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# Draft Road Maintenance Strategy 'Better Roads'

## Consultation Report

July 2026



# **Consultation on the Proposed Road Maintenance Strategy 'Better Roads'**

## **Draft Consultation Outcome Report**

| <b>Contents;</b>                                                   | <b>Page Number</b> |
|--------------------------------------------------------------------|--------------------|
| <b>Executive Summary</b>                                           | <b>2</b>           |
| <b>1. Introduction</b>                                             | <b>4</b>           |
| <b>2. Consultation Feedback</b>                                    | <b>5</b>           |
| 2.1 Feedback Summary                                               | <b>5</b>           |
| 2.2 Higher Quality Maintenance                                     | <b>6</b>           |
| 2.3 Targeted Maintenance Investment                                | <b>7</b>           |
| 2.4 Approach to Sustainable Maintenance                            | <b>8</b>           |
| 2.5 Other comments on Draft Road Maintenance Strategy              | <b>9</b>           |
| 2.6 Equality Impact Assessment screening                           | <b>10</b>          |
| 2.7 Rural Proof Assessment                                         | <b>10</b>          |
| <b>3. Key Issues from Individuals (via Citizen Space)</b>          | <b>11</b>          |
| <b>4. Responses from Organisations (via Citizen Space)</b>         | <b>15</b>          |
| <b>5. Responses from Organisations (via Written Submission)</b>    | <b>21</b>          |
| <b>6. Conclusions and Next Steps</b>                               | <b>33</b>          |
| <b>ANNEX A Analysis and Demographics of Consultation Responses</b> | <b>34</b>          |
| <b>ANNEX B Copy of Written Submissions</b>                         | <b>39</b>          |

## Executive Summary

A public consultation was launched on the draft Road Maintenance Strategy by the Department for Infrastructure on 2 December 2025 and closed on 30 January 2026.

This Consultation Report summarises the views of respondents across industry, professional bodies, local government, community groups and the public.

There were a total of 35 respondents to the public consultation. Overall, there was broad support for the Strategy's ambitions, with;

- 82% of respondents agreeing or strongly agreeing with the Strategy's approach to Higher Quality Maintenance.
- 76.5% of respondents agreeing or strongly agreeing with the Strategy's approach to Targeted Maintenance Investment
- 69.7% of respondents agreeing or strongly agreeing with the Strategy's approach to Sustainable Maintenance.

However, concerns were raised regarding the current condition of the road network, long-term underinvestment, and the need for clearer commitments, targets and delivery mechanisms.

Respondents welcomed the focus on targeted investment, higher quality and sustainable maintenance. They emphasised the need for durable repairs, improved drainage, better data and condition surveying, and more consistent standards across the network. Many stressed the importance of accountability for contractors, stronger oversight of workmanship and utility reinstatements, as well as investment in technology, innovation and collaboration with industry and academia.

Public stakeholders highlighted widespread dissatisfaction with current road conditions, citing poor-quality repairs, slow responses to defects, inadequate gully cleaning and winter gritting. Concerns were raised about an imbalance of investment between urban and rural areas, particularly west of the Bann, and on U class roads. Respondents emphasised the safety implications of poor maintenance, especially for vulnerable users such as motorcyclists, pedestrians and cyclists.

While there was support for targeted maintenance investment, concerns were expressed that the approach could disadvantage rural and lower class roads if not carefully managed. Respondents stressed the need for transparent

prioritisation criteria, robust data, continued site inspection capacity, and integration of both technical evidence and public reporting.

On sustainable maintenance, respondents supported the use of low carbon materials, recycling and improved climate resilience. However, they sought stronger commitments, clearer timelines and assurance that sustainability goals would not overshadow the immediate need to address widespread deterioration. Many noted that low carbon surfacing products are already available but not consistently used.

Additional comments emphasised the importance of routine maintenance such as drainage management, vegetation control and active travel route upkeep and raised concerns about procurement processes, use of consultants and lack of visible long-term planning. Respondents called for better communication, open data reporting, defined targets and technical guidance to support implementation.

Equality and rural impacts were key considerations. Respondents highlighted the need to better assess impacts on disabled people, older people and those reliant on active travel infrastructure, as well as the disproportionately higher dependence rural communities have on the road network. Many believed stronger rural proofing and equality screening should be undertaken and published.

Overall, while respondents broadly endorsed the direction of the Strategy, they stressed the need for clearer delivery plans, stronger accountability, consistent funding and transparency in implementation to ensure meaningful improvements to the condition and safety of Northern Ireland's road network.

## 1. Introduction

A public consultation was launched on the Draft Road Maintenance Strategy by the Department for Infrastructure from 2 December 2025 to 30 January 2026.

The draft Strategy acknowledges the long-standing pressures on road maintenance, including funding uncertainty, a growing maintenance backlog, and the increasing need for resilient, sustainable infrastructure. It outlines a refined approach focused on three core principles:

- higher quality maintenance,
- more targeted investment, and
- long-term environmental and financial sustainability.

This Consultation Report presents the views of a total of 35 respondents from; the public, industry, professional bodies, local government, and community groups, that will help develop a more effective and efficient Strategy.

The insights gathered will be used to refine priorities, inform actions, and ensure that the final Strategy reflects and delivers a balanced, evidence-based plan that supports safety, connectivity, and economic vitality.

## 2. Consultation Feedback

### 2.1 Feedback Summary

There were a total of 35 respondents from; the public, industry, professional bodies, local government, and community groups, that will help develop a more effective and efficient Strategy.

There were 26 responses from individuals and 5 responses from organisations via Citizen Space. There were 4 written submissions received from organisations.

Table 1 - Consultation Responses

| Submissions   | Total | Percentage |
|---------------|-------|------------|
| Individuals   | 26    | 74.3%      |
| Organisations | 9     | 25.7%      |

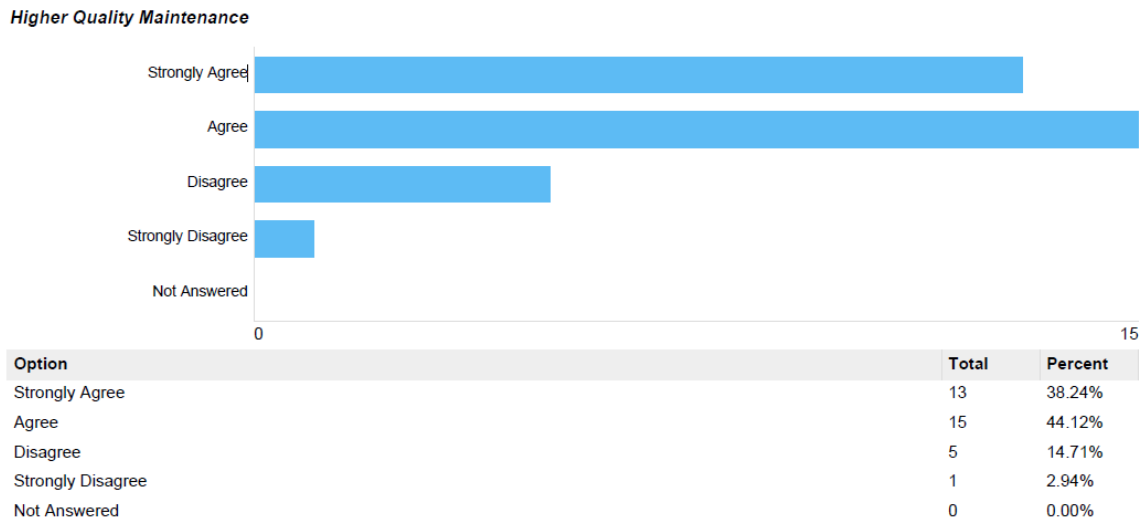
Respondents broadly supported the aims of the Drat Road Maintenance Strategy but expressed significant concerns about current network conditions, long term underinvestment, and the need for clearer targets, delivery plans, and sustained funding.

Many highlighted recurring issues such as poor quality repairs, inadequate drainage and gully cleaning, slow responses to defects, and a perceived imbalance between investment in Belfast and rural areas, particularly west of the Bann and on U class roads. There were repeated calls for stronger accountability for contractors, better integration of utility reinstatements, more robust data and survey processes, and the need to address safety for vulnerable users, especially motorcyclists. Several respondents welcomed innovation, collaboration with industry and academia, and improved reporting through open data, but stressed the need for practical implementation detail and transparency. Others raised concerns about consultation accessibility, equality impacts, and rural proofing, emphasising that rural communities rely heavily on the road network. Overall, while the Strategy's direction was generally welcomed, respondents sought clearer commitments, more specificity, and stronger evidence of how the Department will deliver meaningful improvements.

**Annex A** sets out an analysis and demographics of the consultation responses, and, **Annex B** provides a copy of the written submissions received.

The following paragraphs provide an analysis and summary of responses to each of the questions posed on the Consultation.

## 2.2 Do you agree with the new Roads Maintenance Strategy's approach to Higher Quality Maintenance?

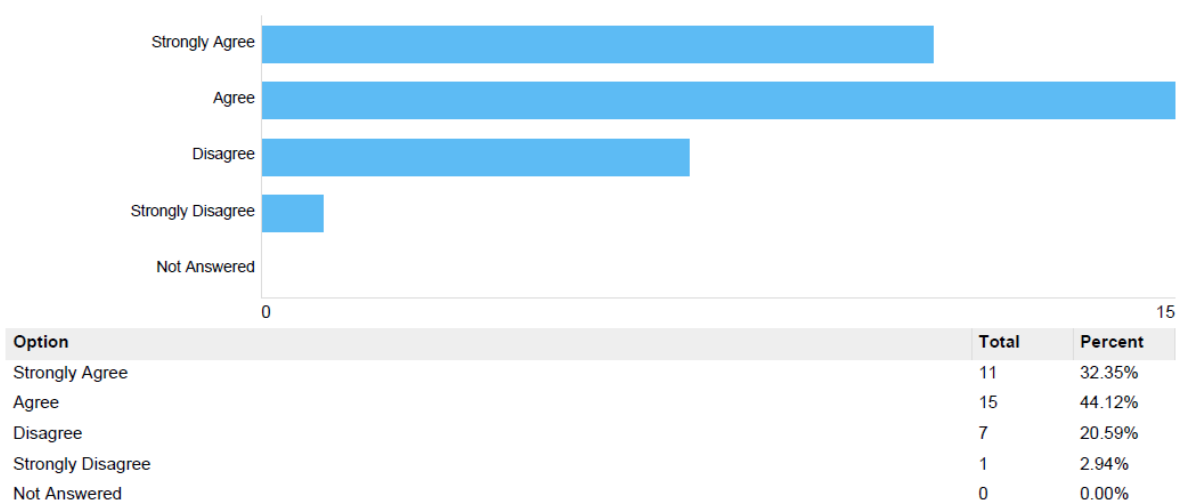


- Most respondents agree that higher quality maintenance is necessary and long overdue, particularly given the deterioration of the network, recurring short term repairs, and safety concerns for vulnerable users such as motorcyclists. Professional bodies and industry stakeholders strongly support the shift toward durable repairs, better use of data and technology, and more proactive asset management. They highlight that these approaches can improve long term outcomes, reduce repeat defects, and support financial, environmental, and service sustainability.
- Alongside this support, many respondents expressed concerns about missing detail in the Strategy. They questioned how quality will be defined, measured, and enforced; how data quality and risk assessment will be assured; and how the proposed approach differs from existing practices, including long standing quality management systems already in place. Several raised issues not fully addressed in the Strategy, such as utility reinstatements, resurfacing depths, maintenance of bridges and other asset types, treatment of bonded roads, and workforce skills. Concerns were also raised about the need for stable funding, accountability for contractors, and clearer targets beyond establishing a baseline.
- Public respondents highlighted poor current road conditions, frustrations with perceived declining winter service, and dissatisfaction with temporary or low quality repairs. Some questioned the clarity and accessibility of the document and expressed skepticism about financial pressures. Across many responses, there was a consistent call for more transparency, clearer definitions, stronger

oversight of workmanship, and repairs that last longer and provide better value.

