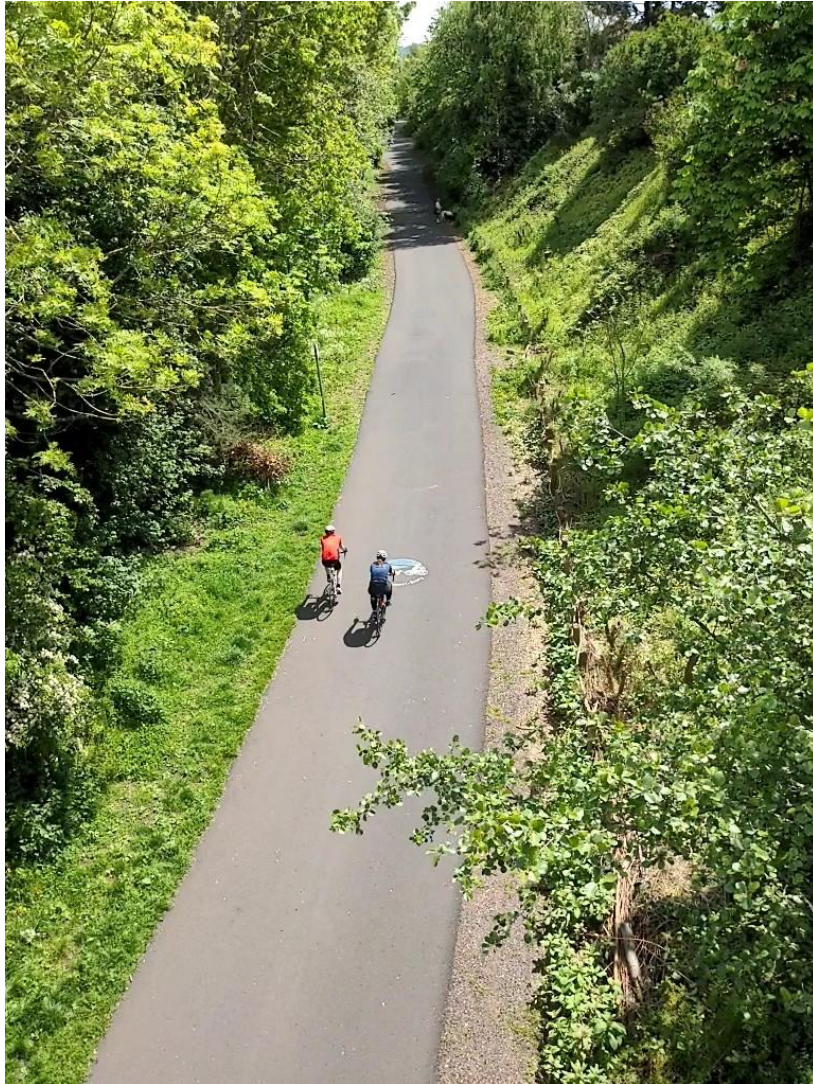


Consultation on Lighting Comber Greenway



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Executive Summary

The Comber Greenway is a 6½ mile shared use off-road (i.e. traffic-free) path almost entirely along the route of the former Belfast and County Down Railway mainline. Running from Ravenscroft Avenue car park, Belfast to Belfast Road, Comber, the greenway forms part of a planned 1,000km greenway network across Northern Ireland aimed at bringing potential benefits in the areas of active travel, physical activity, physical and mental health and wellbeing, social inclusion, strengthening of the local economy and leisure, recreation and tourism.

Since its construction, no lighting has been provided on the greenway between Beersbridge Road and Comber. This may be one of the reasons why, during the winter months, use of the greenway drops away. The provision of some form of lighting along all or part of the greenway could help to encourage people to continue to use it after sunset throughout the year.

The purpose of this public consultation was to gather views and comments as to whether lighting should be provided on the Comber Greenway, and if so over what sections. This consultation ran from 16th August 2021 to 30th September 2021 and there was a total of 1,712 responses: 1,692 were received via the Citizen Space consultation site; the remaining responses were received via email or letter.

Taking all responses into account, there was 81% support for lighting the urban section of the Comber Greenway and 58% support for lighting the whole greenway, urban and rural. Among those whose properties were adjacent to the greenway, there was 65% support for lighting the urban section and 43% support for lighting it all.

Accordingly, we propose to light the urban section of the greenway as a pilot scheme. This would enable us to determine whether lighting the greenway did, in fact, deliver an increase in usage as anticipated. It would also enable us to assess whether the concerns raised do materialize (e.g. light spill into adjacent properties, an adverse effect on wildlife or an increase in anti-social behaviour). The pilot scheme would be reviewed after two years operation (i.e. in the summer of 2024).

Introduction

Minister for Infrastructure, Nichola Mallon, took up post in January 2020 and made a commitment to deliver sustainable infrastructure that would transform our communities and lives. Active travel and the development of greenways is key to the Minister's green recovery action plan and the consultation is an opportunity to hear directly from the public on how we can make progress.

Background

The Comber Greenway was constructed in 2008 and is currently in the ownership of the Department for Infrastructure (DfI). It is a 6.5 mile shared use path almost entirely along the route of the former Belfast and County Down Railway line between Ravenscroft Avenue car park, Belfast and Belfast Road, Comber. The greenway is primarily urban for 4.8 miles from Ravenscroft Avenue to Billy Neill Halt and rural for the remaining 1.7 miles to Comber. There is a short length of lighting (300m) between Ravenscroft Avenue car park and Beersbridge Road.

The greenway has become a popular amenity in the area, used for walking, dog walking, running, wheeling and cycling. Use includes a significant number of people commuting. During the three years 2017/18 – 2019/20, there was an average of around 370 cycling journeys and 300 walking journeys daily during the six months April – September, with annual usage levels of around 190,000 journeys at Abbey Road, Belfast and around 140,000 journeys at Belfast Road, Comber. A long section of the urban greenway, between Holywood Arches and Millmount Road was widened in 2018 to 4m, and this was expected to further increase usage. In 2020/21 (during the first year of the Covid-19 pandemic) annual usage increased to 370,000 at Abbey Road, Belfast and 250,000 at Belfast Road, Comber.

