

Armagh City, Banbridge and Craigavon Borough Council Local Development Plan: Draft Plan Strategy Sustainability Appraisal Report Non-Technical Summary

**Armagh City, Banbridge and Craigavon Borough
Council**

Final Report

Prepared by LUC

May 2026

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Contents

Introduction	4
Sustainability Appraisal	4
Policy Context	6
Baseline information and key sustainability issues	8
Methodology and the SA Framework	16
The SA framework	16
Difficulties and limitations	19

Sustainability Appraisal Findings for the Draft Plan Strategy

21

How has the Sustainability Appraisal influenced Plan Making	26
Recommendations	27
Monitoring	27

Introduction

1. This Sustainability Appraisal Report: Non-Technical Summary relates to the Sustainability Appraisal (SA) of the Plan Strategy for the emerging new Local Development Plan for Armagh City, Banbridge and Craigavon Borough.
2. The Plan Strategy will set the planning framework for Armagh City, Banbridge and Craigavon Borough up to 2035 and will set out policies to address housing needs and other social, economic and environmental issues. Once adopted, the Council will begin working on the Local Policies Plan. Both the Plan Strategy and Local Policies Plan form the Local Development Plan. The Local Development Plan will replace the current Armagh Area Plan 2004 & Alteration No. 1; Armagh Countryside Proposals 2004; Craigavon Area Plan 2010; Craigavon Town Centre Boundaries and Retail Designation Plan 2010; Banbridge, Newry and Mourne Area Plan 2015; and the Dungannon and South Tyrone Area Plan 2010.
3. Plans and strategies such as the Armagh City, Banbridge and Craigavon Plan Strategy are required to be subject to a process called Sustainability Appraisal (SA), which assesses the likely effects of a plan on social, economic and environmental issues.

Sustainability Appraisal

4. Armagh City, Banbridge and Craigavon Borough Council is required by law to carry out both SA and Strategic Environmental Assessment (SEA) of the Plan Strategy and has appointed LUC to undertake this work on its behalf. The Government recommends that these two legal requirements are met through the production of a single report. As described above, these requirements are met for the Armagh City, Banbridge and Craigavon Plan Strategy through preparation of the SA Report.
5. The purpose of the SA is to promote sustainable development through the better integration of sustainability considerations into the preparation and adoption of plans. The SA is therefore being undertaken in stages in order to provide sustainability guidance as the plan developed. The approach that has been taken to the SA of the Armagh City, Banbridge and Craigavon Plan Strategy to date is summarised below and is described in detail in the full SA Report.

Stage A (1): Scoping

6. The SA process began in Spring 2018 with the production of a Scoping Report which was prepared by Shared Environmental Service in conjunction with Armagh City, Banbridge and Craigavon Borough Council and was subject to consultation. The Scoping stage of the SA determined what the SA should cover by reviewing a wide range of relevant policy documents and examining data to help identify the key sustainability issues for Armagh City, Banbridge and Craigavon, and likely future trends. This work helped to inform the development of a set of sustainability objectives (referred to as the 'SA framework') against which the effects of the plan would be assessed. The SA framework is presented later in this Non-Technical Summary.

SA Stage A (2): SA Interim Report

7. Developing options for a plan is an iterative process, usually involving a number of consultations with stakeholders and the public. The SA process can help to identify where there may be other 'reasonable alternatives' to the options being considered for the policies to be included in a plan. The reasonable alternative options that have been considered for the Armagh City, Banbridge and Craigavon Plan Strategy to date have comprised alternative policy approaches. These options are explained and their effects summarised in Chapter 4 of the full SA report.

Stage B/C: Preparing the SA Report

8. The full SA Report describes the process that has been undertaken to date in carrying out the SA of the Armagh City, Banbridge and Craigavon Plan Strategy. It sets out the SA findings for the policies in the Draft Plan Strategy consultation document, as well as the reasonable alternative options considered. Likely significant effects, both positive and negative, have been presented, taking into account the likely secondary, cumulative, synergistic, short, medium and long-term and permanent and temporary effects where relevant.

Stage D: Consultation on the Armagh City, Banbridge and Craigavon Plan Strategy and the SA Report

9. Armagh City, Banbridge and Craigavon Borough Council is inviting comments on the Draft Plan Strategy and the SA Report. The SA Report and this Non-Technical Summary are being published on the Council's website at the same time as the consultation on the Draft Plan Strategy, so that the documents can be read in

parallel. Consultation comments received on the SA Report will be taken into account at the next stage of the SA.

Stage E: Monitoring Implementation of the Plan Strategy

10. Draft indicators for monitoring the likely significant social, economic and environmental effects of implementing the Armagh City, Banbridge and Craigavon Plan Strategy are included in the full SA report and these will be updated as appropriate during later stages of the SA.

Policy Context

11. There are a large number of plans and programmes that could be relevant to the preparation of the Armagh City, Banbridge and Craigavon Plan Strategy. In particular, the Strategy must adhere to planning policy as set out in the Regional Development Strategy 2035 (RDS) and the Strategic Planning Policy Statement.

12. The Regional Development Strategy (RDS) [\[See reference 1\]](#) provides a strategic and long-term perspective on the future development of Northern Ireland up to 2035 to deliver the spatial aspects of the Programme for Government. It contains regional guidance to provide policy direction in relation to the economy, society and environment. It complements the Sustainable Development Strategy and sets the context for policy and development decisions in order to achieve sustainable development throughout the region.

13. The RDS sets out a strategic, long-term vision on the future development of NI up to 2035. It provides an overarching strategic planning framework and influences the future distribution of development throughout NI. The RDS contains strategic regional guidance which provides policy direction in relation to social, economic and environmental matters aimed at achieving sustainable development and social cohesion.

14. The RDS recognises the important role of Belfast in generating regional prosperity and that Londonderry is the focus for economic growth in the Northwest. It recognises that Craigavon Urban Area performs a strong sub-regional function, offering a wide range of services and facilities, including an acute hospital. However, to ensure all areas benefit from economic growth, it also reflects the Programme for Government approach of balanced sub-regional growth and recognises the importance of key settlements as centres for growth and prosperity.

