

**Armagh City, Banbridge and Craigavon
Borough Council
Local Development Plan**



**Paper 13 : Pressure Analysis
February 2017**

PAPER 13: Development Pressure Analysis

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PURPOSE:

To provide members with a Development Pressure Analysis for Armagh City, Banbridge and Craigavon Borough Council, and to identify those areas where significant development pressure has occurred and local rural character is under threat.

CONTENTS:

The paper provides information on:-

- (i) The Development Pressure Analysis for the rural area within the Borough, and the key findings;
- (ii) The areas within the Borough which have experienced significant development pressure due to individual single dwelling planning applications and wind energy applications; and
- (iii) The development pressures in the context of the environmental designations and landscape character areas within the district

1.0 Introduction

- 1.1 This Development Pressure Analysis is one of the four strands of the Countryside Assessment, which includes Settlement Appraisals, Environmental Assets, and Landscape Character Assessment. It seeks to identify areas where significant development pressure has occurred and/or where local rural character is under threat of significant change. Development pressure analysis typically involves looking at the distribution of one-off single rural dwellings in the countryside. Additionally, wind energy applications are also examined, since these types of application have been increasingly prevalent in recent years and have the ability to have a significant visual impact upon the rural countryside area, and thus have a cumulative impact upon the issues to be considered as part of the aforementioned strands of the Countryside Assessment.
- 1.2 It is acknowledged that types of development other than single dwellings and wind energy, can have an impact upon the visual amenity and character of our countryside area, and these activities can include agriculture, mineral extraction and industrial type development. It is considered that these types of development are sufficiently controlled by prevailing regional policy. Additionally, any emerging policy which may be brought forward by the Local Development Plan will tailor any local guidance to manage what is considered to be 'unsatisfactory development' which has an adverse impact on rural character.
- 1.3 This rural pressure analysis therefore focuses specifically on the impact of single rural dwellings and wind energy developments on the countryside within the council area.
- 1.4 'The countryside' as referred to in this paper, is defined as the land outside of the designated settlements (as defined in the existing Armagh Area Plan 2004 and associated Alteration No1. Countryside Proposals March 2001, Craigavon Area Plan 2010, Banbridge, Newry and Mourne Area Plan 2015 and the Dungannon South Tyrone Area Plan 2010) and focuses upon single dwelling applications in this area, as well as the wind energy development proposals.

2.0 Regional Planning Policy

- 2.1 The Strategic Planning Policy Statement for Northern Ireland (SPPS) places Sustainable Development at the heart of the planning system. The SPPS sets out the need to protect and enhance the built and natural environment, including landscape character. The SPPS states that our environment must be managed in a sustainable manner in accordance with the Northern Ireland Executive's commitment to preserve and improve the built and natural environment and halt the loss of biodiversity.

- 2.2 The SPPS directs that policy approaches to new development in the countryside should reflect differences within the region, be sensitive to local needs and be sensitive to environmental issues including the ability of settlements and landscapes to absorb development. This regional policy context therefore provides scope for developing policies in the LDP which are tailored to particular circumstances; for example through restricting development in areas that are particularly sensitive to change, or accommodating sustainable development in rural areas with lower sensitivity. All proposals for development in the countryside must be sited and designed to integrate sympathetically with their surroundings, including the natural topography, and to meet other planning policy and environmental considerations. New development should cluster, consolidate and group with existing established buildings, and must not have an adverse impact on the rural character of the area.

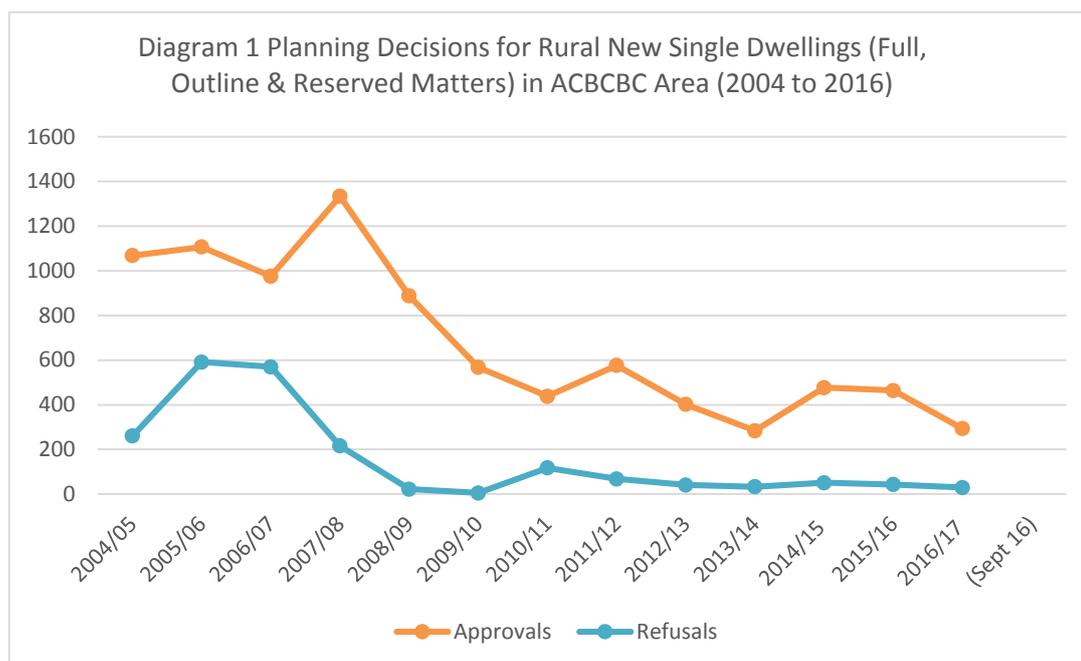
3.0 Data Provision

- 3.1 The data used to inform the pressure analysis has been provided by the Department of Infrastructure (DfI). All residential planning applications in the countryside with the exception of minor alterations and extensions from April 2002 to September 2016 were identified by DfI's Analytical Services Branch and results are compiled in tables. This paper focuses on the period June 2010 to present which corresponds with the first six years following the introduction of the current rural planning policy PPS21 Sustainable Development in the Countryside. In this period it is considered that PPS21 has become sufficiently 'bedded in' to allow emerging trends to be highlighted and identified.
- 3.2 Prior to undertaking an analysis of the impact of PPS21 it is useful to understand trends from preceding years experienced under previous policies including the Planning Strategy for Rural Northern Ireland 199, draft PPS14 (March 2006 to September 2009) and draft PPS21 (September 2009 to June 2010) .
- 3.3 Applications for single dwellings in the countryside have been mapped and those on the same site are shown as one dot and provide an indication of development pressures in the countryside (see Map 1) under all these policies. Appeal information is not included within the statistics.

