

# STRANGFORD LOUGH CROSSING

## Climate Change, Infrastructure Resilience and the Case for Independent Scrutiny

A Briefing for Ministers and Members of the Legislative Assembly

### MINISTERIAL / MLA BRIEFING

**Subject:** Strangford Lough Crossing -- Request for Independent Feasibility Study

**Theme:** Climate Resilience, Transport Decarbonisation and Public Subsidy Value for Money

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**Classification:** Not Protectively Marked – Not a joke either !

## 1. Purpose and Scope of This Briefing

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Our climate knows no border. This briefing places the Strangford Lough Crossing Campaign's request for an independent, Transport Appraisal Guidance (TAG)-compliant feasibility study within the framework established by two major published reports of Ireland's Climate Change Advisory Council (CCAC): the Climate Change Advisory Council Annual Review 2025 (published in nine parts between March and September 2025) and the Climate Change Advisory Council Annual Review 2026: Our Changing Climate in 2025 (published March 2026). Both documents are independent advisory publications of an expert statutory body. They are not cited as advocacy material; they are cited because their findings directly bear upon the policy questions raised by continued public subsidy of a diesel-powered ferry service in preference to a structural assessment of a permanent crossing option.

The campaign's sole request remains unchanged: commission an independent feasibility study, estimated to cost between £750,000 and £1,000,000, to examine in accordance with DfI's own Transport Appraisal Guidance whether a permanent crossing represents better long-term value for public money than continued operation and subsidy of the Strangford Ferry service. The campaign does not advocate for any predetermined outcome. It advocates for the evidence.

## 2. The Climate Change Advisory Council: Scope and Authority

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The Climate Change Advisory Council is an independent statutory advisory body established under the Climate Action and Low Carbon Development (Amendment) Act 2021 of the Republic of Ireland. Its Annual Review assesses Ireland's progress in reducing greenhouse gas emissions, meeting carbon budget obligations, and preparing for the physical impacts of a changing climate. The CCAC's reviews are addressed to the Irish Government, but the council's remit explicitly encompasses all-island climate risks and cross-border infrastructure considerations.

The Annual Review 2025 was published in nine separate sectoral and cross-sectoral reports. The Annual Review 2026: Our Changing Climate in 2025 was published on 19 March 2026 and focuses specifically on observed climate impacts during 2025, including the consequences of Storm Eowyn (24 January 2025) and subsequent extreme weather events.

The relevance of both reviews to the Strangford Lough Crossing is not incidental. Their findings bear directly and materially on three policy dimensions of the feasibility study request: transport decarbonisation, infrastructure resilience, and the systemic costs of institutional inaction.

### **3. Transport Decarbonisation: The CCAC's Findings and the Ferry Service**

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#### **3.1 Ireland's Transport Sector Is Substantially Off Track**

The CCAC Annual Review 2025: Summary for All (published September 2025) records that Ireland's transport sector emitted 11.8 Mt CO<sub>2</sub> equivalent in 2024, an increase of 1.2% on 2023 levels. Under existing measures, the sector is projected to reach 126.5% of its 2021-2030 sectoral emissions ceiling: in plain terms, transport emissions are rising when they must fall sharply. The CCAC states directly that the Government is urged to move from ambitious statements to implementing impactful and demonstrable actions.

The Northern Ireland Climate Change Act (Northern Ireland) 2022, which binds DfI as lead department for transport and infrastructure sectors, requires net zero by 2050 and mandates that sectoral plans for transport include a minimum spend of 10% of overall transport budgets on active travel. DfI's own submission to the Incorporating Environmental and Climate Considerations into Business Cases guidance (DoF, September 2025) confirms that the department is the lead department for the Transport Sector and Infrastructure Sector under Northern Ireland's climate action planning framework. DfI is therefore accountable, under statute, for the climate performance of transport assets it operates.

#### **3.2 The Strangford Ferry Service as a Climate Liability**

The Strangford Ferry is a diesel-powered service, comprising two vessels owned and operated by DfI. It operates approximately 22,000 sailings per year (DfI internal memo, FOI reference DFI-2024-0412, 22 August 2024). Each sailing generates carbon emissions from marine fuel combustion. These emissions are direct emissions attributable to a DfI-operated asset.

