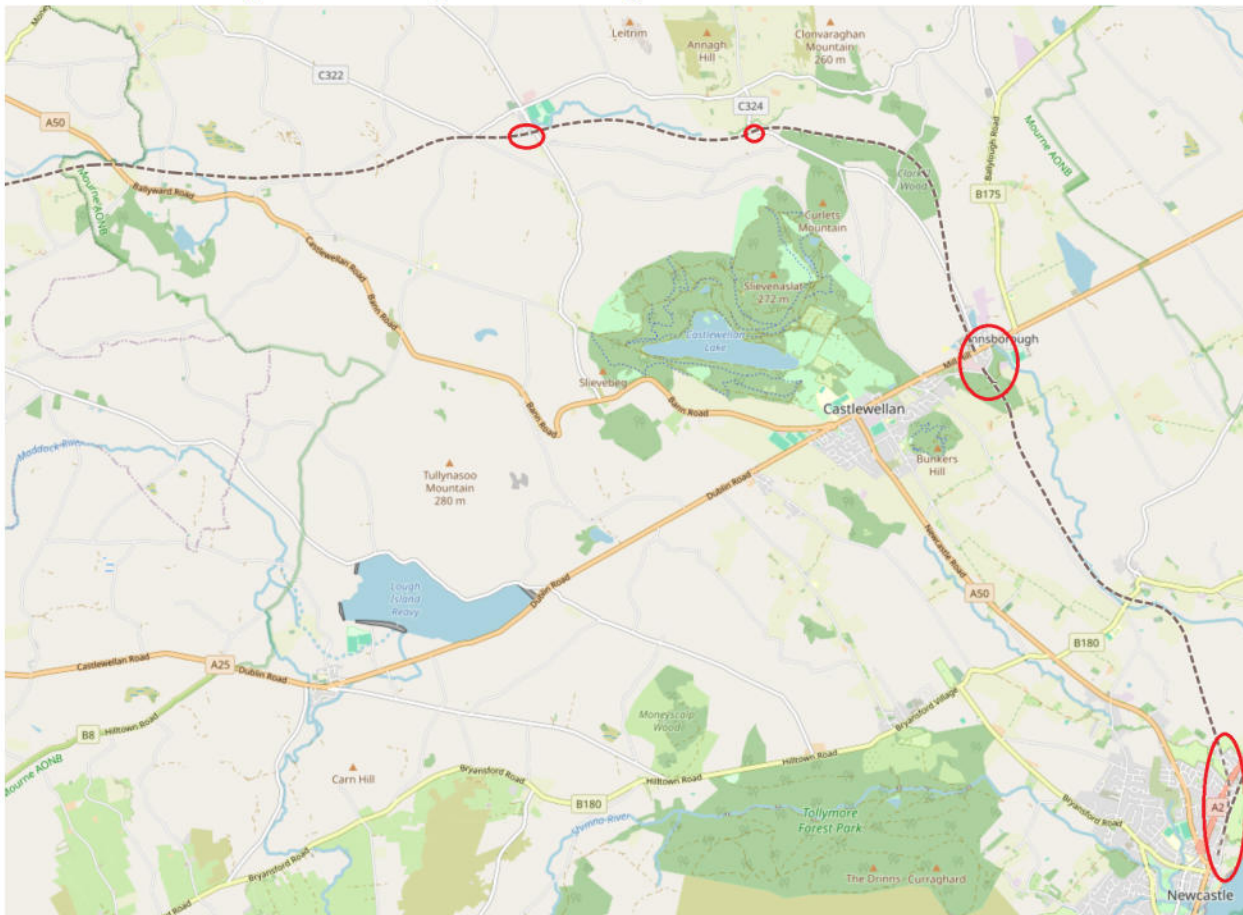
- **Great Northern Railway (Ireland) line, Newry to Armagh; branch to Warrenpoint**

Whilst there are definitely interesting (if costly) possibilities regarding the rural stretches of this line (not least the Lissummon tunnel), the rest of the former line is so manifestly obstructed that I have not even attempted to show it on a map: the modern A1 dual carriageway (Carnbane junctions with the A27 and A28) obliterated old railway corridor, then from the A27 to Newry city centre, the route is built on. Between Newry and Warrenpoint port, the A2 dual carriageway was built on top of the railway line in the 1960s.

All in all, I find the 'evidence' put forward in Tech Supp 5 to support the feasibility for Greenways along former railway lines to be cursory in nature, and lacking in any detailed consideration of obstructions in the corridors, or the practicalities of reacquiring the land from its present day owners.

I would stress that I nevertheless (strongly!) support the underlying strategic aims and desirability of 'greenway' style routes. But I cannot agree that the evidence is there to demonstrate that reuse of former railway lines is going to work as a delivery method. In many cases, I feel that entirely new greenway corridors would likely need to be vested from agricultural land.