15. The RDS has a statutory basis, is material to decisions on individual planning applications and appeals, and Councils must take account of the RDS when drawing up their LDPs.

16. The Strategic Planning Policy Statement 2nd Edition 2025 (SPPS) [\[See reference 2\]](#) provides an overarching statement of the general regional planning principles underlying the reformed plan led system. It provides a planning policy framework which must be taken into account in the preparation of LDPs and the provisions are also material to all decisions on individual planning applications and appeals.

17. The SPPS outlines a number of core principles underpinning the reformed planning system in Northern Ireland. These are:

- improving health and well-being;
- creating and enhancing shared space;
- supporting the economy;
- supporting good design and positive place-making; and
- preserving and improving the built and natural environment.

18. The Republic of Ireland also has its own National Planning Framework First Revision 2025 (NPF, Project Ireland 2040), and an Eastern & Midlands Regional Spatial and Economic Strategy (RSES, 2019). The NPF and RSES establishes a policy framework that supports joined-up approaches and the mechanisms to deliver co-ordinated growth in the border region.

19. The Plan Strategy should provide a spatial expression of other plans and programmes where relevant, to assist in their implementation. It must also conform to environmental protection legislation and the sustainability objectives established at an international, national and regional level. In line with the requirements of the SEA Regulations, relevant international, national, regional, sub-regional and local plans have been reviewed in detail in relation to their objectives, targets and indicators and their implications for the Plan Strategy and the SA. This review can be seen in Chapter 3 and Appendix B of the full SA Report.

20. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development, including qualitative aspects such as design, landscapes, and development.

21. Below the national level there are further plans and programmes which are of relevance to the Armagh City, Banbridge and Craigavon Plan Strategy and the SA process. These plans and programmes sit mostly at the sub-regional, county and district levels.

Draft Plan Strategy

22. The following documents currently make up the Local Development Plan for Armagh City, Banbridge and Craigavon Local Development Plan:

- Armagh Area Plan 2004 & Alteration No. 1: Armagh Countryside Proposals 2004
- Craigavon Area Plan 2010
- Craigavon Town Centre Boundaries and Retail Designation Plan 2010
- Banbridge, Newry and Mourne Area Plan 2015
- Dungannon and South Tyrone Area Plan 2010.

23. The new Local Development Plan is being prepared within the context of the Council's Corporate Plan and takes full account of the Council's Community Plan, ensuring a positive and coordinated approach to shaping the future of the area. It also reflects the wider regional policy framework set by the Northern Ireland Executive and Central Government, including the Programme for Government Framework, the Sustainable Development Strategy, the Regional Development Strategy and the Strategic Planning Policy Statement.

24. As part of the Local Development Plan, the Plan Strategy sets out objectives which will support the delivery of the overarching Vision for the Borough. The Plan Strategy contains 130 policies covering; the Spatial growth Strategy, design and place-making, housing, open space, economic development, retail, minerals, infrastructure, transportation as well as environmental topics such as historic environment, natural heritage, flood risk, waste and environmental protection.

Baseline information and key sustainability issues

25. Baseline information provides the context for assessing the sustainability of proposals in the Armagh City, Banbridge and Craigavon Plan Strategy and it provides the basis for identifying trends, predicting the likely effects of the plan and monitoring its outcomes. Baseline data must be relevant to social, economic and environmental issues, be sensitive to change and should ideally relate to records that are sufficient to identify trends.

26. Information on existing social, economic and environmental conditions in the plan area provides the baseline against which the plan's effects can be assessed in the SA and monitored during the plan's implementation. Baseline information can also be combined with an understanding of drivers of change that are likely to persist regardless of the Armagh City, Banbridge and Craigavon Plan Strategy to understand the likely future sustainability conditions in the absence of the Plan Strategy.

27. The baseline information for Armagh City, Banbridge and Craigavon is presented in Appendix C of the full SA Report.

28. Key sustainability issues for Armagh City, Banbridge and Craigavon Borough were originally identified in the SA Scoping Report in March 2018. These issues have been reviewed and been subject to re-working as the Scoping Report was updated, in order to ensure that they are genuine 'key issues' for Armagh City, Banbridge and Craigavon Borough specifically, i.e. problems that the Draft Plan Strategy can seek to address. The set of key issues is presented in Table 1.

Table 1: Key sustainability issues for Armagh City, Banbridge and Craigavon and their likely evolution in the absence of the new Plan Strategy

