

Lanyon Place Station
East Bridge Street
Belfast
BT1 3PB

6th March 2026

Dear Sir / Madam

Ards and North Down Borough Council Local Development Plan (LDP) 2032 draft Plan Strategy - Consultation Response via email

Translink welcomes the opportunity to comment on the Council's Local Development Plan (LDP) 2032 draft Plan Strategy.

The draft Strategy appropriately recognises the importance of promoting active travel and sustainable transport in new development proposals. Strategic Policy CC1 reflects the need to deliver economic prosperity while mitigating negative impacts of development and minimising environmental harm. Furthermore, AT1 Supporting Active Travel and Sustainable Transport and GP1 General Principles acknowledge that effective integration of transport and land use is fundamental in advancing sustainable development, enhancing place making, and addressing climate change.

Translink supports the draft Strategy's emphasis on parking policies as a key mechanism for reducing private car dependency and addressing congestion, particularly in urban areas. Parking control remains one of the most effective tools for influencing travel behaviours. It is essential that parking restraint is embedded at the heart of future land use planning to ensure sustainability.

Translink welcomes the Council's housing strategy, which seeks to promote higher-density development in areas with high accessibility to public transport. It is important to note that the Department for Infrastructure (DfI) compensates Translink for the delivery of public transport services under the Public Service Agreement (PSA). The provision of new or enhanced public transport services required to support sustainable development is not covered under the PSA and would therefore require developer contributions. To ensure the successful delivery of sustainable development, we recommend that Policy PA 1 explicitly references the requirement for developer contributions to fund public transport service enhancements that are identified as necessary through a Transport Assessment. These contributions should be secured through key site requirements and / or Section 76 agreements.

Developer contributions have a vital role to play in establishing public transport services during the early phases of developments and in encouraging behavioural change and modal shift. The draft Strategy should ensure that developer contributions can be secured not only for infrastructure but also for public transport provision, which is essential to achieving sustainable development objectives.

Translink welcomes Policy HECC 2, which specifies that new educational facilities should be accessible via active travel networks and public transport. Translink currently provides school transport under contract with the Education Authority. The development of schools outside of the existing contractual arrangements will require additional funding to support school transport services. This requirement should be acknowledged within the LDP to ensure appropriate provision and funding mechanisms are in place.

Translink welcomes the inclusion of TRAN 5 – Disused Transport Routes within the draft Plan Strategy. However, we recommend that this policy be strengthened, or an additional policy be introduced, to explicitly protect the existing railway network. The railway is classified as national critical infrastructure and is integral to Northern Ireland’s transport strategy and climate change mitigation objectives. Suggested wording would include *“Planning permission will not be granted for development that would prejudice the existing railway or compromise the safe passage and performance of trains”*. Justification and Amplification – Translink, through NI Railways, has a statutory responsibility to operate scheduled passenger rail services and owns and manages railway infrastructure within the Borough. The railway network plays a vital role in delivering sustainable transport, reducing reliance on private cars and supporting climate change adaptation and mitigation strategies. Trains travel up to 140km/h and require approximately 2kms to stop, making it impossible to avoid obstacles. Development adjacent to, over, or under the railway can pose significant risks to safety and operational integrity. To mitigate these risks, we recommend that any planning application within the defined railway buffer zone be subject to consultation with Translink at the earliest stage. This approach will ensure safe development near rail infrastructure and will reduce potential delays or hazards for both developers and rail operations.

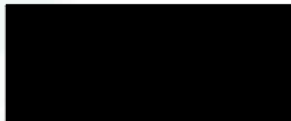
Park and Ride provision aligns with the Regional Development Strategy (RDS) 2035 and the draft Transport Strategy 2035 which recognises its role in supporting viable public transport services, particularly for large, lower density dispersed catchment areas. These facilities are critical to enabling modal shift and improving connectivity to employment opportunities, contributing to economic growth. The draft Plan Strategy correctly identifies the constraints of public transport provision in certain areas, such as the Peninsula, and highlights the role Park and Ride plays in bridging the gap with active and sustainable transport. Planning permission has been granted for a new Park and Ride facility in Newtownards which will provide a much needed connection to help reduce car-dominant trips. Translink in conjunction with DfI is keen to progress a Park

and Ride facility in Comber and has identified a suitable location adjacent to the Comber Greenway, promoting integration between active and sustainable transport. Given their transport benefits to the wider network, access for Park and Ride facilities should be permitted onto protected routes, subject to compliance with appropriate standards. Precedents for this already exist elsewhere in Northern Ireland. As the identified location meets the criteria outlined in TRAN 9, we recommend that this land be zoned for Park and Ride use within the LDP to facilitate delivery.

Finally, we believe that the Monitoring and Review framework for the LDP should include more ambitious targets for sustainable transport, particularly in light of the Council's sustainable growth objectives. Stronger targets will ensure that the LDP delivers on its commitment to sustainability and climate change mitigation.

We look forward to further engagement with the Council in finalising the strategy, with the aim of securing the sustainable growth of Ards and North Down.

Yours faithfully,



Deirdre Watson
Strategic Network Planning & Development Manager