Further deficiencies in the evidence base for Greenways

Appendix A of the '*Exercise Explore Enjoy - A Strategic Plan for Greenways*' document contains further dubious claims:

- **EuroVelo** (https://en.eurovelo.com/) The claim is made that this comprises 60,000km of routes 'connecting the whole European continent' and will be 'substantially complete by 2020'. I find this project to be largely 'vapourware'. In large part it has only ever been a branding exercise, where 'national' cycle routes in each country would be labelled as 'EuroVelo' ones. In the UK, this meant labelling some of Sustrans' National Cycle Network routes as being part of 'EuroVelo' (but not actually waymarking or signing them as such on the ground – the concept only ever existed on maps and websites). Far from being 'substantially complete in 2020', what happened in that year was that Sustrans decimated their NCN in Northern Ireland on safety grounds. Thus, the majority of the co-opted NCN routes which were notionally part of the 'EuroVelo' scheme do not even exist any more (all that remains is the Lagan towpath between Belfast and Lisburn, and a few cycle paths in Craigavon). Furthermore, no EuroVelo cycle routes in Northern Ireland connect to any ferry port, so the contention that the route is connected to 'the whole European continent' is quite specious.
- **The National Cycle Network** – again, the claims made here for the NCN were blown apart by Sustrans' decimation in 2020.
- **The Ulster Way** (https://walkni.com/ulster-way/) – the claim that this is a '1000km circular walking round, predominantly off road' is simply false. Some of the shenanigans are outlined on https://en.wikipedia.org/wiki/Ulster_Way but essentially the continuous circular route originally devised in the 1970s had become non-viable by the turn of the millennium, with several sections now on unpleasantly-busy 60mph roads that lacked pavements, or blocked by changes of landowners who had withdrawn permissive rights of way. The route was relaunched in a new configuration in 2009. To save face, it is presented on Walkni.com as a continuous circular route, but in actual fact it now consists of several disconnected segments (albeit high quality, traffic free ones) – the remaining gap portions are labelled 'Link Sections': and the official Ulster Way website rather diplomatically advises that 'these are not waymarked', and 'follow public roads' and recommends you 'take public transport' rather than attempt to walk on them. What it fails to mention is that there often *is* no public transport along these sections! (For an example in the NMD district: the A2 dual carriageway between Newry and Warrenpoint is notionally an 'Ulster Way Link section'. There is no serious suggestion that members of the public walk along this as a hiking route (thankfully, a bus service is in this case available). The implication that this stretch of dual carriageway is somehow an asset which can be regarded as part of a greenway network is quite bogus.

Harbours and Ferries

4.26, 4.27 (page 22).   There is no mention in the evidence of the former 'Omeath Ferry'. As far as I can gather, this was a foot-passenger service running between Warrenpoint and Omeath across the lough. Google Maps Street View shows a signpost for it mounted on a street lamp in Warrenpoint as recently as 2022 (see screenshot below), and Google Gemini suggests it ceased running in 2015 (simply because of a health and safety issue with the vessel, which the operator could not afford to rectify). I think it would be appropriate to include this ferry service in the evidence base, with consideration of what happened to it! It is relevant to the financial viability of such services in future.
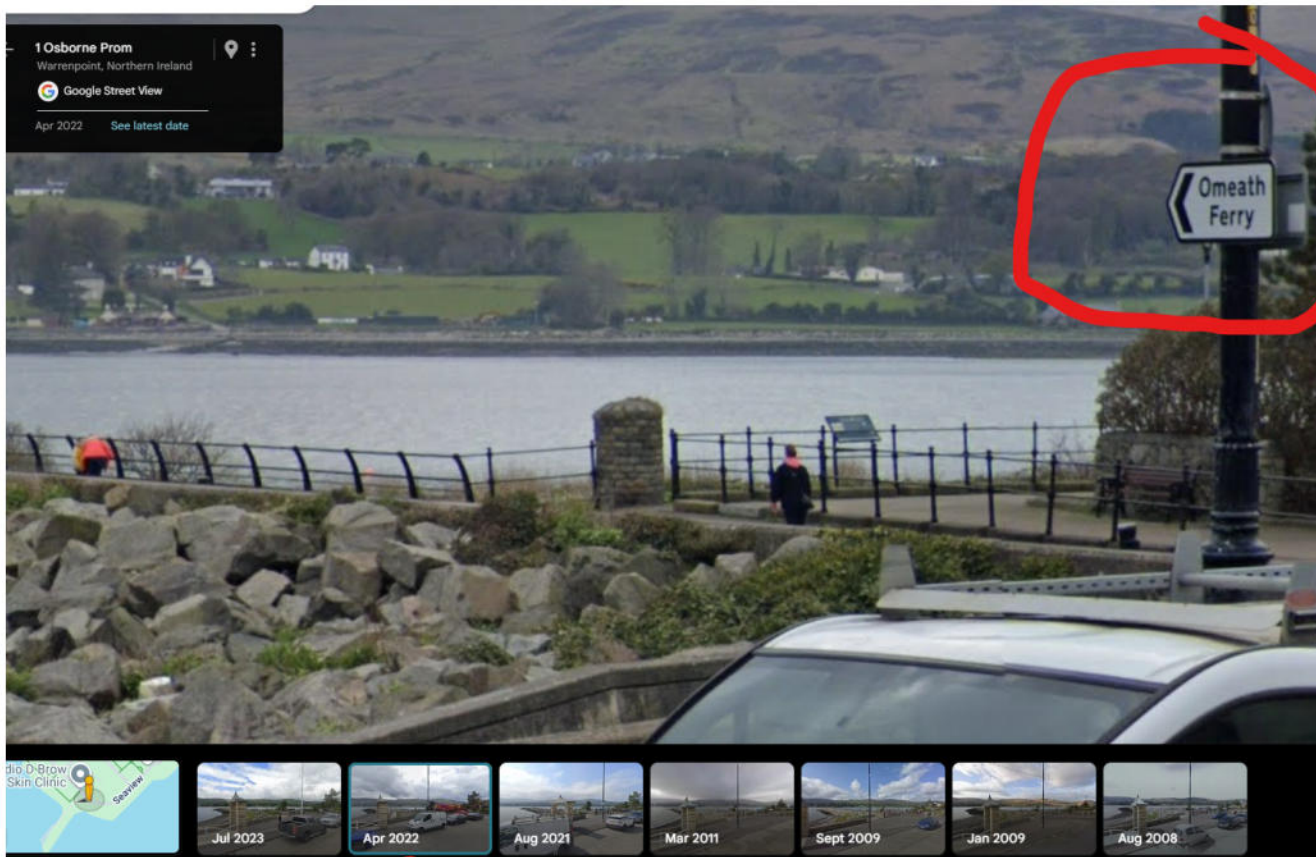
2. Coherence and Effectiveness of the Strategic Policy on Sustainable Transport (TRS1)