Although the greenway is already well used, the Department is keen to make better use of this asset for walking, wheeling and cycling and to maximise the positive impacts of the greenway for local communities and businesses, especially in the winter months.

The Comber Greenway is used more during the brighter months of the year. In June 2020 there were around 40,000 movements (walking and cycling) at the Abbey Road counter, whereas in December 2020 there were around 17,000 at the same location.

Abbey Road, Belfast	June 2020	December 2020	Reduction
5.0 am – 9.0 am	4600	1400	- 70%
9.0 am – 4.0 pm	20600	13200	- 36%
4.0 pm – 10.0 pm	14900	2500	- 83%
Before 5.0 am or after 10.0 pm	500	100	- 80%
TOTAL	40600	17200	- 58%

Table 1: usage of the Comber Greenway in June 2020 and December 2020.

Options

The environmental issues and presence of bats has limited the options that could be used for lighting the greenway. The lighting proposed comes out of extensive research on bat-friendly lighting. The design proposes a red spectrum of light with back spill louvres and 4m rather than 5m columns. This type of system would mean that bats would continue to behave in the same manner under this lighting as they would in darkness. It is also proposed that the lighting only operates during the hours of darkness and to switch the lights off between the hours of 12 midnight and 5am.

The three options consulted upon were:

Option 1 – Do nothing, leave the greenway as it is.

Under this option there would be no investment. The physical footprint of the greenway would remain unchanged, and the Department would not have to make available budget for adding lighting. There would be no additional impact on local wildlife, such as bats, and no requirement for potentially disruptive work to be carried out along the route.

The use of the greenway during the evenings and early mornings would remain low, and the use of the route for generating modal shift from driving to walking and cycling would be hampered. Furthermore, this valuable community resource would remain under-utilised.

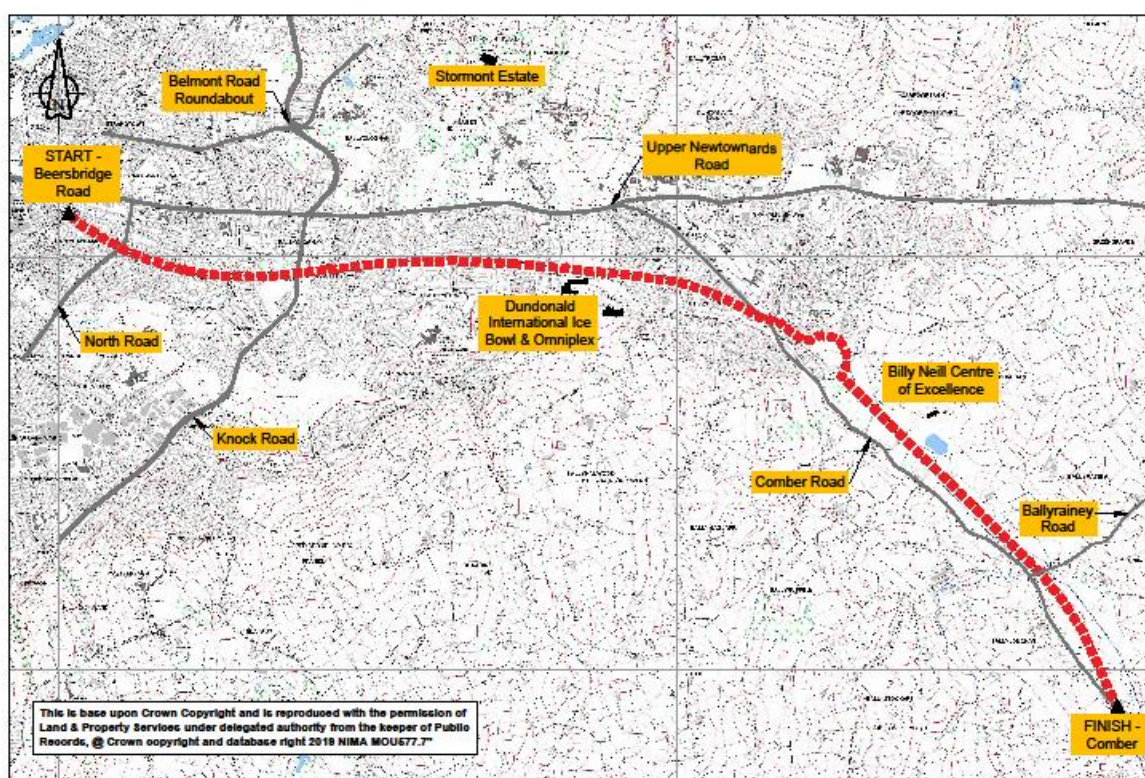


Figure 1: No lighting

Option 2 – install lighting on the urban section of the greenway between Beersbridge Road and Billy Neill Halt

The section between Beersbridge Road and Billy Neill Halt is largely urban and suburban.

Under this option higher use of the greenway could continue during the darker autumn, winter and spring early mornings and evenings. This would facilitate modal shift for commuting and for walking and cycling to school. The community resource would also be better utilised. The physical footprint of the greenway would remain unchanged.

There would be minimal impact on local wildlife, such as bats due to the nature of the design. This design would minimise overspill to back gardens because of it being low level with a louvre at the back of the light head.

However, there would be the cost and requirement for work to be carried out along the route, although this should be relatively short term and minimal as ducting is largely in place already.

