

Armagh City, Banbridge &
Craigavon Borough Council

Local Development Plan 2035

Draft Plan Strategy

TECHNICAL SUPPLEMENT 16

Renewable and Low Carbon Energy Development

September 2026



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Armagh City
Banbridge
& Craigavon
Borough Council

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1.0 Introduction

Purpose of this document

This Technical Supplement brings together the evidence base that has informed the preparation of the Armagh City, Banbridge and Craigavon Local Development Plan (LDP) 2035 draft Plan Strategy (dPS). It is one of a suite of topic based Technical Supplements that should be read alongside the dPS to understand the rationale and justification for the planning policies proposed within it.

This Technical Supplement includes key updates relating to renewable and low carbon energy development in the Borough, which have emerged since the publication of the Council's original evidence base Preparatory Paper. These papers provided the baseline information that formed part of the evidence base for the Council's Preferred Options Paper (POP). The POP, published in March 2018, provided an overview of the Key Issues of strategic significance affecting the Borough and the Preferred Options to address them.

This Technical Supplement also seeks to provide an update on the Council's progress in its approach towards and the development of associated planning policies, since the publication of the POP.

In order to reflect the broad range of matters that were considered in the development of the Council's approach towards renewable and low carbon energy development and the formulation of associated dPS planning policies this Technical Supplement has been organised into the following sections:

- **Sections 2 & 3** provide a summary of the Legislative, Regional and Local Policy Context that is relevant to the LDP, with particular emphasis on this topic area;
- **Section 4** provides an overview of the renewable and low carbon energy development profile of the Borough;
- **Section 5** outlines the relevant Key Issue and Preferred Approach as detailed in the POP, alongside a summary of POP Commitments and a brief summary of some of the POP responses that were received, with a focus on those offering suggestions in respect of policy development. Where necessary, Section 5 also acknowledges and examines areas in which the Council's approach towards a particular topic area has evolved.
- **Section 6** provides an overview of the policy review, and the ongoing consultation and engagement that has been carried out in preparation of the draft Plan Strategy policies. Furthermore, it also details the approach of neighbouring councils to renewable and low carbon energy development, briefly outlining their position, followed by a brief consideration of any potential conflict.
- **Section 7** summarises how the dPS policies for renewable and low carbon energy development have been developed. It provides a rationale where amendments have been made to the existing planning policies to take account of regional direction, POP feedback, consultation and engagement, where it has been considered necessary and appropriate to do so.
- **Section 8** sets out how the dPS policies for renewable and low carbon energy development have been prepared in accordance with the tests for soundness set out in the Department for Infrastructure's (DfI) Development Plan Practice Note 6: Soundness (Version 2, May 2017).

The information and data presented in this Technical Supplement has been derived from a number of different sources however, where possible, the most recent datasets available have been utilised.

It is important to note that this evidence base has been collated at a specific point in time and therefore it may be necessary for the Council to review and update it as the plan is progressed. The notional end date of the plan period has now been amended to 2035. The Council will continue to work with key stakeholders to ensure that renewable and low carbon energy development in the Borough are managed in an appropriate and sustainable manner throughout and beyond the plan period of 2035.

Renewable and Low Carbon Energy Development

Renewable energy resources are sources of energy that naturally replenish themselves without being depleted whilst low carbon energy sources are those that have minimal output of greenhouse gas emissions, specifically carbon dioxide.

The main sources of renewable energy include are wind, sun (solar photovoltaic/thermal energy), moving water (hydropower), heat extracted from the air, ground, and water (including geothermal energy), biomass (wood, biodegradable waste, and energy crops such as for use in an Anaerobic Digester). In addition to developments which generate renewable energy from these sources there are also emerging and advancing technologies that can help enhance the renewable energy development's contribution, such as electricity support technologies and energy storage systems (examples include synchronous compensators and battery energy storage systems (BESS)). The renewable and low carbon energy sector is a dynamic industry, with new technologies continuing to emerge and advance.

Northern Ireland has significant renewable energy resources and a vibrant renewable and low carbon energy industry. It is not only a significant provider of jobs and investment, but it also reduces our reliance on fossil fuels and brings security to our energy supply, thus helping to reduce harmful emissions and improve our quality of life. As such the renewable and low carbon energy industry makes an important contribution towards furthering sustainable development and green growth.

In order for the net zero carbon and renewable energy consumption targets to be realised¹ it is vital that Northern Ireland takes advantage of our natural resources by enhancing the usage and supply of green energy through the delivery of a flexible, diverse, resilient and integrated renewable and low carbon energy network.

The LDP will play a vital role in ensuring that the Borough makes its optimum contribution towards achieving the net zero carbon and renewable energy consumption targets by bringing forward policies that facilitate the delivery of renewable and low carbon energy developments (electricity and heat), at various scales and in appropriate locations.

Whilst it is important that the delivery of the necessary increase in appropriate renewable and low carbon energy developments is facilitated, it will require careful balancing of the local impacts with the wider environmental, economic, and social benefits.

¹ The Climate Change (Northern Ireland) Act 2022 places a duty on NI Departments to ensure that the net emissions account for the year 2050 is at least 100% lower than the baseline and to ensure that the net emissions account for carbon dioxide for the year 2050 is at least 100% lower than the baseline for carbon dioxide. The Northern Ireland Energy Strategy 'The Path to Net Zero Energy' 2022 (DfE) established a renewable electricity consumption target of 70% by 2030 however this was increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022

2.0 Legislative Context

The key pieces of legislation relating to this subject area include the following:

UK Climate Change Act 2008

The UK Government passed the Climate Change Act in 2008. This Act sets ambitious targets beyond those agreed by Europe in setting legally binding targets to reduce carbon emissions by 80% by 2050, from 1990 levels. It is implicit in the Climate Change Act 2008 that Northern Ireland contributes its fair share of required greenhouse gas emission and the UK Government's 5-yearly carbon budgets.

The Planning Act (Northern Ireland) 2011

The Planning Act (Northern Ireland) 2011 (hereafter referred to as the 2011 Act) is the principal planning legislation in Northern Ireland, which underpins the reformed two-tier planning system that commenced on 1 April 2015. It introduced the plan-led system, where the LDP is the primary consideration for decision making on all new development schemes and proposals will be required to accord with its provisions unless, exceptionally, other material considerations indicate otherwise.

The Planning (Local Development Plan) Regulations (Northern Ireland) 2015

The Planning (Local Development Plan) Regulations set out the sequence in which the Council's new LDP is to be prepared and provides detail on the content and procedure of each stage in the plan preparation process and independent examination.

The Climate Change Act 2008 (2050 Target Amendment) Order 2019

In 2019 the UK Government, in response to the climate change emergency, revised its commitment to reduce carbon emissions by 80% (from 1990 levels) by 2050, to a target of net zero greenhouse gas emissions by 2050.

The Climate Change Act (Northern Ireland) 2022

The Climate Change Act (Northern Ireland) 2022, which received Royal Assent on 6 June 2022, sets a target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 (i.e. net zero emissions by 2050) for Northern Ireland compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030.