I would like to state I am very much supportive of the stated aims of TRS1. I regard modal shift away from private cars to a mixture of public transport and active travel as highly desirable, and am pleased to see it stated so unequivocally in the Draft Plan.

However I have significant misgivings that the 11 Transportation Policies (TRA1 to TRA11) form a coherent and effective set of policies with clear mechanisms to achieve the desired strategic aims. In part, of course, this is because NMDDC as a body is not responsible for the provision of public transport nor for transportation infrastructure (sustainable or otherwise) — these are the domain of Translink and the Dept for Infrastructure. As such, it is difficult for the 11 Transportation Policies to directly influence some key aspects of what would need to happen in practice to realistically deliver a modal shift.

Nevertheless, I feel that when viewed under the lens of tests **CE1**, **CE2** and **CE3**, the Plan at present struggles to achieve its stated aims.

I discuss some weaknesses and suggested measures that might address these below.

Consideration of Policies TRA1 – TRA11

TRA1 - Creating an accessible environment

I am happy to see the measures set out in TRA1 as far as they go, but I do not think they go far enough. Realistically it seems to be that they amount to not much more than if a wheelchair user or person of otherwise reduced mobility was driven to a new public or retail building, they could expect to find step-free access onto the premises. This is obviously welcome (and indeed essential) but I do not see how it would drive a modal shift to sustainable transport.

Suggested changes in the plan:
- New public and retail buildings should be required to provide covered cycle parking as standard. For public sector buildings this requirement should be upgraded to secure cycle parking. (In fairness, this is covered in TRA8)

- New public and retail buildings should be required to make an assessment of their accessibility by public transport. In most cases this would involve identifying the nearest bus stops, walk time from them, and the service provision (e.g. are there services at weekends and evenings). The Planning Service should consider guidelines as to what would be considered adequate public transport provision to such a building. (This would be in much the same vein as to how the availability/capacity of water, waste water, telecoms, electricity and other utilities is currently considered when granting permission for development).
  Such a policy could be construed as giving Translink an unmerited veto on development, and creating a 'tail wags dog' situation. I would argue it need not operate like that. I suggest that it is vital to introduce an assessment criterion of this kind so as to build a quantitative evidence base to really understand gaps in Translink's current service provision, and use that information at

departmental level to inform and drive the change and investment that would truly be necessary to deliver modal change.

TRA2 - Access to Public Roads

I do not disagree with policy TRA2 as far as it goes, but I do note that this policy seems focussed entirely on motor vehicles.
It is often the case with new developments (both retail and housing) that they focus on vehicular access to the road network and ignore potential for access to pedestrian and cycle infrastructure.

Here are a couple of examples to illustrate the point (not intended to be an exhaustive survey). They use screenshots from the OSNI Map View with the 'Greenspace Off Road Trails' layer showing a green overlay for public rights of way:

- ***Bessbrook: Hillcrest housing development***
As can be seen on the screenshot below, this substantial development features a single vehicular access point onto McKnight's Hill (ringed in red), and fails to capitalise on the pedestrian permeability that could arise from making better use of the public footpath (PRoW) between Derrymore Road and two points on Millvale Road. In particular on the Millvale Road side, the PRoW is fenced off behind people's back gardens when instead pedestrian access could have been provided at multiple points into an attractive woodland area.
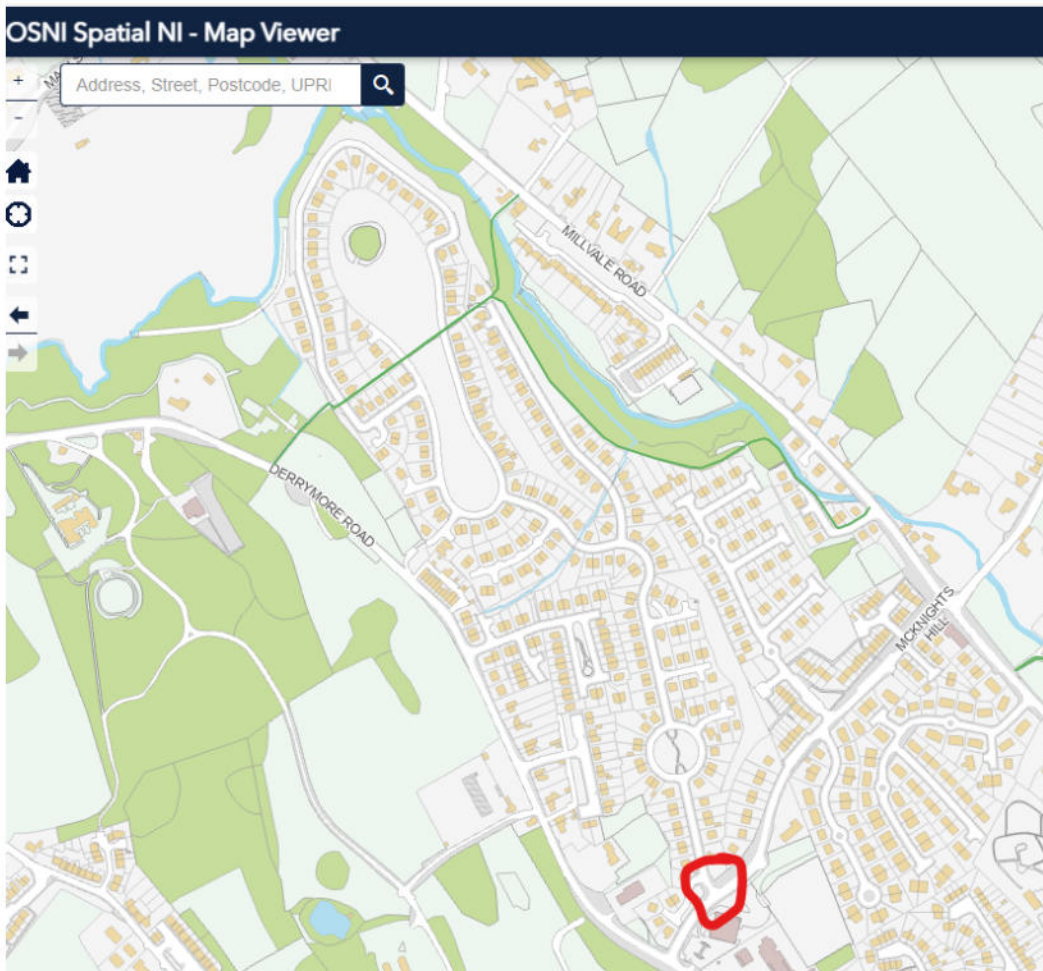
- **Carneyhough Court / Ardfreelin / Cairn Hill developments in Newry**
  In a similar fashion to the Bessbrook example above, these modern housing development in Newry are adjacent to public footpaths (PRoWs) but are served with a single vehicular access to the road network, which access to the PRoW is blocked (hidden behind fences at the backs of gardens). In Carneyhough Court, the development actually appears to have been built with an asphalt path leading to connect with the PRoW on its eastern flank, but this has been barricaded by a fence. This restricts pedestrian permeability and encourages car use.
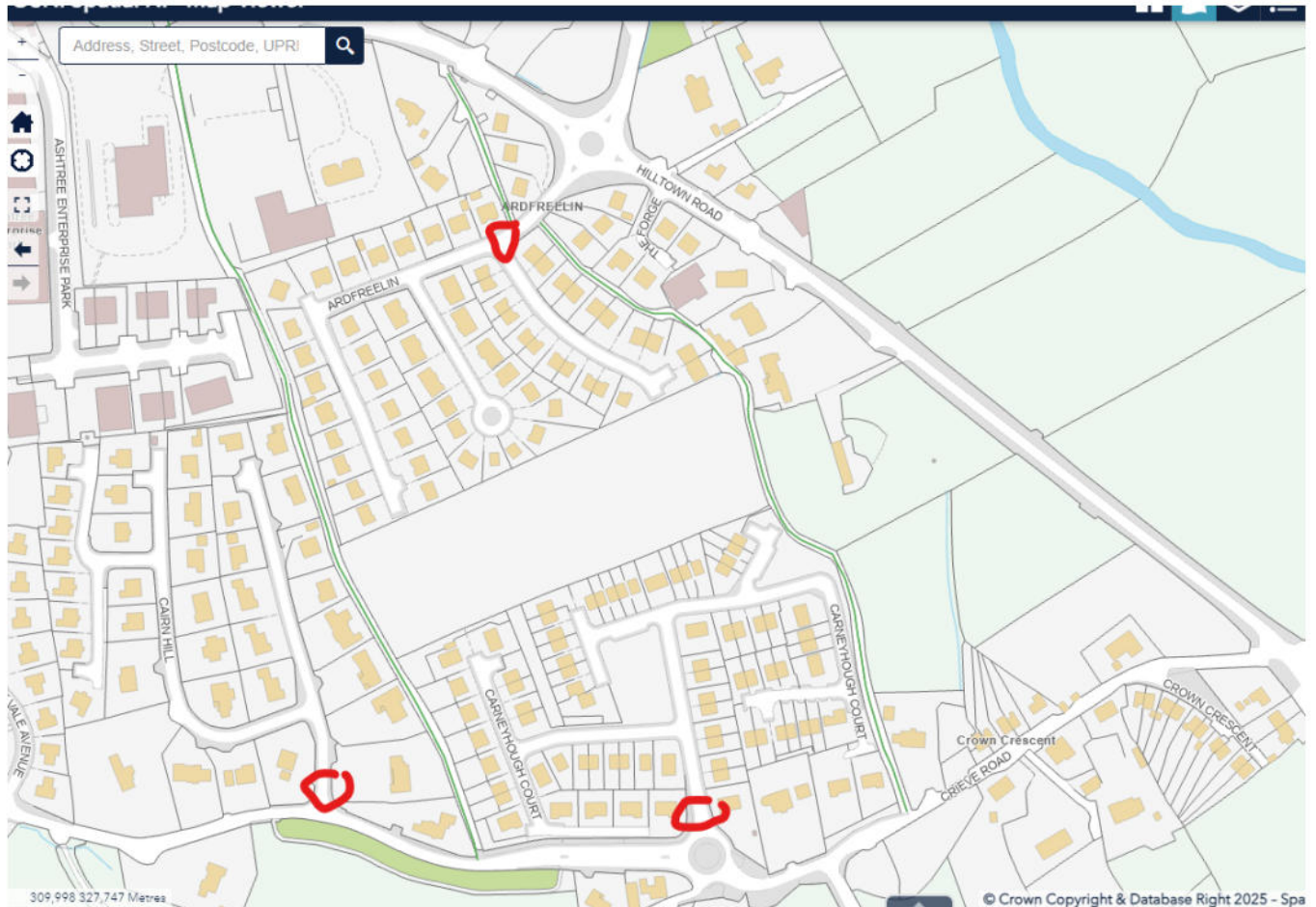
There are similar examples to be found at other settlements in the district.