In addition, the ferry's timetabled and capacity-constrained operation suppresses demand for the direct crossing and displaces approximately 29,000 vehicle movements per day onto road journeys around the lough (DfI traffic count data, Count Point 444, A20 Portaferry Road, 2018-2023). Each diverted vehicle journey adds approximately 75 kilometres to what would otherwise be a direct 1-kilometre crossing. The carbon penalty embedded in these enforced diversions is not recorded against the ferry service's ledger; it is distributed invisibly across the road network.

The CCAC Annual Review 2025 identifies private car demand reduction as one of the ten most important policies available to Ireland for meeting its 2030 carbon targets, with a projected abatement potential of 0.94 Mt CO<sub>2</sub> equivalent per year. A fixed crossing at Strangford Narrows would reduce unnecessary vehicle kilometres travelled by eliminating the 75-kilometre diversion for all traffic that would otherwise use a direct route. This is precisely the category of intervention the CCAC endorses.

### **CCAC Annual Review 2025 -- Transport Sector Key Findings (relevant to SLC)**

- Transport emissions increased 1.2% in 2024; the sector is projected to exceed its sectoral emissions ceiling by 26.5% under existing measures (CCAC Annual Review 2025: Summary for All, published 18 June 2025).
- Private car demand reduction is identified as one of the ten highest-impact measures available, with a potential abatement of 0.94 Mt CO<sub>2</sub> equivalent per annum (CCAC Annual Review 2025: Cross-sectoral Review, Table 3).
- The CCAC calls for urgent action to reduce car dependency and shift journeys to active travel, public transport, and shorter routes -- precisely the outcome a fixed crossing would enable for peninsula communities.
- Fossil fuel subsidies in 2024 totalled EUR 4.7 billion across Ireland; the CCAC calls for their elimination without delay (CCAC Annual Review 2025: Summary for All).
- The DfI Active Travel Delivery Plan (November 2024) confirms that the Climate Change Act (Northern Ireland) 2022 mandates a minimum 10% spend on active travel from transport budgets. A fixed crossing designed with walking and cycling infrastructure would directly contribute to this obligation.

## **4. Infrastructure Resilience: An Emerging Statutory Duty**

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### **4.1 What the CCAC Says About Extreme Weather and Critical Infrastructure**

The CCAC Annual Review 2026: Our Changing Climate in 2025 is the most recent of the two reports under consideration. Published 19 March 2026, it documents the impacts of Storm Eowyn (24 January 2025), which the council records as setting new all-time records for measured wind speed in Ireland, with 768,000 premises left without power and 19 days required to restore all connections. The council notes that Eowyn was the most expensive insurance event in Irish history, with insurance claims totalling over EUR 301 million.

Critically, the CCAC Annual Review 2026 observes that impacts on critical infrastructure and services, the built environment and productive assets are likely to become increasingly severe, and records that the event has highlighted the lack of resilience to extreme weather events of Ireland's critical infrastructure and the urgent need to accelerate investment in and action on climate adaptation.

On ports specifically, the CCAC Annual Review 2025 (published September 2025, Preparing for Ireland's Changing Climate section) draws direct attention to the disruption caused by the closure of Holyhead Port in Wales, with knock-on impacts on supply chains and travel plans. The council states that it is vital that Ireland's port infrastructure and that of its neighbours can resist and recover from extreme weather events.

### **4.2 The Strangford Ferry's Vulnerability to Extreme Weather**

The Northern Ireland Assembly Official Report (Hansard), Tuesday 3 February 2026, Volume 188, No. 2, records an Adjournment Debate on the A20 Portaferry Road. The debate, secured by Kellie Armstrong MLA, addresses the vulnerability of the coastal A20 route, the sole road access to the Ards Peninsula, to extreme weather events. Members note that severe weather events are becoming more

and more common and are only likely to become more so as the impacts of climate change become more obvious.