The Act also requires various NI Departments to produce and publish sectoral plans. This includes a requirement for the Department for the Economy to develop and publish sectoral plans for the energy sector setting out how the sector will contribute to the achievement of the 2030, 2040 and 2050 emissions reduction targets (as set out in sections 1, 3 and 4 of the Act). The Act also requires that the Sectoral plans for energy must include proposals and policies for energy production and the supply of private and public heating and cooling systems (as set out in section 14 of the Act). In relation to renewable electricity consumption the Act requires that The Department for the Economy must ensure that at least 80% of electricity consumption is from renewable sources by 2030 (as set out in Section 15 of the Act).

3.0 Policy Context

Regional Policy Context

The key pieces of regional policy relating to this subject area include the following:

Programme for Government (PfG) 2024-2027 'Our Plan: Doing What Matters Most' (2025, Northern Ireland Executive)

The PfG 'Our Plan: Doing What Matters Most' outlines the NI Executives priorities for making a real difference to the lives of everyone living and working in Northern Ireland. It sets out three long term Missions (People, Planet and Prosperity), underpinned by a cross-cutting commitment to Peace, through which improved wellbeing, long term sustainability, and a thriving economy will be delivered.

Within the PfG there are a wide range of actions including the development of Northern Ireland's Climate Action Plan, publication of the Third Northern Ireland Climate Change Adaptation Programme and the delivery of actions identified within the Lough Neagh Report and Action Plan.

One of the key challenges identified in 'growing a globally competitive and sustainable economy' is decarbonisation. The PfG seeks to achieve self-sufficiency in Northern Ireland's clean and affordable energy. It acknowledges that Northern Ireland has the natural resources including wind, biomethane, and geothermal to meet our own energy needs and become a net exporter of renewables, not only reducing carbon emissions, but also unlocking the economy. It highlights that the Green Growth Strategy will provide a framework for enabling the transition to a greener, sustainable future based on a low carbon, nature positive environment reaping the advantages of good green jobs and the health and wellbeing benefits of an improved environment.

The PfG commits to publishing a Circular Economy Strategy which will have three key principles of designing out waste, keeping products in circulation at their highest value for as long as possible and regenerating natural systems. The PfG also commits to developing a Climate Action Plan, that will detail cross-cutting steps to reduce carbon emissions across many sectors including energy.

Other actions aimed at protecting the environment and tackle climate change include facilitating net zero infrastructure, a renewed focus on affordable renewable energy and retrofitting homes with renewable energy technologies.

The Regional Development Strategy (RDS) 2035

The RDS is a spatial strategy and provides an overarching strategic planning framework to facilitate and guide sustainable development. It aims to take account of the economic ambitions and needs of the Region, and put in place spatial planning, transport and housing priorities that will support and enable the aspirations of the Region to be met.

Regional guidance (RG5) aims to deliver a sustainable and secure energy supply. One of the ways this can be achieved is to increase the contribution that renewable energy can make to the overall energy mix. It acknowledges that there needs to be a significant increase in all types of renewable electricity installations and renewable heat installations, including a wide range of renewable resources for electricity generation both onshore and offshore to meet the region's needs.

Additionally, Regional Guidance (RG9) seeks to reduce our carbon footprint and facilitate mitigation and adaptation to climate change whilst improving air quality. In relation to renewables, it considers how to reduce energy consumption and move to more sustainable methods of energy production. In relation to mitigation, there is a drive to improve the energy efficiency and adaptability of buildings; increase the use of renewable energies; and utilise local production of heat and/or electricity from low or zero carbon energy sources.

Strategic Planning Policy Statement for Northern Ireland (SPPS) - Planning for Sustainable Development (Edition 2, 2025)

The Strategic Planning Policy Statement, Edition 2 (SPPS) was published in December 2025 following the conclusion of a focused review of the former SPPS (2015) on the subject of renewable and low carbon energy. Whilst the revised SPPS sets out new policy provisions for Renewable and Low Carbon Energy all other policy provisions within the former SPPS are unchanged.

Mitigating and Adapting to Climate Change

The SPPS (paragraph 3.10) acknowledges that a central challenge in furthering sustainable development is mitigating and adapting to climate change, whilst improving air quality. This includes the need to reduce emissions of greenhouse gases that contribute to climate change and to respond to the impacts brought about by climate change. The SPPS highlights (paragraph 3.13) a number of ways through which the planning system should help to mitigate and adapt to climate change, including:

- shaping new and existing developments in ways that reduce greenhouse gas emissions and positively build community resilience to problems such as extreme heat or flood risk;
- requiring the siting, design and layout of all new development to limit likely greenhouse gas emissions and minimise resource and energy requirements;
 - considering the energy and heat requirements of new developments when designating land for new residential, commercial and industrial development and making use of opportunities for energy and power sharing, or for decentralised or low carbon sources of heat and power wherever possible; and
- promoting the use of energy efficient, micro-generating and decentralised renewable energy systems.

Renewable and Low Carbon Energy

The aim of the SPPS in relation to renewable and low carbon energy (paragraph 6.219) is to maximise sustainable renewable and low carbon energy from a wide range of technologies, at various scales, in appropriate locations within the built and natural environment, without compromising other environmental assets of acknowledged importance.

The regional strategic objectives for renewable and low carbon energy (paragraph 6.220) are to:

- ensure that sustainable renewable and low carbon energy development is facilitated at appropriate locations in order to increase the contribution to the transition to a net zero carbon economy, in accordance with the Climate Change Act;
- secure the delivery of an appropriate mix of energy provision that supports the Energy Strategy where this benefits our environment, economy, and communities;

- ensure that the environmental, landscape, seascape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;
- ensure appropriate protection of the region's built, natural, and cultural heritage features;
- facilitate the integration of renewable and low carbon energy technology into the design, siting, and layout of new development, and promote greater application of the principles of Passive Solar Design; and
- facilitate the appropriate onshore development required to enable offshore renewable and low carbon energy proposals.

Paragraph 6.221 directs that in plan-making and decision-taking, planning authorities must give appropriate weight to climate considerations (including the target to generate 80% of electricity consumption from renewable sources by 2030) and to supporting efforts to protect and enhance biodiversity. It emphasises that planning authorities must help facilitate delivery of the necessary increase in appropriate renewable and low carbon energy developments (electricity and heat) so that the contribution of this sector to the transition to a net zero energy is optimised. The SPPS highlights that requires careful balancing of the local impacts with the wider environmental, economic, and social benefits.

The SPPS directs (paragraph 6.222) that LDPs must include policies and proposals to enable the plan area's optimum contribution to achieving the renewable energy targets to be realised. It highlights that LDPs should support a diverse range of technologies at different scales and include the factors to be considered in decision-taking such as locational criteria, technology specific criteria, micro-generation, and passive solar design considerations, where appropriate. Paragraph 6.223 sets out the relevant planning considerations for all renewable and low carbon energy development, associated buildings and supporting infrastructure. It directs that proposals must not result in an unacceptable adverse impact (alone or in combination with other developments) on any of these considerations.