Suggested changes in the plan:
New developments (both residential and retail) should be required to consider pedestrian and cycle permeability on their boundaries and to avoid restricting it by ill-judged placement of dwelling or premises boundaries. Vehicular access should not be the only consideration.

(I am not 100% clear whether my suggestion here for TRA2 was not actually part of the intended aim for TRA1! However the 'justification and amplification' examples given in the Plan for TRA1 make it read as if TRA1 is intended to focus on access to buildings within the curtilage of a site, whilst TRA2 is more concerned with access across the boundary of an entire developed plot of land.
If I am misinterpreting things there, perhaps there is scope to clarify the respective policy wordings in that regard).

TRA3 - Access to Protected Routes

Whilst I do not find fault with this policy on its own terms, I note that, by its own words, its chief aim is to maintain efficient conveyance of private motor vehicles on roads. It is hard to see how this can realistically help contribute to the overarching strategy of modal shift. Arguably public transport (bus services) will also benefit from the TRA3 policy, but this is rather tenuous. There is nothing in TRA3 about sustainable transport (e.g. requirements regarding cycling infrastructure or bus stops with respect to protected routes).

TRA4 - Protection of New Transport Schemes

Regrettably, within the context of the TRS1 Transport Strategy, I find this policy to be absurd and incoherent. Whilst ostensibly it could be claimed to be neutral as regards sustainable transport (given that it seeks not to prejudice *any* major transport scheme, and explicitly cites park & ride, pedestrian, cycling and public transport among the types, alongside road schemes), this must be read in context of the currently proposed schemes set out in Tech Supp 5 (page 18, Strategic Network Improvements). Significantly, these schemes are the A24 Ballynahinch By-pass (a non-sustainable road scheme only necessary due the destruction of Ballynahinch's railway connection by the DfI's predecessor) and the Newry Southern Relief Road (a scheme which would cripple the functional capacity of the Newry Ship Canal, and is only necessary, yet again, because of the destruction of Warrenpoint Port's rail connection by the DfI's predecessor). So, the de facto proposal in TRA4 is for NMD's Planning Service to facilitate two multi-million pound non-sustainable road schemes (in excess of £60M, e.g. see press reports such as http://thedownrecorder.co.uk/pages/?title=Ballynahinch_bypass_fears__as_costs_spiral_up_to_%C2%A360m and £130M https://www.bbc.co.uk/news/articles/cx2ggjk7n23o) – dwarfing any expenditure on sustainable alternatives.

Suggested changes in the plan:
In order to align with Strategy TRS1, Policy TRA4 should be restricted to protection of new *sustainable* transport schemes. This must include consideration of how such schemes conform to the requirements of applicable legislation, such as the Climate Change Act (NI) 2022.

TRA5 - Disused Transport Routes

I support the aims of this policy, however I do note that:
-   The DfI's proposed Newry Southern Relief Road (https://www.infrastructure-ni.gov.uk/articles/newry-southern-relief-road-overview) would contravene this policy in its current form, as its proposal for a fixed bridge across the Newry Ship Canal would place a height restriction on masted vessels of 12 metres, manifestly prejudicing the continued use of Ship Canal for transport of such vessels.
-   From the evidence I have collated and presented above regarding the 'Greenways and Disused Transport Routes' section of Tech Supp 5, the NMDDC Planning Service seems to have already violated the proposed TRA5 at several key locations, which in the worst case may have already scuppered plans for use of the disused transport corridors in question. A prime example of this would be the Craigmore Heights development in Newry, on the line of the former Bessbrook Electric Tramway, which was a greenfield site as recently as 2020.

TRA6 - Transport Assessment

Whilst I find this policy to be sensible in intent, I feel it will be of limited efficacy as regards helping to bring about any modal shift in transport modes, because it is too passive in nature: under this policy in its current, developments on sites already well served by public transport or active travel infrastructure will be favoured, and sites not blessed with these will be disadvantaged. This has the potential to stifle growth in the district rather than to direct it in a coordinated and sustainable way. In other words, rather than assist NMDDC's Planning Service to drive development in ways which fulfill strategic objectives, it risks making development in the district subservient to the whims and failings of Translink and the DfI.

Suggested changes in the plan:

In order to provide more agency and mechanism by which TRA6 could help fulfill the aims of TRS1, I suggest the requirement should not merely to be to conduct a Transport Assessment and share it with the NMDDC Planning Service, but that the Planning Service should commit to share the results of assessments with the DfI and Translink, in a coordinated way. (Clearly this could be done periodically, in aggregated form, rather than every individual assessment). This would provide a valuable source of data on demand which the DfI and Translink could use to plan service provision. In effect, a commitment to partnership working.

TRA7 - Car Parking and Servicing Arrangements

Regrettably I must contend that policy TRA7 in its current form is woefully at odds with the overall aims of the TRS1 Strategic Policy on Sustainable Transport. As presented, TRA7 directly favours and seeks to facilitate private car use. The requirements for EV charging are weak.