## 2.3 Do you agree with the new Roads Maintenance Strategy's approach to Targeted Maintenance Investment?

*Targeted Maintenance Investment*

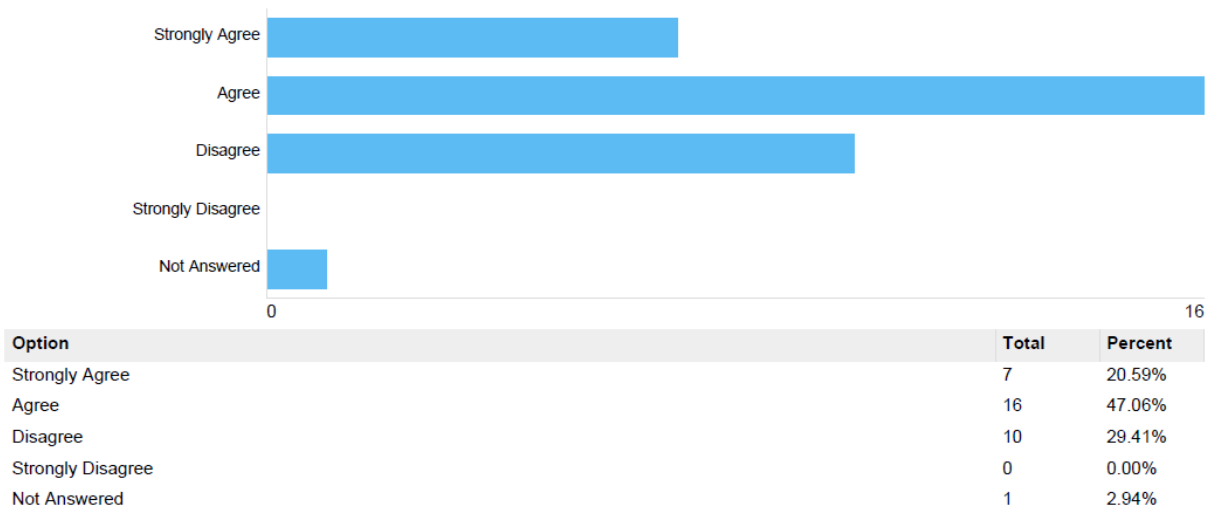


- Many respondents supported the principle of Targeted Maintenance Investment, particularly the use of data, digital condition surveys, and technology to prioritise resources and improve whole life value. Industry and professional bodies noted that targeted investment aligns with best practice and could help move from reactive to preventative maintenance, especially where climate related deterioration is a factor. Several highlighted the need for effective integration of technology, clear guidance, and strong monitoring arrangements, including proper supervision, drainage maintenance, and mechanisms for incorporating both technical data and human inputs such as public reports or elected member correspondence.
- Alongside this support, respondents raised concerns about the risk that targeted investment could disadvantage certain roads, particularly U class, rural, or less visible routes that could lead to further decline in already poor condition areas. Some questioned the absence of clarity around definitions such as “short term” and “long term”, the criteria for prioritisation, and the availability of statistics for all road classes. Concerns were also raised about the potential replacement of site inspectors, the need for asset specific strategies (e.g. drainage, bridges), and the perception that prioritisation might favour urban or high profile locations.

- Several responses also reflected broader dissatisfaction with current maintenance practices, citing inconsistent standards, poor-quality repairs, inadequate drainage management, and examples of work being carried out on roads perceived to be in better condition while heavily used or damaged routes received less attention. Some respondents expressed general mistrust in the Department's ability to deliver improvements without clearer accountability, quality controls, and independent oversight. Others emphasised that targeted investment must still address safety for vulnerable users, especially motorcyclists, and ensure that all potholes and defects, regardless of location, receive appropriate attention.

## 2.4 Do you agree with the new Roads Maintenance Strategy's approach to Sustainable Maintenance?

*Sustainable Maintenance*



- Many respondents supported the principle of sustainable maintenance, including recycling materials, using low carbon surfacing products, improving climate resilience, and shifting from reactive repairs to planned maintenance. Several highlighted that well maintained roads inherently reduce carbon by avoiding deep reconstruction and repeated interventions. Professional and engineering bodies welcomed the Strategy's emphasis on environmental responsibility, resilience, and whole life asset management, and encouraged clearer measurement of environmental performance, defined service outcomes, and long term standards.
- At the same time, respondents raised concerns about the pace and clarity of the Department's approach. A number felt that lower carbon surfacing materials have been available for years but are not being consistently adopted

in Northern Ireland. Others questioned whether the Strategy places too much emphasis on active travel at the expense of the wider 26,000 km road network, and stressed the need to maintain safety for all users before pursuing wider sustainability aims. Some also noted that sustainability goals must not overshadow the need to address the widespread deterioration of the current network.

- Several responses highlighted practical issues that they felt were missing from the Strategy, including: the absence of commitments regarding utility reinstatements, the need for accountability for contractors and sign off processes, the importance of drainage maintenance, and concerns about affordability and rural impacts. While many supported the long term direction, they sought clearer targets, timelines, and explanations of how sustainable maintenance will be delivered in practice within current budget constraints.

## **2.5 Please provide any other comments you may have on the new Road Maintenance Strategy**

- Many respondents expressed concern about the current condition of the road network and emphasised the need for routine maintenance activities such as gully cleaning, drainage management, litter removal, surface sweeping, and upkeep of active travel routes. Several noted delays in repairing landslips and structures, and raised issues with the use of external consultants, procurement processes, and the perceived lack of responsiveness to emerging defects. Respondents also highlighted the need for stronger data, clearer baselines, more regular surveys, and better integration of information on utility reinstatements, as well as the need to develop asset management maturity for non pavement assets.
- A number of respondents raised dissatisfaction with funding levels, long term underinvestment, and the perceived lack of a credible plan to secure sustainable maintenance budgets. Some questioned the Strategy's clarity and level of detail, asking for technical supplements, defined targets, performance reporting, and more transparent communication with the public. Concerns were also raised about rural impacts, the condition of U class roads, and the safety needs of motorcyclists. Several respondents argued that any strategy must ensure accountability for contractor performance and improve the quality and durability of work.
- Industry and professional bodies broadly supported the long term direction of the Strategy, particularly commitments to evidence led maintenance, innovation trials, whole life asset management, and improved reporting through open data. They encouraged continued collaboration between the

Department, industry, and academia, alongside clearer implementation timescales, resourcing plans, and consistent funding. Some respondents also called for better engagement with local communities, more attention to accident prone locations, and clearer strategic direction on the services the road network is expected to deliver.

## **2.6 Do you have any comments on the Equality Impact Assessment screening?**

- Respondents provided mixed views on the Equality Impact Assessment screening, with several highlighting concerns about rural disadvantage, particularly west of the Bann, and calling for equal consideration of U class roads and rural communities. Many emphasised the importance of assessing impacts on disabled people, older people, pedestrians, and users of active travel infrastructure, noting that deteriorating footways and crossings can disproportionately affect these groups.
- Some respondents said the consultation language was difficult to understand, and noted that an Equality Screening was not made available, or simply had no additional comments. Others encouraged the Department to monitor equality impacts during implementation, report transparently, engage widely with diverse stakeholders, and ensure equality considerations are fully incorporated into maintenance decision making.

## **2.7 Do you have any comments on the Rural Proof Assessment?**

- Respondents highlighted concerns that rural areas, particularly west of the Bann, may be disproportionately affected if the Strategy does not fully address the condition of U class and other rural roads. Some noted that rural communities rely more heavily on road infrastructure and that maintenance prioritisation should reflect this dependence, including issues such as large agricultural vehicles, environmental wear, sight lines, winter salting, and pedestrian safety on degraded rural routes.
- Professional bodies supported the need for clear rural proofing, transparent reporting on rural network conditions, and demonstration of how targeted maintenance will address rural challenges.
- A number of respondents had no comments or noted the assessment was not published, while others emphasised the need to monitor impacts on rural communities and adjust the Strategy if evidence shows disproportionate effects.

### **3.0 Key Issues from Individuals (via Citizen Space)**

A series of key issues have been drawn from responses and are set out below, each with a Departmental response.

#### **3.1 Current road network condition and long-term underinvestment**

**Response:** The Department will implement a data-driven maintenance programme, prioritising high-risk areas and investing in long-term structural repairs as outlined in the draft Strategy. A multi-year financial plan will be developed to demonstrate funding needs and secure sustainable investment.

#### **3.2 Clearer targets, delivery plans, and sustained funding**

**Response:** A detailed implementation plan will be produced, including measurable targets, clearer baselines, and annual reporting through the Road Condition Report and Open Data NI. This will ensure transparency and support future funding bids.

#### **3.3 Poor quality repairs and need for durable interventions**

**Response:** The Department will adopt higher-quality specifications, strengthen quality assurance processes, and expand the use of long-lasting materials and technologies. Contractor oversight will be enhanced to ensure repairs meet agreed standards.

#### **3.4 Inadequate drainage and gully cleaning**

**Response:** Drainage will form a core part of routine maintenance, with improved inspection cycles and targeted investment in areas prone to flooding or deterioration. New technologies will support faster identification of drainage issues.

#### **3.5 Slow responses to defects and winter service concerns**

**Response:** Operational models will be reviewed to improve responsiveness, supported by enhanced digital reporting and more efficient deployment of maintenance teams, especially during winter periods.

### **3.6 Urban / rural investment imbalance**

**Response:** A revised prioritisation framework will ensure fair distribution of resources across all road classes, including U roads and rural communities. Rural proofing will be strengthened and reported transparently.

### **3.7 Accountability for contractors and utility reinstatements**

**Response:** The Department will strengthen inspection regimes, enforce penalties for substandard work, and review utility reinstatement agreements to ensure long-term quality and compliance.

### **3.8 Improved data collection and survey processes**

**Response:** More frequent surveys will be undertaken using a range of techniques and digital tools to improve accuracy. Baselines will be refreshed regularly to measure progress objectively.

### **3.9 Safety for vulnerable users**

**Response:** The Strategy strengthens safety assessments for motorcyclists, pedestrians, and cyclists. Maintenance planning will include targeted interventions at known risk areas, with improved skid resistance, surface quality, and footway maintenance.

### **3.10. Definition and measurement of maintenance quality**

**Response:** A new quality framework will be introduced, including clear definitions, performance indicators, and audit processes. Annual reporting will demonstrate improvements over time.

### **3.11 Clarity in targeted investment prioritisation**

**Response:** Transparent criteria will be published, incorporating road condition data, safety risk, traffic volumes, rural dependence, and lifecycle cost considerations.

### **3.12 Risk of disadvantage to rural or low-profile roads**

**Response:** The Department will ensure that prioritisation tools include rural dependency factors, agricultural usage, and accessibility needs, avoiding disproportionate impacts on rural communities.

### **3.13 Asset-specific strategies (drainage, bridges, structures)**

**Response:** Dedicated asset management plans will be developed for drainage networks, structures, and other non-pavement assets to ensure consistent maintenance and long-term resilience.

### **3.14 Concerns on reduced on-site inspection capacity**

**Response:** Digital tools will supplement, not replace, physical inspections. Human inspection capacity will be protected for safety-critical assessments.

### **3.15 Inconsistent use of low-carbon materials and unclear sustainability timelines**

**Response:** The Department will expand the use of low-carbon surfacing products, adopt recycling practices, and set clear environmental performance measures aligned with climate commitments.

### **3.16 Balancing sustainability with urgent repairs**

**Response:** While progressing sustainability goals, the Department will maintain a strong focus on essential repairs to prevent deterioration and safeguard safety.

### **3.17 Procurement processes and use of consultants**

**Response:** Procurement will be reviewed to ensure value for money, consistency in delivery, and reduction in unnecessary reliance on external consultancy where internal capacity can be built.

### **3.18 Communication, transparency, and open data**

**Response:** The Department will expand open data publications, provide clearer public updates on maintenance activity, and enhance communication with stakeholders.

### **3.19 Equality considerations**

**Response:** Accessibility, mobility, and safety needs of disabled people, older users, and active travelers will be integrated into maintenance planning, supported by equality monitoring throughout implementation. [Click for the department's Section 75 Equality Assessment.](#)

### **3.20 Rural proofing and disproportionate rural impacts**

**Response:** The Department will strengthen rural proofing assessments, regularly monitor impacts on rural communities, and adjust priority frameworks where evidence indicates disproportionate effects.

## 4.0 Responses from Organisations (via Citizen Space)

There were five responses from organizations via Citizen Space, namely;

- The Law Society of Northern Ireland.
- Royal Academy of Engineering.
- Institute of Highway Engineers (CIHE).
- Construction Employers Federation.
- Motorcycle Action Group UK Northern Ireland Region.

**4.1 The Law Society of Northern Ireland** - The Law Society of Northern Ireland supports the principle of Higher Quality Maintenance and emphasises the need for the Strategy to consider bonded roads, highlighting that over 3,521 bonded stretches existed as of September 2025. They state the Strategy should ensure both older and new developments are addressed, including timely interventions where bonded works are incomplete. They support Targeted Maintenance Investment, stressing that clear guidance, accurate record keeping, and effective monitoring are essential. They recommend integrating digital solutions with Land Registry and NI Water systems to improve transparency and assist conveyancing by showing how public infrastructure connects to properties. On Sustainable Maintenance, the Society supports the aims but finds the Strategy too broad for detailed comment. They call for a robust rural impact assessment to avoid disproportionate impacts on rural users and urge consideration of how reduced access to courts and custody suites interacts with active travel limitations. They caution that sustainability measures must not compromise access to justice. Overall, the Society offers no additional comments beyond these core points, and reiterates that equality and rural considerations should be clearly assessed and reported.