Paragraph 6.225 identifies that a cautious approach will apply within designated landscapes which are of significant value, such as areas of outstanding natural beauty, world heritage sites, UNESCO Global Geoparks, and their wider settings. It identifies that it may be difficult to accommodate developments and their associated infrastructure, without detriment to the region's cultural, archaeological, and natural heritage assets. It highlights that in all cases the landscape and visual impacts of proposals require particular attention in order to avoid unacceptable adverse impact on visual amenity and landscape character.

Paragraphs 6.227 – 6.229 set out specific considerations for wind farm development, solar farms and anaerobic digestion plants. Paragraph 6.230 acknowledges that life extension and re-powering of existing development has the potential to maintain or enhance installed renewable energy generation, where appropriate and as such, directs that significant weight will be given to the benefits of re-powering, expanding, and extending the life of existing solar and wind farms unless the impacts identified (including cumulative impacts) are unacceptable and cannot otherwise be made acceptable. The SPPS also recognises the benefits of co-location (6.231) and encourages councils, developers, and other stakeholders to explore more widely the opportunities for harnessing renewable and low carbon energy from new and extant developments. Furthermore, paragraph 6.232 directs that planning authorities should encourage and support the appropriate use of micro-generation energy, including the retrofitting of renewable and low carbon energy technologies.

In relation to landscape considerations, the SPPS (paragraph 6.233) identifies that the ability of the landscape to accommodate development depends on careful siting, the skill of the designer and the inherent characteristics of the landscape. It emphasises that the siting and cumulative landscape and visual impact of all energy developments (including existing

development, extant permissions, and valid but undetermined applications) is of great importance and must be carefully considered.

Paragraph 6.235 highlights that where appropriate, planning authorities should give due consideration to the use of suitable emerging technologies that can assist with enhancing the renewable energy potential of a development (e.g. green hydrogen production facilities, heat networks, geo-thermal, and BESS).

The SPPS (paragraph 6.239) directs that details on future decommissioning, including proposals for site restoration must be provided by the applicant and that planning authorities must consider and make use of suitable planning conditions (or a legal agreement, where appropriate) to ensure the decommissioning of developments and site restoration when they reach the end of their design life, taking into account any proposed after use of the site.

It also encourages developers (paragraph 6.241) to proactively engage with key stakeholders, including the local community and, having taken account of any views received, consider how to avoid or minimise any adverse impacts through the choice of location, siting, scale, and design being proposed.

UK Marine Policy Statement

The UK Marine Policy Statement (MPS) was published in September 2011 under the Marine Coastal Access Act 2009 and provides the policy framework for the marine planning system and taking decisions affecting the marine environment. The MPS provides the high-level policy context within which marine plans will be developed and monitored and will ensure consistency in marine planning across the UK marine area. The MPS will contribute to the achievement of sustainable development in the United Kingdom marine area. Although the Borough does not directly connect to a coastline, waterways will have connectivity to marine areas, therefore the draft Plan Strategy has had regard to the MPS.

Draft Marine Plan for Northern Ireland

The draft Marine Plan for Northern Ireland has been prepared under the Marine and Coastal Access Act 2009 (MCAA) and the Marine Act (Northern Ireland) 2013 (The Marine Act) and within the framework of the UK Marine Policy Statement. Published in April 2018, it provides a framework of policies to be considered by public authorities taking decisions that affect or might affect the marine area. The Northern Ireland marine area is made up of an inshore and an offshore region. The marine area comprises all marine waters including seabed, subsoil, sea loughs and tidal rivers, so far as the tide flows at Mean High Water Spring Tide. Although the Borough does not directly connect to a coastline, waterways will have connectivity to marine areas, therefore the draft Marine Plan for NI has been taken into consideration in the preparation of the draft Plan Strategy.

Planning Policy Statements²

Planning Policy Statement 21 ‘Sustainable Development in the Countryside’ (PPS 21)

PPS 21 is the current operational planning policy that development proposals in the countryside are primarily considered under.

² Following the publication of Edition 2 of the SPPS, Planning Policy Statement 18: Renewable Energy (August 2009) was cancelled. Its provisions ceased to have effect and as such it will no longer be a material consideration.

The policy objectives of PPS21 are retained by the SPPS and are:

- manage growth in the countryside to achieve appropriate and sustainable patterns of development that meet the essential needs of a vibrant rural community;
- to conserve the landscape and natural resources of the rural area and to protect it from excessive, inappropriate or obtrusive development and from the actual or potential effects of pollution;
- to facilitate development necessary to achieve a sustainable rural economy; including appropriate farm diversification and other economic activity; and
- to promote high standards in the design, siting and landscaping of development in the countryside

Supplementary Planning Guidance

Best Practice Guidance to Planning Policy Statement 18 ‘Renewable Energy’ (2009)

The Best Practice Guidance to Planning Policy Statement 18 ‘Renewable Energy’³ provides background information on the various renewable energy technologies that may come forward in Northern Ireland and is designed to contribute to the development management process.

Wind Energy Development in Northern Ireland’s Landscapes (2010)

This document provides broad, strategic guidance in relation to the visual and landscape impacts of wind energy development. The guidance is based on the sensitivity of Northern Ireland’s landscapes to wind energy development for each of the 130 Landscape Character Areas (LCAs) in Northern Ireland. Each LCA is given an overall sensitivity level using a five point scale from high to low sensitivity. The publication provides guiding principles for site selection, layout and design of wind energy developments, the assessment of landscape and associated sensitivities, opportunities and challenges.

It identifies that careful consideration must be given to distinctive landscape areas including the Lough Neagh Basin, South Armagh Hills and the foothills of Slieve Croob when considering wind energy proposals. Each of the three areas above contain significant portions within the Borough (Areas as defined in the Draft NIRLCA: Northern Ireland Regional Landscape Character Assessment published April 2015).

The Northern Ireland Landscape Character Assessment 2000 identified a secondary tier to AONBS in the hierarchy of special landscapes, Areas of Scenic Quality (ASQ). The location of these ASQs is shown in that report, and their boundaries are often included in development plans where they may be designated as Areas of High Scenic Value (AoHSV). All these landscapes are recognised not only for their special scenic qualities but also for their natural and cultural heritage value.

Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside (2012)

‘Building on Tradition’ acknowledges that schemes that are in accordance with the highest standards of environmental design and energy efficiency will reduce costs over the lifetime of the development and result in healthier environments. It identifies a range of design measures

³ Whilst Planning Policy Statement 18: Renewable Energy (August 2009) was cancelled following publication of Edition 2 of the SPPS, the guidance contained in Best Practice Guidance to PPS 18 - Renewable Energy will continue to have effect (where relevant) unless and until such guidance is updated, revised or replaced by new Departmental guidance.

that seek to conserve finite resources, including the siting of buildings in sheltered areas to take advantage of the potential for energy conservation and renewable energy generation and the positioning of smaller windows on north facing elevations, with larger windows on southern elevations, to increase solar gain.