Suggested changes in the plan:

Many planning departments throughout the UK and beyond actively require that some kinds of residential development (particularly in urban areas) must be car free and not provide residential parking. I would suggest the NMDDC Service align with best current practice in this regard.

To align with central government policy on internal combustion vehicles vs electric ones, the requirement to provide EV changing points should surely be mandatory?

TRA8 - Active Travel

Clearly policy TRA8 is wholeheartedly aligned with the TRS1 strategy, and is thus very welcome. However it appears to be outnumbered ten-to-one in the Draft Plan by old fashioned policies which broadly favour private cars and are in opposition to the stated aims of TRS1.
I note that the current provision of cycle parking within the district is very meagre, restricted to a few of the larger settlements, and almost none of it is covered from the elements or secure. Tech Supp 5 omits any detailed assessment of the current cycle provision.

Suggested changes in the plan:
I suggest TRA8 should be expanded and strengthened. The requirement at present only appears to call for an assessment of cycling and walking provision (that it be 'taken into account') and it only suggests measures which 'may' be required, 'where appropriate'. The policy should seek to be more explicit and quantified in its requirements, and the requirements should be mandatory rather than optional.

TRA9 - Design of Car Parking

Yet another policy dedicated to serving the needs of private car use, in conflict with TRS1!

TRA10 - Provision of Public Car Parking and Private Car Parking

And yet another policy dedicated to serving the needs of private car use, in conflict with TRS1.

TRA10 makes some requirements for the design of Park and Ride / Park and Share facilities. Having observed various such existing facilities both within and beyond the district, I have noted they often fail to meet public needs in fairly basic ways.

Examples of these facilities can be found across the district at Clough, Sheepbridge, Cloghogue Roundaboard [Newry], and Bann Road [Castlewellan].
The Castlewellan facility is a striking example of one which has seen very low usage by the public (indeed it stands entirely empty most days) – it is very poorly connected to bus services (the nearest stop on Bann Road is about a quarter of a mile away and doesn't even have a bus stop sign!) It lacks differentiation from the public car parks in Castlewellan Square, which readily trump it in terms of both integrated bus connections and ready proximity to shops and amenities.

Suggested changes in the plan:
There should be a requirement for Park & Rides to incorporate bus stops with **bus shelters** (with lighting – solar-powered lighting would be a preferred option) and **real-time readouts** for when the next bus is coming. These amenities are essential for passenger convenience and comfort, making it much more agreeable to use the facilities in the dark and in inclement weather, and removing much of the uncertainty as regards onward connections. Real-time readouts are a technology that has been in routine use on public transport in many parts of the world for decades, and should not be treated as some kind of exotic luxury. Secure cycle parking at Park & Rides should also be mandatory.
The concept of 'park and share' seems rather lame to many potential users, myself included. Park and ride should always be the preferred option.

TRA11 - Temporary Car Parks

Yet another policy focussing on private car use. I appreciate that TRA11 is essentially a 'stick' measure and does align with TRS1, but in the bigger picture it would surely be desirable to have more policies and more detail in the Plan devoted to facilitating active travel and sustainable travel, rather than the Plan giving undue weight to issues involving cars.

Consideration of Journey Types

As I have alluded to above, I contend the Draft Plan's current policy set (TRA1 – TRA11) is underdeveloped in terms of 'coherent and effective' measures and 'clear mechanisms for implementation' that would achieve the modal shift away from private car use that TRS1 envisages.

One aspect of this is consideration of journey types: their purpose, length and duration, and who is undertaking them. This kind of consideration is alluded to in the '*A Bicycle Strategy for Northern Ireland*' document that Tech Supp 5 references (e.g. "*many of the journeys we make daily are short journeys: 1 in 6 of all the journeys we make is less than one mile; another 1 in 6 is between one and two miles*"). However the point needs to be explored in more practical detail: this is because **different types of active travel infrastructure provision are appropriate for different types of journey**. Instead it appears to me that the Draft Plan jumbles these together in a largely undifferentiated fashion.

For example: greenways – the kinds of 'greenway' proposed are generally lengthy routes. For instance, were a traffic free Greenway to be constructed between, say, Downpatrick and Newcastle, it would be about 15 miles long and take something like 60 or 90 minutes to complete by bicycle (or more like five hours on foot!) It can immediately be appreciated that this kind of provision could be excellent for recreation and leisure, but much less practical for everyday commuting or shopping in all weathers and times of year. Conversely, another example could be journeys to and from a primary school in a town or village. These are short trips that, with a suitable safe built environment, might typically be walked in something like 20 minutes and perhaps cycled in 5 or 10 minutes. But this must be door-to-door, from home to school and back. Street lighting and secure covered cycle parking at the school end would be essential..

These two different examples (or 'use cases') have very different practical requirements, and need to be supported by different policy specifics.

 Suggested changes in the plan:

The plan should explicitly consider various clearly defined active travel use cases. This must be done with reference to an evidence base which surveys real people who either currently make these journeys, or have expressed a desire to make them. Specific policies can then be developed which address the particular needs of defined use cases.

One use case which I think deserves particular attention is travel to and from school. There is little disagreement that 'school runs' based around private car use are undesirable, for numerous reasons (road safety, traffic congestion, air quality, health and fitness,...). School runs for primary and for secondary school are distinct use cases and involve differing demographics and considerations. The concept of a '**school street**' has been deployed in many parts of the UK with considerable success in many areas – essentially consisting of temporary closure of roads to non-essential vehicles during 'school run' hours, creating a safer space for walking and cycling to school. These can be abetted by

various forms of infrastructure intervention and camera enforcement which planning policy can assist with. This is an example of the kind of use case which could be tackled in a much more concrete way within the Plan.