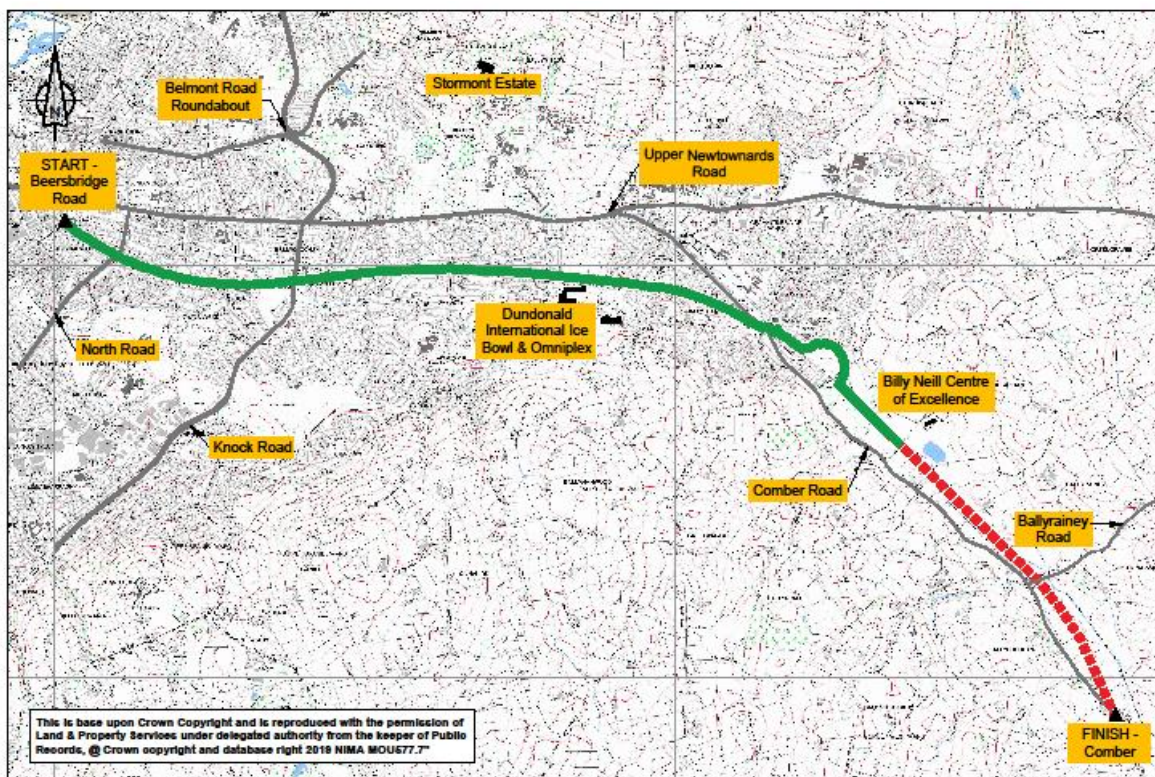


Figure 2: Lighting the urban section of the Comber Greenway

Option 3 – Install lighting on the whole greenway between Beersbridge Road and Comber

The section between Billy Neill Halt and Comber is rural in nature.

This option would simply extend Option 2 the whole way to Comber and would provide lighting on the rural part of the greenway in addition to the urban / suburban part. It would therefore extend the benefits of lighting to the whole greenway at additional cost. Usage levels on the rural part of the greenway are estimated at around two thirds of the urban part – mainly due to fewer walking journeys.

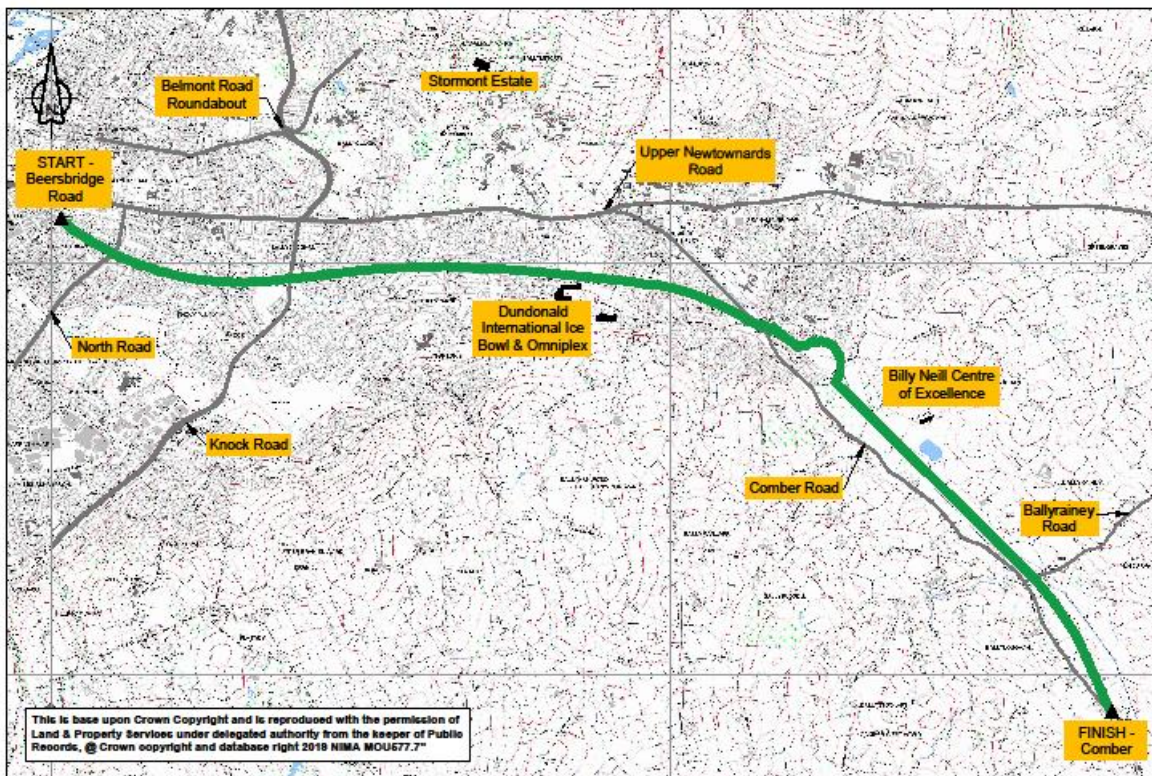


Figure 3: Lighting the whole Comber Greenway

Overall results

Details of all the questions asked are set out in Appendix A.

The full results of the survey questions from the Citizen Space responses are detailed in Appendices B and C.

Overall, 1,692 responses were received through the Citizen Space online survey and a further 20 by email or post. Those 20 individuals who responded via email and post did not answer the questions as posed in the consultation and an analysis of those responses is at the end of this section.