**Response:** This response addresses the issues raised by the Law Society of Northern Ireland in relation to the Draft Road Maintenance Strategy. The Strategy's commitment to Higher Quality Maintenance aligns with the Society's concerns about ensuring robust oversight and timely intervention. The Strategy explicitly aims to raise standards through durable, consistent repairs and improved risk management (see Higher Quality Maintenance section). Regarding bonded roads, while not referenced explicitly, the Strategy's proposals to baseline the entire network and implement a new operational delivery model provide an appropriate framework within which bonded road oversight can be integrated. The long-term business case and multi-year investment plan also support more consistent intervention on older and newer developments alike. On

Targeted Maintenance Investment, the Society correctly identifies the importance of clear guidance and monitoring. The Strategy commits to developing data-led baselining tools, enhanced analytical capabilities, and improved decision-making processes, all of which will strengthen transparency and provide scope for integration with systems such as Land Registry and NI Water. The Society's call for enhanced digital integration aligns with the Strategy's intention to expand technology-enabled maintenance, including digital surveys, predictive tools, and improved reporting via Open Data NI. This supports improved transparency for conveyancing and public awareness. In relation to Sustainable Maintenance, the Strategy takes a broad approach centred on climate resilience, low-carbon materials, and long-term planning. It also includes commitments to enhance footway resurfacing and develop maintenance standards for active travel routes. These address the Society's concerns about ensuring that sustainability measures do not restrict access to essential public services. The Society highlights the need for robust rural impact assessment. While the Strategy does not explicitly name rural proofing, its commitment to a Resilient Road Network Plan and multi-year investment framework supports equitable treatment across rural and urban areas. It is acknowledged, however, that future iterations of the Strategy should articulate rural considerations more directly. Finally, the Society's emphasis on equality implications is well-made. The Strategy commits to accessible footway improvements and inclusive maintenance standards. As implementation proceeds, equality screening and monitoring will be essential to ensure that no group, particularly rural communities, older people, or those with limited mobility, is disproportionately affected. In conclusion, the Law Society's submission is broadly consistent with the direction and intent of the Draft Road Maintenance Strategy. The Department will consider how best to deal with bonded roads.

- 4.2 Royal Academy of Engineering** - The Royal Academy of Engineering strongly supports the Strategy's approach to Higher Quality Maintenance, emphasising the importance of proactive maintenance and whole-life asset management. They highlight evidence showing that every £1 spent on proactive maintenance can save £5–£10 in future costs. They also stress the need for robust baselining, ongoing monitoring of asset condition, and improved data interpretation to guide optimal maintenance interventions. The Academy supports the Strategy's focus on Targeted Maintenance Investment, welcoming the use of digital tools, enhanced condition surveys, and risk-based decision making. They emphasise the need for an infrastructure data framework to support secure data sharing, and call on the Department to identify and remove barriers to innovation, including through challenge funds and cross-sector knowledge sharing. On Sustainable Maintenance, the Academy welcomes commitments to climate

resilience, long-term planning, and reduced carbon impacts. They stress that climate change is already accelerating infrastructure deterioration, making resilience planning essential. They endorse the Resilient Road Network Plan and urge a whole-life valuation approach to support robust investment decisions. They also note that maximising the lifecycle of assets reduces embodied carbon. They highlight the need for clear long-term outcomes and levels of service to guide investment priorities, and stress that sufficient, stable funding is essential to deliver the Strategy's ambitions. They encourage coordinated planning across infrastructure sectors and call for improved engineering expertise within departmental governance structures to manage asset risk effectively. Overall, the Academy strongly supports the Strategy but encourages deeper focus on skills planning, innovation, data frameworks, whole-life economics, resilience, and cross-sector collaboration.

**Response:** The Department welcomes the Royal Academy of Engineering's constructive submission and notes the strong alignment with the Draft Road Maintenance Strategy. The Strategy already prioritises higher-quality, durable repairs and improved engineering judgement, reflecting RAEng's emphasis on proactive and whole-life asset management.

The Strategy's commitment to baselining the full network using enhanced survey data and real-time indicators supports RAEng's call for robust monitoring and better interpretation of asset condition trends.

Regarding targeted investment, the Department agrees on the need for improved analytical tools, technology-enabled inspections, and evidence-led prioritisation. Planned development of predictive maintenance tools and a multi-year investment framework provides a foundation for future data integration and innovation. The Department also supports RAEng's recognition of climate-driven deterioration. The Strategy's Resilient Road Network Plan, long-term financial planning, and greater use of low-carbon materials align with recommendations for climate-adaptive, whole-life asset valuation.

Finally, the Department acknowledges the importance of engineering capability and will continue reviewing delivery models to ensure the right skills and expertise are available to support innovation and resilience. Overall, RAEng's recommendations strengthen the Strategy's direction and will inform implementation.

**4.3 Institute of Highway Engineers (IHT)** - The Institute of Highway Engineers (IHE) supports higher quality maintenance, noting need for clear quality expectations and measurable performance indicators. They seek data-led targeted maintenance with clear translation of condition data into priorities and transparent sharing. They support sustainability with lower carbon materials and resilience planning, urging clear measurement of environmental performance. They highlight need for realistic funding, implementation detail, timelines, resource needs, and effective stakeholder communication. They urge equality considerations for vulnerable users and rural proofing to ensure rural roads are addressed appropriately.

**Response:** The Department welcomes the Institute of Highway Engineers' (IHE) submission and notes strong alignment with the Draft Road Maintenance Strategy. The Strategy's focus on higher-quality, durable repairs directly reflects IHE's call for clear performance standards and better quality assurance. The Strategy also responds to IHE's emphasis on data-led maintenance by committing to a full network baseline, modern digital surveys, and improved condition analytics to support transparent, evidence-based prioritisation.

On sustainability, the Strategy prioritises low-carbon materials, climate resilience, and the development of a Resilient Road Network Plan, addressing IHE's concerns about environmental performance and long-term planning.

The Department recognises IHE's points on funding stability and workforce capability. The Strategy sets out a long-term financial case and multi-year investment plan, alongside a review of delivery models to ensure the right skills and capacity. The Department also acknowledges the importance of equality and rural considerations. Commitments to improved footway accessibility and targeted maintenance will help ensure that vulnerable users and rural communities are appropriately supported.

Overall, IHE's recommendations reinforce the direction of the Strategy and will help shape its implementation, particularly around measurement, transparency, sustainability and skills planning.

**4.4 Construction Employers Federation** - The Construction Employers Federation (CEF) highlights long-term underinvestment in road maintenance since 2015, leading to deterioration, particularly in rural areas. They support a long-term, strategic approach focused on higher-quality, durable repairs and consistent maintenance standards.

CEF endorses targeted maintenance based on detailed digital road condition data and improved prioritisation tools, emphasising that resource allocation should be evidence-led. They also support a multi-dimensional approach to sustainability—environmental, financial, and service sustainability—calling for the use of low-carbon materials, improved resilience to climate pressures, and a shift from reactive patching to planned, proactive maintenance.

The Federation stresses the need for greater collaboration between the Department and contractors, recommending reforms to procurement and delivery models to support innovation and efficient maintenance delivery. They argue that better-maintained roads, supported by data-led decision making, will improve safety, reduce defects, extend asset life, and maximise value for public investment.

**Response:** The Department welcomes the constructive submission from the Construction Employers Federation (CEF). Their concerns closely align with the aims of the Draft Road Maintenance Strategy, which recognises historic underinvestment and commits to developing a long-term business case and multi-year investment plan to ensure sustainable, stable maintenance funding.

CEF's support for higher-quality, durable repairs is reflected in the Strategy's commitment to improving repair standards, enhancing quality assurance processes, and adopting innovative approaches to reduce repeat defects. The Strategy also responds to CEF's call for data-led decision making by introducing a full network baseline, modern digital surveys, and improved condition analytics to guide prioritisation. This will make investment allocation more evidence-led and transparent. On sustainability, the Strategy supports the use of low-carbon materials, improved resilience to climate impacts, and development of a Resilient Road Network Plan. These actions align with CEF's emphasis on environmental, financial, and service sustainability.

The Department agrees with CEF on the importance of stronger collaboration between the Department and the construction sector. The Strategy commits to partnership working across all three pillars—quality, targeted investment, and sustainability—to improve delivery and support innovation. Overall, CEF's recommendations reinforce the direction of the Strategy.

**4.5 The Motorcycle Action Group UK (NI Region)** - The Motorcycle Action Group UK (NI Region) welcomes the Strategy's aims but stresses that motorcyclists are the most vulnerable road users and must be explicitly considered. They note that defects which pose little risk to drivers can be lethal for motorcyclists, making defect location and repair quality critical. They express conditional agreement with Higher Quality Maintenance, Targeted Maintenance Investment, and Sustainable Maintenance, but only if the Strategy provides clear assurances that motorcyclist safety needs are addressed in maintenance standards and prioritisation.

The group highlights that motorcycle-specific risks—such as surface defects, debris, and inconsistent repair standards—require explicit recognition. They note that motorcyclists represent a similar share of traffic to HGVs but face unique hazards that are not adequately reflected in current maintenance practices. They urge the Department to incorporate motorcyclist-focused criteria into maintenance decision-making, emphasising that a road safe for motorcycles is safe for all users. They reaffirm their willingness to engage further, referencing prior meetings with the Minister.

**Response:** The Department thanks the Motorcycle Action Group UK (NI Region) for its submission and recognises the heightened vulnerability of motorcyclists. The Strategy's Higher Quality Maintenance measures, such as more durable repairs and strengthened quality assurance, directly support safer riding conditions. The Group's concerns about the specific risks posed by surface defects align with the Strategy's expanded use of digital surveys, network baselining, and risk-based assessments, which will better identify defects that pose significant hazards to motorcyclists. Targeted Maintenance Investment, including automated inspections and predictive tools will help ensure that maintenance decisions take account of motorcyclist safety as well as traffic patterns. Sustainable Maintenance commitments, such as improved drainage, climate-resilient design, and the Resilient Road Network Plan will further support long-term surface integrity and reduce hazards linked to weather-related deterioration. The Department agrees that roads made safer for motorcycles benefit all users and will continue working with motorcycle representatives during implementation to ensure their needs are fully reflected.

## 5.0 Responses from Organisations (via Written Submission)

There were four written responses from organizations, namely;

- 5.1 Chartered Institution of Highways and Transportation (CIHT)
- 5.2 Mineral Products Association NI (MPANI)
- 5.3 Northern Ireland Local Government Association (NILGA)
- 5.4 Fermanagh and Omagh District Council.

A copy of the written submissions are in **Annex B**.

### 5.1 Chartered Institute of Highway & Transportation (CIHT)

**Clarification on definition and treatment of non-urgent maintenance** - The Strategy should clarify that non-urgent maintenance includes essential safety-related tasks such as sign cleaning and vegetation control, and commit to routine rather than reactive programmes.

**Response:** The Department will consider clarification within the Strategy that non-urgent maintenance includes routine activities essential to road safety, such as sign cleaning, vegetation control, and visibility maintenance, and consider the re-establishment of scheduled programmes, that will be subject to budget availability.

**Impact of long-term underfunding and need for alternative funding methods** - The Strategy acknowledges funding shortages but should explicitly commit to exploring alternative funding models such as multi-year settlements or new revenue-raising mechanisms.

**Response:** The Strategy recognises the need to create a long term financial plan to support the viability of the Department road maintenance, and cost recovery where possible, as well as efficiency mechanisms, while continuing to make the financial case for adequate funding.

**Use of term 'average' for road condition and clarity on backlog/intervention standards** - The term 'average' may mask sub-standard sections. The Strategy

should refine its classification system and acknowledge the true backlog scale, setting clear intervention thresholds.

**Response:** The Strategy includes the baselining of road condition and the use of this and other surveys to determine a programme of data-driven investment decisions. This will include lifecycling modelling and a clearer understanding of the scale of funding required. A review of the maintenance standards and the intervention levels will form part of the new approach set on the Strategy.

**Increase in vehicle damage claims linked to inadequate maintenance -** The Strategy recognises rising claims; however it should commit to targeted interventions based on claims data to prioritise high-risk locations.

**Response:** The Strategy will use claims data alongside condition surveys to prioritise interventions in high-risk areas and support proactive safety-related maintenance.

**Need for a new data-driven approach supported by engineering judgement -** CIHT supports the Strategy's data-driven approach, but recommends embedding engineering judgement formally in decision-making frameworks.

**Response:** The Strategy confirms that decisions will be data-driven but also supported by engineering judgement. Processes will be updated to embed professional oversight in prioritisation and treatment selection.

**Historic underinvestment and need for long-term investment commitment -** The Strategy references long-term planning but should explicitly incorporate findings of previous independent reports and commit to restoring structural maintenance funding to recommended levels.

**Response:** The Strategy recognises historic underfunding and commits to making a financial case for long term and sustainable delivery of road maintenance functions.

**Risk that higher-quality repairs could worsen degradation elsewhere -** Higher-quality repairs must not create deterioration elsewhere. The Strategy should ensure equitable distribution of resources using risk-based prioritisation.

**Response:** The Strategy will balance quality and coverage through risk-based prioritisation to ensure that enhanced repairs in some areas do not disproportionately accelerate deterioration elsewhere.

**Need for performance-measured delivery models** - A shift to performance-measured delivery is welcomed. The Strategy should require contractors to guarantee durability with measurable performance indicators.

**Response:** A new performance-measured delivery model will be developed, introducing clearer standards, durability expectations and accountability for suppliers.

**Poor utility reinstatements and need for tighter controls** - Utility reinstatement quality is a key issue missing from the Strategy. Stronger regulatory oversight and mandatory full-lane reinstatements should be included.

**Response:** The Strategy will review utility reinstatement regulation, consider strengthened inspection regimes, and explore requirements for higher-standard reinstatements including full-lane repairs where appropriate. A separate review of the management of Streetworks will be taken forward in due course.

**Need for clear baseline and improved target network conditions** - CIHT supports baselining but recommends defining explicit improvement targets rather than maintaining status quo.

**Response:** The Strategy will baseline current conditions and introduce improvement targets that ensure the network progresses beyond present performance levels.

**Clarification on ‘partners’ referenced in the Strategy** - MPANI should be explicitly listed as a strategic industry partner given its role in materials and road construction.