Translink

I think it fair to say the 'elephant in the room' regarding achievement of the TRS1 strategy is **Translink**. It is impossible for members of the public to undertake a modal shift from private car use to public transport if there simply is no suitable public transport for them to use. Moreover, NMDDC's Planning Service is limited in what direct influence it can have on this situation.

Nevertheless, the situation is not entirely intractable, and in many cases, incremental improvements in convenience, reliability and usability of Translink's services can reach a tipping point, and make it feasible for members of the public to switch. NMDDC does have some agency as regards some of these incremental improvements. I present two examples below:

Rural bus stops often lack any signage

A surprising number of Translink bus stops do not currently have any bus stop sign (often termed a 'flag' sign) to indicate their physical existence.
In response to FOI request 0067-2025-FOI (Jan 2025), Translink confirmed the following:

- Translink operates 14,650 bus stops across Northern Ireland
- 5239 of these do not have any bus stop signage ('flag' signs)

Thus approximately **36% of bus stops province-wide lack any signage**. The large majority of these are on rural roads; routes through the NMD district are entirely typical of these.

Translink have argued that 'passenger numbers at these unsigned stops are low, so it would not be economical to provide signage at them'. We might well argue in return that the lack of visible stops is a major contributor to low passenger numbers! **How are passengers to know that the stop is there in the first place?**

Translink have argued that the stop positions are shown in their smartphone app. However:
- Not all passengers have smartphones, or know about the Translink app and how to use it.
- Data signals are often weak or non-existent at rural locations such as these unsigned stops, meaning the app simply won't work there.
- The positional accuracy of Translink's bus stop data in its app is often out by 100 metres or more, which in practical terms means the stop can be rendered on the wrong side of a hedge or at a position on a rural road which is not suitable for passengers to wait (e.g. a blind bend with no verge).

To quantify the cost of installing a 'pole and flag' sign at a bus stop, in Sept 2024, Colin McGrath MLA submitted written question AQW 14409 22-27 (https://aims.niassembly.gov.uk/questions/printquestionsummary.aspx?docid=408974) on this topic:

The Minister replied that the cost of a designated pole and flag was "*approximately £500*".

Translink contend this expenditure is not economically viable.
I note however, assuming a standard bus fare of approximately £5, that even if an investment of £500 in a visible stop sign only resulted in two more passenger journeys to that stop per week (surely a modest projection), this would pay for itself within a year.

AQW 14409 22-27 also asked "*whether the Department will consider a scheme allowing community stakeholders to sponsor a bus stop?*".
Translink responded positively – they "*would be keen to work in partnership with community stakeholders to provide funding for specific installation*s". Notable "All new installations **will be subject to statutory consents including planning approval**, land ownership confirmation and funding".
This does suggest a way forward if Translink remain opposed to funding rural stop signage themselves.

Suggested changes in the plan:
I contend it would be highly desirable for ALL Translink bus stops in the NMD district to have a 'flag' sign indicating their existence. The lack of a sign undoubtedly impedes public awareness of bus stops and indeed of entire routes (for example, excluding a couple of urban stops with Ballynahinch, the entire set of stops from Ulsterbus route 27 between Ballynahinch, Dromara, Finnis and Dechomet at unsigned).
In their response to AQW 14409 22-27, Translink have cited planning consents as one of the bureaucratic and financial hurdles to achieving this. NMDDC Planning Service could assist in this situation by for example:
- making it a planning policy requirement that a bus stop *must* have a flag sign, and ensure there is a fast-track streamlined process for providing planning consents for signage.

Few bus stops have bus shelters

Bus shelters make a real difference to passengers using services in inclement weather. If they provide seating, they are particularly helpful to passengers who are less able to stand for long periods of time.

However the large majority of bus stops within the NMD district are not equipped with bus shelters. This can be one of many cumulative factors which combine to make a modal shift from private car to public transport an unattractive option.

Translink is responsible for providing bus shelters in the first instance, however under the Roads (NI) Order 1993 (https://www.legislation.gov.uk/nisi/1993/3160/contents/made), district councils are also empowered to "*erect and maintain on any road within the district, shelters for the protection from the weather of persons waiting to enter public service vehicles.*"

To this end, NMDDC has had a **Bus Shelter Policy** since the year 2015.
https://www.newrymournedown.org/media/uploads/ns1_-_bus_shelter_policy_2022.pdf

A recent FOI request https://www.whatdotheyknow.com/request/bus_shelter_policy revealed that this Policy as drafted had been decidedly unproductive:
- In the past 10 years, NMDDC had approached Translink to request provision of a bus shelter at 34 different stops.

- Translink had declined in every single instance.
- The Council has only gone on to exercise its own powers to erect a bus shelter in 11 of those cases.

There are two flaws with the current NMDDC Bus Shelter Policy as it stands:

- The Policy requires the Council to pursue the matter through Translink in the first instance. Translink have been extremely slow to respond at all (and have never responded positively). It has been reported in the press (https://www.newry.ie/news/council-to-review-their-bus-shelter-policy) that in some cases the Council's bus shelter applications had sat fruitlessly with Translink for over two years.

- The Policy as currently written constrains the Council to only consider 'passenger usage numbers' at a stop as the criterion for whether a bus shelter is merited. This seems short sighted, as the very lack of a bus shelter (often compounded with a lack of bus stop sign) can be a significant factor in making the stop an unattractive choice for passengers in the first place.