Table 1: Planning Decisions for Rural New Single Dwellings (Full, Outline & Reserved Matters) in ACBCBC Area (2004 to 2016)

Financial Year	Approvals	Refusals	Total
2004/05	1068	260	1328
2005/06	1107	591	1698
2006/07	976	570	1546
2007/08	1334	216	1550
2008/09	888	22	910
2009/10	568	5	573
2010/11	438	117	555
2011/12	576	68	644
2012/13	402	41	443
2013/14	284	33	317
2014/15	477	51	528
2015/16	464	43	507
2016/17 (Sept 16)	293	29	322
TOTAL	8875	2046	10921

Source: Dfl Analysis, Statistics and Research Branch 2016



Source: Figures Dfl Analysis, Statistics and Research Branch 2016

4.0 Summary of Analysis

- 4.1 Diagram 1 illustrates the number of planning decisions issued for rural new single dwellings. The accelerated increase during the period 2005/06, 2006/07 to 2007/08 is clearly evident.
- 4.2 The peaks of 2005 -2008 are reflective of the high volume of speculative applications submitted in anticipation of a revised rural policy i.e. draft PPS14 (March 2006) and the economic conditions that prevailed at that time. This increase may also be attributed to several factors, including the increasing trend of people desiring to live in the countryside and the selling off of land by farmers for individual houses. It was also likely fuelled by public fears that a tightening of controls in the countryside was imminent. The number of planning decisions remained high into 2007/08, but have since declined with a noticeably small percentage of refusals across the Council area. It should be noted that decisions on almost 300 applications were held pending the publication of the final version of PPS 21 (June 2010). These application had to be reassessed against the policy provisions of PPS 21. Whilst the majority of planning decisions for single dwellings prior to 2006 were outline, the majority of those post-2006 were mainly Full and Reserved Matters applications. This may explain the increase in approvals in 2010/11 – 2011/12.
- 4.3 If the number of planning applications in rural areas had continued at the pre-2006/07 levels, and had been accompanied by correspondingly high building rates, a point would have been reached whereby unsustainable patterns of development in the countryside would have threatened its value as a regional asset by damaging landscape, biodiversity and natural habitats. This would have applied particularly in areas with a sensitive landscape character area where the landscape had a limited capacity to absorb further development. The introduction of PPS 21 sought to strike a balance between the need to protect the environment while simultaneously sustaining a strong and vibrant rural community. It should be noted that the policy provisions of PPS 21 provide a range of different categories of residential development including dwellings on farms, replacement dwellings, dwellings in existing clusters etc. The provision of permitting one dwelling per active farm every 10 years has the potential to yield a significant number of additional rural dwellings subject to meeting PPS21 policy criteria. There are 3,246 active farms in the Borough (The Agricultural Census in NI, June 2015). If each active farm within the Borough received planning permission for one dwelling this has the potential to yield 3,246 units. This is an average of some 216 dwellings per year over the plan period (15 years) across the council area.
- 4.4 Overall, the number of approvals has remained high from 2004 – 2007/08. In 2008/09 the number of applications dropped to 888, and drops further to 568 in 2009/10, which may be explained by the effects of the recession. In 2011/12 the number of approvals peaks to 576 which may be due to decisions being reached on applications that were held pending the publication of PPS 21. However there is a dramatic fall in 2013/14 with the number of approvals dropping to 284. In the last two years (2014/15 – 2015/16) the average

number of approvals was 470 which is similar when compared to the preceding years from 2010 – 2012/13. If this trend were to continue, there is the potential that 7,050 approvals could issue over the fifteen year plan period.

Analysis of PPS21 Decisions June 2010 – May 2016- Methodology

- 4.5 All rural new single dwelling application decisions i.e. approvals, refusals and withdrawals of Outline, Full and Reserved Matters applications, have been identified through DfI statistics and plotted as a 'dot map'. (See Map 1). Applications which fall on the same site will show as one dot only at the scale displayed. In order to give as accurate a picture as possible of the impact of PPS21 policy through the study period the statistics have been cleansed to avoid double counting and exclude those decisions issued post June 2010 that could have been linked to previous rural planning policy.
- 4.6 It can be seen from the dot map that certain patterns have emerged in terms of the number, location and geographical spread of decisions for single dwelling rural applications across the district. For ease of reference, density point analysis has been used to shade the dot map to illustrate on density surface maps, areas shaded white (lowest pressure) through medium grey (medium pressure) to dark grey/black (highest pressure). This analysis shows the relation of the points to each other within a specified area and calculates the density.

Variations in Development Pressure

- 4.7 *Higher Pressure Areas include;*
- Lands to the south of Portadown adjacent to Drumnacanny and Bleary.
- 4.8 *Medium Pressure Areas include;*
- A swathe of land along the Lough Shore to the north of the council area;
 - An area to the west of Lurgan in close proximity to Dollingstown and Ballymacmaine;
 - Lands to the northeast of Banbridge along the A1 in close proximity to Ashfield and Gowdystown.
- 4.9 *Lower Pressure Areas include;*
- Lands along the Blackwater Valley identified area of scenic quality;
 - Small pockets to the west and southeast of Keady;
 - To the east of the council area extending from Rathfriland to Ardtanagh.
- 4.10 These pressure areas have been categorised in the context of a six year analysis period of data within the council area and may not necessarily translate as being excessive or significant.

Single Housing – Analysis

- 4.11 The analysis shows that a total of 3,316 Outline, Full and RM planning applications for single rural houses (including replacements) were decided in the April 2010 –September 2016 period. Of these 88% were approved, 11% were refused and 1% were withdrawn.
- 4.12 Map No 2 shows the geographical spread of single dwelling decisions in the context of vulnerable landscapes identified as part of the landscape Assessment. This map suggests that the Blackwater Valley is identified by the NILCA¹ report as an area of scenic quality or natural heritage and has experienced less pressure for single house developments than the remainder of the district and this area is not under threat of significant change it is safe to assume that the current PPS21 policy is adequate.
- 4.13 On the other hand, the borough's other area of scenic quality, the Lough Neagh Shore's seems to have experienced medium pressure for development. This may be an area where it would be worthwhile to consider if there should be new measures introduced to protect the sensitive landscape and high quality rural environment.
- 4.14 It should be noted that 'higher pressure' areas identified as part of this analysis does not necessarily translate as being excessive or inappropriate in the local context. For example, lands located to the south of Portadown fall within an area experiencing the highest pressure. This area, however, lies outside those identified as being particularly vulnerable to change within the landscape assessment. The cumulative impact of one off dwellings within this area has been offset by its capacity to absorb higher levels of development.
- 4.15 The trends highlighted above are largely based on a desktop assessment only. It is suggested that a more detailed assessment, including complementary field survey work would be required in order to justify the introduction of a stricter policy regime in certain areas, or the relaxation in others as the case may be.