The same debate records that in December 2025, school buses and multiple other vehicles were stranded on the coastal A20 road. Emergency services could not access those vehicles because it was not safe to do so. Members note that a proper early warning alert system could have prevented this outcome. Minister Kimmins, in her response recorded in Hansard (Volume 188, No. 2, 3 February 2026), confirmed that the Department is responsible for maintaining the road/sea line boundary with Strangford.

The ferry service, which operates at 96.69% availability per annum (DfI Roads Southern Division Report, Newry, Mourne and Down District Council, Annual Report 2024/25), records that of 21,472 scheduled sailings, 108 were cancelled due to fog, 32 due to staff unavailability, 550 due to industrial action, and 158 due to mechanical and technical issues. Fog, in particular, is a weather-linked cancellation cause. The ferry cannot operate in conditions that are, by the CCAC's own analysis, projected to become more frequent and more severe.

A permanent crossing is not susceptible to fog cancellation, sea state disruption, or industrial action. In the language of the CCAC Annual Review 2026, it is a resilience intervention: it eliminates a single point of failure in the peninsula's transport connectivity. The CCAC identifies resilience as a core transport system objective (HITRANS Corran Fixed Link Study, Scotland's National Transport Strategy 2 framework, to which the CCAC's all-island analysis refers).

#### **CCAC Annual Review 2026: Our Changing Climate in 2025 -- Key Findings (relevant to SLC)**

- Storm Eowyn (24 January 2025) left 768,000 premises without power; 19 days were required to restore all connections; EUR 301 million in insurance claims resulted (CCAC Annual Review 2026, published 19 March 2026).
- The CCAC records that impacts on critical infrastructure are likely to become increasingly severe and that the event has highlighted the lack of resilience to extreme weather events of Ireland's critical infrastructure.
- A rapid attribution study cited by the CCAC found that the 7-day rainfall accumulation of Storm Chandra (January 2026) was 9% higher than pre-industrial equivalents, and that such events are now almost three times more likely than in a pre-industrial climate (CCAC Annual Review 2026).
- The CCAC calls for a national climate damage register to monitor and record economic, social and environmental impacts of extreme events in support of more robust preparedness and planning (CCAC Annual Review 2025).
- The closure of Holyhead Port demonstrated how vital it is that transport infrastructure can resist and recover from extreme weather events (CCAC Annual Review 2025: Preparing for Ireland's Changing Climate).

## 5. The Cost of Institutional Inaction: A Climate Governance Dimension

### 5.1 The CCAC on Policy Delivery Failure

The CCAC Annual Review 2025 Cross-sectoral Review records that in 2024, the overall pace of emissions reductions slowed and that Ireland is expected to achieve only a 9% reduction in emissions by 2030 under existing measures, well short of the legally binding 51% target. The council identifies failure of policy delivery, not absence of policy intent, as the primary cause. The council records with evident concern that of the most recent quarterly progress report, only 10 out of 64 legacy actions marked as complete, and urges the Government to publish implementation updates every quarter.

The parallel at Strangford is direct. DfI has declined to commission a feasibility study on the grounds of insufficient economic benefit. That conclusion was reached on the basis of an internal cost estimate described in the department's own disclosed documentation as a 'guesstimate' (Mark McPeak, DfI Divisional Roads Manager, Southern Division, internal memo, 22 August 2024; disclosed under FOI reference DFI-2024-0412). No independent appraisal has ever been conducted. The department has, in effect, determined that the evidence does not justify a study -- without the study that would provide the evidence.

### 5.2 The Financial Record of Subsidy

FOI disclosure reference DFI-2024-0366 (DfI, 9 October 2024) provides the following verified data on annual ferry operating costs and income since DfI's inception in 2016/17.