**Response:** The Strategy is generic in specifying partner groups. These generally include local authorities, utilities, emergency services, and industry bodies and clarify partnership roles in resilience and innovation.

**Need for industry engagement through MPANI** - MPANI should be explicitly listed as a strategic industry partner given its role in materials and road construction.

**Response:** The Strategy is generic in specifying partner groups. Industry stakeholders including MPANI are engaged formally through structured consultation and partnership mechanisms.

**Consistent use of diagnostic tools across divisions** - Diagnostic tools should be used consistently across all DfI divisions to avoid inconsistency in treatment decisions.

**Response:** The Strategy will ensure that diagnostic tools such as the annual condition survey, deflectograph, scanner and SCRIM are used consistently across all operational areas to support equitable prioritisation. Regular digital road condition surveys across the entire road network will support this.

**Importance of drainage maintenance and its absence in the Strategy** - Drainage maintenance is fundamental and should be added as a dedicated section in the Strategy, including inspection and clearing regimes.

**Response:** Drainage maintenance is incorporated in the Strategy through commitments to routine inspection, cleaning programmes and inclusion of drainage in structural integrity assessments.

**Footway resurfacing and utility reinstatement hazards** - Utilities must be required to meet the same high standards expected of DfI, particularly to protect vulnerable pedestrians.

**Response:** The Strategy will ensure that utility reinstatements on footways meet high accessibility standards and will work with utilities to minimise hazards for vulnerable users. The Department is also taking forward a separate review of the management of Streetworks.

**Need for clear success measures and investment requirements** - The Strategy should outline measurable success indicators and tie them directly to required funding levels.

**Response:** The Strategy will introduce measurable success indicators linked to road condition improvements, safety outcomes and cost-effectiveness, alongside transparent reporting.

**Need for delivery timetable linked to budget realities** - A detailed delivery timeline should be included, showing the consequences of underfunding on strategic objectives.

**Response:** The Strategy includes the delivery of data-driven investment decisions which includes lifecycle modelling. This will provide clear analysis of the impact of funding levels.

## **5.2 Mineral Products Association Northern Ireland (MPANI)**

**Deterioration of Road Network Due to Underfunding** - MPANI highlight that years of limited service, reduced maintenance funding, and declining resources have resulted in significant deterioration of the Northern Ireland road network, especially rural roads. They note that the lack of adequate structural and routine maintenance has accelerated defects, increased long-term costs, and harmed road safety and user experience.

**Response:** The Strategy acknowledges the long-term underfunding of the road network, noting that current allocations fall well below the independently recommended annual requirement of £190m for structural maintenance and £60m for routine activities. It commits to making the long-term financial case for investment and establishing a multi-year business plan to stabilise maintenance delivery. This aligns with MPANI concerns by recognising the backlog and introducing baseline condition monitoring to guide future investment decisions.

**Need for Higher-Quality Maintenance Standards** - MPANI strongly support the Strategy's intention to deliver higher-quality, more durable repairs. They stress that interventions must be timely, consistently executed, and delivered to high technical specifications to reduce repeat works, improve safety, and enhance user satisfaction. They advocate for a shift from reactive patching to long-term, planned interventions.

**Response:** The Strategy reinforces a shift toward higher-quality maintenance by prioritising durable repairs delivered to consistent standards. It proposes a comprehensive quality assurance regime, innovative technologies to improve routine maintenance, and a new operational delivery model focused on long-term outcomes rather than short-term patching. This directly responds to MPANI's call for durable, timely, and technically robust maintenance.

**Importance of Data-Driven, Targeted Maintenance** - MPANI support the Strategy's move to targeted maintenance using technology such as digital road condition surveys and detailed data analytics. They emphasise that maintenance resources should be directed where they are most needed, and that evidence-based prioritisation will deliver better outcomes and more efficient use of limited budgets.

**Response:** The Strategy strongly supports targeted, data-driven maintenance by expanding the use of road condition surveys, digital tools, automated inspections, and predictive analytics. It commits to baselining the full network condition and using this evidence to prioritise interventions. This directly reflects MPANI's emphasis on using technology and evidence-based prioritisation to allocate limited resources effectively.

**Sustainable Maintenance – Environmental, Financial, and Service Sustainability** - MPANI highlight that sustainability in road maintenance must include low-carbon materials, climate resilience, optimised investment, and long-term stewardship of the network. They emphasise that planned maintenance reduces carbon emissions, avoids deep reconstructions, and supports safer, more resilient infrastructure.

**Response:** The Strategy places sustainability one of its key objectives, embedding low-carbon materials, climate-resilient design, and a focus on long-term asset stewardship. It highlights the need to reduce the carbon footprint of maintenance operations and introduces a Resilient Road Network Plan to

strengthen climate preparedness. These commitments address MPANI's emphasis on environmental, financial, and service-level sustainability.

**Reactive Maintenance as a Cost and Carbon Burden** - MPANI warn that underfunding maintenance creates a 'vicious circle', leading to more failures, more emergency repairs, and higher carbon impacts. They stress that reactive maintenance is expensive, disruptive, and environmentally damaging, whereas planned maintenance is both cost-effective and a form of climate action.

**Response:** The Strategy recognises that reactive maintenance is inefficient and costly, acknowledging that limited service since 2015 has increased defects and safety risks. It emphasises a shift to planned, intelligent, and preventative maintenance supported by real-time data and baseline monitoring. This aligns with MPANI's argument that planned maintenance reduces carbon impacts, avoids deep reconstructions, and supports long-term cost efficiency.

**Need for Greater Collaboration with Industry** - MPANI state that they welcome collaboration with the Department but urge DfI to go further. They request deeper partnership working with contractors and a review of procurement and delivery structures to enable innovation, efficiency, and long-term value in maintenance delivery.

**Response:** The Strategy highlights partnership working as a delivery mechanism, and commits to collaboration with external partners to enhance resilience, develop innovative technologies, share best practice, and improve delivery structures. MPANI's request for deeper contractor collaboration aligns with the Strategy's intent to modernise procurement, strengthen industry partnerships, and build the workforce capability required for long-term success.

### 5.3 Northern Ireland Local Government Association (NILGA)

#### **Maintenance of Trees and Hedges Along Roadsides**

NILGA highlights that while the Roads Order (NI) 1993 addresses dangerous trees, the new strategy should explicitly cover routine maintenance of trees and hedges. Proper management improves visibility, reduces hazards, and enhances overall road safety.

**Response:** The Department is committed to improving tree and hedge maintenance and has carried out extensive research into tree risk management. The Department has taken forward work to develop a Tree Management Strategy and Implementation Plan that will set the direction for managing roadside trees and hedges on the public road network aimed at improving our current maintenance and enforcement arrangements. Further work is currently being undertaken to develop the necessary documents and will be dependent on having the necessary funding and resources in place.

#### **Alleviating Flood Risk – Clearing of Gullies**

Members emphasise the need for more frequent and structured gully clearing to prevent road flooding. Current once-per-year clearance is insufficient, and adhoc follow-up creates significant flooding risks.

**Response:** The strategy outlines that climate resilience is a core element of Sustainable Maintenance. Actions include developing a Resilient Road Network Plan and adopting techniques that enhance the network's durability during and after adverse weather events. Investment in improved operational capacity and a long-term financial plan will support increased responsiveness, which may enable more frequent and targeted gully maintenance to address flooding risks.

#### **Substandard Resurfacing by Utility Bodies**

Concerns were raised that resurfacing works undertaken after utility companies open roads are often substandard. NILGA notes DfI has authority to require utilities to redo work within warranty periods and encourages stricter enforcement.

**Response:** The Quality Maintenance principle commits to higher specification repair works, better quality assurance, and a review of delivery models. This aligns with NILGA's concerns by reinforcing that maintenance must meet high standards regardless of who undertakes the work. Enhanced quality assurance processes can strengthen oversight of utility reinstatements, ensuring work meets required standards and supporting consistent long-term road condition.

### **Shortage of Industrial Staff**

There is a significant shortage of industrial road maintenance workers across council areas. This reduces responsiveness, increases reliance on contractors, and leads to subpar repairs.

**Response:** The strategy directly addresses workforce capacity by committing to a long-term multi-year investment plan to increase capability within the industrial workforce. This includes ensuring adequate staffing levels to support responsive maintenance. The Department also intends to review delivery models to ensure the right skills are maintained over time, reducing reliance on contractors where possible.

### **Need for Reporting System / Contact Directory**

NILGA requests a dedicated reporting system or directory enabling councillors to quickly contact Roads Division personnel to report defects, flooding, or fallen trees.

**Response:** The Draft Strategy highlights partnership working as a key action under Targeted Maintenance Investment and Sustainable Maintenance. While not explicitly providing a reporting system, the strategy commits to improving collaboration with stakeholders and improving accessibility of information through Open Data NI. These commitments create a foundation for developing clearer communication channels with councillors and other community representatives.

### **Maintenance of Rural Roads**

NILGA asserts that rural roads have been deprioritised in favour of urban areas for many years. The strategy should more clearly commit to giving rural roads equal priority.

**Response:** Targeted Maintenance principles include directing resources based on risk assessments and data-driven condition analysis. This approach will ensure rural roads are assessed equally alongside urban routes, with prioritisation based on condition and risk rather than location. Embracing technology for detailed road condition analytics will support better-informed decisions that can address rural road maintenance backlogs.

### **Street Lighting in Rural Areas**

Although not under Roads Maintenance Division's remit, NILGA requests review of rural street lighting, especially where new housing or industrial developments have emerged.

**Response:** Although street lighting is outside the remit of the Roads Maintenance Directorate, the Sustainable Maintenance section identifies the importance of improving resilience, accessibility, and safety across transport infrastructure. This future partnership work and multi-year planning would inform related policy areas, including rural lighting considerations by the relevant divisions.

## **5.4 Fermanagh and Omagh District Council**

### **Inequitable Funding for Rural Roads**

Fermanagh and Omagh District Council highlights that it has the lowest roads expenditure per kilometre in Northern Ireland, with only £5,937/km spent in 2022/23 compared to the NI average of £10,372/km. This long-term underfunding impacts the condition of its extensive rural road network.

**Response:** The Road Maintenance Strategy recognises long-term funding pressures and commits to creating a multi-year investment plan and a long-term business case to place maintenance on a sustainable footing. This approach aims to improve equity across all regions, including rural areas.

### **Poor Condition and Lack of Data for U-class Roads**

U-class roads make up 59% of the district's network, yet official condition data does not cover them. The Council argues that these roads are likely in poorer condition and must be formally included in baselining and annual condition reporting.

**Response:** The Strategy commits to baselining the entire network using enhanced data collection tools, including a full digital road condition survey, scanner and SCRIM surveys, enabling more consistent classification and monitoring across all road types. This supports the potential future inclusion of U-class roads in condition reporting.

### **Need for Transparency in Resource Allocation**

The Council calls for the publication of indicator sets and weightings used to allocate road maintenance resources, stressing the importance of rural equity and accountability.

**Response:** The Strategy notes improved governance, reporting and publication of enhanced metrics through Open Data NI, contributing to greater transparency in decision-making and resource allocation

### **Winter Treatment Programme Limitations**

Given the high volumes of B and C class roads and rural dependence on minor roads, the Council urges assessment of high-traffic lower-class roads for inclusion in winter gritting to improve safety during adverse weather.

**Response:** Through the provision of a Resilient Road Network Plan, the Department will consider climate-related risks and improve network durability during adverse weather events—providing a framework for reviewing winter treatment priorities. Departmental policy on winter maintenance is set out in [RSPPG-EO22 Winter Maintenance Policy](#).

### **High Collision and Fatality Rates on A5 Corridor**

FO records disproportionately high fatality rates on the A5, representing only 0.32% of NI's network but 10.9% of NI's road deaths in 2022. The Council stresses urgent need for durable interventions and upgrades.

**Response:** The Strategy prioritises safety through higher quality maintenance, improved risk management and more durable interventions, supporting work to address high-risk routes such as the A5 corridor.

### **Lack of Clear Success Measures in the Strategy**

The draft Strategy references Road Condition Reports but does not define the success measures. The Council warns this risks retrospective definition and urges consultation on metrics, including rural-specific indicators.

**Response:** The Strategy states that success measures will be based on Road Condition Reports, including baseline condition, defect volumes and vehicle damage claims, with ongoing monitoring and adaptation of the Strategy

**Need for Progress on A5 and A4 Upgrades**

The Council urges prioritisation of the A5 Western Transport Corridor and A4 upgrades to improve regional connectivity, economic parity, and safety.

**Response:** While major schemes, such as the A5 and A4 upgrades, are outside the Strategy's scope, the focus on targeted maintenance, safety improvements and data-led prioritisation supports the case for future capital investment on key strategic corridors.

**Absence of Equality and Rural Needs Assessments**

The Council notes with concern that the Equality Impact Assessment and Rural Needs Impact Assessment were not provided. It stresses the statutory obligation under the Rural Needs Act 2016 to ensure rural needs are considered.

**Response:** The department carried out an Section 75 Equality Impact Assessment and it can be found at [S75 Equality Impact Assessment](#). A Rural Needs Assessment has also been completed.