¹ Northern Ireland Landscape Character Assessment 2000

5.0 Wind Energy Decisions

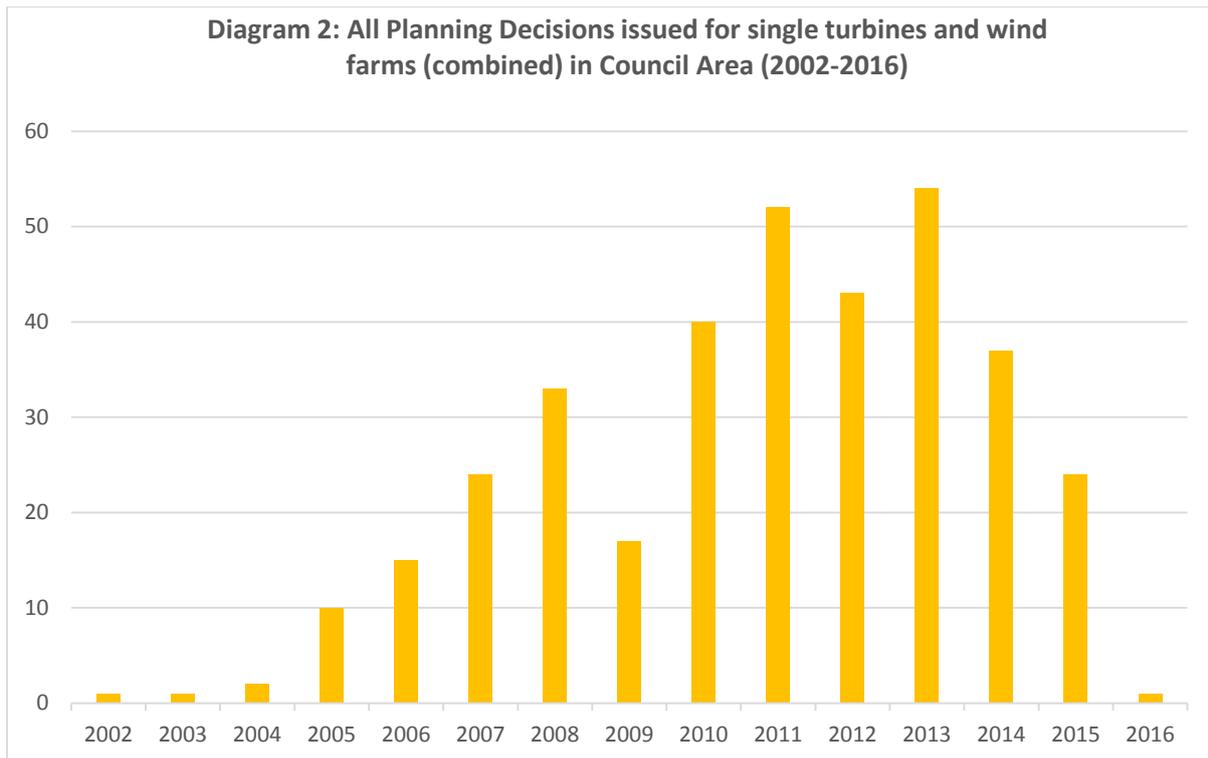
- 5.1 Planning decisions for all single wind turbines and wind farm applications issued in ACBCBC have been gathered for a 14 year period from 2002 to 2016. For the purposes of this paper the period from 2009 to 2016 has been analysed which corresponds with the introduction of Planning Policy Statement 18 Renewable Energy. All decisions have been plotted as a 'dot map' (See Map 3). Applications which fall on the same site will show as one dot only at the scale displayed.
- 5.2 Prior to PPS18 Renewable Energy, applications for wind energy development were primarily influenced by Policy PSU 12 'Renewable Energy' of the Planning Strategy for Rural Northern Ireland. Stringent renewable energy targets however, as set by the former Department of Enterprise, Trade and Investment (DETI) formed the backdrop to a more permissive PPS18 renewable energy policy being introduced. It is therefore not surprising, as can be seen from Table 2 and Diagram 2, that there has been a sharp increase in approvals for wind energy development since its introduction in August 2009.
- 5.3 Ambitious government targets, reflected in the Programme for Government 2011-2015, require Northern Ireland to seek to achieve 40% of its electricity consumption from renewable resources and a 10% renewable heat by 2020.
- 5.4 A recent consultation paper was issued by the Department of Enterprise, Trade and Investment (DETI) on the Closure of the Northern Ireland Renewables Obligation to new onshore wind in 2016. The impact of the closure of the Renewable Obligation Certification payments is likely to have a negative impact on the Renewable Energy sector in Northern Ireland and will bring about an overall reduction in the number of planning applications for Wind Energy Development. It should be noted that Armagh City, Banbridge and Craigavon Borough Council has had a smaller number of wind energy applications in comparison with other councils such as Mid Ulster Council and Fermanagh and Omagh Council, where has been economically more viable due to topography and prevailing winds.

Table 2 Planning Decisions (Approvals and Refusals) for single wind turbines/windfarms in ACBCBC 2002 -2016

Year	Approval	Refusal	Withdrawn	Total
2002	1	0	0	1
2003	1	0	0	1
2004	2	0	0	2
2005	10	0	0	10
2006	13	1	1	15
2007	22	1	1	24
2008	31	1	1	33
2009	13	3	1	17
2010	27	6	7	40
2011	38	3	11	52
2012	31	5	7	43
2013	38	5	11	54
2014	24	8	5	37
2015	15	3	6	24
2016	1	0	0	1
Total	267	36	51	354

Source: DfI Analysis, Statistics and Research Branch 2016. *Proposals for wind farms are for more than 2 wind turbines.

5.5 Table 2 and Diagram 2 show a small number of wind energy applications from 2002 -2004 with a marked increase in 2005. The number of wind energy developments continued to increase at a steady level for three years until 2008. In 2009 there was a sharp decline in the number of wind energy developments which may be attributed to the effects of the recession. There was a noticeable increase in 2010 to over double the number of wind energy developments compared to the previous year, this number continued to rise until its peak in 2013. This particularly large increase in the number of planning decisions for single wind turbines in 2013 could be attributed to a drive by the DOE to prioritise decisions on all renewable energy applications. Since 2013 there has been a steady level of decisions for wind energy developments leading up until 2015, after which, numbers dramatically declined.



Source: DfI Analysis, Statistics and Research Branch 2016. *Proposals for wind farms are for more than 2 wind turbines.

5.6 Whilst there were quite a number of approvals for wind energy in the council area, there is a lack of information regarding how many have been implemented. It should be noted that a number of historic planning permissions may have lapsed, and will no longer be eligible to be enacted unless previously commenced.

Distribution of wind energy decisions

5.7 Throughout Armagh City, Banbridge and Craigavon Borough council area there are a number of variations in the distribution of wind energy. The vast majority of applications received were for single turbines. Map 3 illustrates the geographical spread of wind energy decisions across the Borough since 2009 - 2017 and Map 4 illustrates the spread of decisions from 2009 - 2017 in the context of vulnerable landscapes identified as part of the ACBCBC Landscape Assessment. Map 8 illustrates wind pressure analysis across the council area from 2009 -2017. The following trends have been identified:

- There is a visibly higher concentration of wind energy development to the southeast of Markethill close to Tannyoky Road, to the east of Armagh City, southwest of Keady along the border with the Republic of Ireland and small pockets to the east of Banbridge.
- There are areas that have a medium level of concentration of wind energy development these include to the north of Keady and south of Armagh City, to the north of Tynan, to the northeast of Poyntzpass, west of Rathfriland and to the west of Kinallen.
- The remainder of Borough has a lower concentration of wind energy development which is more scattered.

- The area with the lowest concentration of approved wind turbines is located to the north of the Borough around the shores of Lough Neagh and to the north west of Armagh City.
 - There is only one wind farm approval (consisting of two wind turbines) to the west of Markethill.
- 5.8 The presence of the international environmental designations in the north of the borough along with lack of prevailing winds and topography around the shores of Lough Neagh has resulted in a very low level of wind development applications. There is a little pressure from wind developments on the edge of the Blackwater Valley identified area of scenic quality to the west of the borough, although within this vulnerable area there have been no applications for wind developments.
- 5.9 To the southwest of the Borough there is high pressure for wind developments extending from the southwest of the borough with the border of the Republic of Ireland towards the east of Armagh City. This area is not identified as a vulnerable landscape.
- 5.10 Elsewhere there is a fairly scattered distribution of wind development applications across the borough.
- 5.11 Accessibility and forestry plantations may have been a further limiting factor in the distribution of wind energy development. Ongoing issues with grid connection, in particular the delay in timescales for receipt of quotes for connection to the electricity grid and the high cost of connecting to the grid has resulted in many projects becoming unfeasible.
- 5.12 Broadly speaking, these landscapes identified as vulnerable have not experienced a significant amount of development pressure from wind energy development. However, it is important to note that numerical pressure would not be the reason for the introduction of a more restrictive policy for wind energy. It is the recognition of the potential harm that may be caused by high structures such as wind turbines that such a bespoke policy should be considered to protect those landscapes for future generations. It is acknowledged, however, that factors other than planning policy have influenced the geographical spread of wind technology across the Borough including, for example, the distribution of the viable wind resource, technical and economic constraints to the viability of exploiting different wind speeds and electricity grid access constraints.
- 5.13 There are no landscapes into which a wind farm or wind turbine will not introduce a new and distinctive feature. It is important however for society at large to accept them as a feature of many areas of the Council area for the foreseeable future. This is not to suggest that areas valued for their particular landscape and/or nature conservation interest will have to be sacrificed. Nor that elsewhere, attempts to lessen the impacts by integrating the development into the surrounding landscape would not be worthwhile. On the contrary, it emphasises the need for account to be taken of regional and local landscape considerations.