Of the three options, the majority of respondents (58%) selected option 3: lighting on the whole length of the greenway from Beersbridge Road to Comber. A further 23% selected option 2: lighting of the urban section of the greenway only. Option 1 was selected by 19% of respondents: no lighting on the greenway and leave it as it is. A combination of lighting all or part of the greenway highlights that 81% are content to have the urban section of the greenway lit.

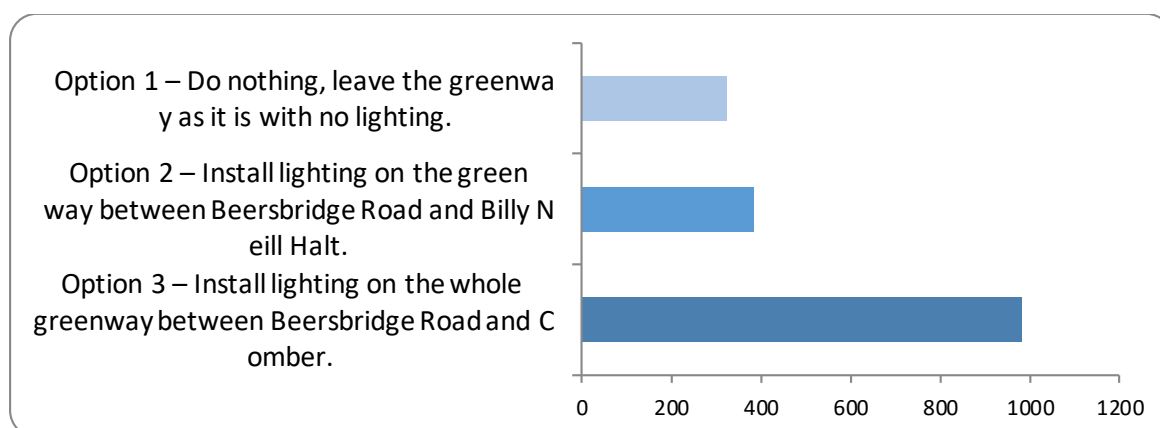


Figure 4: Results of Consultation Options

Of those who responded 22% said that their property bordered the greenway. Although the proposed lighting will have minimum impact on bordering properties due to back filters on the lights and lower columns, it is recognised that it would be considered likely that the Comber Greenway 'neighbours' would be most directly affected by any proposal to light the greenway. Analysis of these responses showed that of the 373 who responded, 159 (43%) supported Option 3 (light the whole greenway) and 83 (22%) supported Option 2 (light the urban section of the greenway). The remaining 132 (35%) of those whose properties bordered the greenway were against lighting it at all. Combining the responses supporting options 2 and 3 indicates that 65% are content to have the urban section of the greenway lit.

We also looked at the comments made by all respondents to understand more fully the positives or negatives that were important to them in choosing an option. Some respondents made no comment at all and some made more than one comment.

Perceived dis-benefits to lighting included the following:

- Encouraging anti-social behaviour/crime 155 (9%)
- Affecting wildlife /environment 194 (11%)
- Light pollution generally or onto property 327 (19%)
- Cost of running / money better spent elsewhere 23 (1%)

Perceived benefits listed included:

- Discouraging anti-social behaviour/crime 20 (1%)
- Users feel safer/females feeling safer (security) 288 (17%)
- Safer walking and cycling for all (reducing potential conflict) 30 (2%)

The PSNI also felt that lighting would help better support those who were vulnerable in the community, who can be inclined to go to the greenway in the hours of darkness.

There were almost 40 comments on the proposed hours of lighting, with 22 suggesting a variation that proposed shorter lighting times with switching off between 9.00pm and 11.00pm. Ten respondents suggested leaving the timings as suggested in the consultation with switch off at midnight.

Emailed and posted responses

Of the 20 individuals who responded via letter and email, ten indicated that they would want part or all of the greenway lit. Of the remaining respondents seven recorded that they did not want the greenway lit and three did not indicate or it wasn't clear what their preference was.

For those who did not want lighting or wanted lighting limited to the urban section noted concern that it would increase antisocial behaviour and impact negatively on the rural section (from Billy Neill Halt to Comber). Other comments in support of lighting referred to improved public safety and assisting of a modal shift to active travel.

Analysis of Consultation responses

Overall there was substantial support for lighting the Comber Greenway. 81% of all respondents wanted the Comber Greenway lit in some form or other, whether that be the urban section only or the whole length.

Among those who responded and indicated that their property bordered the greenway, the majority (65%) supported lighting on the urban section and 43% supported lighting the whole length.

In analysing the perceived dis-benefits, 194 said that they would like the wildlife and or the environment undisturbed. Although more users in the hours of darkness could disturb wildlife, the lighting itself is designed to minimise the effect on bats through the use of the red spectrum of light. Furthermore, shorter lighting columns (4m instead of 5m) and back louvres on the light heads would considerably reduce light overspill.

155 felt that lighting would encourage anti-social behaviour or crime and 20 felt that it would discourage such activities. There were also 288 who felt that lighting would make them feel safer, from a perceived security perspective and this included improved safety for women as well as over 30 individuals who felt that lighting would reduce the risk of injury.

Lighting would discourage potential criminal activity and increase a sense of personal security for users. A 2008 academic review¹ of the effects of street lighting looked at five reports where the level of anti-social behavior and crime had been measured both before and after the installation of improved street lighting. In four out of five of these reports, the level of criminality was found to have dropped significantly. The review suggested that street lighting was an effective method of strengthening informal social cohesion through encouraging more use of the streets and investment in the neighbourhood.

In 2013 over 300 residents and a range of project stakeholders were consulted about potential 24 hour opening and lighting of the Connswater Community Greenway². The results indicated that local people saw clear benefits in the presence of the greenway – 72% felt that ‘improving the quality of life for people in the community’ was a major benefit of the greenway, with 90% of stakeholders seeing walking as a major benefit. Responding to questions focusing on lighting and 24 hour opening, 85% of residents and 82% of stakeholders believed that lighting the greenway 24 hours a day would improve people’s sense of personal safety. Additionally, 75% of residents and 70% of stakeholders believed that 24-hour greenway opening would promote positive use of the amenity.