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
Health and well-being ■ By 2035 the population of the Borough is projected to have increased from its 2021 level by 10.6% from 218,656 in 2021 to 241,823 in 2035, significantly above the predicted average rate for NI. ■ Population trends indicate an ageing population with potentially a higher number of older dependents e.g. the number of people aged 85 and over is expected to double by around 3,580 individuals by mid-2030. ■ An increase in the proportion of older people in the population will increase the requirement for care. There is a need to meet the future needs for care and support for older people at home or in communal homes and to improve access to health services, other facilities and services. ■ Participation rates in physical activity are lower than the Northern Ireland average and significantly lower than recommended minimum levels. ■ There is a particular need for children to have accessible play in places where they feel safe. ■ There will be an increasing need to create accessible means for older people to engage in physical activity to prolong their healthy lives. ■ Need to protect and enhance biodiversity to promote positive health benefits. ■ Levels of adult obesity in Northern Ireland and the UK are high by global standards, reflecting poor diet and a relatively sedentary lifestyle. ■ Many of the indicators for mental health appear to show a lower than average quality of mental health. ■ Noise and environmental quality are not identified as being significant adverse effects at present however they can impact on health and therefore environmental quality should be improved, or sustained where it is good, to minimise adverse health impacts. ■ The location of and access to emergency services can impact on response times. Rural areas require accessibility to general practice and non-emergency healthcare services. ■ There is a lower rate of health deprivation and disability compared with the Northern Ireland average, but there are large inequalities in health and well-being with most measures of health being significantly worse in the most deprived areas. ■ There are some communities within the Council area which experience problems of multiple deprivation particularly in parts of Armagh City, Banbridge, Lurgan, Portadown and Keady, where income and employment are the key concerns. ■ Parts of Armagh City, Banbridge and Craigavon Borough may have increased probability of the incidence of Radon at actionable levels.	In the absence of a new LDP in place, the Regional Development Strategy (RDS), the Strategic Planning Policy Statement (SPPS) and relevant planning policy statements (PPSs), would still be applied. However, adverse baseline trends relevant to health and well-being, such as below average levels of physical activity and outdoor leisure time for residents within the Borough may continue. Opportunities to improve the large discrepancies in health and well-being between the most deprived communities and the average in the Borough could be missed. The opportunity to plan strategically for an environment that encourages active travel and physical activity and improve the environment in the most deprived areas could also be missed. Some of the measures of health such as respiratory disease may be exacerbated if there is no change or a deterioration in environmental conditions. While there are other environmental controls in place, the lack of a plan would mean that there is less opportunity to site development to reduce negative interactions between uses. The LDP could support national and regional strategies, through planning and designing development to ensure high standards of homes which support people through all stages of life, enabling access to healthcare facilities and helping enhance living and working environments in areas of greatest deprivation. It can promote accessible spaces for all ages and active travel to incentivise physical activity and encourage social interaction as well as protecting and enhancing the environment to minimise adverse effects on health and to support healthy living.
Community ■ Some areas have seen substantial growth in recent years, there is a need to ensure that facilities meet the needs of the population. ■ Some areas have seen significant population decline in recent years, there is a need to ensure that this does not have a long-term adverse effect on them as places to live or do business.	The legacy area plans were not prepared in the context of the new council area and do not reflect the council's more up to date understanding of economic growth and social development in our area. Therefore, in the absence of a new plan, there is a risk that policies and provision for development will not reflect the needs of the Borough or support delivery of the Community Plan. A new plan brings an opportunity to develop a plan led system and to reflect the most recent strategies.

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
■ A decline in household size will increase the number of homes required per capita and influence the type of dwellings required. ■ People may be more likely to stay in a home long-term if it meets their changing needs and facilities and amenities that they wish to use are as accessible as possible through their lives. ■ A greater proportion of older people will increase the need for suitable housing that is accessible for those who may not drive and enables support to be provided. ■ Levels of deprivation vary widely throughout the council area. ■ Rural communities have relatively good access to urban areas, however some of their populations may not have good proximity to services. ■ The needs and experience of different parts of Armagh City, Banbridge and Craigavon Borough society differ and are best expressed by representatives of the range of groups. ■ There will be an increased need to accommodate those with disability. ■ The community is not ethnically diverse, but there is a higher than average proportion of people born in an EU country resident in the Council area. The needs of minority groups such as Irish Travellers must be taken into account.	
Housing ■ For the period 2011 to 2021, the rate of population growth overall for the council area (11.5%) was significantly above the Northern Ireland average and the Borough had the largest increase in population of all 11 NI LGDs. ■ The number of households has increased rapidly over the period 2001 to 2021 with a trend for smaller household sizes. A decline in household size will increase the number of homes required per capita and influence the type of dwellings required. ■ Overall, the proportion of social housing has dropped over the period 2001 to 2011, alongside an increase in the proportion of private rented accommodation used. ■ A changing demography has created a high demand within social housing amongst young people, single parents, migrant workers and the elderly. ■ There continues to be a demand across Armagh, Craigavon and Banbridge for social housing provision particularly in Craigavon. ■ The number of people presenting themselves as homeless between 2009/10 and 2013/14 has increased across the council area by 3-5%. ■ As life expectancy of the population rises this will increase the need for suitable housing that is accessible for the elderly and which enables support to be provided.	Without a new LDP there would be fewer opportunities to consider current zonings for housing and adapt to meet the areas of greatest need. There would also be fewer opportunities to design housing policy to accommodate the changing demography of the Borough and the identified social housing need for more ‘single elderly’ and ‘small family’ units. Applying a sustainability appraisal will enable a more strategic and balanced plan for the future. Considerations for future housing include the availability of or capacity to provide necessary infrastructure, energy efficiency, a good quality environment, accessibility to employment and services, forms of transport that reduce reliance on private cars and social considerations such as shared space, the vitality of towns and provision of care.
Education and skills ■ Although the council area has a high level of educational achievement at all levels, this is not consistent between DEAs. ■ Since 2023 there has been a 0.5% decrease in the number of enrolments in schools within the Borough. There has also been a decrease of 6.4% in 2024 of the number of children enrolled in pre-school education. Post-primary has seen a 18.6 increase in enrolments since 2015/16 while Special Schools have seen the greatest percentage increase in enrolments from 2014/15 to 2024/25 rising by 54.3%.	Without a new LDP there may be fewer opportunities to look at settlement pattern and school sustainability or to facilitate skills training.