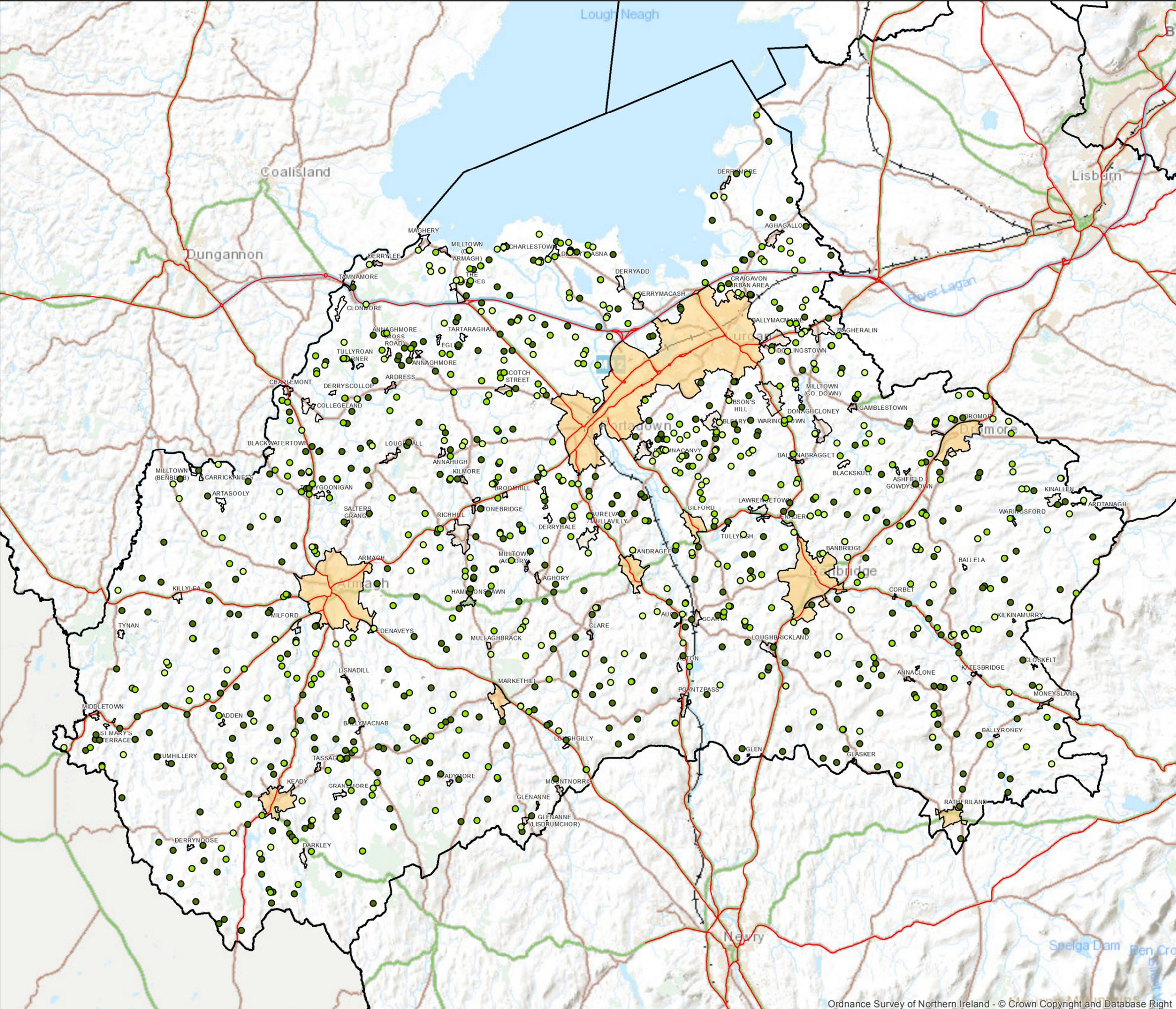
6.0 Conclusion and Recommendation

- 6.1 It is evident from the available statistics that the rate of rural housing approvals under PPS 21 is notably reduced when compared to approvals under historical rural planning policies. However, this must also be considered in the context of the downturn of the economy. Furthermore, since its final adoption in June 2010, having had a chance to 'bed in', the rate of rural approvals has reduced by almost a third. Overall, the development pressure analysis shows little evidence of significant pressure across the district and that apart from some exceptions, rural character has been maintained.
- 6.2 Whilst the number of decisions in relation to wind energy development have increased over recent years there has been a general downward trend in the number of wind energy applications being received. This downward trend may be linked to uncertainties over network infrastructure, operating incentives and the costs of installing this technology all of which are beyond the control of planning policy.
- 6.3 A broad overview of the development pressure from both single rural dwellings and wind energy development indicates that in general the areas within the district that are identified for their scenic quality or natural heritage importance such as the Blackwater Valley has experienced less pressure for development. However the Lough Neagh Shores has experienced medium level of pressure and this may be an area where it would be worthwhile to consider if there should be new measures introduced to protect the sensitive landscape and high quality rural environment.
- 6.4 Policy formulation should reflect differences in the area including the ability of landscapes to absorb development and striking a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities in order to be consistent with the RDS and the SPPS.
- 6.5 As such the findings need to be taken into account when formulating countryside planning policies and further engagement with NIEA is required as the the development pressure analysis is part of the Countryside Assessment and as such it is part of the Sustainability Appraisal which incorporates the Strategic Environmental Assessment (SEA) and should be taken into account when formulating the LDP.