Just over 20 individuals felt that the light pollution from the lighting scheme would affect their properties. As described above, the lighting columns are shorter (4m instead of 5m) with back louvres on the back of the light heads to minimise lighting overspill. The red spectrum of light, which minimises the effect on the nature of the path, provides a very low contrast with the natural night time light level.

Just over 20 individuals raised the issue about the cost of running or suggested the money would be better spent elsewhere. There is a cost to installing and running the lighting on this traffic-free path, but overall, the cost to society as a whole will be less. A project that encourages more walking and

¹ Welsh, B., and Farrington, D.F. (2008). Effects of Improved Street Lighting on Crime. Campbell Collaboration Systematic Review. Campbell Collaboration: Norway.

² Connswater Community Greenway Evaluation report 2014 – engagement survey

cycling and less use of the private car, not only delivers better physical activity benefits to users and society as a whole but also reduces the amount of air pollution produced.

A research paper¹ from 2020 conducted by PARC sets out the evidence base for the social return on investment of the Connswater Community Greenway. The research found that evidence supports the multi-functional nature of urban green space, and so economic evaluations should have a broad lens in order to capture their full impact. Given the evidence for a range of health, wellbeing, social and environmental benefits of such interventions, PARC modelled the potential social return on investment of a new urban greenway intervention in Belfast, Northern Ireland. Areas that the greenway was purported to impact upon included: land and property values; flood alleviation; tourism; labour employment and productivity; quality of place; climate change; and, health. The most recent and applicable evidence pre-development of the greenway for each area was summarised to obtain an 'effect estimate'; this was then applied to available data for the greenway area and the impact estimated and monetised using various methods.

To calculate the Benefit Cost Ratio were summed, for both a worst case and best case scenario, and divided by the total investment cost. The Benefit Cost Ratio for all seven monetary benefits, was calculated to range from 2.88 to 5.81 (i.e. for every £1 invested in the greenway, there would be £2 – 6 returned). This is one of the first studies to conduct a social return on investment of a new urban greenway estimating the potential benefits.

Over the last number of year over £700,000 has been spent on widening, laying ducting and improvements to linkages along the route. The cost of lighting was initially estimated of the order of £350,000. Considering lighting alone, and using the calculation above, the return for the Comber Greenway will be between £700,000 and £2.1 million

¹ Ruth F. Hunter, Mary A.T. Dallat, Mark A. Tully, Leonie Heron, Ciaran O'Neill & Frank Kee On Behalf of the PARC Study Research Team (2020): Social return on investment analysis of an urban greenway, Cities & Health, DOI: 10.1080/23748834.2020.1766783

Conclusion

It is concluded from the consultation that there is substantial public support for the lighting of the Comber Greenway. In addition, there is significant support for lighting among those whose properties adjoin the greenway. Consequently, we conclude that the Department could proceed to install bat friendly lighting on the Comber Greenway. Given that respondents have raised reasonable issues about a lighting scheme we recommend that this lighting scheme be installed on a pilot basis for two years. This will provide an opportunity for the Department to monitor issues such as the effect on wildlife, light overspill and antisocial behaviour.

Although there is majority support (58%) for lighting the whole length of the greenway (urban and rural) support among neighbours of the Comber Greenway is more equivocal (43%). However, there is clear support for the lighting of the urban section of the greenway (81% overall and 65% among 'neighbours'). Accordingly, we conclude that the Department should proceed with lighting the urban section from Beersbridge Road to Billy Neill Halt.

Installing lighting on a pilot basis will also provide an opportunity to assess the effectiveness of lighting a traffic-free walking and cycling path in terms of the level of use of the greenway. Accordingly, this pilot scheme will be used to inform a review of current Departmental policy on the provision of street lighting in terms of whether it should include the lighting of active travel and greenway routes in the future.

An assessment of the pilot scheme, including a bat and environmental survey, will be undertaken 24 months after installation of the lighting.

In terms of the rural section of the greenway, we conclude that ducting for a possible future lighting scheme should be installed alongside proposals to widen the rural section of the Comber Greenway to 4m. Proceeding with lighting that section should be considered as part of the review of the pilot scheme.

Appendices

Appendix A – Questions from Consultation

Q1: How often do you use the greenway:

- a) Don't use it;
- b) Occasionally (up to 3 times a year);
- c) Frequently (up to once a week); or
- d) Regularly (several times a week or daily)?

Q2: Do you feel that lighting the greenway would be:

generally a good thing?

a generally bad thing?

Please provide any reasons for your choice.

Q3: Does your property border the greenway?

Q4: If lighting was provided along the greenway would it encourage you to use it during the hours of darkness?

Yes

No (a) I still would not use it at night even if it was lit.

No (b) It would make no difference as I would use the greenway at night whether it was lit or not.

Q5: If you would classify yourself as an occasional user, do you think that the addition of lighting would cause you to consider using the greenway more often?

Q6: The proposal for lighting is only for the hours of darkness except when they are switched off between 12.00 midnight and 5.00am, so what is your preferred option?

- a) Option 1 – Do nothing, leave the greenway as it is with no lighting;
- b) Option 2 – install lighting on the greenway between Beersbridge Road and Billy Neill Halt;
- c) Option 3 – Install lighting on the whole greenway between Beersbridge Road and Comber.