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
■ In Armagh City, Banbridge and Craigavon Borough the percentage of residents aged 16 and over with no qualifications (25.2%) was slightly higher than Northern Ireland overall (23.8%). Level 1 qualifications and apprenticeships showed similar proportions in both the borough and Northern Ireland. Those with qualifications at level 4 and above was lower in the borough (30.4%) than Northern Ireland (32.1%).	
Economy and employment ■ A higher than Northern Ireland average percentage of people in the Council area are economically active. ■ The Council area has a high proportion of people employed in the wholesale / retail trade, manufacturing and health sectors. ■ Employee salaries are broadly average for Northern Ireland. ■ The business birth rate and survival rate is average for Northern Ireland, but lower than the rest of the UK. A focus on encouraging and nurturing new business ideas would help the Council increase and sustain economic growth. ■ Within retail, there have been a number of challenges in recent years, however the market is in recovery and is evolving. ■ 'Brexit' and exchange rate fluctuations may disproportionately affect businesses in border areas. ■ Almost three quarters of overnight visits to the Council area are to visit friends and relatives. The proportion of overnight visitors staying for holiday/pleasure/leisure is the lowest in Norther Ireland.	Without a new LDP in place, the opportunity to make plans for growth in line with recent evidence and to develop a plan-led system may be missed. The absence of a LDP to address local needs could further disadvantage those on lower incomes in terms of access to places of work. High levels of retail building vacancy in village and town centres might continue which would be detrimental to the vitality and viability these centres. The Council would be unable to facilitate sustainable tourism growth to adequately reflect the needs and assets unique to the Armagh City, Banbridge and Craigavon area.
Material assets ■ Sustainably improve the telecommunications network in areas with slow download speeds and in rural areas to help ensure those residents, communities and businesses are not disadvantaged. ■ The lack of financial incentives for renewable projects may affect the demand to develop renewables. ■ Consider community based renewable projects that can make more efficient use of land and reduce environmental impacts including landscape related issues. ■ Consider alternative renewable technologies to wind in areas where wind technology may cause concern for landscape issues. ■ Reduce non-recyclable wastes and educate people about alternatives in accordance with the principles of the waste management hierarchy – avoid, reduce, reuse, recycle, recover.	In the absence of a new plan, it may become more difficult to sustainably manage provision and integration of material assets, as land is more likely to be developed without appropriate infrastructure in place or planned for.
Physical resources ■ The minerals industry makes an essential contribution both the local and regional economy and to people's quality of life, providing primary minerals for construction and as a valued provider of jobs and employment, particularly in rural areas. ■ Peat extraction still takes place in the Council, but peatlands are also important for a range of ecosystem services (i.e. water/carbon stores, biodiversity including habitat for rare plants/animals) requiring their conservation. ■ Armagh City, Banbridge and Craigavon Borough needs to consider the future need for cemetery provision in some areas. ■ Local development pressure from single turbines, rural dwellings, and in some areas cemetery provision may require local site-specific measures. ■ Soil quality should be protected using effective conservation measures.	In the absence of a new plan, there could be less opportunity to spatially plan and sustainably manage our physical resources so that reserves are safeguarded, environmental damage avoided and geological sites conserved. It may become more difficult to manage local development pressures on our physical resources and to avoid inappropriate development, pollution and erosion.

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
Transport and accessibility ■ There is a slightly higher than average number of households with access to two, three, four or more vehicles and a high reliance on the private car/van for transport. ■ Traffic congestion is one of the top environmental concerns of people in the Borough. ■ Over three quarters of workers in the Council rely on some form of motorised transport to get to work rather than using public transport, walking or cycling. ■ A considerable amount of people walk to work rather than use any other mode of transport and this trend could be encouraged by providing appropriate services and walkways/greenways to enable more people to commute this way. ■ Less than 1% of commutes to work are by bike so there may be a need to investigate measures (design, connectivity) that could help enable more people to commute by bike. ■ The amount of people who choose to use public transport to commute to work is lower than those that choose to walk and significantly lower than those relying on a car/van so there is a need to investigate measures that could help enable more people to commute by bus or train. ■ A considerable amount of people car share and this trend could be encouraged by providing additional park and ride/share facilities at strategic locations to enable more citizens to commute this way and enable much stronger transport connections for rural communities to urban hubs and reduce traffic congestion.	In the absence of a new plan, there would be a lack of up-to-date spatial information that reflects the new Council area. Without this information there would be a higher risk of missing key opportunities to integrate sustainable and active travel options to new and existing developments. The most sustainable use of land for a transport system that enables people to reduce their reliance on the private car and connects people and places together would be less feasible. This could be problematic for some aspects such as use of disused railways due to differing policies within legacy Area Plans.
Air quality ■ One Air Quality Management Area (AQMA) for NO₂ is located in a main town and directly linked to road traffic emissions. ■ Road traffic generates 85% of emissions and is the largest contributor to air pollution in the Council. ■ Traffic congestion in Armagh City continues to be an air quality issue. ■ Traffic congestion is one of the top three environmental concerns of residents. ■ Public transport options need to be improved to help reduce reliance on the private car particularly in rural areas but also in the main towns where congestion is frequent. ■ Ammonia is known to have a damaging impact on biodiversity, including sensitive habitats, as well as human health. Reducing ammonia emissions across Northern Ireland is one of DAERA's key priorities.	In the absence of a new plan, there may be the risk of decreasing air quality through inappropriately located development and fewer opportunities to spatially influence development and/or help improve local air quality. The likelihood of congested areas and AQMAs improving in any way would be harder to manage.
Climate change ■ Agriculture is a significant contributor to GHG emissions and opportunities to reduce emissions within the scope of the LDP need to be considered. ■ There is a need to encourage and increase options for active and sustainable travel across the Borough, to help reduce reliance on the car and reduce GHG emissions from the transport sector. ■ The waste management hierarchy and the proximity principle should continue to be used to guide waste management facilities and practices, based on the principles of sustainable development. ■ Any potential development in areas of flood risk needs to be carefully considered against the likely impact of flooding but also the likely impact of the development on adjacent or downstream areas, including the marine area.	In the absence of a new Plan, there could be fewer opportunities to apply land use planning to help reduce GHG emissions by integrating sustainable development patterns. Without up-to-date spatial information, it would become more difficult to locate development away from areas at risk of flooding, to design efficient transport routes and to zone lands for the most appropriate use. Considering the most sustainable use of land that reduces greenhouse gas emissions and reliance on fossil fuels, whilst also enabling adaptation measures for climate change (e.g. preservation of peatlands and blue/green infrastructure) would not be feasible. It could become increasingly difficult to locate renewable energy projects in the most sustainable locations in relation to both infrastructure and users. There may be fewer opportunities to integrate measures such as sustainable drainage systems, green/blue infrastructure and sustainable transport infrastructure.