Appendices

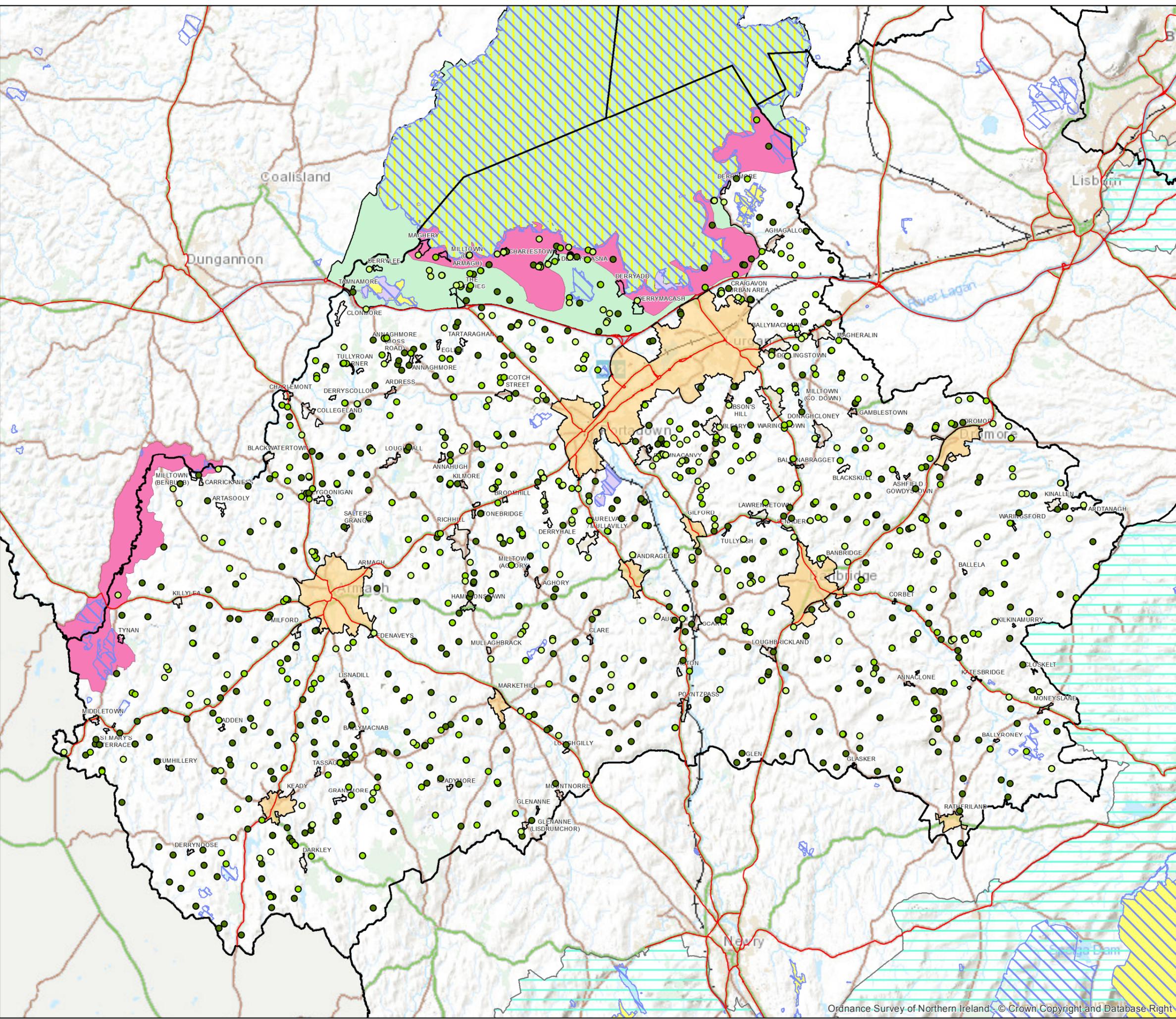
**Map 1
Armagh City, Banbridge &
Craigavon Borough Council
Rural Housing Applications
2010 - 2016**

- Approvals - Full
- Approvals - Outline
- Approvals - RM
- Settlement Development Limit
- Protected Route
- Town /Small Towns Development Limit
- Local Government Boundary



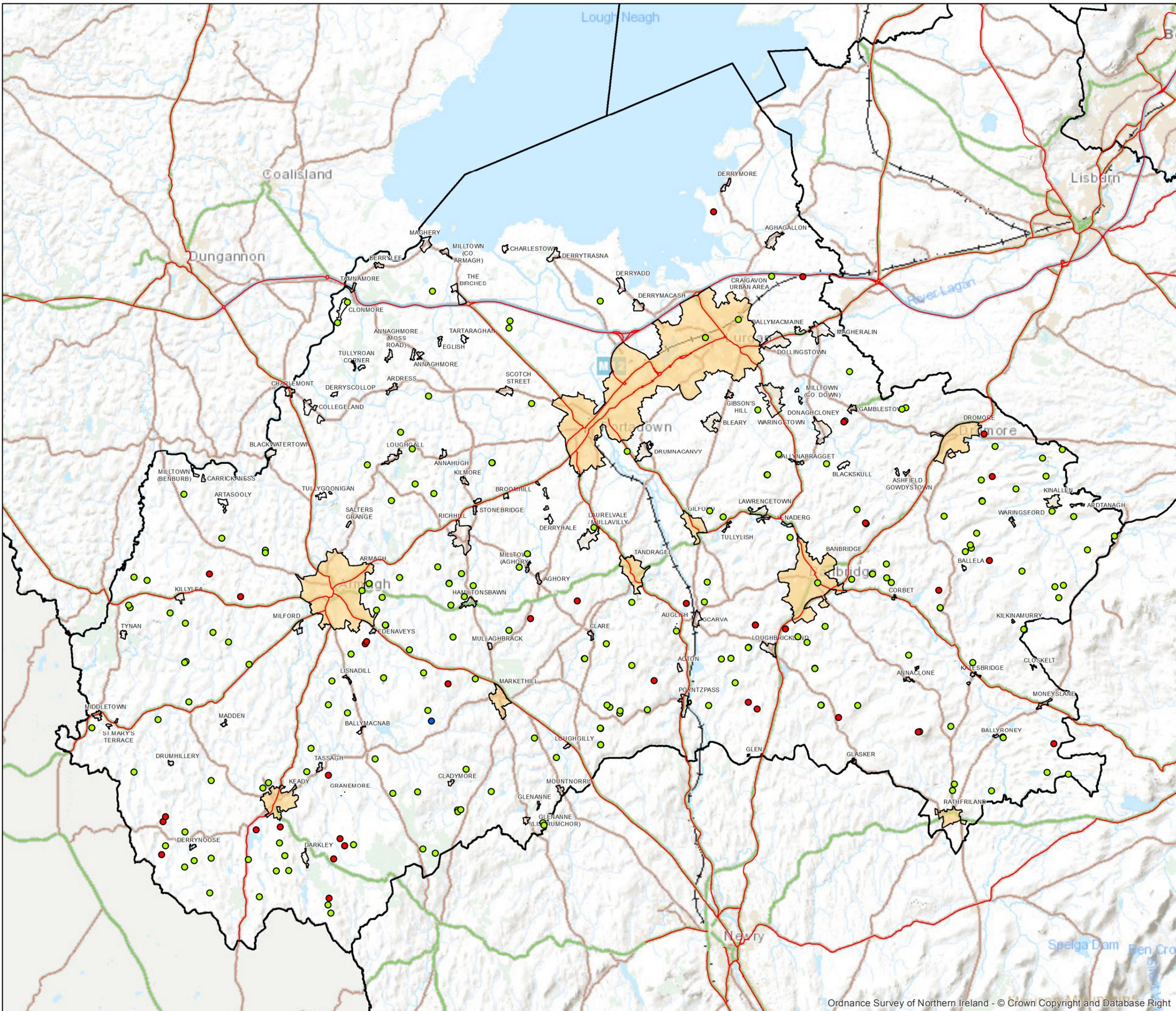
Map 2
Armagh City, Banbridge & Craigavon Borough Council
Rural Housing & Vulnerable
Landscapes 2010 - 2016

-  Approvals - Full
-  Approvals - Outline
-  Approvals - RM
-  Settlement Development Limit
-  Protected Route
-  Town /Small Towns Development Limit
-  Local Government Boundary
-  ASSI
-  NNR
-  Identified as Areas Of Scenic Quality (NICLA 2000)
-  SAC
-  SPA
-  AONB
-  RAMSAR