Appendix B – Citizen Space Analysis Report - Lighting of the Comber Greenway

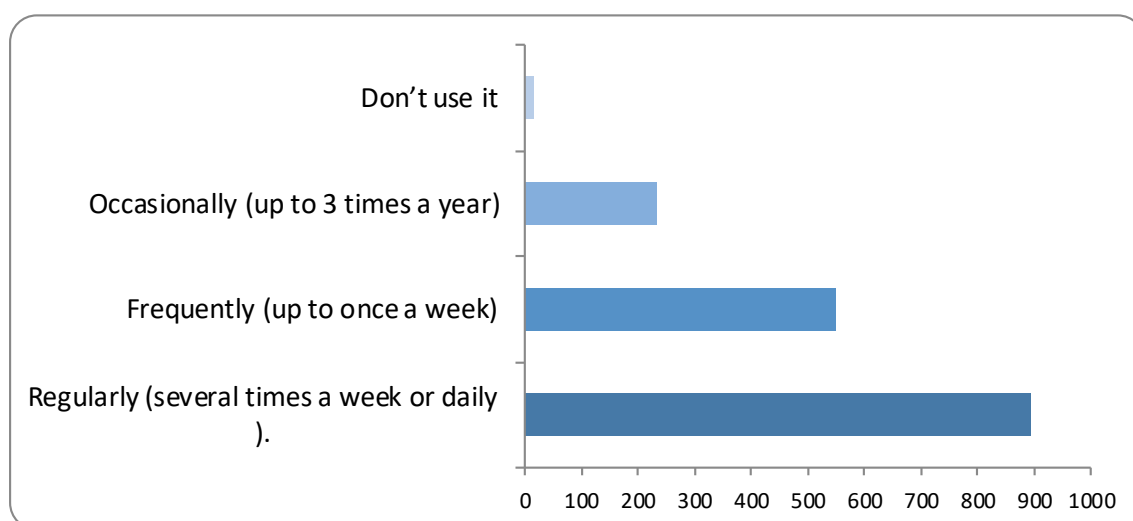
<https://consultations.nidirect.gov.uk/dfi-active-travel-branch/lighting-of-the-comber-greenway>

This report was created on Tuesday 19 October 2021 at 13:08 - The activity ran from 16/08/2021 to 30/09/2021

Responses to this survey via Citizen space: **1692**. **Not all responders answered every question and the numbers of responses or comments to each question is highlighted in the detail below.**

Q1: How often do you use the greenway?

There were 1692 responses to this part of the question.

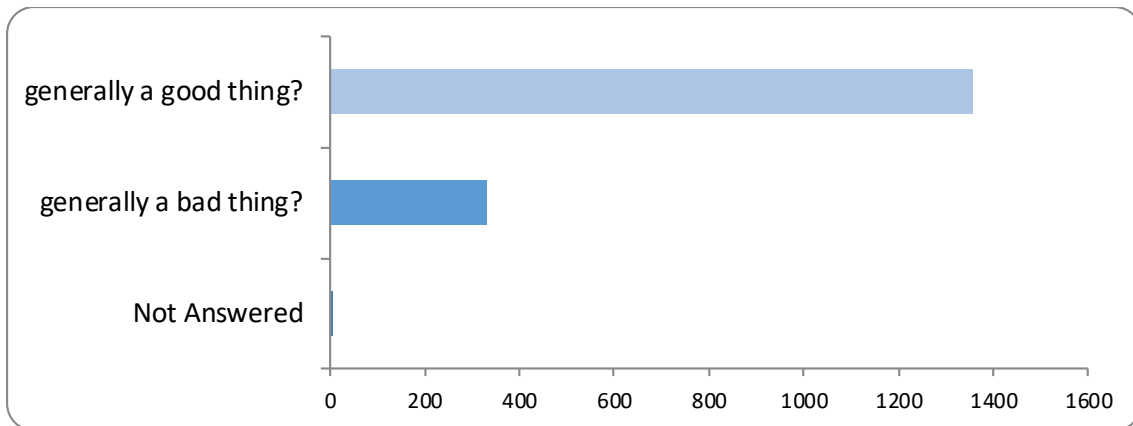


Option	Total	Percent
Don't use it	15	0.89%
Occasionally (up to 3 times a year)	233	13.77%
Frequently (up to once a week)	550	32.51%
Regularly (several times a week or daily).	894	52.84%
Not Answered	0	0.00%

Q2: Do you feel that lighting the greenway would be:

Select one answer only.

There were 1688 responses to this part of the question.



Option	Total	Percent
generally a good thing?	1357	80.20%
generally a bad thing?	331	19.56%
Not Answered	4	0.24%

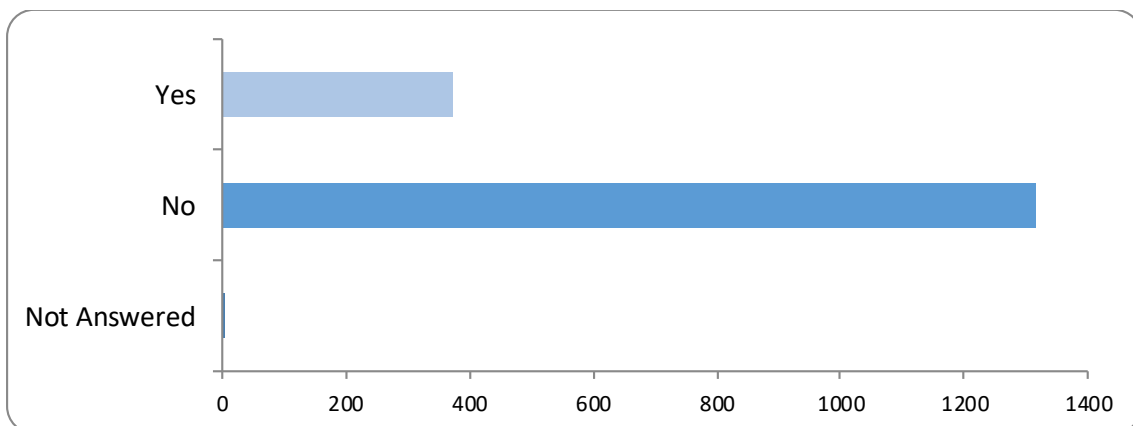
Please provide comments

There were 1116 responses to this part of the question

Q3: Does your property border the greenway?

does your property border the greenway? - yes or no

There were 1689 responses to this part of the question.