The design guide supports maximising opportunities for capturing and providing energy, encouraging integration of renewable energy in the form of active solar technology, ground source heat pumps (GSHP), air and water pumps and micro combined heat and power (CHP) systems. It also highlights that small scale wind turbines and hydrogen fuel cells could become cost effective and sustainable means of supplying the energy requirements for individual buildings whilst biomass heating systems also provide a sustainable source of heating and hot water. Whilst encouraging the application of renewable energy technology, the design guide emphasises that all externally visible forms of micro renewable energy operation will need to be sensitively sited.

Further Guidance

Further guidance in respect of renewable energy is set out in the following documents:

- (Draft) Supplementary Planning Guidance: Anaerobic Digestion- provides additional advice and guidance specific to anaerobic digestion (AD) to complement information already set out in the Best Practice Guidance to PPS 18, detailed above.
- NIEA SPG – Wind Energy Development in Northern Ireland
- DCAN 10 Environmental Impact Assessment

Relevant Consultations

- Call for evidence on A Future Focused Review of the Strategic Planning Policy Statement (SPPS) on the issue of Climate Change (January-March 2024)
- Department of Finance Public Consultation - Review of energy efficiency requirements and related areas of Building Regulations (July – November 2023)
- Department for the Economy Consultation on Support for Low Carbon Heating in Residential Buildings (2024)
- Department for Agriculture, Environment and Rural Affairs Consultation on Northern Ireland's 2030 & 2040 Emissions Reduction Targets & First Three Carbon Budgets & Seeking views on Climate Change Committee (CCC) Advice Report: The path to a Net Zero Northern Ireland (2023)

Other Strategies, Plans and Documents

Everyone's Involved - Sustainable Development Strategy 2010 (Northern Ireland Executive)

The Sustainable Development Strategy, 'Everyone's Involved' identifies six priority areas which provide the framework for the actions that Departments will take in support of sustainable development.

Priority Action 3, 'Driving sustainable, long-term investment in key infrastructure to support economic and social development' acknowledges that the commitment to a sustainable future must be built around an infrastructural legacy that will support the transformation to sustainability. In order to achieve this, the Strategy identifies that this will require a commitment to the concept that future infrastructural provision will enable high quality services, sustainable transport, resource efficiency, energy efficiency and renewable energy employment.

Priority Action 5, 'Ensuring reliable, affordable and sustainable energy provision and reducing our carbon footprint' highlights the importance of promoting energy efficiency, reducing the amount of fossil fuels we need by promoting renewable energy.

The Sustainable Development Strategy seeks to achieve 'an appropriate balance between the responsible use and protection of natural resources in support of a better quality of life and a better-quality environment.' It highlights that in all aspects of our lives, from development planning to waste management, that we must be aware of our environment as a finite resource and that we need to recognise the need to live within environmental limits, acknowledging how our consumption of natural resources affects the ability of the natural environment to support us in the future.

UK Housing- Fit for the Future? (2019, Climate Change Committee)

The UK Housing- Fit for the Future? report assesses whether the UK's housing stock is adequately prepared for the challenges of climate change; both in terms of reducing emissions from UK homes and ensuring homes are adequately prepared for the impacts of climate change.

One of the priorities for Government action, suggested by the report, includes retrofitting existing homes so that they are low carbon, low-energy and resilient to a changing climate. The Report recommends that homes should use low-carbon sources of heating such as heat pumps and heat networks, and the uptake of energy efficiency measures such as loft and wall insulation must be increased. It also suggests that upgrades or repairs to homes should include increasing the uptake of passive cooling measures (shading and ventilation); measures to reduce indoor moisture; improved air quality and water efficiency; and, in homes at risk of flooding, the installation of property-level flood protection.

Another of the priorities identified by the report is that new homes must be built to be low-carbon, energy and water efficient and climate resilient. It acknowledges that the costs of building to a specification that achieves the aims set out in this report are not prohibitive, and getting design right from the outset is vastly cheaper than forcing retrofit later.

Draft Green Growth Strategy for Northern Ireland (2021, DAERA on behalf of the Northern Ireland Executive)

The Draft Green Growth Strategy for Northern Ireland acknowledges that continuing to meet consumption by traditional methods and unsustainable use of natural resources is having a damaging impact on our environment.

As such, the Strategy highlights that every country must urgently reduce the greenhouse gases they produce and that radical change is required in order to tackle climate change. It recognises that an opportunity exists for Northern Ireland to embrace its world-famous innovation, by examining things can be done differently, more efficiently and within a circular economy.

The Strategy considers that balancing climate and environment action with economic ambition can be achieved by following a number of high level Green Growth principles, including decarbonisation and respecting our planet, and ensuring they are at the core of all future policy development.

Northern Ireland Energy Strategy 'The Path to Net Zero Energy' 2021 (DfE)

The Northern Ireland Energy Strategy aims to ensure that Northern Ireland has an affordable, secure and clean energy system for current and future generations. As such, the Strategy

sets out a pathway for energy to 2030 that will help to achieve the vision of net zero carbon and affordable energy by 2050.

The Strategy defines net zero carbon energy as when ‘overall greenhouse gas emissions from energy are zero’ and highlights that this will require a reduction in the emissions from energy used for transport, electricity generation etc. and removing any remaining emissions with schemes that offset an equivalent amount from the atmosphere.

In order to achieve this vision, the Strategy outlines three targets:

1. Energy Efficiency: Deliver energy savings of 25% from buildings and industry by 2030.
2. Renewables: Meet at least 70% of electricity consumption from a diverse mix of renewable sources by 2030.
3. Green Economy: Double the size of the low carbon and renewable energy economy to a turnover of more than 2 billion by 2030.

Two of the five key principles of the Strategy are of particular significance:

‘Replace fossil fuels with renewable energy’- phasing out of fossil fuels by growing the indigenous renewable base, supported by sustainable renewable imports and use these to decarbonise power, heat and transport.

‘Create a flexible, resilient and integrated energy system’- create a flexible, smart and digitised energy system that integrate renewables across heat, power and transport, create value for customers and enhance security of supply.

The Strategy acknowledges that although Northern Ireland has been successful at utilising its natural resources to meet its electricity needs, particularly wind resources, a significant proportion of its electricity consumption still comes from fossil fuels. It identifies that in order to achieve a renewable electricity consumption target of 70%⁴ the renewable generating capacity will need to be doubled in order to meet demand. The Strategy highlights that this will involve a more diverse renewables base with back up from more conventional plant and the introduction of less familiar technologies.

The Strategy highlights that the pathway to decarbonising heat is complex and will include a range of technologies, however these will need to be fully considered to ensure they do not lead to adverse impacts on human health or the environment. The Strategy acknowledges that whilst expertise will be developed in the installation and use of a range of low carbon technologies over the next ten years, there is greater uncertainty about the future balance of existing and energy sources and technologies in our energy system. Whilst the Strategy anticipates that some new technologies will become more cost effective, such as electrolyzers, floating platform offshore wind and carbon capture, usage and storage this will be dependent on their future development over the coming years.