## 6.0 Conclusion and Next Steps

Overall, the consultation responses have demonstrated strong support for the strategic direction outlined in the Draft Road Maintenance Strategy, particularly its focus on higher quality maintenance, targeted investment and more sustainable practices. Respondents clearly signalled that these ambitions must be matched by credible delivery plans, sustained and predictable funding, and transparent prioritisation processes.

Feedback consistently highlighted the need for durable repairs, improved routine maintenance, better data and condition monitoring, and more consistent standards across the network. Respondents also emphasised the importance of strengthened oversight, clearer accountability, and greater use of innovation, technology and collaboration with industry and academia.

Concerns about the condition of the current network, rural accessibility, equality impacts and the balance of investment across road classes underline the importance of an approach that is both evidence-based and sensitive to local needs. Stakeholders further called for clearer targets, open reporting and enhanced communication to ensure that progress can be measured.

Taken together, the consultation responses reaffirm the Strategy's overall direction while highlighting the need for robust implementation arrangements. Delivering on these expectations will be essential to securing meaningful, long-term improvements to the safety, reliability and condition of Northern Ireland's road network for all users.

The insights gathered will be used to refine priorities, inform actions, and ensure that the final Strategy reflects and delivers a balanced, evidence-based plan that supports safety, connectivity, and economic vitality.

## ANNEX A - Analysis and Demographics of Consultation Responses

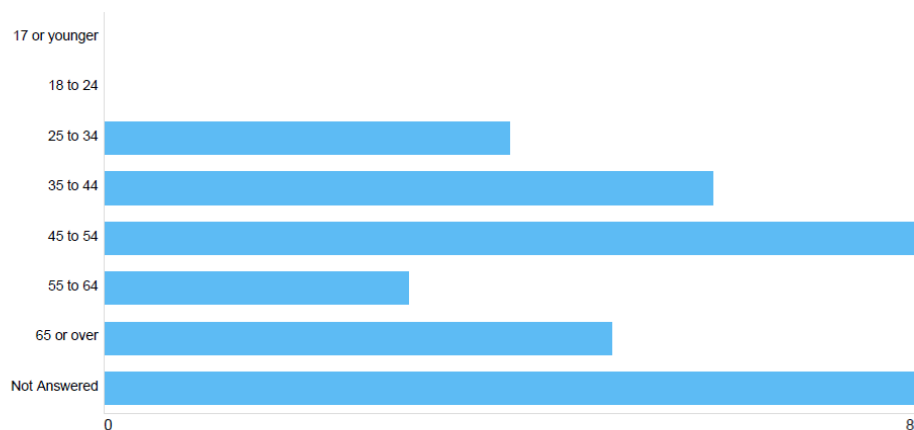
### Analysis of Responses

| <b>Submissions</b> | <b>Total</b> | <b>Percentage</b> |
|--------------------|--------------|-------------------|
| Individuals        | 26           | 74.3%             |
| Organisations      | 9            | 25.7%             |
| Not Answered       | 0            | 0                 |

### Demographics of Responses

Question 10: What is your age range?

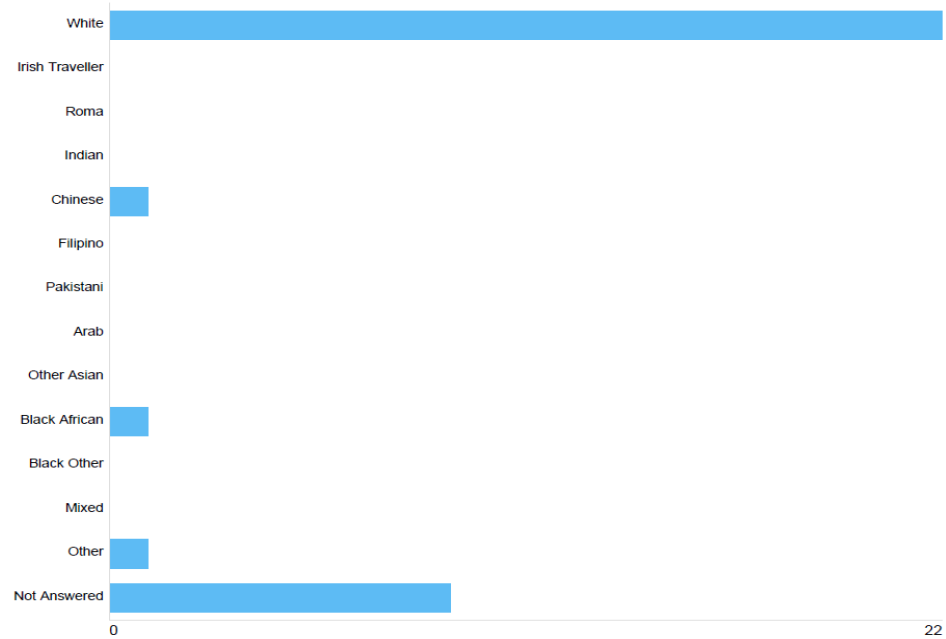
Age



| Option        | Total | Percent |
|---------------|-------|---------|
| 17 or younger | 0     | 0.00%   |
| 18 to 24      | 0     | 0.00%   |
| 25 to 34      | 4     | 11.76%  |
| 35 to 44      | 6     | 17.65%  |
| 45 to 54      | 8     | 23.53%  |
| 55 to 64      | 3     | 8.82%   |
| 65 or over    | 5     | 14.71%  |
| Not Answered  | 8     | 23.53%  |

Question 11: What is your ethnic group?

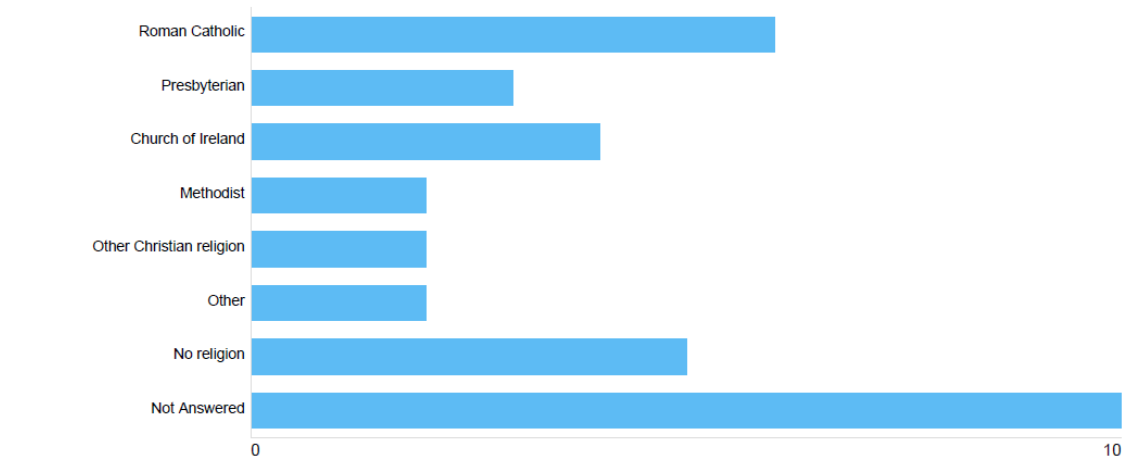
*Ethnic group*



| Option          | Total | Percent |
|-----------------|-------|---------|
| White           | 22    | 64.71%  |
| Irish Traveller | 0     | 0.00%   |
| Roma            | 0     | 0.00%   |
| Indian          | 0     | 0.00%   |
| Chinese         | 1     | 2.94%   |
| Filipino        | 0     | 0.00%   |
| Pakistani       | 0     | 0.00%   |
| Arab            | 0     | 0.00%   |
| Other Asian     | 0     | 0.00%   |
| Black African   | 1     | 2.94%   |
| Black Other     | 0     | 0.00%   |
| Mixed           | 0     | 0.00%   |
| Other           | 1     | 2.94%   |
| Not Answered    | 9     | 26.47%  |

### Question 12: What religion, religious denomination or body do you belong to?

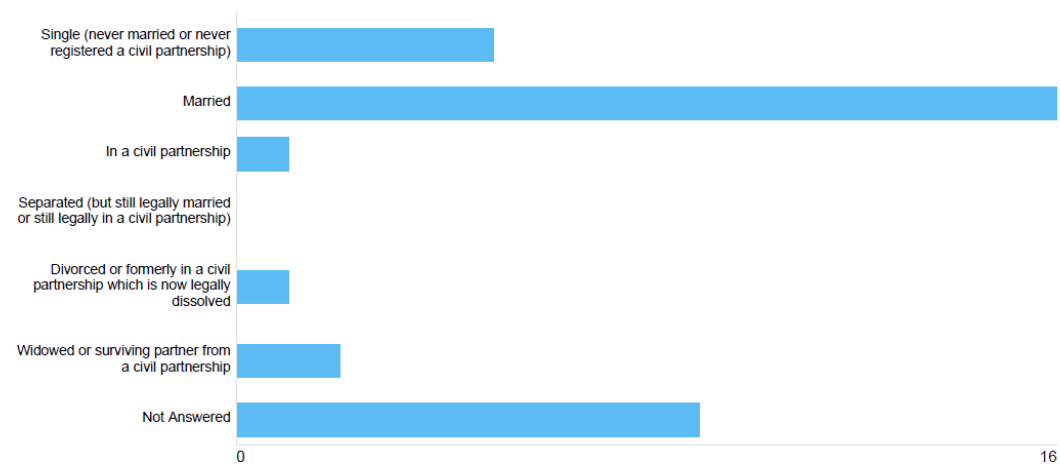
#### Religion



| Option                   | Total | Percent |
|--------------------------|-------|---------|
| Roman Catholic           | 6     | 17.65%  |
| Presbyterian             | 3     | 8.82%   |
| Church of Ireland        | 4     | 11.76%  |
| Methodist                | 2     | 5.88%   |
| Other Christian religion | 2     | 5.88%   |
| Other                    | 2     | 5.88%   |
| No religion              | 5     | 14.71%  |
| Not Answered             | 10    | 29.41%  |

### Question 13: What is your marital status?

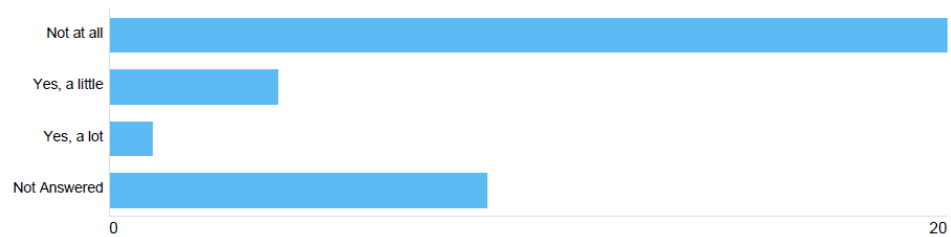
#### Relationship



| Option                                                                        | Total | Percent |
|-------------------------------------------------------------------------------|-------|---------|
| Single (never married or never registered a civil partnership)                | 5     | 14.71%  |
| Married                                                                       | 16    | 47.06%  |
| In a civil partnership                                                        | 1     | 2.94%   |
| Separated (but still legally married or still legally in a civil partnership) | 0     | 0.00%   |
| Divorced or formerly in a civil partnership which is now legally dissolved    | 1     | 2.94%   |
| Widowed or surviving partner from a civil partnership                         | 2     | 5.88%   |
| Not Answered                                                                  | 9     | 26.47%  |

**Question 14: Are your day-to-day activities limited because of a health issue or disability which has lasted or is expected to last at least 12 months?**

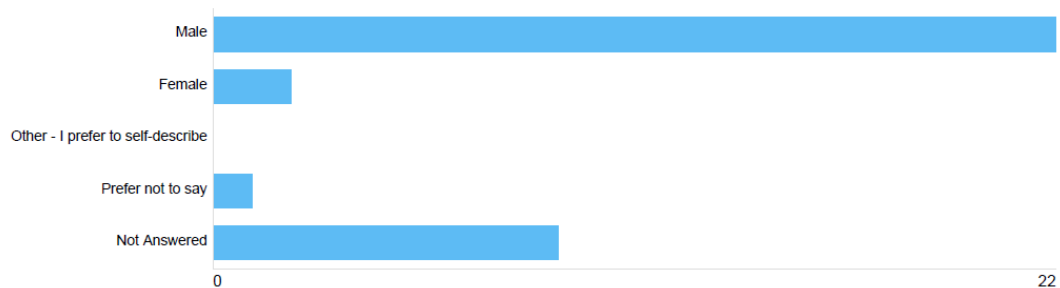
**Health**



| Option        | Total | Percent |
|---------------|-------|---------|
| Not at all    | 20    | 58.82%  |
| Yes, a little | 4     | 11.76%  |
| Yes, a lot    | 1     | 2.94%   |
| Not Answered  | 9     | 26.47%  |