Indicator	Figure	Source
Annual net ferry subsidy (DfI, 2023/24)	<b>approx. £2.09 million</b>	FOI Ref. DFI-2024-0366, 9 October 2024
Cumulative subsidy liability (30 years at current rate)	<b>exceeds £70 million</b>	Campaign analysis; FOI Ref. DFI-2024-0366
Estimated cost of independent feasibility study	<b>£750,000 -- £1,000,000</b>	Campaign estimate; comparable studies
Equivalent feasibility cost in months of net subsidy	<b>approx. 4--5 months</b>	Campaign calculation
DfI internal cost 'guesstimate' for crossing	<b>£650 million</b>	FOI Ref. DFI-2024-0412; McPeak internal memo, 22 August 2024
Comparable project: Rose Fitzgerald Kennedy Bridge (inflation-adjusted 2025)	<b>approx. £106 million</b>	Campaign QS analysis; BAM Ireland project data
DfI cost inflation above comparable per-metre rate	<b>85%--133%</b>	Campaign QS analysis
Daily road traffic around Strangford Lough (DfI count data 2018--2023)	<b>approx. 29,000 vehicles/day</b>	DfI Traffic Count Data, Count Point 444
Daily ferry vehicle carryings	<b>approx. 650 vehicles/day</b>	DfI internal memo, FOI Ref. DFI-2024-0412
Ferry avoidance rate (suppressed demand indicator)	<b>approx. 83%</b>	Campaign analysis; DfI traffic data

The net annual subsidy for 2023/24 was approximately £2.09 million (operating costs £3.52 million, income £1.43 million; FOI reference DFI-2024-0366). Over 30 years at current rates, the cumulative taxpayer liability exceeds £70 million. The campaign's requested feasibility study, at an estimated cost of £750,000 to £1,000,000, represents approximately four to five months of net subsidy.

The CCAC Annual Review 2025 notes explicitly that fossil fuel subsidies totalled EUR 4.7 billion in 2024 and calls for their elimination without delay. A diesel ferry service subsidised at £2.09 million net per annum, in preference to commissioning a study that might identify a lower-carbon alternative, is precisely the category of expenditure the CCAC's framework would examine critically.

## 6. Demand Suppression: What the Traffic Data Show

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DfI traffic count data for Count Point 444 (A20 Portaferry Road, Kircubbin), the primary road count point for traffic approaching the Ards Peninsula, records an annual average daily traffic (AADT) figure consistent with approximately 29,000 vehicle movements per day on roads around Strangford Lough. The ferry, by contrast, carries approximately 650 vehicles per day (DfI internal memo, FOI reference DFI-2024-0412).

This approximately 83% avoidance rate is not evidence of low demand for the crossing. It is evidence of suppressed demand: road users are making rational choices to use a longer but reliable route rather than an uncertain timetabled service with a 30-minute interval, limited operating hours (07.30 to 22.45, excluding Christmas Day), and vulnerability to fog, sea state, and mechanical failure.

The HITRANS Corran Fixed Link Study (Highland and Islands Transport Partnership, Scotland, 2019) provides a directly comparable analysis for the Corran Narrows crossing, where annual traffic volumes are comparable to Strangford. The HITRANS study found that replacement of the ferry with a fixed link would generate significant induced demand from suppressed journeys. The CCAC Annual Review 2025 Cross-sectoral Review cites transport-oriented development and demand management as among the highest-impact policy levers available.

The Cleddau Bridge in Wales, opened in 1975 to replace a ferry on the same crossing from which the MV Portaferry subsequently originated, recorded approximately 885,900 vehicle crossings in its opening year. By 2024, annual crossings had risen to approximately 4,745,000: a 20-fold increase over 49 years. The Strangford Ferry recorded zero growth over the same comparative period. These are not comparable infrastructure outcomes.

## 7. The Assembly Record and the Governance Position

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### 7.1 Ministerial Statements on the Assembly Record

The Northern Ireland Assembly Official Report (Hansard), Tuesday 3 February 2026, Volume 188, No. 2, records the Adjournment Debate: A20 Portaferry Road. In the course of that debate, Minister Liz Kimmins MLA made statements on the assembly record regarding the Strangford Lough Crossing. The campaign notes those statements as recorded in Hansard and makes no further conjecture as to their meaning or effect.