Energy in Northern Ireland 2024 (June 2024) (DfE / NISRA)

‘Energy in Northern Ireland 2024’ aims to provide a ‘comprehensive and accessible overview of key statistics and information relating to energy in Northern Ireland’.

Energy in Northern Ireland 2024 includes a variety of statistics and information, including renewable energy generation, in Northern Ireland which has been used to inform Section 4.0 of this Technical Supplement.

Draft Investment Strategy for NI 2050 (ISNI, 2022)

⁴ Whilst the Northern Ireland Energy Strategy ‘Path to Net Zero Energy’ established a renewable electricity consumption target of 70% by 2030 this was then increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022 (Sectoral Plan for the Department for the Economy).

The Strategy highlights that around 42% of our energy is generated from renewable sources, exceeding the target of 40% target that was set by 2020. Despite this, the Strategy acknowledges that more than 65,000 homes still remain reliant on oil heating and whilst the roll-out of the natural gas network has been a notable achievement, this been mainly in urban areas.

The Strategy identifies that more properties need to be linked to the grid and that the system must be decarbonised, however it highlights that the gas transmission and distribution infrastructure in Northern Ireland is relatively new compared to other jurisdictions which means that Northern Ireland is relatively better placed to 'manage the transition to a low-carbon gas mix'. One of the Strategies 'Strategic Investment Priorities: What We Need to Do to Decarbonise Our Economy, Assets and Society' identifies that decarbonisation of our utilities will be achieved by improving energy efficiency and diversified renewable energy generation, storage and distribution, including solar, hydrogen, off- and on-shore wind.

Shaping Our Electricity Future Roadmap Version 1.1 (2023, SONI & EirGrid)

The Shaping Our Electricity Future roadmap acknowledges that the electricity grid requires unprecedented change in the lead up to 2030 and as such its main objective is to outline how the grid can be mobilised so that 80% of Ireland's and Northern Ireland's electricity can come from renewable sources by 2030.

The roadmap highlights that although natural gas is expected to still be used to generate some electricity, renewable electricity will increasingly replace fossil fuels, such as oil and coal, and as such there will be increasing demand for electricity to facilitate other requirements, including transport and heating.

It also identifies that Ireland and Northern Ireland will need at least another 19 gigawatts (GW) of electricity from clean sources, approximately three times as much clean electricity compared to what is currently available. It acknowledged that in order to prepare for this demand, the electricity grid will need to be stronger, capable of carrying more power, and more flexible.

Environmental Improvement Plan for Northern Ireland (DAERA, 2024)

The Environmental Improvement Plan (EIP), which forms part of the Green Growth Agenda, acknowledges that Northern Ireland faces a range of local environmental challenges including habitat and species loss, greenhouse gas emissions, climate change, waste management and water / soil / air quality.

The Plan sets out six Strategic Environmental Outcomes, based around DAERAs core vision of 'sustainability at the heart of a living, working, active landscape valued by everyone'. Outcomes of particular relevance to this subject area include:

- Excellent air, water and land quality- includes actions and targets such as investment in sewage infrastructure & treatment works, the development of improved monitoring and data collection to enable the impacts of energy decarbonisation policies on air quality to be measured and the achievement of sustainable management and efficient use of natural resources including water & soils by 2031
- Sustainable production and consumption on land and at sea- includes actions and targets such as the development of an action plan to deliver 1GW of offshore wind from 2030, development of low carbon heat demonstrator projects and increase overall recycling of packaging to 76% by 2031.

- Net zero greenhouse gas emissions and improved climate resilience and adaptability- includes actions and targets such as publication of Northern Ireland’s first Climate Action Plan, publication of a Nature based Solutions Plan to enhance ecological and climate resilience and the development of new legislation to ensure greenhouse gas emissions reduction targets for the years 2030 and 2040 are in line with the Climate Change Act’s net zero by 2050 target.

Draft Northern Ireland Climate Action Plan 2023-2027 (2025, DAERA, on Behalf of the NI Executive)

The draft Climate Action Plan sets out a road map, consisting of fifty-two ambitious policies, proposals and actions aimed at reducing emissions and achieving the first carbon budget for Northern Ireland⁵. The policies and proposals are arranged into nine sectors: energy production and supply, business and industrial processes, residential and public buildings, transport, land use, land use change and forestry, waste management, fisheries and agriculture.

The draft Climate Action Plan acknowledges that planning policy and planning decisions both have significant roles to play in enabling the delivery of climate action and emphasises that the planning system should ‘positively and proactively facilitate development that contributes to a more socially, economically and environmentally sustainable Northern Ireland’. It also recognises the importance of ensuring that the legislative, policy and guidance frameworks for plan making and decision making is appropriate and suitably future proofed, so that planning authorities- through the LDP and planning decisions- continue to contribute to the wider efforts of government in addressing the climate emergency.

Policies, proposals and actions outlined within the draft Climate Action Plan that are of particular relevance to this topic include introduction of a new Renewable Electricity Support Scheme and the development of legislative changes to facilitate greater connection of energy storage facilities to the network.

draft Third Northern Ireland Climate Change Adaptation Programme (NICCAP3) (2025, DAERA)

The Draft NICCAP 3 sets out the framework and vision for a future where Northern Ireland is well-adapted and resilient to the impacts of climate change, acknowledging the economic, social, health and environmental benefits that this will bring. It emphasises that the challenge of climate change must be tackled on two fronts, climate change mitigation and climate change adaptation. This involves limiting increases to global temperatures by reducing GHG emissions and achieving net zero whilst also recognising that we must adapt to the climate impacts that exist because of historic emissions, so that our environment, society and economy are robust and resilient.

The Draft NICCAP 3 highlights that the Climate Change Committee’s (CCC) independent review of NICCAP2 emphasised that further action is required in relation to energy supply in NI to meet future adaptation needs. It identifies that the provision of a resilient, renewable energy system supplied from a diverse mix of sources and supported by resilient network infrastructure will ensure a reliable energy supply that limits the potential for power outages. Additionally, it highlights that climate change projections indicate that severe weather events, will become more frequent, emphasising the need for the energy system to be ‘climate resilient

⁵ In the first carbon budget (2023-2027) greenhouse gases emissions need to reduce by an annual average of 33% from the 1990 baseline emission levels across the five-year period

in its design, supply diversity and storage capacity' to ensure that generation and supply will continue during periods of low rainfall, low wind speeds and poor weather.

Northern Ireland Peatland Strategy to 2040 (2025, DAERA)

The NI Peatland Strategy acknowledges that renewable energy plays a vital role in mitigating the impacts of climate change and highlights that many wind farms are located on peatlands due to their typically windy and remote locations. The Strategy acknowledges that wind farm development can impact peatland during the construction, operational and de-commissioning stages. It also highlights that Habitat Management Plans provide an important opportunity to restore degraded areas of peatland.