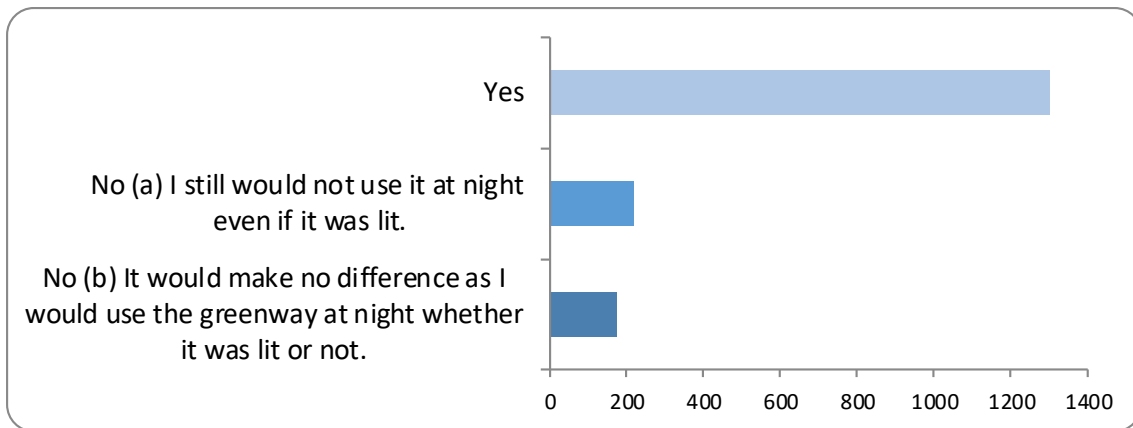


Option	Total	Percent
Yes	373	22.04%
No	1316	77.78%
Not Answered	3	0.18%

Q4: If lighting was provided along the greenway would it encourage you to use it during the hours of darkness?

provision of lighting would make you feel more like using the greenway on dark evenings

There were 1692 responses to this part of the question.

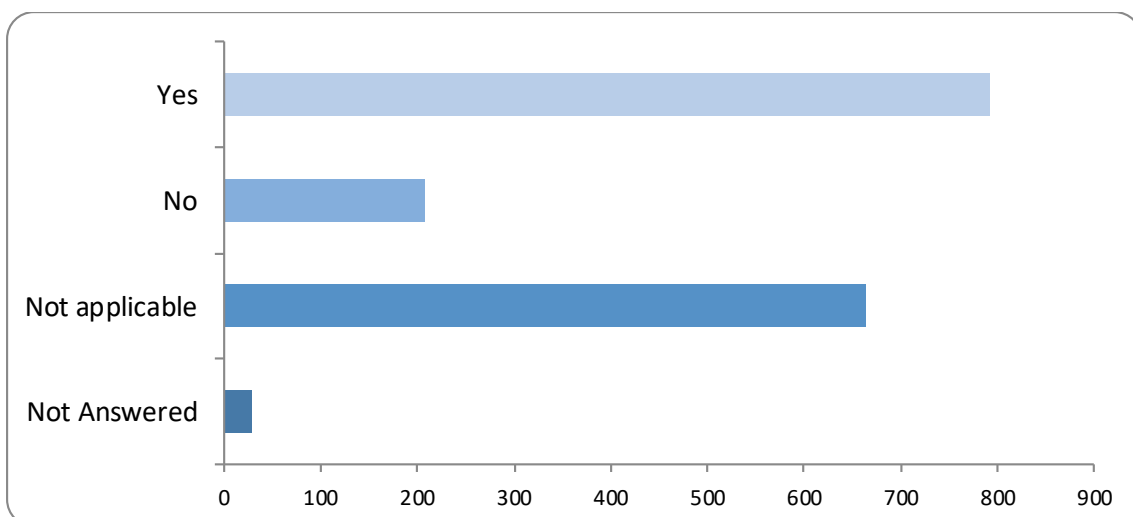


Option	Total	Percent
Yes	1302	76.95%
No (a) I still would not use it at night even if it was lit.	218	12.88%
No (b) It would make no difference as I would use the greenway at night whether it was lit or not.	172	10.17%
Not Answered	0	0.00%

Q5: If you would classify yourself as an occasional user, do you think that the addition of lighting would cause you to consider using the greenway more often?

do you classify yourself as an occasional user?

There were 1664 responses to this part of the question.



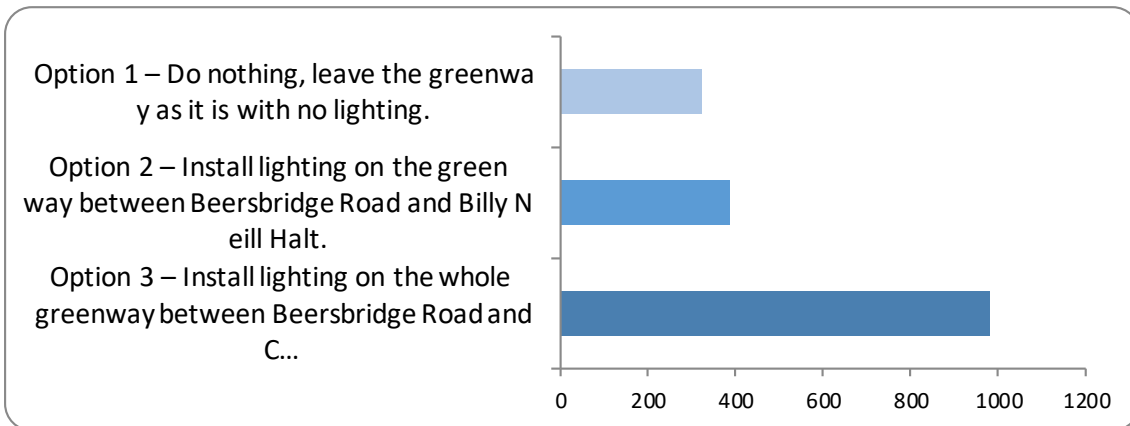
Option	Total	Percent
Yes	792	46.81%
No	208	12.29%

Not applicable	664	39.24%
Not Answered	28	1.65%

Q6: The proposal for lighting is only for the hours of darkness except when they are switched off between 12.00 midnight and 5.00am, so what is your preferred option?

proposal for lighting

There were 1692 responses to this part of the question.