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
■ It is important to protect ecosystems which provide habitat for local biodiversity, and which provide natural resilience against the effects of climate change. ■ Provisioning of buffer zones around designated sites and priority habitats could help enable species and habitats to move and reactively adapt in a changing climate. ■ A cross-sectoral approach involving various stakeholders will be needed to further develop and deliver Climate Change Action Plans.	
Water ■ By comparison to the rest of Northern Ireland, surface water quality is generally lower in Armagh City, Banbridge and Craigavon Borough; a quarter of the waterbodies in the Council area are at ‘poor’ or ‘bad’ ecological status. ■ Other wastes may also cause pollution at the point where they are disposed of or utilised. Wastes from livestock, food processing or primary treatment such as sewage or anaerobic digesters have the potential to cause pollution elsewhere. ■ Lurgan, Portadown and Banbridge are identified as SFRAs and there are four other settlements at moderate risk of flooding. ■ Constructed flood alleviation and defence measures are expensive and should, where possible, be avoided and alternative methods of flood risk management considered. ■ Climate change will increase the probability and extent of flood risk. ■ Development should be planned to avoid areas at significant risk from flooding, now or in the future, or where development may increase the flood risk elsewhere. ■ Development may lead to changes in the rate of surface water runoff, or the capacity of a receiving watercourse may be altered which in turn has the potential to increase flood risk. ■ A safety issue arises because there are not currently legal requirements relating to impounded water therefore there are considered to be risks in potential inundation zones below reservoirs. ■ The high use of untargeted methods to apply herbicides and pesticides has caused pollution in waterbodies. ■ There are issues with elevated levels of nutrients entering watercourses and polluting waterbodies. ■ There are capacity issues at a number of WwTWs and unless infrastructure is upgraded development requiring new connections to municipal treatment works will not be possible in certain areas. This may limit or delay potential for development.	In the absence of a new plan there will be less certainty about the need for supply or treatment of water, therefore infrastructure may not be developed in the most efficient manner. There is a risk that cumulative effects from development will counteract the goals of plans such as the 2015 River Basin Management Plans to achieve ‘good’ ecological status. While planning policies address issues such as flood risk, the opportunity to take a more strategic approach would be missed. There is a risk that taking decisions in the absence of an up-to-date plan could result in development that does not make the most sustainable use of infrastructure, or which subsequently requires further measures to address knock-on effects. The plan will enable space for surface water management to be identified when zoning land. LDP policy could require, either generally or for specific zonings, that schemes are put in place that minimise surface water runoff as part of their design.
Natural resources ■ Significant areas of Lough Neagh and Portmore Lough are within the Council and are protected under numerous nature conservation designations with varying features of interest. ■ There is a lack of formally designated nature conservation areas through the majority of the Council’s interior, the focus of which is over the wetlands of Lough Neagh and its southern fringe and Portmore Lough. ■ ■ There are areas within the Borough with a higher level of development pressure, in terms of either residential development or wind energy development. In certain locations within the Borough, having taken into account the accumulations of such development, the unique landscape character of the area and scenic vulnerability along	In the absence of a new plan, there is the risk that development may occur in inappropriate locations that could negatively impact upon nature conservation sites or green/blue infrastructure including wildlife corridors. It may become increasingly difficult to spatially manage development to avoid these negative impacts on the local environment and to maintain and enhance local biodiversity. Without current spatial information, opportunities to protect green / blue infrastructure and ecosystems services would be more likely to be missed.

Key sustainability issue	Likely evolution of the issue without the new Plan Strategy
with its overall environmental capacity may be limited to absorb higher levels of development, therefore suggesting additional protection may be warranted. '	
Landscape ■ There is a small portion of AONB in the Council and there are a wide variety of landscape types across the area including 23 Landscape Character Areas (LCAs), six Regional Landscape Character Areas (RLCAs) and 101 Local Landscape Policy Areas (LLPAs) that make the Council unique in its own right and therefore attractive to investors for housing, recreation and business ventures. ■ When considering landscapes within the borough, the Landscape Character Assessment concluded that two areas, Blackwater Valley and Lough Neagh environs should be as Strategic Landscape Policy areas as an acknowledgment of their unique landscape characteristics and sensitivity to inappropriate development. ■ The Mourne Area of Outstanding Natural Beauty (AONB) borders the Council on its south eastern flank and is an example of where management of landscape issues could particularly benefit from partnership working with other stakeholders including Newry, Mourne & Down Council.	In the absence of a new plan, there could be an increased risk of losing or degrading landscapes due to over development or inappropriate siting of development. It could become increasingly difficult to spatially manage new development in the context of local landscape character.
Historic environment and cultural heritage ■ Heritage assets are at risk from neglect, decay, development pressures and vacancy. ■ Heritage at Risk should continue to be identified and efforts made to maintain their regular use and/or support their restoration. ■ The Council area's rich cultural and heritage assets can contribute to a high-quality built environment that helps to create attractive places for living, investing in and visiting. ■ The Council area contains centres, villages and towns which each have a unique sense of place, and character. Protecting this sense of place aspect has benefits for people and their pride in their community. ■ The Council area has a rich archaeological heritage, and this could be further explored through identifying new Areas of Archaeological Potential. ■ The Navan Fort Complex is of sufficient importance to merit its inclusion on the tentative list for nomination as a World Heritage Site. Development in this area should be managed to support nomination of the Navan site and the recently announced bid by Armagh Observatory and Planetarium (AOP) as part of the Astronomical Observatories of Ireland's bid for UNESCO World Heritage Status. ■ The Council area has a rich industrial heritage through milling, linen and textiles production, its 18th and 19th Century transport engineering and defence heritage associated with World War II. ■ There is ongoing loss of certain non-designated heritage assets such as historic farmsteads and buildings in the countryside, industrial and defence heritage, and historic shopfronts in some towns and settlements. Non-designated buildings which are of heritage or architectural importance in the context of overall landscape, townscape or heritage value should be recognised for their role in conserving these settings. ■ A number of Conservation Areas and Townscape Character Areas may be at risk of flooding both with and without the effects of climate change. ■ Traffic pollution, air quality, noise pollution and other problems are affecting the historic environment.	Without the LDP in place, the RDS, the SPPS, extant Area Plans and PPSs would all still be applied. Stakeholder consultation would also continue to inform decisions. However, in the absence of a new plan, opportunities to consider the historical and cultural assets in the Borough in future growth plans and place-shaping may be missed. There are a very large number of strategic heritage assets in the Borough, dating from the Mesolithic period through to World War II. Without a new LDP in place, opportunities to designate new areas of special archaeological interest and areas of archaeological potential in the LDP might also be missed. Opportunities might also be missed to take advantage of the potential that archaeological, industrial, and defence heritage assets have as part of our tourism and visitor offer, leading to reduced economic benefit for local communities. The protection, conservation and regeneration of historic places can contribute to well-being in society through providing people with enjoyment, inspiration, learning opportunities, mental and physical health benefits, and a sense of place and identity. It has been recognised that there is evidence of incremental erosion of historic/architectural character and appearance within some of the designated conservation areas. In the absence of a LDP the 'setting' of historic assets or places, which may extend far beyond the boundary or curtilage of the site, may not be taken into consideration. A new LDP is an opportunity to consider the reasons for these issues and identify the positive role that planning can play.