Path to Net Zero- Action Plan 2024 (DfE, 2025)

The Energy Strategy Action Plan for 2024, delivered in the context of the Climate Change (Northern Ireland) Act 2022, outlines some of the key actions being delivered as part of the Executive's Energy Strategy - The Path to Net Zero Energy, detailed above.

The Action Plan focuses on the strategic priorities:

- Replacing Fossil Fuels;
- Improving Energy Efficiency;
- Growing Renewable Electricity;
- Supporting the Electricity Grid; and
- Growing the Green economy.

Actions include publishing a consultation on the future of domestic energy efficiency support and delivery, identifying solutions to rapidly increase the quantity of onshore renewables on the electricity grid and the publication of new regional strategic planning policy on renewable and low carbon energy. The Action Plan is updated annually and is available on the Department for the Economy's website.

Mid-term Review of the Energy Strategy- The Path to Net Zero Energy (DfE, 2025)

The purpose of the Mid-term Review of the Energy Strategy is to set out the progress that is being made in the delivery of the Energy Strategy: The Path to Net Zero Energy (2021). It seeks to highlight both achievements and constraints, provide a clear account of progress and set out the Department for the Economy's plans for implementation of the Northern Ireland Audit Office recommendations in its report on the delivery of the Energy Strategy.

Additional Strategies, Plans and Documents of the relevance to this subject area include:

- The Onshore Renewable Energy Action Plan 2013-2020 (OREAP) (DETI November 2013)
- Communities and Renewable Energy: A Study (2015, commissioned by DETI, DoE and DARD)
- Investment Strategy for Northern Ireland 2011- 2021 'Building a Better Future' (ISNI, 2015)
- Sustainable Energy Action Plan 2012-2015 and beyond (DfE)
- NI Climate Change Adaption Plan 2019-2024 (Second Edition) (DAERA, 2019)
- Future of Renewables in Northern Ireland (Prepared for Department for the Economy, 2020)
- Net Zero Pathways- Building the geothermal energy sector in Northern Ireland (prepared by Queen's University Belfast for the Department for the Economy and the Geothermal Advisory Committee, 2022)
- Transmission Development Plan for Northern Ireland 2025-2034 (SONI)

- Environment Strategy for Northern Ireland (2022, DAERA)
- Advice report: The path to a Net Zero Northern Ireland (Climate Change Committee, 2023)
- Energy Strategy- Adapting to climate change - Progress in Northern Ireland (Climate Change Committee, 2023)
- Lough Neagh Report and Action Plan - Blue Green Algae and Water Quality in Northern Ireland (DAERA in conjunction with DfI and NIW, 2024)
- The Housing Supply Strategy 2024 – 2039 (2024, DFC)
- Northern Ireland's Fourth Climate Budget (2025, Climate Change Committee)

Local Policy Context

The key pieces of local policy relating to this subject area include the following:

Existing Area Plans

The existing 4 statutory Area Plans covering the Borough provide the policy framework against which development proposals are considered.

- The Armagh Area Plan (AAP) 2004
- The Armagh Area Plan Alteration No 1: Countryside Proposals
- The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015
- The Craigavon Area Plan (CAP) 2010
- The Dungannon and South Tyrone Area Plan (DSTAP) 2010

Due to the varying ages of the extant Development Plans, there are inconsistencies in approach with regards to a number of planning issues as well as the degree of emphasis in respect of the principles of sustainable development. However, the existing Plans are an important consideration in the LDP process, and as such have been considered in the development of the draft Plan Strategy.

Whilst the statutory plans do not include any specific policies in relation to this topic, the Banbridge Newry and Mourne, Craigavon and Dungannon and South Tyrone Area Plans refer to Planning Policy Statement 18 for further direction and guidance in respect of renewable energy development.

The SPPS's transitional arrangements provide for continuity until such times as a new LDP for the whole of the council area is adopted to ensure continuity in planning policy for taking planning decisions. All of the extant Plans will be superseded following the adoption of the new Local Development Plan.

Other Council Documents and Strategies

City / Town Centre Masterplans

Whilst the Area Plans provide the statutory planning framework for land use proposals, City / Town Centre Masterplans are non-statutory documents which focus on regeneration initiatives and public realm improvements in our town centres.

City / Town Centre Masterplans set out a vision for a particular City / Town Centre and identify key proposals for realising that vision over a set period. Prior to the publication of the Council's Place Plans, Armagh had a City Centre Masterplan in place, Banbridge Town Centre Masterplan 2016 set out the regeneration objectives for Banbridge and Dromore Town Centre Master Plan defined a vision of how Dromore town centre could be transformed 2015-30. The Masterplans informed the direction of the Place Plans and had been considered during the

POP and early policy development but have since been superseded by Place Plans for each respective settlement.

The Craigavon, Lurgan and Portadown Place Plans are still in the development stage, with a draft document for public consultation anticipated in early 2027. Regeneration strategies for Craigavon, Portadown and Lurgan are contained within the Craigavon Integrated Development Framework (CIDF) until the publication of the respective Place Plans.

‘Our People, Our Place, Our Future’- The Council’s Corporate Plan 2023 – 2027

The Corporate Plan 2023-27 sets out the vision, values and priorities of the Council and represents its aspirations and dedication to continuous improvement. The priority of the Corporate Plan is to improve economic, social and environmental well-being through place shaping in order to attract visitors, investors, and to encourage people to be active, with a focus on promoting health and wellbeing.

The Corporate Plan proposes five priorities, each with three commitments outlining what the Council are going to do alongside actions aimed at achieving the commitments. The priority and associated commitments of particular relevance to this subject area is as follows:

Priority 1 ‘Environment and Place’ Commitments:

- Actively respond to the climate crisis and support others to do likewise
- Seek investment to preserve the uniqueness of our heritage and places
- Shape our places to be attractive, accessible, healthy, safe, and clean.

Actions for Priority 1 include the development of a Climate Action Plan and the creation of a community and business climate tool kit and associated green initiatives.

The Corporate Plan acknowledges that the environment plays a critical role in sustainably planning for the future, underpinning the wellbeing of societies, economies, and ecosystems. It also highlights the Council’s commitment to addressing climate change and supporting efforts to reduce carbon emissions, generate and use energy more cleanly so that the Borough remains a progressive and vibrant place to live, work and visit.

Connected a Community Plan for Armagh City, Banbridge & Craigavon Borough 2017-2030

Councils across Northern Ireland have a statutory responsibility to participate and lead in Community Planning. The Local Government (Northern Ireland) Act 2014 and the Planning Act (Northern Ireland) 2011 create a statutory link between the Community Plan and the LDP. It outlines that the LDP will provide ‘the spatial expression of the Community Plan.’

The Council’s Community Plan is an overarching strategy for the Armagh City, Banbridge and Craigavon Borough. ‘Connected’ was launched on 4th May 2017 and updated in 2025.. It provides a strategic framework for collaborative working, helping to integrate other local and regional strategies and the delivery of positive change for communities. The Community Plan will be taken into account throughout the preparation of the LDP, which will provide the spatial reflection of the Community Plan.