Option	Total	Percent
Option 1 – Do nothing, leave the greenway as it is with no lighting.	324	19.15%
Option 2 – Install lighting on the greenway between Beersbridge Road and Billy Neill Halt.	386	22.81%
Option 3 – Install lighting on the whole greenway between Beersbridge Road and Comber.	982	58.04%
Not Answered	0	0.00%

Appendix C – Other Stakeholder Input

PSNI

We are really keen to support this project and identify best practice for this and future projects/initiatives.

From a designing out crime perspective it is important that the lighting scheme conforms to BS 5489-1:2020. The recent changes to BS 5489 have been thoughtfully and deliberately crafted to prioritise environmental protection.

I note there does not appear to be any additional work in terms of planting schemes and infrastructure (seating, bicycle racks etc). If there an intention to include these in this pilot or future stages then we would be happy to comment. Again this will be dependent on the success of the lighting scheme and in line with the designing out crime principle.....

Police would welcome the introduction of the proposed new park & ride facility at the Comber end of the Greenway, particularly if the Department introduces lighting on the Greenway, which may lead to further increases of its use with its associated vehicular traffic movements.....

Obviously from a general perspective of increasing public safety, local Police would welcome any security measures such as lighting. With the caveat that any light pollution, and the unintentional consequence of youths getting involved in ASB at conveniently illuminated sites, would need to be factored in, on their decision making.

The essential question is, does Lighting improve the security and convenience of the general public, whilst taking into consideration and mitigating any negate impact this may have on those householders who live in close proximity to the Comber Greenway?

I believe that lighting is already in place on the sections of the Comber Greenway which dissect Dundonald/Castlereagh, so I am sure that provision has already been made by Planners at DFI, to adequately address those quality of life/peaceful enjoyment of property concerns of local residents.

Missing persons have previously accessed the Greenway, and have harmed themselves there. Lighting would make searching by Emergency Services on winter evenings more effective

Council Ards and North Down Borough Council

I can confirm that following the Community and Wellbeing Committee meeting last night it was agreed that Council support: Option 3 – Install lighting on the whole greenway between Beersbridge Road and Comber.

Ulster Farmers

The UFU strongly encourage direct engagement with landowners at the earliest stages of considering a greenway.

Landowners that may be affected by the route should receive a visit or phone call from the greenway project manager/ co-ordinator etc. when a potential route is being considered.

Public consultation opportunities should be advertised in the farming press as well as local press and through the UFU, who can make members in the area aware.

A stockproof fence must be erected and maintained for the duration of the lifetime of the greenway.

It should be made clear to landowners what department within the council is responsible for maintenance of the greenway once operational. Landowners should have a direct contact for that department should any issues arise.

Whilst the guidance references new greenways it also applies to existing greenways where changes are being considered. Has the DfI directly contacted all landowners to make them aware of the plans to light up sections or the entire length of the greenway? Where has the consultation been advertised? The UFU request that the views of landowners and property owners are balanced with the request of greenway users, as it is likely the majority of responses to this consultation will come from users of the greenway. Those who use the greenway, use it for a short period of time in comparison to land and property owners who will be affected by the lights for the entire length of time that they are on.

It is normal that the number of greenway users decreases in December, compared to June as there is less daylight. The weather is also another factor that should be recognised as a reason for fewer movements in December, and lighting cannot offset the effect of poor weather. Lighting the rural section of the greenway from Billy Neill Soccer Centre to Comber will cause light pollution. Despite plans to mitigate against this, the visual impact of light and street lamps will not compliment rural areas and take away from the landscape which users of the greenway and landowners enjoy.

In conclusion the UFU are not supportive of lighting the greenway. Where funding for investment is available for the greenway the UFU ask that is used to provide stockproof fences and gates and promote responsible use of the greenway.

If you require any further information please do not hesitate to get in contact.

CIHT

As a matter of policy, CIHT would support and encourage Active Travel. The proposal to provide lighting on the Comber Greenway would send out a useful message about a commitment to encourage modal shift, however, the actual benefits and costs need to be carefully weighed considering existing pressures on public funding.

We are aware that the proposal would be outside of current Departmental policy on the provision of street lighting. Any movement away from this may be seen to set a precedent for the extension of street lighting across other existing and future Greenways.

Whilst grants are often available for the capital cost of such infrastructure, given the current difficulties in sufficiently maintaining the existing lighting stock, additional funding would also need to be secured for the ongoing maintenance commitment.

Given the lighting would provide most benefit in the winter months when walking and cycling aren't particularly favoured, and considering the potential negative environmental effects of lighting what is in part an essentially rural area, we believe the case to proceed with the proposal to be finely balanced and probably more one of longer term affordability. Within the Department's constrained funding limits, we believe it is likely that other interventions could produce a better rate of return, in terms of modal shift or safety improvements, than lighting Greenways would.

IMTAC

The Committee met yesterday and discussed the consultation on the lighting of the Comber Greenway. As a stakeholder with a general interest in the provision of inclusive and accessible active travel infrastructure including Greenways the Committee has agreed it is appropriate to comment on the consultation. I would be grateful if you consider the following comments as Imtac's response to the consultation.

Imtac strongly supports the development of inclusive and accessible infrastructure that enables everyone to take part in walking, wheeling and cycling on an equal basis. To achieve this we believe there should be clear standards that any new infrastructure should be required to meet including consistent standards around accessibility. These standards should also be used in the upgrade of existing infrastructure, removing barriers that make it difficult for some in society to use this infrastructure.

For Imtac lighting is an essential component to ensure that active travel infrastructure is both accessible, safe and attractive to all users. We recommend that lighting should be considered as part of all new Greenway schemes and any refurbishment of existing infrastructure. We recommend that for urban schemes lighting should be made a requirement. For rural schemes we recommend that lighting be required unless there are strong local justifications for not doing so.

Based on the above Imtac does not support option 1 (do nothing). As with the recent addition of seating, lighting is vital to making the existing Greenway more accessible and inclusive to a broader range of users.

In line with our comments above we believe it is essential that lighting is provided on the section between Beersbridge Road and Billy Neil Halt (option 2) as this is largely urban in nature.

With regard to the short rural section of the Greenway (option 3) the Committee is supportive of extending the lighting, particularly as the Department is proposing mitigating measures that recognise potential environmental impacts.