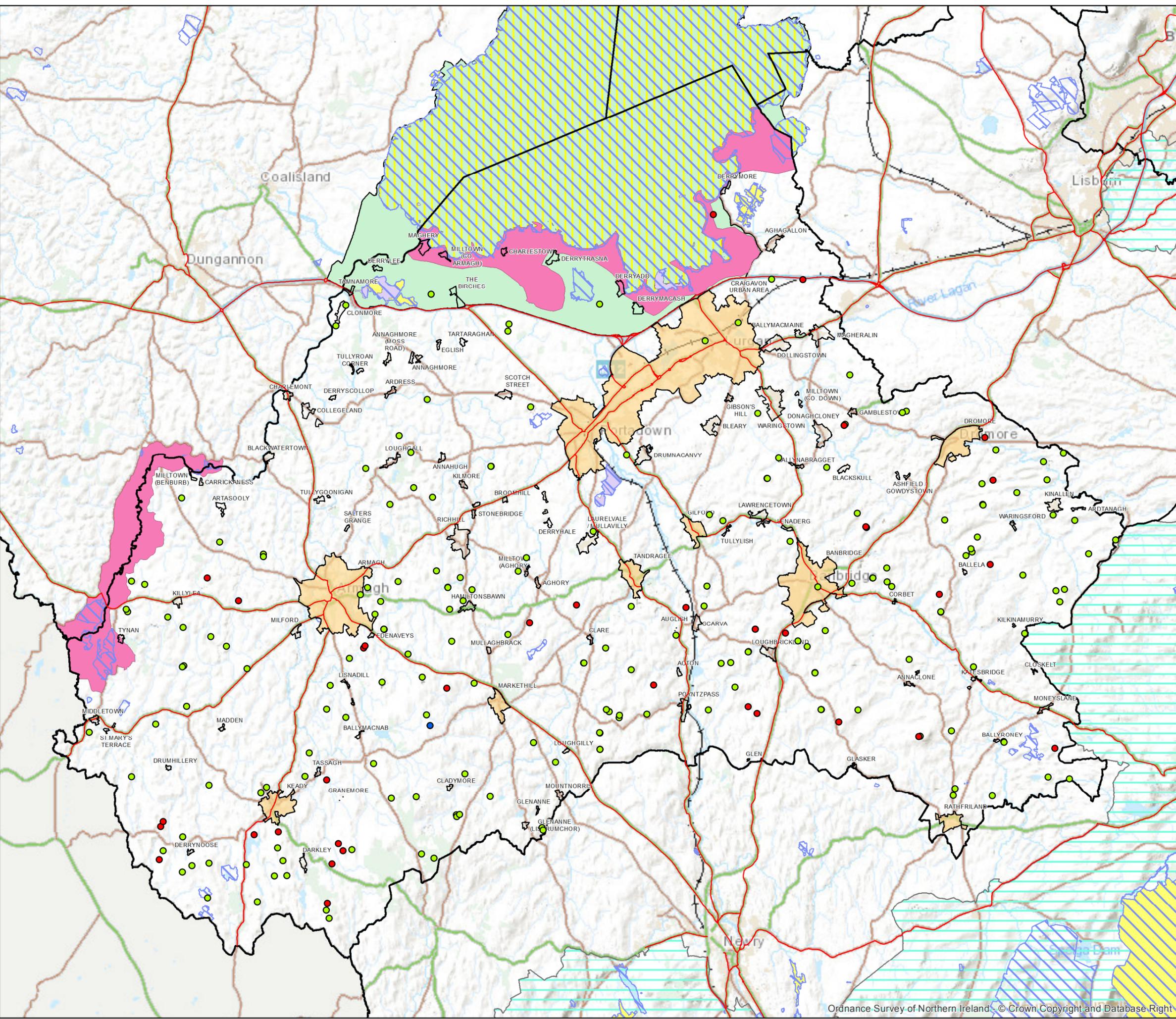
**Map 3
Armagh City, Banbridge & Craigavon Borough Council
Wind Energy Decisions
2009 - 2017**

- Wind Turbines - Approved
- Wind Turbines - Refused
- Wind Farm
- Settlement Development Limit
- Protected Route
- Town /Small Towns Development Limit
- Local Government Boundary



**Map 4
Armagh City, Banbridge & Craigavon Borough Council
Wind Energy Decisions & Vulnerable Landscapes
2009 - 2017**

- Wind Turbines -
- Wind Turbines - Refused
- Wind Farm
- Settlement Development Limit
- Protected Route
- Town /Small Towns Development Limit
- Local Government Boundary
- ASSI
- NNR
- Identified as Areas Of Scenic Quality (NICLA 2000)
- SAC
- SPA
- AONB
- RAMSAR