The Community Plan 2030 Vision is ‘We have a happy, healthy and connected community, a vibrant and sustainable economy and appealing places for living, working and learning.’

The Community Plan aims to achieve the vision through three strategic themes of *Community*, *Economy* and *Place* and nine shared outcomes, as follows:

1. *Community*: Connected | Healthy | Welcoming
2. *Economy*: Enterprising | Inclusive | Skilled
3. *Place*: Creative | Revitalised | Sustainable

The three cross-cutting themes at the centre of the Community Plan are: *Connectivity*, *Equality* and *Sustainability*. These form the foundation of and underpin the Plan. The Community Plan identifies strong strategic alignment, including with the Programme for Government.

Due to the close relationship between the two plans, the LDP Vision will be based on the Community Plan Vision; citizen focused and aspiring to improve the quality of life for everyone. However, within the LDP, emphasis will be placed on land use and the creation of quality places.

Whilst the Community Plan makes no specific reference to renewable and low carbon energy, it identifies sustainability as a cross-cutting theme which seeks to ‘improve everyone’s quality of life economically, environmentally and socially, without compromising future generations’ ability to develop, grow and flourish’. The use of renewable energy can contribute towards improving the health and wellbeing of our citizens, through reduced reliance on fossil fuel and the resultant improvement in air quality. The LDP, as the spatial reflection of the Community Plan, has an important role in facilitating the appropriate siting of renewable energy development, so our daily lives and environment can be improved by the benefits that arise from having a clean, secure energy supply.

Craigavon Integrated Development Framework (CIDF) (2010)

The purpose of the CIDF is to guide how the town centres of Central Craigavon, Portadown and Lurgan will develop and thrive over the next 20 years and sets out a strategy for regeneration.

It focuses on achieving an integrated vision for the 3 centres as the complete package- where they will be three complementary and successful centres all with a unique offer, each having a distinct role and identity and each benefiting from a greatly enhanced environment and range of facilities. The CIDF aims to project this vision through scores of individual actions, projects and development schemes that will strengthen each individual centre and contribute to the overall regeneration of Craigavon.

The Armagh Place Plan (2022)

The Armagh Place Plan details the aspirations for the city that will be taken forward as a shared agenda for Armagh through collaborative partnership working. The four key themes for development focus on making Armagh; a connected city, a greener city, an engaged city and a healthy city.

The Place Plan identifies that in order for Armagh to lead the way in sustainable and green thinking, we need to invest in the jobs and skills in emerging sectors that will transition us away from fossil fuel industries. This will involve new economic opportunities in retrofitting buildings, renewable energy, social economy, digital skills and advanced manufacturing.

The Banbridge Place Plan (2024)

The Armagh, Banbridge and Craigavon Community Planning Partnership launched the Banbridge Place Plan on 20 March 2024.

The Plan is designed around 5 outcomes; Bridging Banbridge, Green Banbridge, Healthy Banbridge, Creative Banbridge, and Growing Banbridge. The plan identifies 56 actions to bring about positive change in Banbridge. The theme of particular relevance to this subject area is 'Green Innovation', with associated actions including research initiatives such as zero waste, rewilding, tree planting, carbon neutral and sustainable travel.

Dromore Place Plan (2025)

The Armagh, Banbridge and Craigavon Community Planning Partnership launched the Dromore Place Plan on 7 May 2025.

It outlines a strategic vision for the place and sets out five outcomes which are aimed at enhancing the quality of life for the residents, preserving the unique character of the area whilst stimulating economic growth.

The plan details four big ideas, and six thematic clusters comprising of thirty-seven suggested actions, serving as a road map for the community planning partners, stakeholders, businesses and local community groups, designed to help with the shaping, transformation and development of Dromore into the future.

Recovery & Growth Framework (2021)

The ABC Recovery and Growth Framework was launched in February 2021 and focuses on how the Council can create the right social and economic conditions to help the borough recover from the covid pandemic and drive sustainable long-term growth for the region.

It sets out a series of aims which will meet the needs of companies within the borough, such as boosting tourism and footfall in towns, and delivering support to business of all sizes, as well as longer-term interventions which will boost efficiency and competitiveness.

The Framework emphasises the regional focus on driving economic investment for Northern Ireland around key sectors such as; agri-food, health and life sciences and advanced manufacturing, where the borough already excels and which, with support to improve skills, connectivity, and productivity, can become global exemplars.

It addresses the need for a specific focus on the case for investment in sustainable roads and rail infrastructure, for urban regeneration and rural development; for education and training to upskill the talent pool; for support of technological developments including Industry and investment in manufacturing research & development; and a commitment to driving regional competitiveness through the development of a start-up and innovative business ecosystem.

These targeted actions are aimed at accelerating the borough's recovery and set it on a path of renewed inclusive growth and prosperity.

Armagh City, Banbridge and Craigavon Borough Council Air Quality Action Plan 2022-2024

The Air Quality Action Plan was prepared in accordance with the Council's statutory duties under the Environment (NI) Order 2000. Through Local Air Quality Management actions the Plan seeks to reduce inefficient and unnecessary releases of combustion emissions to the atmosphere and reduce man-made impacts of carbon dioxide. As such, it aims to improve the sustainability of the Borough and improve air quality for all residents, workers and visitors.

The Action Plan welcomes the Government's commitment in the "Road to Zero" Strategy to end the sale of new petrol and diesel vehicles in the UK by 2040, a target that was subsequently brought forward by successive administrations, first to 2035 and then to 2030.

However, it recognises that the success of such an ambitious proposal hinges on producing enough clean energy to power the new fleet and making it cost and time-effective to purchase and re-charge individual vehicles. In turn it acknowledges that such infrastructure requires an increase in renewable energy developments and the development of a bridge from fossil fuel combustion to renewable.

Local Development Plan – Development Pressure Analysis (Technical Supplement 8)

The Development Pressure Analysis seeks to identify areas in the countryside where significant development pressure has occurred and/or where local rural character is under threat from significant change. Given the prevalence of wind energy applications within the Borough over the last 15-20 years, and the potential for such development to have a significant visual impact upon the rural area, an assessment of wind energy development was included as part of the LDP Development Pressure Analysis. The findings of the Development Pressure Analysis, contributes towards the evidence base informing the LDP's strategic approach towards the countryside. This includes the development of the LDP's Countryside Strategy, including the Strategic Landscape Designation and complementary Strategic Policy recommended above, as well as the operational planning policies relating to renewable and low carbon energy development. See Technical Supplement 8 for further information including the methodology, findings and conclusions of the Development Pressure Analysis.

Local Development Plan - Landscape Character Assessment (LCA) (Technical Supplement 9)

The Landscape Character Assessment (LCA) forms part of the evidence base informing the Local Development Plan (LDP). It provides an updated understanding of the Borough's landscapes, building on the Northern Ireland Landscape Character Assessment (2000). The assessment identifies and evaluates the key characteristics, condition, value, vulnerability and sensitivity of landscape character areas located wholly or partly within the Borough and considers the extent to which they have been influenced by development pressures, land use change, renewable and low-carbon energy development, agricultural practices, recreation, infrastructure provision, and wider social and environmental trends.