Methodology and the SA Framework

29. The key sustainability issues for Armagh City, Banbridge and Craigavon Borough fed into the identification of a set of SA objectives which are the main tool used at each stage of the SA for assessing the likely effects of policies in the Plan Strategy. The SA framework is presented below.

The SA framework

30. The SA Framework consists of 14 SA Objectives. This includes:

SA Objective 1: Improve health and well-being.

- This objective covers access to healthcare, but also healthy lifestyles and physical activity including supporting opportunities for social contact, and support for carers. It also supports providing suitable accommodation for everyone's needs and a high quality living environment in terms of air quality, noise pollution and safety.

SA Objective 2: Strengthen society.

- This objective covers inclusion, improved community relations, community safety, shared spaces, and social integration. It also supports access to facilities and services, and reduced inequalities.

SA Objective 3: Provide good quality, sustainable housing.

- This objective supports low carbon development, providing accessible and affordable homes, diversity in housing supply to meet everyone's needs, and improved housing quality.

SA Objective 4: Enable access to high quality education.

- This objective covers improved education and employability, promoting access to education and skills training including for rural communities and, improvements to the education estate.

SA Objective 5: Enable sustainable economic growth.

- This objective covers supporting innovation and competitiveness within the local economy, ensuring sufficient land supply, creating a range of job types in appropriate locations for economic growth, supporting town centres, enhancing the skills base, improving the quality of the Borough and supporting tourism.

SA Objective 6: Manage material assets sustainably.

- This objective focuses on improving infrastructure such as telecommunications, energy and waste management systems, while supporting renewable energy and better connectivity. It promotes reducing waste, increasing recycling, reuse and composting, encouraging efficient local use of resources, and helping to bring derelict or contaminated land back into use.

SA Objective 7: Protect physical resources and use sustainably.

- This objective includes protecting earth science features, safeguarding geological features and biodiversity, minimising greenfield loss, supporting future uses such as sustainable minerals development and geothermal energy, and considering cross-boundary and sub-surface planning.

SA Objective 8: Encourage active and sustainable travel.

- This objective includes improving access to public transport and creating opportunities for walking and cycling, making travel more affordable, benefiting those without a car, improving health, and reducing greenhouse gas emissions.

SA Objective 9: Improve air quality.

- This objective seeks to ensure development is carefully located and designed to minimise emissions, reduce traffic-related pollution by encouraging sustainable transport, and protect sensitive receptors.

SA Objective 10: Reduce causes of and adapt to climate change.

- This objective focuses on reducing greenhouse gas emissions and energy use by promoting sustainable travel, renewable energy, and efficient resource consumption, including waste reduction and increased recycling. It also

supports protecting key environmental assets such as habitats, wildlife corridors, floodplains and peatlands, while incorporating measures to adapt to the impacts of climate change.

SA Objective 11: Protect, manage and use water resources sustainably.

- This objective aims to improve the quality and efficient use of water resources while maintaining ecological flows and protecting aquatic ecosystems. It also seeks to minimise flood risk by safeguarding and enhancing floodplains, avoiding the need for flood defences where possible, and supporting natural water management.

SA Objective 12: Protect natural resources and enhance biodiversity.

- This objective focuses on protecting and enhancing key sites such as Lough Neagh and Portmore Lough, alongside designated areas and their buffer zones. It also supports conserving local biodiversity, strengthening green and blue infrastructure, and maintaining ecosystem services.

SA Objective 13: Maintain and enhance landscape character.

- This objective seeks to conserve the natural character and distinctiveness of the coast and countryside by protecting them from inappropriate or intrusive development. It focuses on safeguarding designated landscapes, including the Mourne AONB and neighbouring areas, minimising visual impacts, and ensuring new development is sensitively integrated while enhancing the setting of key features, settlements and transport corridors.

SA Objective 14: Protect, conserve and enhance the historic environment and cultural resources.

- This objective aims to protect and enhance built and cultural heritage, ensuring that local distinctiveness and a strong sense of place are conserved in both urban and rural settings. It supports the preservation of archaeological features and the setting of heritage assets, while enabling proper assessment and management of impacts from development. It also promotes access to and understanding of the historic environment, alongside providing opportunities for cultural activities and engagement.

Use of the SA Framework

31. Within the assessment matrices showing the likely sustainability effects of the Plan Strategy policies, symbols and colour-coding have been used against each SA objective to show whether an effect is likely to be positive or negative, minor or significant, or uncertain, as shown in Table 2. Where a potential positive or negative effect is uncertain, a question mark is added to the relevant symbol (for example +? or -?).

Table 2: Key to symbols and colour coding used in the SA

Symbol and Colour Coding	Description
++	Significant positive effect likely.
++/-	Mixed significant positive and minor negative effects likely.
+	Minor positive effect likely.
+/-	Mixed minor or significant effects likely.
-	Minor negative effect likely.
--/+	Mixed significant negative and minor positive effects likely.
--	Significant negative effect likely.
0	Negligible effect likely.
?	Likely effect uncertain.