**Map 5
Armagh City, Banbridge &
Craigavon Borough Council
Rural Housing Pressure
Analysis 2010 - 2016**

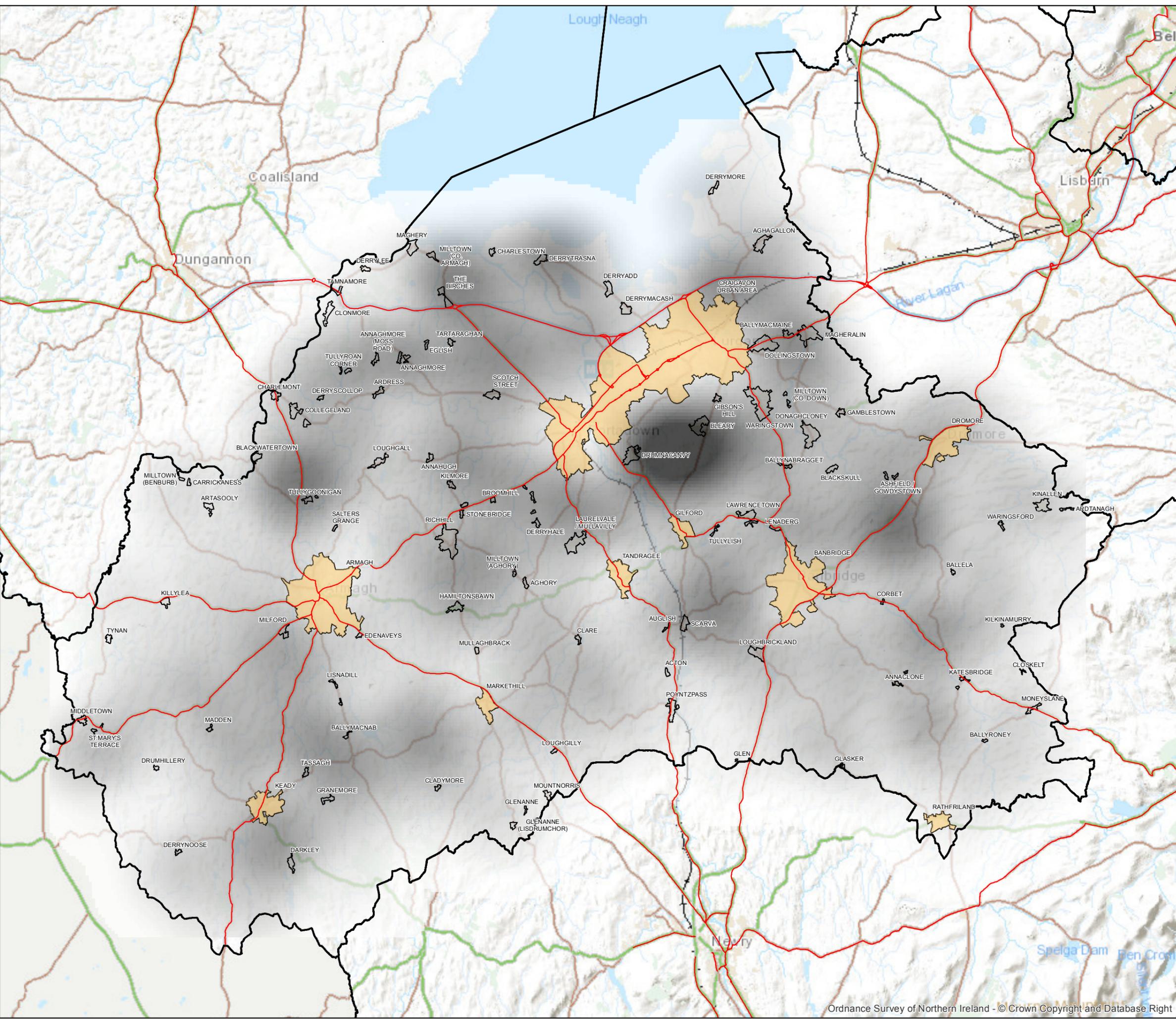
Pressure Analysis

Value



High
Low

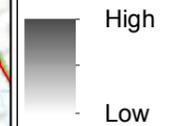
-  Local Government Boundary
-  Protected Route
-  Town / Small Towns Development Limit
-  Settlement Development Limit



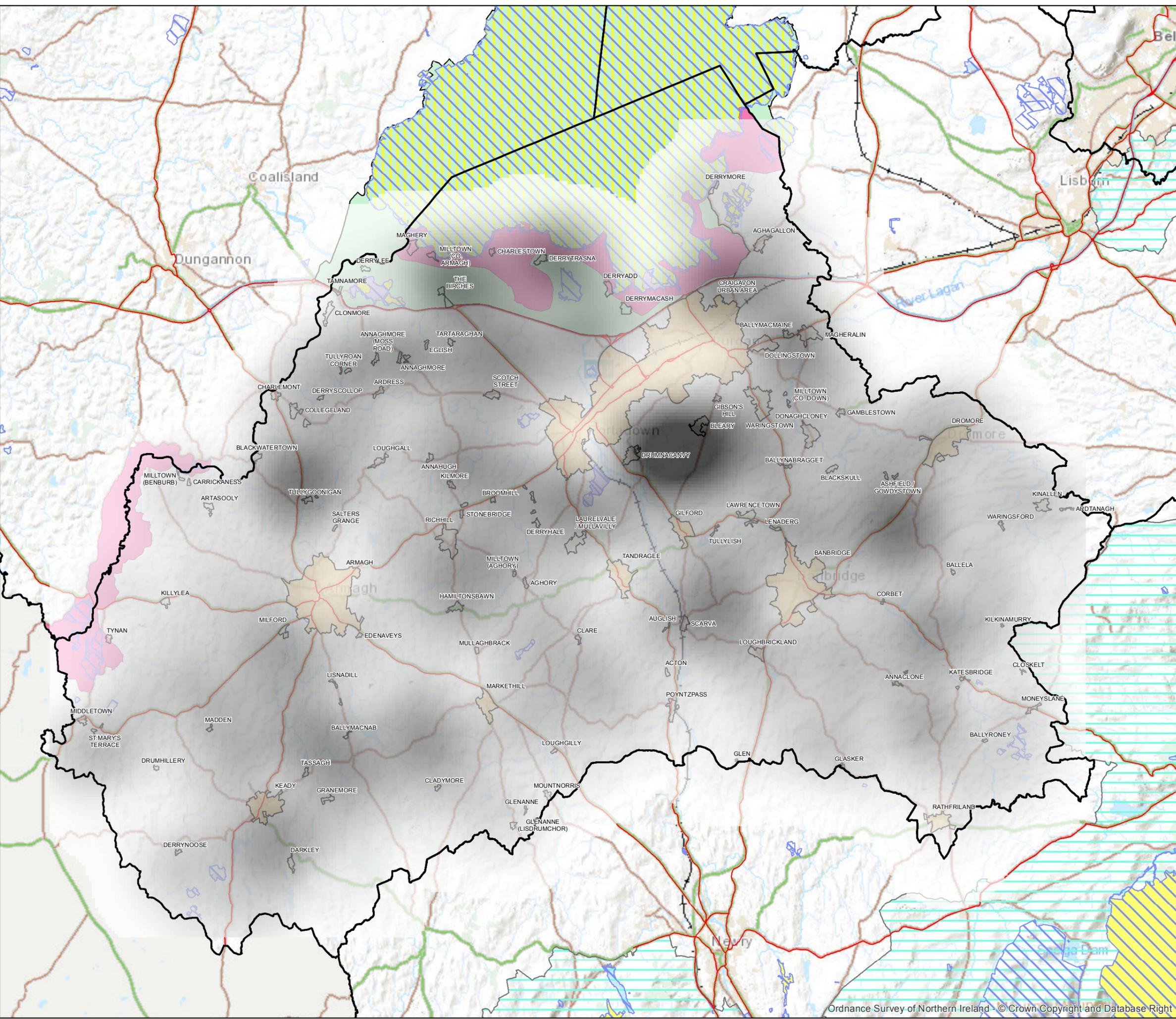
**Map 6
Armagh City, Banbridge & Craigavon Borough Council
Rural Housing Pressure
Analysis & Vulnerable
Landscapes 2010 - 2016**

Pressure Analysis

Value



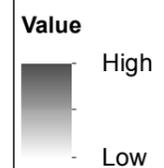
-  Local Government Boundary
-  Protected Route
-  Settlement Development Limit
-  Town /Small Towns Development Limit
-  ASSI
-  NNR
-  Identified as Areas Of Scenic Quality (NICLA 2000)
-  SAC
-  SPA
-  AONB
-  RAMSAR



**Map 7
Armagh City, Banbridge & Craigavon Borough Council
Rural Housing Pressure
Analysis & Plotted
Applications 2010 - 2016**