The campaign's position, stated to Chris Hazzard MP in a briefing dated 13 March 2026, is that the contradiction between any Ministerial Assembly statement and DfI's standing written institutional refusal (most recently set out by Sian Kerr, Director, Transport Planning and Policy, under reference TOF-0467-2025, 24 October 2025) is a governance matter of substance. A department's written institutional position and a Minister's spoken Assembly position cannot both be operative simultaneously.

### 7.2 DfI's Institutional Position

DfI's most recent formal refusal of the feasibility study request is set out in correspondence reference TOF-0467-2025, signed by Sian Kerr, Director of Transport Planning and Policy, dated 24 October 2025. That letter states that the existing ferry service provides a level of service that meets both current and projected demand, and that a fixed crossing at this location is not a priority at this time. The letter does not reference climate change obligations, carbon budget targets, transport decarbonisation duties, or infrastructure resilience planning.

The 'Raising a Concern' investigation, conducted within DfI and resulting in a closure letter from Sian Kerr dated 19 January 2026, was conducted internally. No independent external body assessed the governance or conflict of interest questions raised. The Department operates the ferry, produced the cost estimate, advised against independent scrutiny, and conducted the investigation through the same directorate.

## 8. The Ask: Four Specific and Proportionate Actions

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The following four asks are addressed to Ministers and MLAs with an interest in transport, climate, and regional equity. They are set out in order of urgency.

### Ask 1: Ministerial Direction to Commission an Independent Feasibility Study

The campaign requests that Minister Kimmins MLA issue a formal Ministerial direction to DfI to commission an independent, TAG-compliant feasibility study into a permanent crossing of Strangford Lough at the Narrows. The study should be conducted in accordance with Transport Appraisal Guidance -- DfI's own standard appraisal framework -- and should objectively assess costs, benefits and value for money of a permanent crossing compared to the long-term continuation of the subsidised

ferry service. A Ministerial direction does not commit the Executive to a bridge. It commits the Department to gathering the evidence.

### **Ask 2: A Formal Parliamentary or Assembly Question**

A formal Parliamentary Question or Assembly Question asking the Minister to confirm whether her Assembly statement of 3 February 2026 (Hansard, Volume 188, No. 2) represents a change in Ministerial direction to her Department would create a public record requiring a formal answer. It would ensure that the Ministerial position is stated clearly and cannot be absorbed back into DfI's standing institutional resistance without public accountability.

### **Ask 3: Newry, Mourne and Down District Council Resolution**

Ards and North Down Borough Council passed a full Council resolution in late March 2026 supporting the commissioning of an independent feasibility study. The campaign requests support from relevant MLAs and MPs in encouraging Newry, Mourne and Down District Council to pass a corresponding resolution at its next available opportunity. A bi-council political mandate is a material consideration within the Eastern Transport Plan 2035 planning process.

### **Ask 4: Inclusion in the Eastern Transport Plan 2035**

The campaign requests that the Strangford Lough Crossing be identified in the Eastern Transport Plan 2035 as a scheme requiring further assessment. This is the minimum and most proportionate first step available within the existing planning framework. DfI's most recent formal refusal (TOF-0467-2025, 24 October 2025) acknowledges that the Eastern Transport Plan is the appropriate vehicle for considering permanent linkage between Strangford and Portaferry. Identification as a scheme for further assessment does not commit the department or the Executive to any design, expenditure or outcome.

## **9. Summary of the Climate Change Case**

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The CCAC's Annual Reviews 2025 and 2026 establish, independently of this campaign's advocacy, the following propositions relevant to the feasibility study request:

- Transport emissions in Ireland and Northern Ireland are rising, not falling, and are projected to substantially exceed legally binding sectoral ceilings under existing policy settings.
- Extreme weather events are becoming more frequent and more severe. The physical impacts on critical infrastructure, including transport infrastructure, are worsening. This is not a future risk; it is a present condition documented by Met Eireann data and insurance loss records for 2024 and 2025.
- Port and ferry infrastructure is specifically identified by the CCAC as vulnerable to extreme weather disruption, with the closure of Holyhead Port used as a case study. A diesel-powered timetabled ferry service exposed to fog, sea state and mechanical cancellation is structurally analogous.