Difficulties and limitations

32. A number of difficulties and limitations arose in the course of the SA as follows:

- With the establishment of Armagh City, Banbridge and Craigavon Borough Council in 2015 and the new statutory Community Planning duty there has been significant data collection to support plan making. Therefore, some of the recent data collected doesn't always align with previous evidence studies
- The extended timescale of the LDP development, and therefore environmental assessments, have meant that baseline information for the Plan, SEA and HRA has had to be updated to take account of real-world changes.
- As a consequence of the COVID-19 pandemic, many of the Northern Ireland Statistics and Research Agency (NISRA) datasets compiled from its Household Surveys had a reduced sample size.
- Local Government Districts-scale results of the 2021 Census had not been published.
- Predicting effects and trends always involves an element of uncertainty or a need for assumptions to be made. The ability to predict effects accurately is also limited by gaps in the baseline and understanding of future trends.

Sustainability Appraisal Findings for the Draft Plan Strategy

33. The Draft Plan Strategy is supported by 130 policies. The likely effects of these policies on the SA objectives are presented in Table 3 overleaf. These are described in detail in Chapter 5 of the full SA Report. Table 4 which follows presents the likely cumulative effects of the Draft Plan Strategy as a whole on each of the SA objectives.

34. The Sustainability Appraisal process requires the consideration of reasonable alternatives. The Council explored a number of reasonable alternatives in relation to policies SGS 2; Settlement Hierarchy, SGS 3: Strategic Housing Allocation and SGS 5: Strategic Economic Development Lands Allocation. The reasonable alternatives to policies SGS 3 and SGS 5 were rejected as they were not expected to deliver enough housing and employment need. In relation to Policy SGS 2 the reasonable alternative was rejected due to two of the candidate settlements being located near a Ramsar site. No other reasonable alternatives were identified as they were too similar to the chosen policy.

Table 3: Cumulative Effects of the Draft Plan Strategy policies

[illegible]

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
HOU 9	+	+	++	0	0	0	0	+	0	0	0	0	0	0
HOU 10	+	+	++	0	0	+	0	0	0	0	0	0	+	0
HOU 11	+	+	0	0	0	0	0	0	0	0	0	+	+	0
HOU 12	+	+	+	0	0	0	0	0	0	0	0	0	0	0
HOU 13	0	0	+	0	0	+	0	0	0	0	0	0	0	+
HOU 14	0	0	+/-	0	0	0	0	0	0	0	0	0	0	0
HOU 15	0	+	+	0	+	0	0	-	-	-	0	0	+	0
HOU 16	0	+	+	0	+	0	0	-	-	-	0	0	+	0
HOU 17	+	0	+	0	0	0	0	-	-	-	0	0	0	0
HOU 18	+	+	++	0	0	+	0	0	0	0	0	0	+	0
HOU 19	0	+	+	0	0	+	0	0	0	0	0	0	0	0
Open Space, Sport and Outdoor Recreation														
OSR 1	++	0	0	0	0	0	0	0	0	0	0	+	+	0
OSR 2	++	+	+	0	0	0	0	0	0	0	0	+	+	+
OSR 3	++	+	0	0	0	0	0	+	0	0	0	0	0	0
OSR 4	+	0	0	0	0	0	0	0	0	0	0	+	+	+
OSR 5	+	0	0	0	0	0	0	0	0	0	0	+	+	0
OSR 6	+	0	0	0	0	0	0	0	0	0	+	+	+	+
OSR 7	+	0	0	0	0	0	0	0	0	0	0	+	+	0
OSR 8	++	+	0	0	0	0	0	+	+	+	+	++	+	0
Community and Cultural														
CCF 1	+	++	0	0	0	0	0	+	0	0	0	0	0	0
Economic development														
ECN 1	0	0	0	0	++	0	0	0	0	0	0	0	0	0
ECN 2	0	0	0	0	++	+	0	0	0	0	0	0	+	0
ECN 3	0	+	+	0	++	+	0	0	0	0	0	0	+	0
ECN 4	0	0	0	0	++	0	0	+	0	0	0	0	0	0
ECN 5	0	+	0	0	++	+	0	0	0	0	0	0	+	0
ECN 6	0	0	0	0	++	+	+	0	0	0	0	0	+	0
ECN 7	+	0	0	0	++	+	0	0	+	0	0	0	0	0
ECN 8	0	0	0	0	++	0	0	0	0	0	0	0	0	0
ECN 9	0	+	0	0	+	+	0	0	0	0	0	0	0	+
ECN 10	0	0	0	0	+	0	0	0	0	0	0	0	0	0
Retailing and Town Centres														
RTC 1	0	0	0	0	++	0	0	0	0	0	0	0	0	0
RTC 2	0	0	0	0	+	0	0	0	0	0	0	0	0	0
RTC 3	0	0	0	0	+	0	0	0	0	0	0	0	0	0
RTC 4	0	+	0	0	+	0	0	0	0	0	0	0	0	0
RTC 5	0	+	0	0	+	0	+	0	0	0	0	0	0	0

[illegible]

	SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA10	SA11	SA12	SA13	SA14
HE 8	0	0	0	0	0	0	0	0	0	0	0	0	+	++
HE 9	+	0	0	0	0	0	0	0	0	0	0	0	++	++
HE 10	0	0	0	0	0	0	0	0	0	0	0	0	0	++
HE 11	0	0	0	0	0	0	0	0	0	0	0	0	0	++
HE 12	0	0	0	0	0	0	0	0	0	0	0	0	+	++
HE 13	0	0	0	0	0	0	0	0	0	0	0	0	0	+/-?
HE 14	0	0	0	0	0	0	0	0	0	0	0	0	0	+
Natural Heritage														
NH 1	0	0	0	0	0	0	0	0	0	0	0	++	0	0
NH 2	0	0	0	0	0	0	0	0	0	0	0	++	0	0
NH 3	0	0	0	0	0	0	0	0	0	0	0	++	0	0
NH 4	0	0	0	0	0	0	0	0	0	0	0	++	0	0
NH 5	0	0	0	0	0	0	+	0	0	0	+	++	+	0
NH 6	0	0	0	0	0	0	0	0	0	0	0	+	++	+
NH 7	0	0	0	0	0	0	0	0	0	0	0	0	++	0
NH 8	0	0	0	0	0	0	0	0	0	0	0	+	++	+
NH 9	0	0	0	0	0	0	0	0	0	0	0	++	0	0
Flood Risk and Drainage														
FRD 1	+	+	0	0	+/-	+	0	0	0	+	++	0	0	0
FRD 2	0	0	0	0	0	+	0	0	0	+	++	0	0	0
FRD 3	+	0	0	0	0	+	0	0	0	+	++	+	0	+
FRD 4	0	0	0	0	0	0	0	0	0	+	++	+	0	0
FRD 5	+	+	0	0	0	+	0	0	0	0	++	0	0	0
Renewable and Low Carbon Energy														
RLED 1	+	+	0	0	0	++	0	+	+	++	+	+	+	+
Waste Management														
WMT 1	+	0	0	0	0	++	+	+/-	+/-	0	+	+	+	+
WMT 2	+	0	0	0	0	++	+	+	0	0	0	+	+	0
WMT 3	0	0	0	0	0	++	+	+	0	0	0	+	0	0
WMT 4	0	0	0	0	0	+	+	0	0	0	0	+	0	0
WMT 5	+	0	0	0	0	+	0	0	0	0	0	+	0	0
Environmental Protection														
EP 1	+	0	0	0	0	0	0	0	+	+	+	+	0	0
EP 2	+	0	0	0	0	0	0	0	0	0	+	+	0	0
Other specialised areas														
DC 1	+	+	0	+	0	+	0	0	0	0	0	+?	+?	+?

35. The SA of the draft Plan Strategy resulted in largely positive effects across the SA objectives. In particular, a large number of positive effects were identified in relation to SA objective 1: Health and well-being and SA objective 2: Society; for the policies under Spatial Growth Strategy, General Policies for development, Design and Placemaking, Housing and Open Space, Sport and Outdoor Recreation. For the environmental objectives (SA12: Biodiversity, SA13: Landscape and SA14: Historic Environment) positive effects are expected from specific policies relating to the Historic Environment and Natural heritage as well as mitigation set out within policies that propose development. This demonstrates that the draft Plan Strategy sets out a positive framework for delivering sustainable growth.

Table 4: Cumulative Effects of the Draft Plan Strategy

SA objective	Cumulative effect
SA1: Health and well-being	++
SA2: Society	+
SA3: Housing	++
SA4: Education	0/+
SA5: Economic growth	++
SA6: Material assets	+
SA7: Physical resources	+?
SA8: Active and sustainable travel	+/-
SA9: Air	+/-
SA10: Climate change	+/-
SA11: Water	+
SA12: Biodiversity	+
SA13: Landscape	+
SA14: Historic environment	+

How has the Sustainability Appraisal influenced Plan Making

36. The entire plan-making process is one of decisions, change and fine-tuning in response to many factors, including the Sustainability Appraisal. Identifying and clarifying these changes is therefore a key element of the Sustainability Appraisal process as it shows how the plan-making process has been influenced, in particular

how the plan has changed and what mitigation measures have been incorporated into the plan. In summary, the Sustainability Appraisal has influenced the draft Plan Strategy by helping to draw out the interrelationships and cross overs between draft policies and identifying word changes to address potential policy gaps or to provide points of clarification.

37. The Sustainability Appraisal scoping report and Sustainability Appraisal report have been published alongside the draft Plan Strategy for consultation. Responses to the consultation may lead to the modification of the Plan Strategy. If these modifications are significant, this may lead to additional appraisal against the Sustainability Appraisal framework.

Recommendations

38. Prior to the SA, an initial set of recommendations were shared with the council on their Plan Strategy policies. Where they have agreed with the suggestions raised, amendments have been made to the policies in the Draft Plan Strategy and this Non-Technical Summary. These recommendations and the Council's response to each are set out in Appendix D of the full SA Report. The recommendations largely related to design, efficient use of resources, flood risk and trying to minimise adverse impacts on landscape and biodiversity. Several of these recommendations were not taken forward as some of the proposed mitigation is already established in the Strategic Planning Policy Statement. In addition, the Plan should be read as a whole and therefore mitigation is contained within other policies in the plan.

39. A number of further recommendations were shared with the Council on their Plan Strategy policies, which they reviewed and provided a response to. The recommendations and the Council's response to each are detailed in Chapter 5 of the full SA Report. The recommendations largely covered the use of sustainable transport and improving energy efficiency.

Monitoring

40. The SEA Regulations require that monitoring is undertaken in relation to the significant effects of implementing a Plan Strategy. Given the current stage of the Armagh City, Banbridge and Craigavon LDP, the formal framework for monitoring will not be addressed until the Plan Strategy is fully adopted. However, the SA allows a preliminary framework to be prepared at this stage. Preliminary indicators for monitoring effects of the Local Development Plan have been identified for the Key Sustainability Issues and significant effects identified through the Sustainability Appraisal. These will be aligned where possible with Local Development Plan. The

monitoring framework will evolve in response to consultation comments or any amendments to the plan. The proposed monitoring framework includes indicators in relation to:

- Green and blue infrastructure, open space and health
- Number and type of homes approved, numbers of community facilities
- Housing supply and planning approvals for development in the countryside
- Educational achievement
- Amount of employment land
- Tourist related development
- Development within town centres and zoned land
- Planning approvals for renewable energy or low carbon energy related development
- Waste generation and recycling
- Physical and digital connectivity
- Reuse of existing buildings and development on brownfield land
- Reducing private transport use and active travel
- Air quality
- Avoiding development in flood plains, reducing flood risk
- Water quality and wastewater treatment
- Planning approvals affecting sites designated for natural heritage, landscape and cultural heritage
- Condition of cultural heritage assets, loss of listed buildings or buildings in areas designated for cultural heritage significance, development affecting cultural heritage.

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