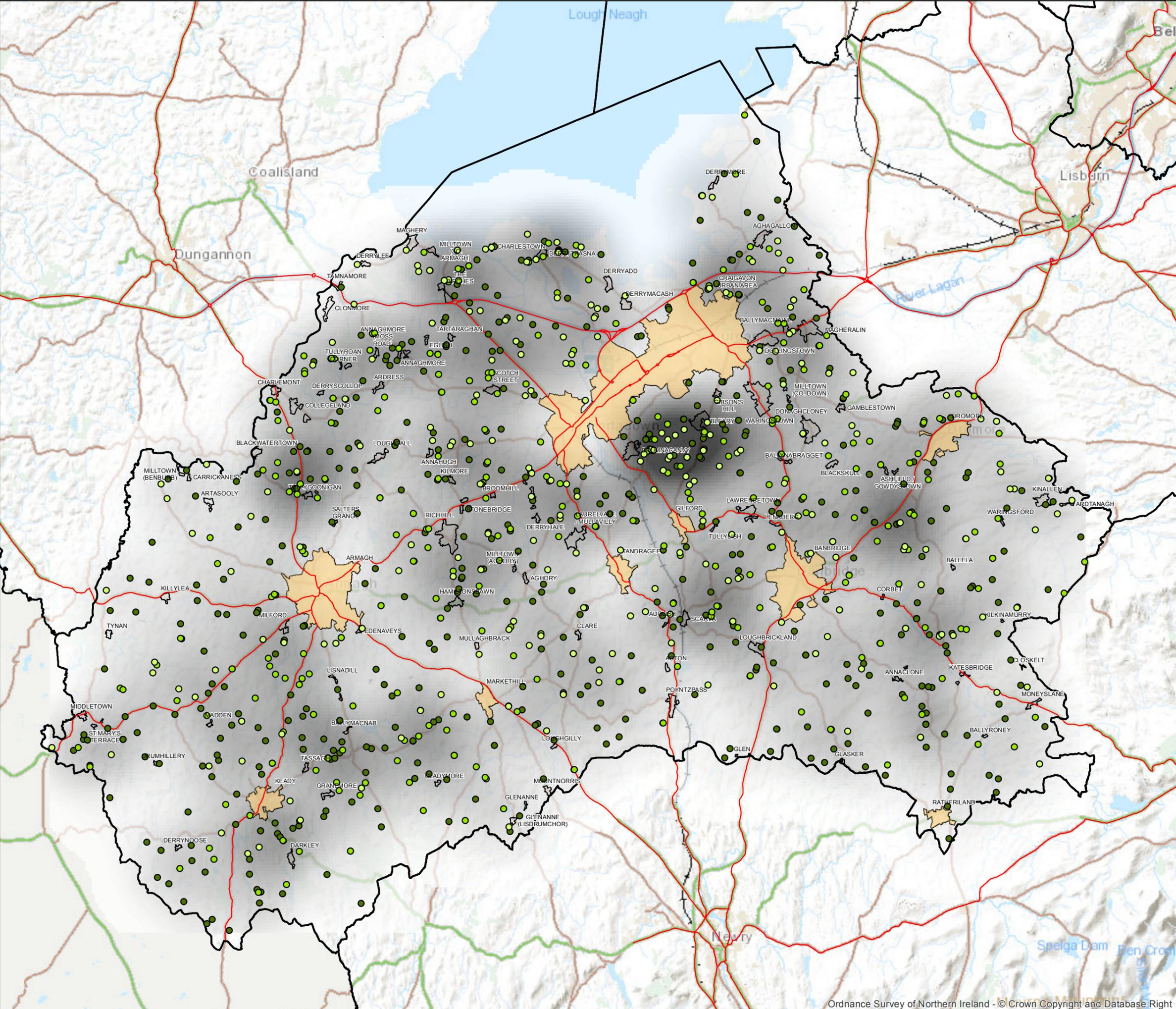
Pressure Analysis

Value



High
Low

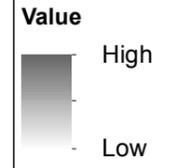
-  Approvals - RM
-  Approvals - Outline
-  Approvals - Full
-  Local Government Boundary
-  Protected Route
-  Town /Small Towns Development Limit
-  Settlement Development Limit



**Map 8
Armagh City, Banbridge & Craigavon Borough Council
Wind Turbine Pressure
Analysis 2009 - 2017**

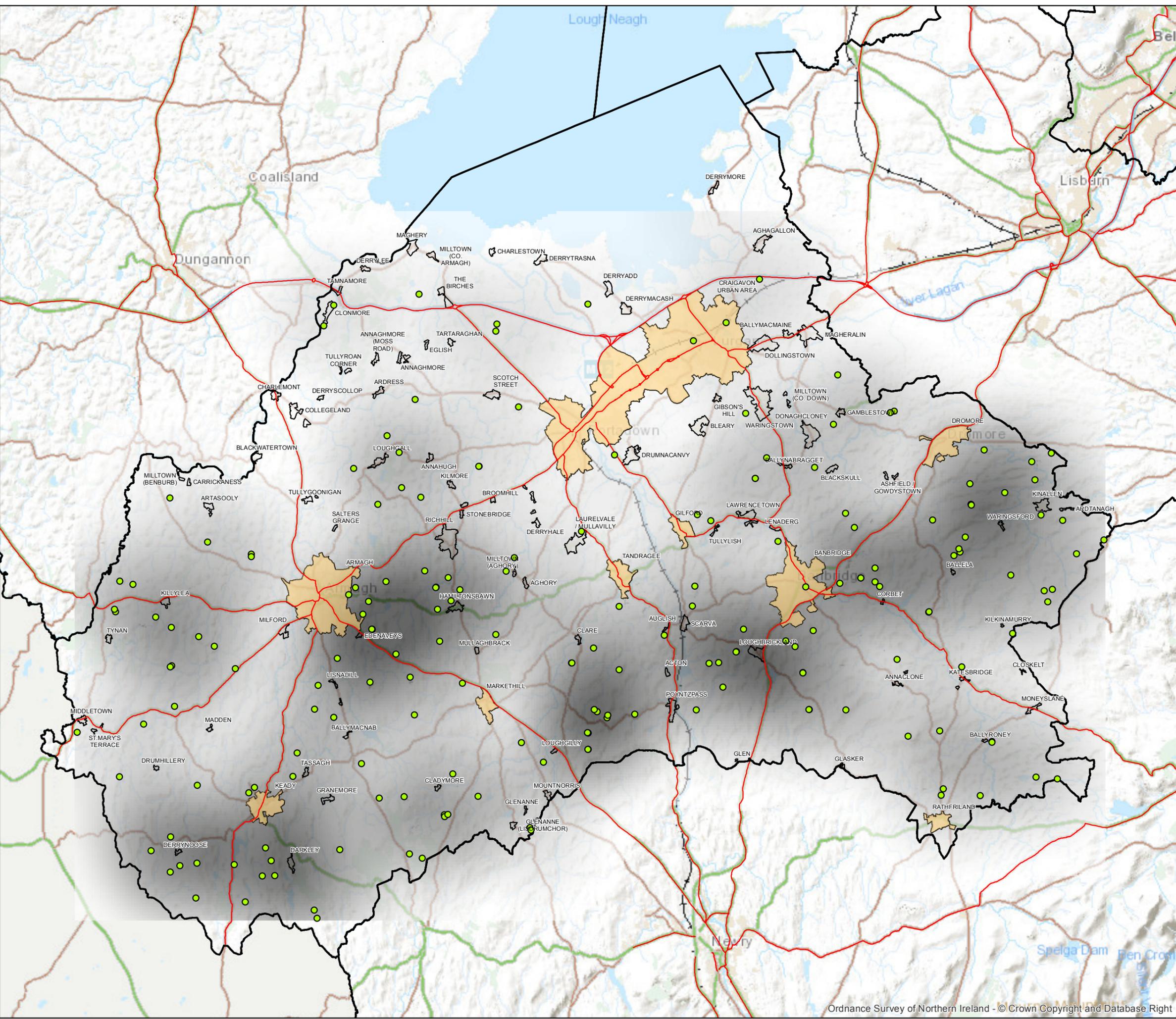
Wind Turbine Pressure Analysis

Value



High
Low

-  Wind Turbines - Approved
-  Local Government Boundary
-  Protected Route
-  Town /Small Towns Development Limit
-  Settlement Development Limit



Armagh Banbridge and Craigavon Borough Planning Department
Marlborough House
Central Way, Craigavon
planning@armaghbanbridgecraigavon.gov.uk Tel:03002007830 (NI) or 02838313690