  The Policy could be amended to also consider a stop's strategic value (e.g. providing access to amenities, tourist sites, etc) rather than solely the current volume of passengers. This would enable the Council to invest some budget strategically to enhance public transport facilities at sites of interest.

Another aspect of bus shelter design is lighting (particularly on rural roads where there will typically not be any street lighting). In 2022, NMDDC conducted a trial on the effectiveness of solar powered lighting at bus shelters in Attical (see https://www.newrymournedown.org/media/uploads/neighbourhood_services_committee_minutes_-_21-04-2022.pdf, item NS/050/2022). My understanding is that this trial was considered a success, but nonetheless no roll out has followed.

 Suggested changes in the plan:
I contend it would be highly desirable for ALL Translink bus stops in the NMD district to have a bus shelter. It is a perfect example of an incremental improvement to the service which can help create a tipping point for modal shift.
NMDDC has significant agency here to help achieve this, both directly through changes in its Bus Shelter Policy (as discussed above), and by making it a planning policy requirement that a bus stop *must* have a bus shelter (arguably this is already mandated by Equality legislation), and ensure there is a fast-track streamlined process for providing planning consents for bus shelter provision.

Railways

The Draft Plan and Tech Supp 5 does not say a great deal about railways, other than acknowledging the existence of the sole line and station which currently remain in the district. This seems a missed opportunity.

Indeed section 2.1 (page 4) of Tech Supp 5 alludes to this missed opportunity by noting that the NI Executive's *'Programme for Government 2024–2027'* states as part of its mission that 'the rail network… will be improved' but yet lists no specific improvement projects.

Newry's key position as a 'main hub' on the 'South-Eastern Gateway' and 'Belfast-Dublin Corridor' in the *Regional Development Strategy 2035* is acknowledged (section 2.3) but I note that the large majority of commuting, freight and other traffic in this corridor takes place by **road** (along the M1/N1/A1), not using the rail network. This is disappointing and contrary to the strategic aims of TRS1.

I feel the Draft Plan fails to consider reasons as to why people and businesses in the corridor may still elect for road travel in preference to rail, and thus also fails to consider measures to address this and achieve modal shift

I would suggest some current problems include:
- Rail services are not frequent enough. I appreciate that the Enterprise frequency has now been increased to hourly, which is undoubtedly an improvement on every 2 hours, but for the mainline between two capitals it is still pretty poor compared to most European cities. The timetable is lacks evening and weekend provision which would greatly valued by passengers attending events or nightlife in Belfast/Dublin
- 'Newry' train station is awkward to reach: its out-of-town location makes it a difficult destination for pedestrians and cyclists. Whilst the station does feature a good Park & Ride, the only real access point to it by sustainable transport is Translink's shuttle bus (Service 341). This only runs to and from Newry Buscentre, and only runs twice per hour. Thus, any passengers wanting to reach Newry train station by bus, either from within Newry city itself or from anywhere else in the district, always have to experience an awkward and timewasting extra journey leg on the No.341. This can add anything up to 45 minutes to a journey time. Often this will be a final straw tipping the balance towards choosing road travel over rail.
- The redevelopment of Newry train station (see section 2.5 of Tech Supp 5) is perplexing in that the new station was constructed with an escalator leading to an upper floor with excellent scenic views across the AONB, but this appears to be permanently closed to passengers. The display boards for passenger information are also dilapidated and hard to read. And the ticket desk is often unmanned, staff seemingly being allocated other maintenance and dispatch tasks. This creates a poor impression for passengers who would often prefer to enquire with a human staff member at a ticket desk as to which ticket to purchase, rather than have to deal with a ticket machine or an app.

Again, many of the problems above are ultimately operational matters for Translink and NMDDC and the Draft Plan may not be able to deliver any solutions directly. Nonetheless, a wide-ranging consideration of problems in their broad context within the Plan can be very helpful, and allow NMDDC, the DfI and Translink to work together to find common strategic approaches informed by a robust evidence base.

I would like to suggest some possible solutions to the above problems:

- Increase service frequency to half hourly; as well as Enterprise express services, include more stopping services to stations between Newry and Belfast. Include late evening services so people can get home after nights out.
- Give serious consideration to reopening closed stations and lines:
    - Adavoyle station served a south Armagh catchment (Meigh, Drumintee, Jonesborough, Forkhill etc) and might do so again (see https://en.wikipedia.org/wiki/Adavoyle_railway_station)
    - Rather than a southern relief road to Warrenpoint port, a freight rail link to the port makes much better strategic and environmental sense
    - And of course, if the rail corridors of the Belfast & County Down Railway really are still viable, a case could certainly be made that they would be of hugely more practical use to the district and community as a reopened railway, rather than a route for athletic cyclists…
- Consider alternative/expanded bus links to Newry train station, rather than all trips having to be funneled through the No.341/Newry bus station. For example, Bessbrook and Camlough currently enjoy a relatively frequent set of services to and from Newry bus station - some of these could call at the train station en route.
- Consider further enhancements to Newry train station itself - opening the upper floor, increased staffing for the ticket desk, replace the information boards with modern OLED screens.

As I noted, many of the above suggestions would be more in the purview of Translink or the DfI to implement, but they are examples of topics which I feel should be considered in Tech Supp 5, as they are very much 'part of the problem', and without acknowledging and exploring them, the Draft Plan cannot begin to contribute to addressing them, and will be hampered in achieving its aims.