**Question 15: What is your sex?**

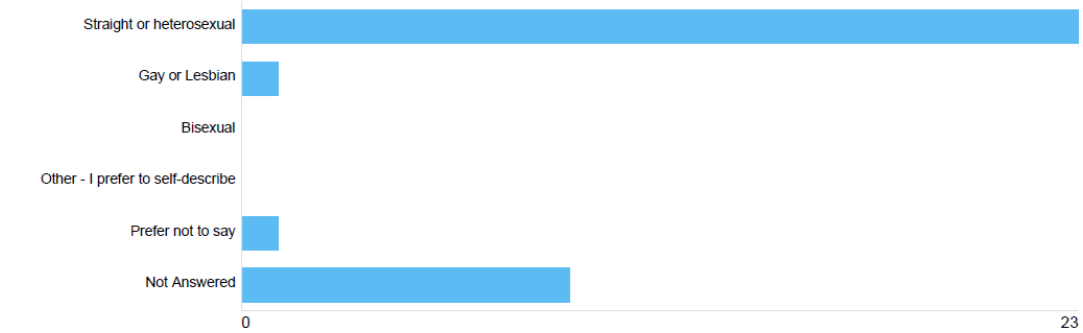
**Sex**



| Option                            | Total | Percent |
|-----------------------------------|-------|---------|
| Male                              | 22    | 64.71%  |
| Female                            | 2     | 5.88%   |
| Other - I prefer to self-describe | 0     | 0.00%   |
| Prefer not to say                 | 1     | 2.94%   |
| Not Answered                      | 9     | 26.47%  |

**Question 16: Which of the following best describes your sexual orientation?**

**Sexual orientation**



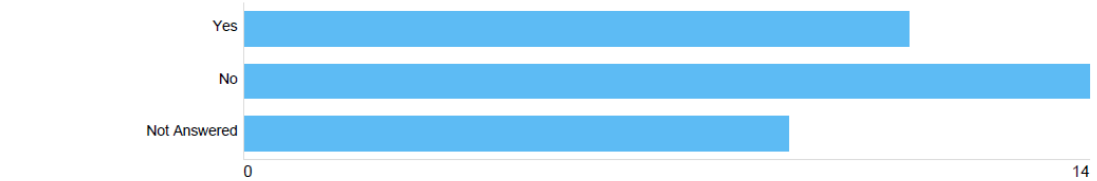
| Option                            | Total | Percent |
|-----------------------------------|-------|---------|
| Straight or heterosexual          | 23    | 67.65%  |
| Gay or Lesbian                    | 1     | 2.94%   |
| Bisexual                          | 0     | 0.00%   |
| Other - I prefer to self-describe | 0     | 0.00%   |
| Prefer not to say                 | 1     | 2.94%   |
| Not Answered                      | 9     | 26.47%  |

**Sexual Orient Other**

There were 0 responses to this part of the question.

**Question 17: Do you have dependants or caring responsibilities for family members or other persons?**

**Carer**



| Option       | Total | Percent |
|--------------|-------|---------|
| Yes          | 11    | 32.35%  |
| No           | 14    | 41.18%  |
| Not Answered | 9     | 26.47%  |

## **ANNEX B - Copy of Written Submissions**

### **Chartered Institution of Highways and Transportation (CIHT)**

#### **Draft Road Maintenance Strategy – Better Roads - CIHT Northern Ireland Response**

The Chartered Institution of Highways and Transportation (CIHT) has 14,000 members who plan, design, build, operate and maintain the transportation systems and infrastructure. Within Northern Ireland, CIHT is focused on bringing together industry and Government in developing shared goals and objectives for a sound transport system seen as essential for a strong, competitive and regionally balanced economy.

CIHT NI welcomes the opportunity to comment on the Draft Road Maintenance Strategy. CIHT NI has continued to highlight the importance of maintaining one of the key assets of the Department for Infrastructure (DfI) has responsibility for, ie the road network. Consistent underfunding has led to very constrained budgets for DfI and difficult decisions needing to be made on where to spend the limited budget. The impacts of poor maintenance include:

- Increased travel times, which can reduce the attractiveness of Northern Ireland as a base for business and manufacturing
- Increased vehicle maintenance costs, for example wear and tear on suspension and steering and damage to wheels and tyres
- A larger number of claims for vehicle damage and public liability claims and the associated costs
- Increased potential for collisions resulting from vehicle malfunctions as a result of road damage
- A more rapidly degrading network infrastructure, worsening the impacts listed.

#### **The Challenge**

It is noted that paragraph 1 refers to 'non-urgent maintenance'. While such maintenance efforts may not be considered urgent in terms of life and death or vehicle damage, many of these activities are essential to the safety and integrity of the network. For example, CIHT NI would argue that cleaning of traffic signs or cutting back overgrowth that reduces their visibility is also important for maintaining network safety. This type of maintenance should be undertaken routinely and not as reactive.

Paragraph 4 refers to budget requirements, current allocations and the current economic climate. The lack of appropriate support to the road maintenance programme contributes to the NI economic landscape – as noted previously, increased journey times and costs as a result of poor conditions on the network can contribute to reducing the attractiveness of Northern Ireland as a base for business and manufacturing. Increased journey times and costs also lead to societal exclusion including difficulties in accessing health services. At a recent meeting between CIHT NI representatives and the DfI Minister it was identified that given current conditions, and indeed conditions over the past 20+ years, road maintenance will continue to be underfunded if we rely on the

current methods of securing funding. The Strategy needs to emphasise that alternative methods of fundraising will be needed unless the government commits sufficient funds at the level indicated by relevant studies by Snaith, Barton, or the Audit Office (index-linked).

Figure 01 provides a breakdown of the current road condition for A Class, B Class and C Class roads. CIHT NI would question if classifying road condition as 'average' is appropriate as this may suggest that some sections of the road are falling below standard with some above standard. We also consider that this section of the Draft Strategy underplays the effect of the backlog on the resourcing of the maintenance budget. While correct in the sum of £190 m PA required it makes little reference to the backlog of some £2 billion as average spend over the last 20 years would not be £90m pa. The categorisation of roads into Average and Poor indicates that there is only a 2 to 3-year backlog to get the network back to average based on the output figures, which have been included. The problem with this is what qualifies as average and how long before the average becomes poor. Is our maintenance strategy to be designed to permit roads to deteriorate to a poor standard before intervention ?

Figure 02 shows the number of vehicle damage claims received over the six-year period from 2019/20 to 2024/25 and this further emphasises the importance of proper maintenance of the road network. In the first half of the period the average sits around 2,000 and is relatively flat, whereas the second half of the period shows a significant increase in claims. It is considered likely that the limited maintenance as a result of reducing budgets is a significant contributing factor due to the worsening condition of the road network.

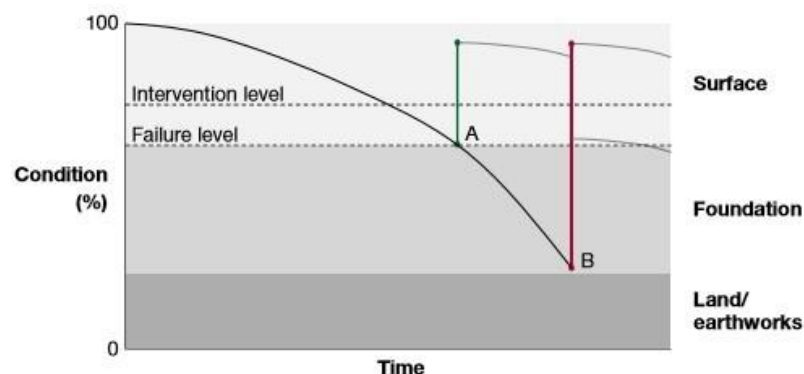
### **A New Approach**

CIHT NI fully supports the need to develop a new approach to maintaining the road network and agree that this approach should be data driven but also supported by good engineering judgement. We also believe that DfI should look to make best use of emerging technologies and skills in asset management in delivering their road maintenance programme.

It is noted that one of Action points highlighted refers to making a financial case for the long term, however CIHT NI would also emphasise that underinvestment in this area has been an issue that has been highlighted for many years. See 'A Review of the Structural Maintenance Funding Requirements for the Roads Service', M.S. Snaith, September 2009, 'An Independent Review into the Funding Requirements for Structural Maintenance of the Northern Ireland road network', Jim Barton, January 2019 and the NI Audit office Report – Structural Maintenance of the Road Network – March 2019.

Failure to intervene at the right time with the appropriate treatment results in poor roads and is poor value for money - see below.

Figure 7: Failure to intervene at the right time and with the most appropriate treatment will result in poor roads and represents poor value for money



Source: Professor Martin Snaith, University of Birmingham

### Quality Maintenance

CIHT NI believe there is potential for "delivering higher quality repairs instead of spreading resources too thinly" to result in increased degradation of some roads. There are many instances where additional consideration of the site conditions will lead to better outcomes, for example better evaluation of existing road surfaces to establish spray and chip rates for surface dressing treatments where there are too many failures within the initial two years. Better supervision of contract works can contribute to improved quality. However, the industry believes that it can deliver highquality maintenance, particularly in resurfacing. A move to performance-measured delivery, in which suppliers must guarantee product quality rather than the current approach, may offer scope for improvement. Applying this approach means that suppliers can design products based on performance criteria to deliver a better product, which in turn would also reduce the burden on DfI to source supervisory staff by placing the onus to the supply side and making best use of limited resources available.

CIHT NI also believe that control of utilities in both the methods and standards of reinstatements should be an area of focus for DfI; we would suggest a tightening on the process for utility companies to open the carriageway and a greater requirement for full width/lane reinstatements along with better supervision of the utility works. Many roads have their structural integrity diminished by the placement of utilities and the location, trench width and quality of reinstatements contribute to reduced road quality and service life.

CIHT NI fully agree that it is appropriate to establish a baseline for the condition of the network and monitor against that. However, it is already noted that many parts of the network is not currently up to an appropriate standard so there is also the need to establish a target which has to be better than the baseline.

We note that Actions refer to partnership working with others – CIHT NI would welcome clarification on who 'others' are and what it is expected that they will bring to the table.

We would encourage engagement with industry through the Mineral Products Association Northern Ireland (MPANI).

### **Targeted maintenance investment**

Paras 14/15 NI and Roads Service was once a leader in the field of technological developments and decision-making tools. CIHT NI believe it would be good to see that recognition achieved again.

Paragraph 15, 2nd Action – CIHT NI consider that rather than "intelligent maintenance" it may be better to refer to "effective maintenance" - the right solution, in the right place at the right time and appropriately supervised work. Too many failed treatments are as the result of inadequate oversight as well as inadequate preparatory investigations.

Paragraph 15 refers to use of new technology and digital solutions, which CIHT NI agrees will be important. Paragraph 22 refers to use of Deflectograph, scanner and SCRIM in a monitoring role. However, these tools can also have a diagnostic role having the ability to identify problems before they are observed. However, it is important that the adoption of any new developments accepted by DfI must be rolled out across Northern Ireland. Local CIHT NI members in the industry have noted that in the past industry has offered alternative products that have been deemed acceptable in one Division but not in another. Any strategy must be able to be consistently rolled out across Departmental divisions.

Many of the failures that occur on our network can be attributed to poor drainage. While much of our rural and older road network has no formal drainage installed most (re)construction schemes of the past 100 years have drainage. When this becomes blocked the substructure of the road pavement which relies on being dry/drained to maintain its structural integrity, becomes weakened resulting in surface deflection, rutting and cracking resulting in costly remedial works. The adverse weather experienced at the time of writing this response has highlighted the apparent lack of maintenance of the drainage network that is fundamental to the structure of the carriageway. CIHT NI considers it is therefore disappointing that the draft Strategy makes no mention of drainage and the importance of its maintenance to the integrity of our network. While there is reference to adverse weather events, and often we see gullies being cleaned before predicted storms there needs to be a programme of drain inspection and cleaning to support the emptying programme.

### **Sustainable maintenance**

CIHT NI welcomes the acknowledgement that an enhanced footway resurfacing programme will support accessibility for those with disabilities and the elderly. We should also suggest that the Strategy should comment on the need to ensure that public utility openings and reinstatements should also be of the highest standard and not become hazards for any or all pedestrians.

### Measuring Success

As noted previously, CIHT NI consider that a key measure of success will be a network that is improved on the current year baseline, given the opinion that many parts of the network are in poor condition.

While the goal of “delivering a long-term financial plan” noted in paragraph 24 is admirable, CIHT NI recognises the challenge associated with this when the Executive does not even have an agreed budget[. The strategy requires a delivery timetable with clearly stated budget requirements and making clear what the outcomes will be if there is not appropriate investment.

We believe Northern Ireland requires a properly funded, sustainable road maintenance strategy rather than another sticking plaster.

Thank you again for the opportunity to provide feedback on the Draft Road Maintenance Strategy, CIHT NI would be happy to discuss the issues raised further as required.

A handwritten signature in black ink that reads "Michael Bell". The signature is written in a cursive, slightly slanted style.

Michael Bell

Policy Sub-Committee Chair, CIHT NI Region

## **Mineral Products Association Northern Ireland (MPANI)**

Submitted to Draft Roads Maintenance Strategy

Submitted on 2026-01-23 10:57:15

### **Introduction**

1 Are you replying on behalf of an individual or organisation?

Name of Organisation: Mineral Products Association NI

2 What is your postcode?

Postcode: BT29 4SR

### **Quality Maintenance**

3 Do you agree with the new Roads Maintenance Strategy's approach to Higher Quality Maintenance?

Agree

Please provide any comments you have regarding the Roads Maintenance Strategy's approach to Higher Quality Maintenance :

MPANI are grateful to the Department for the engagement we have had thus far about the structure and intended final outcomes of this new strategy. The reality is that since 2015 and the limited service that DfI TRAM has had to put in place due to lack of maintenance funding and reduced resources our roads network, particularly our rural road network has suffered significant deterioration.