- The CCAC identifies private car demand reduction and the elimination of unnecessary vehicle kilometres as among the highest-impact and most cost-effective decarbonisation levers available to government. A fixed crossing at Strangford Narrows would eliminate approximately 75 unnecessary kilometres per diverted journey for up to 29,000 road vehicles per day currently travelling around the lough.
- Fossil fuel subsidies are identified by the CCAC as a structural barrier to decarbonisation and should, in the council's view, be eliminated without delay. The Strangford Ferry is a fossil fuel-powered service subsidised at approximately £2.09 million net per annum from public funds administered by DfI.
- The CCAC's cross-sectoral review identifies institutional delivery failure -- the gap between policy intent and policy action -- as a central governance challenge. DfI's refusal to commission any evidence-based assessment of a crossing option is a documented instance of institutional inaction that has persisted across multiple Ministerial terms.

The campaign does not assert that the CCAC endorses the Strangford Lough Crossing. It asserts that the CCAC's published, independent findings, addressed to governments on this island, create a policy environment in which the continued refusal to commission even a feasibility study is increasingly difficult to justify on rational grounds. The study is a request for evidence. The evidence is what is missing.

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## Source Documents

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The following primary documents are cited in this briefing. All are retrievable from the sources indicated.

- Climate Change Advisory Council Annual Review 2025: Summary for All (published September 2025). Available at: [www.climatecouncil.ie](http://www.climatecouncil.ie)
- Climate Change Advisory Council Annual Review 2025: Transport Sectoral Review (published 18 June 2025). Available at: [www.climatecouncil.ie](http://www.climatecouncil.ie)
- Climate Change Advisory Council Annual Review 2025: Preparing for Ireland's Changing Climate (published 29 September 2025). Available at: [www.climatecouncil.ie](http://www.climatecouncil.ie)
- Climate Change Advisory Council Annual Review 2025: Cross-sectoral Review (published September 2025). Available at: [www.climatecouncil.ie](http://www.climatecouncil.ie)
- Climate Change Advisory Council Annual Review 2026: Our Changing Climate in 2025 (published 19 March 2026). Available at: [www.climatecouncil.ie](http://www.climatecouncil.ie)
- Northern Ireland Assembly Official Report (Hansard), Tuesday 3 February 2026, Volume 188, No. 2: Adjournment Debate -- A20 Portaferry Road.
- DfI Environmental Information Regulations Disclosure Reference DFI-2024-0366 (9 October 2024): Annual ferry operating costs, income and capital costs 2016/17 to 2023/24.

- DfI Freedom of Information Disclosure Reference DFI-2024-0412: Internal memo, Mark McPeak, DfI Divisional Roads Manager Southern Division, 22 August 2024. Contains 'guesstimate' characterisation of £650 million cost estimate.
- DfI Correspondence Reference TOF-0467-2025 (24 October 2025): Letter from Sian Kerr, Director, Transport Planning and Policy Directorate -- most recent formal institutional refusal of feasibility study.
- DfI Roads Southern Division Report: Strangford Lough Ferry Service section, Newry, Mourne and Down District Council Annual Report 2024/25. Records 21,472 scheduled sailings and 96.69% availability.
- Department of Finance (NI): Incorporating Environmental and Climate Considerations into Business Cases (September 2025). Confirms DfI's statutory lead role in Transport Sector and Infrastructure Sector climate planning.
- DfI Active Travel Delivery Plan: Public Consultation Document (November 2024). Confirms 10% minimum active travel spend obligation under Climate Change Act (Northern Ireland) 2022.
- HITRANS Corran Fixed Link Study (Highland and Islands Transport Partnership, Scotland, 2019). Primary comparable study for ferry-to-fixed-link demand release modelling.
- DfI Internal Briefing Document Reference DFI-2025-0054: Confirms designation of Regional Strategic Transport Network Transport Plan (RSTNTP) as the strategic planning vehicle to 2035.
- Strangford Lough Crossing Campaign Briefing to Chris Hazzard MP (13 March 2026). Sets out campaign's four asks and primary evidentiary basis.

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