We fully support the intention to deliver a clear, long-term approach to managing and maintaining Northern Ireland's road network by focusing on more effective use of resources, better outcomes for road users, and greater sustainability.

We support and wish to work in partnership with the Department to deliver,

Higher-Quality Maintenance

DfI wants to raise the standard of road repairs and upkeep by ensuring that interventions are timely, durable, and delivered to consistent, high specifications. This should improve the user experience, reduce long-term costs from repeat repairs, and enhance road safety overall.

2. Targeted Maintenance Using Data and Technology

The strategy proposes directing maintenance resources where they are needed most rather than spreading them thinly. This includes using new technologies, such as a digital road condition survey and detailed data collection, to assess the condition of

carriageways and footways more accurately and make prioritisation decisions based on up-to-date evidence.

### 3. Sustainable Maintenance

“Sustainability” in the strategy has multiple dimensions:

- Environmental sustainability – embedding low-carbon materials and climate resilience into maintenance practices.
- Financial sustainability – optimising investment so that maintenance delivers the best value and supports long-term stewardship of the asset.
- Service sustainability – building resilience to future pressures such as climate change and increased travel demand.

Our members wish to work collaboratively at all levels so that we deliver a shift from reactive, short-term patching to proactive, planned, and evidence-based road maintenance aimed at maximising public value and supporting economic and environmental goals that will ultimately deliver;

- Better-maintained roads with fewer defects and longer-lasting repairs.
- More efficient use of limited budgets through data-led prioritisation.
- Enhanced safety and experience for all road users, including motorists, cyclists, and pedestrians.
- Greater resilience and sustainability in how the road network is maintained over time.

### Targeted Maintenance Investment

4 Do you agree with the new Roads Maintenance Strategy's approach to Targeted Maintenance Investment?

Agree

Please provide any comments you have regarding the new Roads Maintenance Strategy's approach to Targeted Maintenance Investment:

Roads are essential to Northern Ireland's economy and communities. The challenge is not whether we build and maintain them — but how we do so in a low-carbon, resilient and affordable way!!

In Northern Ireland, under-investment in maintenance leads to a vicious circle — more failures, more emergency works, higher carbon and higher long-term cost?

Reactive maintenance is expensive, disruptive and carbon-intensive. Planned maintenance is a climate action, not a cost burden!!

Under-funding maintenance is not just a safety issue — it is a carbon failure that increases long-term costs for everyone!!

### **Sustainable Maintenance**

5 Do you agree with the new Roads Maintenance Strategy's approach to Sustainable Maintenance?

Agree

Please provide any comments you have regarding the new Roads Maintenance Strategy's approach to Sustainable Maintenance:

See previous answers. To repeat;

Well-maintained roads = lower carbon

Fewer deep reconstructions

Reduced material use

Better safety and resilience

Smart Maintenance, Not Reactive Repair!

Reactive maintenance is expensive, disruptive and carbon-intensive. Planned maintenance is a climate action, not a cost burden!!

### **Any other comments**

6 Please provide any other comments you may have on the new Road Maintenance Strategy:

Any other comments:

To repeat, MPANI and our members look forward to continuing our collaboration with the Department at all levels to make the new maintenance strategy a success. We would urge the Department to go further in embracing collaboration with contractors and change its procurement and delivery structure.

### **Assessments**

7 Do you have any comments on the Equality Impact Assessment screening?

Please provide comments if any.:

No

8 Do you have any comments on the Rural Proof Assessment?

Please provide comments if any.:

No

## Northern Ireland Local Government Association. (NILGA)

### NILGA Response – January 2026

#### Introduction

NILGA welcomes the opportunity to respond to the Department for Infrastructure on its draft Roads Maintenance Strategy. A well-maintained road network is essential to the safety, mobility, and overall quality of life for our citizens. Well maintained roads enhance community connectivity and resilience. From an economic perspective, a strong road infrastructure supports local businesses, tourism, and trade by ensuring the smooth movement of goods and services.

**On the 19<sup>th</sup> December 2025, officials from DfI's Roads Maintenance Division provided a presentation to NILGA Members on the Department's draft Roads Maintenance Strategy. Members shared their views and recommendations for strengthening the strategy as reflected in this NILGA response.**

As set out in the consultation document, the Draft Roads Maintenance Strategy will be delivered through a work programme centred on three overarching principles:

- Higher Quality Maintenance
- Targeted Maintenance
- Sustainable Maintenance..
- 

with the ultimate aim to “build a road network that supports a thriving, connected, and sustainable future”.

#### The Consultation questionnaire

Respondents to this consultation are asked to consider the following questions:

1. *Do you agree with the Roads Maintenance Strategy's approach to Higher Quality Maintenance?*
2. *Do you agree with the new Roads Maintenance Strategy's approach to Targeted Maintenance Investment?*
3. *Do you agree with the new Roads Maintenance Strategy's approach to Sustainable Maintenance?*
4. *Please provide any other comments you have on the new Roads Maintenance Strategy.*

### Questions 1 – 3

Fundamentally in principle, and in response to Q1 -3, NILGA agrees with the Department's "new" approach through the draft strategy to raise the standard of maintenance across the road network through utilisation of new technology to collect data on the condition of the roads to more effectively target road maintenance resources. The digital survey of roads, which is due to be completed by the end of the financial year – will be a key enabler to ensure monies are targeted for repair and maintenance of roads.

When considering where "targeted investment" is being made – **it is important that rural roads are given due regard for targeted maintenance.** It has been the case that repairs of urban roads have been prioritised over rural roads for many years. It is noted in the draft strategy document, the word "rural" is only mentioned once.

NILGA welcomes (as set out in Paragraph 20 on Page 15 of the consultation document) that in order to *"place road maintenance on a more sustainable footing (the Department) will create a long-term business case for (its) activities to create a longer term business case and create a multi-year investment plan to deliver the capacity and capability in their industrial workforce which will be needed to support delivery and improve responsiveness.* **NILGA welcomes the department's commitment to a longer-term road maintenance and investment plan,** as for far too long (since 2015) a "Limited Maintenance Service" has been in operation which has led to the significant deterioration of our road network. Improving road network infrastructure across Northern Ireland is essential to increasing safety for all road users and reducing the number of serious injuries and fatalities. A well-maintained road network and timely repairs are vital in protecting all road users.

Equally important is the **effective management and maintenance of trees and hedges along roadsides,** which helps to improve visibility, reduce hazards, and to enhance overall road safety. Prioritising these measures are key for public safety, and this **should be more strongly reflected in the final strategy.**

Page 15 Page of the consultation sets out that in addition to the development of its Resilient Road Network Plan, **the Department "will also seek to establish partnerships with others and explore new ways to deliver a better service to citizens.."** One of those partnerships should be with elected members in our Councils; as the tier of government working closest with our citizens.

To strengthen and complement the effective delivery of Roads Maintenance Strategy – and to ensure targeted and sustainable maintenance; **as recommended by NILGA Members at its meeting with DfI's Roads Maintenance Division on 19<sup>th</sup> December 2025; A directory of key personnel at each of the Roads Maintenance Divisions and their contact details should be made available to Councillors to report road defects and fallen trees as and when they are reported to them by constituents. This was a key message set out by NILGA Members in its meeting with DfI Roads Division on 19<sup>th</sup> December.**

As set out in the consultation document (Page 20), NILGA welcomes *the Department's commitment to "deliver the capacity and capability in their industrial workforce which will be needed to support delivery and improve responsiveness.."* however Members are concerned that the Department's ambition will not be realised due to the significant shortage of industrial staff on the ground, and the challenges being experienced with regard to the recruitment and retention of industrial staff. Members wish to see more industrial staff on the ground across the divisions, and less reliance on contractors.

Across all Council areas there is a significant shortage of industrial staff on the ground to tackle the local roads maintenance issues in a timely manner. Members have also expressed their concern that to address the staff shortages, the Department are appointing contractors which do not have correct skillsets to undertake and complete roads maintenance works to a high standard. As a result, the road repairs undertaken are substandard and short-term.

#### **Question 4: Please provide any other comments you have on the new Roads Maintenance Strategy**

**At NILGA's meeting with the Department's Roads Maintenance Division on 19<sup>th</sup> December 2025, the following key issues were raised by Members to be considered as part of the consultation exercise on the new Roads Maintenance Strategy:**

##### Trees alongside roadsides

Members note that the Roads Order (NI) Order 1993 has a section dealing with dangerous trees, **however the new Roads Maintenance Strategy should consider the maintenance of trees and hedges alongside roadsides** (as outlined earlier in this response). See attached with this consultation response earlier correspondence between NILGA and DfI on dangerous trees.

##### Alleviating flood risk – clearing of gullies

Members requested that clearing of gullies to prevent / ease flooding of roads be factored into the new Roads Maintenance Strategy. As outlined in Pg 9 of the Strategy document it is recognised that £60m is required for essential routine maintenance activities and current allocations fall well short of these requirements. Roads Division currently clears all gullies once a year, and after that clearance of gullies is adhoc. It is welcomed that through the new Roads Maintenance Strategy and multi-year investment plan, the department is committed to increasing the capacity of its industrial workforce (have more feet on the ground) to support responsive roads maintenance.

##### Resurfacing of roads by Utility bodies

As raised by Members on the 19<sup>th</sup> September, *"It is the here and now which will hinder the Department's ambition"*. Substandard work needs to be addressed (as already referred to in this response); as does the substandard resurfacing works when roads are opened by other utilities bodies; NI Water, NI Electricity, Phoenix gas, BT etc.

Utilities bodies have a statutory right to open up roads for works – however they have to notify DfI before they carry out works. As raised during the discussion on 19<sup>th</sup> December, DfI do not have to accept poor substandard work. If dissatisfied, DfI can ask the responsible Utilities body /bodies to resurface the road again within the “warranty” period of 2 years (*or within 3 years if deep excavation work has been undertaken on the road*).

### Street lighting

NILGA notes that Street lighting does not fall within the remit of the Roads Maintenance Division, however recommends that outside the remit of this consultation – that street lighting policy being reviewed; particular in our more rural areas where there has been recent industrial and residential development.

### Conclusion

As outlined earlier in this consultation response, NILGA supports the Department’s “new” approach through the draft “Roads Maintenance Strategy” to raise the standard of roads maintenance across Northern Ireland and welcomes the department’s commitment to a longer-term road maintenance and investment plan.

As alluded to throughout this response , NILGA has three key asks to be considered through this consultation exercise:

- 1. The set up of a “reporting system / key contact directory for Council elected members** to contact key Roads Division personnel when road defects, road flooding and fallen trees are reported by constituents.
- 2. Further clarity on the maintenance of trees and hedges along roadsides in the draft Roads Maintenance Strategy.**
- 3. Maintenance of rural roads.** Rural roads often lose out to investment compared to urban roads. Rural roads should be given equal priority to urban roads, as they are essential to NI’s economy and basic connectivity. **3i.** Although not under the remit of the Roads Maintenance division – there should be further consideration of **street lighting policy in rural areas** particularly where new housing and industrial developments have been built.

## Fermanagh and Omagh District Council

### Department for Infrastructure Consultation on New Draft Road Maintenance

#### Strategy

#### Consultation Response from Fermanagh and Omagh District Council

January 2026

### Introduction

Fermanagh and Omagh District Council (FODC) welcomes the opportunity to respond to the Department for Infrastructure's Draft Road Maintenance Strategy. The Council recognises the importance of maintaining Northern Ireland's road network to ensure safety, connectivity, and economic development, particularly in rural areas.

### Picture within Fermanagh and Omagh

Fermanagh and Omagh (FO) is home to 116,994 people and has the longest Local Government District network at 3,992 km, representing 15% of Northern Ireland's road length. This extensive network includes 1,333 km of B and C class roads and 2,348 km of U-class roads (unclassified roads), the largest absolute length of unclassified roads in NI. As a result of the district being the largest district in terms of land mass but smallest in population, the population density of approximately 41 people per square kilometre is the sparsest in Northern Ireland and our District is home to 5 of the 10 most deprived areas in terms of access to services in Northern Ireland, with 23 in the worst 100 areas.<sup>1</sup>

Despite having the largest proportion of B and C Roads of any Local Government District (LGD); the standard of B and C roads in Fermanagh and Omagh continues to lag behind NI averages.<sup>2</sup>

The U-class network accounts for approximately 59% of FO's road length and is not covered by published condition data. Given the higher proportion of B and C roads in FO and their poorer condition relative to NI averages, it is reasonable to infer that U-class roads are also likely to be in poorer condition than elsewhere in NI.

Across the seven-year period from 2016/17 to 2022/23, the total roads expenditure per kilometre in FO averaged £5,750 (the lowest of any LGD). In 2022/23 the expenditure per km was £10,372 across NI and in FO there was only £5,937 per km spent.<sup>3</sup>

Fermanagh and Omagh District Council calls for the Road Maintenance Strategy to address this long-term inequitable gap by including the Maintenance of Rural Roads within the strategy.

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<sup>1</sup> NINIS, NI Multiple Deprivation Measure

<sup>2</sup> [Road Network and Condition](#) | [Department for Infrastructure](#)

<sup>3</sup> Provided via correspondence with DfI Permanent Secretary, 24 Nov 2023

In 2023/24, FO recorded 12,618 defects instructed (+53% year-on-year) and 11,736 repairs (+58% year-on-year)<sup>4</sup>. 'Defects instructed' are defects identified and raised for action following inspections; 'repairs' are the defects actually completed. When normalised by network length, FO consistently records fewer defects and repairs per km than the NI LGD average, the data below demonstrates this:

- During the 2023/24 period, FO v NI average defects/km figures were 3.2/km vs 4.2/km and repairs/km were 2.9/km vs 3.8/km.
- In the 2024/25 period the number of defects instructed were 12,056 and the defect/km for FO was 3.0/km vs the NI average of 3.8/km; the number of repairs completed were 11,465 and repairs/km for FO was 2.9/km vs NI average of 3.4/km.<sup>5</sup>

This combination of high absolute volumes on a very large rural network, but lower per-km rates, underlines the need for durable, high-quality interventions rather than minimum-standard fixes.

### Key asks from FODC

To strengthen delivery and ensure rural equity, the Council requests:

- Publishing area-level indicator sets and weightings used for resource allocation to improve clarity and accountability.
- Including U-class roads in baselining and annual condition reporting, with metrics equivalent to those for other road classes and default inclusion in future performance measures.
- Ensuring multi-year investment planning explicitly addresses rural equity and resilience, reflecting the unique challenges of extensive rural networks.
- Embedding compliance with the 'Rural Needs Act (Northern Ireland) 2016', which places a statutory duty on public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans.
- Ensuring that the formulation of performance indicators explicitly incorporates due regard for rural needs, so that monitoring and reporting frameworks demonstrate compliance with the Rural Needs Act and deliver better outcomes for rural communities.

These steps will help deliver maximum public value and ensure that rural road networks are not disadvantaged under the new approach.

Fermanagh and Omagh District Council would also welcome additional comment from the Department, particularly given recent weather conditions, regarding winter road treatment plans. The Council acknowledges the significant additional financial pressure that this places on the Department, at around £20,000 each time road gritting takes place across the Western Division Network.<sup>6</sup> Given the high volume of B and C roads

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<sup>4</sup> [Road Network and Condition | Department for Infrastructure](#)

<sup>5</sup> [Road Network and Condition | Department for Infrastructure](#)

<sup>6</sup> [Winter safety service in TransportNI Divisions | Department for Infrastructure](#)

within the District, the Council would suggest the Department undertake an assessment of high traffic, lower class roads that could be added into the winter treatment programme, in order to prioritise the safety of the residents of the district who must travel in poor weather conditions.

### Higher Quality Maintenance

The Council supports the principle of higher quality maintenance, including timely and durable interventions. This approach aligns with the Council's concerns about the deterioration of rural roads and the need for improved standards to reduce longterm costs and enhance safety.

Council strongly supports the Strategy's commitment to "delivering higher quality repairs instead of spreading resources too thinly, ensuring a more reliable and safer road network where we intervene". This approach aligns with the objective to "improve the overall condition of the road network enhancing safety and quality" and the early action to baseline the network using technology.

Fermanagh and Omagh District Council welcomes the Strategy's commitment to baselining the entire network using technology (reflectograph, SCANNER, SCRIM) and exploring emerging digital solutions for predictive maintenance. Based on correspondence with the Department and published guidance, Coarse Visual Inspections (CVI) are currently used to assess U-class roads and are expected to remain the primary method in the short to medium term. In the longer term, reporting official statistics may depend on alternative accredited survey technologies becoming available. While SCANNER surveys are carried out on U-class roads for comparison with CVI, SCANNER data is not presently used to determine the official condition classification for this road category. The Council would particularly welcome the publication of comprehensive data relating to these technologies, with explicit inclusion of U-class roads, even if experimental.

Safety evidence reinforces why higher quality interventions are essential. In the last 10 years (2013-2022), there were 74 fatalities, 592 people seriously injured, and 666 killed or seriously injured (KSI) in the FO district<sup>7</sup>. A significant portion of the A5 corridor lies within FO, and fatal collisions on this route have increased over time: from an average of 1.75 fatalities per year during 2011-2014 to 3.33 per year between 2020 and 2022. In that latter period, there were two separate incidents where three lives were lost in a single collision. Since the A5 scheme was first proposed in 2007, 47 lives had been lost on this route<sup>8</sup>. The existing A5 represented only 0.32% of Northern Ireland's road network by length, yet accounted for 10.9% of all road deaths in Northern Ireland in 2022. These statistics indicate that the A5 is significantly more dangerous than the network average. The Outline Business Case stated that if this rising trend continued,

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<sup>7</sup> [Road Traffic Collision Statistics | PSNI](#)

<sup>8</sup> [Road Traffic Collision Statistics | PSNI](#)

the economic assessment of accident savings reported there could have been an underestimate<sup>9</sup>.

This evidence underlines why timely, durable interventions and robust quality assurance are critical to achieving the Strategy's stated goal of improving safety and reliability across the network. The emphasis on "quality over quantity" must not lead to wholesale de-prioritisation of U-class roads, given their critical connectivity role in rural areas.

### Targeted Maintenance

Fermanagh and Omagh District Council agrees with a targeted approach that prioritises resources based on need and condition. However, the Council would stress that rural connectivity must remain a priority, as many communities rely on minor roads for access to essential services.

The Council welcomes the Strategy's commitment to "develop techniques for more targeted and intelligent maintenance interventions, delivering better value for money and ensuring that the integrity of the road network is protected for the future". The proposed use of modern technology, predictive maintenance tools, and improved condition analytics is essential for rural equity and efficiency.

Key corridors in FO carry high volumes of heavy goods vehicles (HGVs), accelerating wear and tear<sup>10</sup>. Among the four busiest monitored locations, daily traffic averages range from 15,450 vehicles on the A32 north of Cherrymount Roundabout (HGVs: 7.1%) to 13,830 vehicles at the A5-B122 junction, Doogary (HGVs: 33.5%).<sup>11</sup> These figures highlight the need for prioritisation based on network criticality and freight intensity.

To ensure fairness and best value, indicator weightings should be transparent and reflect rural realities:

- Road length and classification mix (including U-class coverage)
- Critical rural connectivity and community isolation risk
- Traffic composition, particularly HGV ratios

Publishing these weightings and incorporating predictive maintenance will strengthen confidence in decision-making and align with the Strategy's objectives for smarter, data-driven investment. Targeting must also demonstrate compliance with the Rural Needs Act (Northern Ireland) 2016 to ensure rural networks are not disadvantaged under prioritisation frameworks.

### Sustainable Maintenance

The Council supports embedding sustainability in road maintenance, including the use of low-carbon materials and climate-resilient designs. This aligns with the Council's own

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<sup>9</sup> Public Local Inquiry into the A5 Western Transport Corridor Road Scheme, PAC Report, 31 October 2023: <https://www.infrastructure-ni.gov.uk/publications/a5-western-transport-corridor-pac-report-2023>

<sup>10</sup> Northern Ireland Traffic Count Data - [data.gov.uk](https://data.gov.uk)

<sup>11</sup> Northern Ireland Traffic Count Data - [data.gov.uk](https://data.gov.uk)

commitment to environmental protection and net-zero targets. FODC welcomes the Draft Road Maintenance Strategy's recognition of environmental sustainability and resilience to climate change. The Council strongly encourages prioritisation of low-carbon materials, energy-efficient maintenance practices, and interventions designed to reduce lifecycle emissions. This aligns with the Council's commitment to climate resilience by 2050 and reflects the Council's broader objectives for sustainable development and climate resilience. Fermanagh & Omagh emits the largest share of greenhouse gas emissions yet generates not only the most renewable energy, but is almost 50% ahead of the next best performing LGD. This unique position underscores both the challenge and the opportunity: reducing emissions from an extensive rural road network while leveraging leadership in renewable energy. Embedding these considerations within the Strategy will ensure that maintenance practices contribute meaningfully to decarbonisation and deliver tangible benefits for rural communities.

The Council endorses the Strategy's emphasis on sustainability and resilience, as set out in "Sustainable Maintenance" including the development of a Resilient Road Network Plan and the commitment to reduce carbon impacts while maintaining quality. Given FODC's largely rural geography, the district is particularly vulnerable to climate impacts such as flooding, extreme rainfall, and storm-related damage. Council stresses that climate-specific risk assessments should inform prioritisation of maintenance works, particularly for rural and local roads, bridges, and drainage infrastructure. Ensuring rural roads are climate-resilient supports social equity and economic connectivity, as many residents rely on these routes for daily life and local commerce.

FODC recognises the importance of road infrastructure in supporting economic development. However, the Council emphasises that sustainable development principles must guide transport investment decisions. Road maintenance strategies should balance climate commitments with economic needs, minimising environmental impact while supporting local connectivity and growth. Fermanagh & Omagh has consistently received the lowest spend per kilometre of any Local Government District (£5,937/km in 2022/23 vs NI average £9,767/km)<sup>12</sup> due to its extensive rural network.

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<sup>12</sup> Provided via correspondence with DfI Permanent Secretary, 24 Nov 2023



Under-investment risks higher whole-life costs and reduced resilience. We support the proposed Resilient Road Network Plan and recommend prioritising drainage and edge-strengthening on rural links, using low-carbon materials. Publishing cost-permile metrics and open data will strengthen transparency and accountability.

### Additional Comments

The Strategy states: “A key measure of success will be identified through the various measurements that make up the Road Condition Reports.” While this commitment is noted, the Strategy does not clarify what those measures will be or whether they will be subject to stakeholder consultation. This lack of detail risks success criteria being defined retrospectively, which could undermine transparency and accountability. We recommend that the Department confirm that measures of success will be consulted upon and published in advance, and that they explicitly include reference to rurality and the inclusion of U-class roads. In particular, U-class metrics should commensurate with existing measures for other road classes and incorporated by default into any future performance indicators.

The Council supports the A5 Western Transport Corridor (WTC) as a critical project for regional connectivity and economic parity. The Council does not support the recent ruling, which limits its ability to achieve economic parity, attract green investment, and deliver low-carbon infrastructure. This is particularly concerning given that Fermanagh and Omagh has only 0.6km of Northern Ireland’s dual carriageway network. The judgement restricts progress in an area that already faces longstanding connectivity constraints, further highlighting persistent regional inequalities.

The ruling underscores the interconnected nature of climate action, economic development, and infrastructure planning, highlighting the need for robust, balanced approaches that enable growth while respecting environmental obligations. For FODC, this reinforces the importance of cross-departmental coordination at the

regional level and integrated planning through the Local Development Plan to ensure the Climate Change Act supports both sustainable development and regional resilience.

The Council urges the Department to prioritise the upgrade of the A4 from Ballygawley to Sligo which includes the Enniskillen bypass. This upgrade is an additional critical project for regional connectivity and completion is essential to ensure that those within the district benefit from the increased inward investment, maximised tourism industry potential and improved road safety that this project will deliver.

### **Equality Impact and Rural Needs Assessments**

The 'Rural Needs Act (Northern Ireland) 2016' places a statutory duty on public authorities to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans. This duty should be explicitly referenced in the Strategy and embedded in all large-scale capital programmes and investment planning, alongside compliance with emerging legislation such as the 'Climate Change Act (Northern Ireland) 2022', which has already deferred major schemes like the A5 Western Transport Corridor. Doing so will ensure that rural equity and legislative obligations are considered from the outset.

We note that the draft Strategy does not appear to reference the Rural Needs Act or rurality in general, and the language around prioritisation could imply that rural roads (despite their critical connectivity role) may be treated as lower priority. This would be contrary to the intent of the Act, which seeks to deliver fairer and more equitable treatment for rural communities. We recommend that the Strategy explicitly confirms how rural needs will be factored into prioritisation and performance indicators, ensuring that rural networks are not disadvantaged under the new approach.

Fermanagh and Omagh District Council is also concerned that the Equality and Rural Needs Impact Assessments have not been made available for comment along with the draft Strategy, although Council has been advised that these are still in the process of being prepared. Meaningful comment cannot be provided without sight of these documents and the absence of a comprehensive Rural Needs Impact Assessment in particular gives rise to further concerns regarding rural equity.

### **Conclusion**

Fermanagh and Omagh District Council broadly supports the Draft Road Maintenance Strategy and its three guiding principles of quality, targeted investment, and sustainability. However, successful implementation will depend on adequate and equitable funding, transparent prioritisation frameworks, and meaningful engagement with local authorities and communities.

The Council urges the Department to explicitly embed compliance with the Rural Needs Act (Northern Ireland) 2016 and the Climate Change Act (Northern Ireland) 2022 within the Strategy to ensure rural equity and climate resilience are central to decision-making. This includes publishing clear indicator weightings, incorporating U-class roads in condition reporting, and adopting predictive maintenance technologies to deliver smarter, data-driven investment. The Council would particularly welcome the publication

of comprehensive data relating to these technologies, with explicit inclusion of U-class roads, even if experimental.

By prioritising durable interventions, sustainability, and rural connectivity, the Strategy can deliver long-term value, reduce lifecycle costs, and enhance safety across Northern Ireland's road network. The emphasis on "quality over quantity" must not lead to wholesale deprioritisation of U-class roads, given their critical connectivity role in rural areas. FODC looks forward to continued collaboration with the Department to ensure that these commitments translate into practical outcomes that support economic development, social equity, and environmental responsibility.



Department for

**Infrastructure**

An Roinn

**Bonneagair**

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## **Draft Roads Maintenance Strategy 'Better Roads'**

Consultation Report

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