The LCA provides an objective and evidence-based understanding of landscape character and its contribution to local distinctiveness, sense of place, cultural heritage, visual amenity and the well-being of residents and visitors.

The findings of the LCA have informed the preparation of landscape related planning policies, including the identification of the most valued, vulnerable and sensitive landscapes within the Borough. In doing so, the assessment helps ensure that the LDP promotes sustainable development, protects and enhances important landscape assets, and provides clear guidance for future decision-making so that landscape change is positively managed for current and future generations.

4.0 Borough Profile – Renewable and Low Carbon Energy

Northern Ireland Renewable Electricity Consumption and Net Emission Targets

The Northern Ireland Energy Strategy 'Path to Net Zero Energy' (Department for the Economy) sets a long-term vision of net zero carbon and affordable energy for Northern Ireland. It sets out a target to "Meet at least 70% of electricity consumption from a diverse mix of renewable sources by 2030". It recognises that to achieve this objective "A renewable electricity consumption target of at least 70% likely means that we will need to double our renewable generating capacity in order to meet new demands from heating our homes and powering our vehicles".

The renewable electricity consumption target of 70% by 2030 was increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022. Additionally, the Act set a target of at least a 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 (i.e. net zero emissions by 2050) for Northern Ireland compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030.

Greenhouse Gas Emissions in Northern Ireland

UK local and regional greenhouse gas emissions statistics, 2005 to 2024 (June 2026, Department for Energy Security & Net Zero)

Key Findings of the 2005-2024 statistics in relation to Northern Ireland greenhouse gas emissions include:

- Between 2005 and 2024, greenhouse gas emissions fell by 27% in Northern Ireland, compared to 42% in Scotland, 46% in Wales, and 46% in England.
- Northern Ireland has the highest emissions per capita from agriculture (3.0 tCO₂e per person), land use, land use change and forestry (1.1 tCO₂e per person), domestic (1.6 tCO₂e per person), and waste (0.5 tCO₂e per person) sectors.
- Northern Ireland has the highest Land use, land use change and forestry (LULUCF) emissions per capita, due to the clearing of land for the maintenance and creation of settlements and croplands.

Projected Greenhouse Gas Emissions in Northern Ireland

NI Greenhouse Gas Projections Update (Statistics and Analytical Services Branch, DAERA, 2024)

The NI Greenhouse Gas Projections report provides an estimate of emissions of greenhouse gases in Northern Ireland from 2022 to 2032. The projection based on the 1990 to 2021 inventory is that greenhouse gas emissions in Northern Ireland will reduce by 33% between the base year and 2032 to 20 MtCO₂e.

The Report highlights that from 2021 to 2032 there is a projected gradual reduction in Northern Ireland's greenhouse gas emissions. It is expected that the greenhouse gas emissions will decrease year-on-year with an overall estimated reduction of 13% from 2021 to 2032. The Report suggests that the downward trend is largely driven by the energy supply sector as coal-fired electricity generation comes to an end and electricity generation switches to using more gas and renewables. It also identifies that the business and residential sectors also play a considerable role, contributing almost a third of the overall reduction in emissions from 2021 to 2032.

Other findings of the report include⁶:

Agricultural Sector- Agriculture was the largest source of emissions for NI in 2021 at 28%. The Report highlights that this share is expected to increase to 31% in 2032 as other sectors reduce emissions at a faster rate. It also identifies that between the base year and 2021, the agricultural sector increased emissions by 15% and with the current projections, emissions for the agricultural sector are expected to reduce by 1% between 2021 and 2032, giving an overall projected increase in emissions of 14% from the base year to 2032.

Transportation Sector- Between the base year and 2021, transport emissions in Northern Ireland decreased by 3% and are projected to decrease by 7% from 2021 to 2032. The Report identifies that between the base year and 2032, the projected 4% decrease in emissions from transport may largely be due to new CO₂ regulations for cars, vans and HGVs and the expected increase in the uptake of electric vehicles.

Residential Sector- Between the base year and 2021, residential emissions in Northern Ireland have fallen by 25%. The Report highlights that the projections estimated decline will be maintained with a 15% decrease between 2021 and 2032, resulting in an overall decrease of 36% between the base year and 2032.

Energy Supply Sector- The Report highlights that emissions from energy supply have made the biggest contribution to the NI overall decrease from the base year to 2021 with a 42% decrease. It identifies that the emissions from the energy supply sector are expected to continue decreasing with a projected reduction of 49% between 2021 and 2032, resulting in a total projected decrease in emissions from this sector of 70% by 2032. Additionally, the Report highlights that overall demand for electricity is expected to increase over the projected period, driven by the heat and transport sectors which are expected to increase due to predicted growth in the uptake of heat pumps and electric vehicles.

Business Sector- Between the base year and 2021 emissions from the business sector have fallen by 37% in Northern Ireland. The Report identifies that the decline will continue with a 15% decrease between 2021 and 2032, resulting in an overall decrease of 46% between the base year and 2032.

Land Use, Land Use Change and Forestry (LULUCF)- the Report identifies that LULUCF emissions decreased by 18% between the base year and 2021. The projections estimate that there will be a 2% decrease in emissions from this sector between 2021 and 2032, resulting in an overall decrease of 19% from the base year to 2032.

Northern Ireland Electricity Network Development⁷

The development of NI's electricity transmission and distribution networks are a key element in the roll-out of renewable energy. As a result of ongoing electrification of various sectors, such as transportation, the demand placed on the electricity network will inevitably continue to increase.

In recent years, the electricity network has required significant investment at both transmission and distribution levels, with NIE Networks investing approximately £78m in the distribution network to facilitate renewable energy development.

⁶ The base year is 1990 for carbon dioxide, methane and nitrous oxide and 1995 for the F-gases.

⁷ Source of information: Future of Renewables in Northern Ireland (Prepared for Department for the Economy, 2020)

The Future of Renewables in Northern Ireland (DfE, 2020) anticipates that further generation will likely require a mixture of smart grid measures and capital works, such as network reinforcement and new builds.

In recent years, the electricity network has required significant investment at both transmission and distribution levels, with NIE Networks has investing approximately £78m in the distribution network to facilitate renewables. It is anticipated that further generation will likely require a mixture of smart grid measures and capital works, such as network reinforcement and new builds.

Northern Ireland's Electricity Transmission & Distribution Network

'Transmission' is the bulk transfer of electrical energy from large electricity generators to electrical substations whilst 'electricity distribution' relates to the local wiring between high-voltage substations and customers is referred to as electric power distribution.

The transmission network is operated by the System Operator for Northern Ireland (SONI) and ownership of the transmission system lies with Northern Ireland Electricity Networks Ltd (NIE Networks).

The transmission network is a network of interconnected systems consisting of substations, overhead pylons and underground cables. NIE Networks is responsible for transmission construction and maintenance and also operating the distribution network which transports electricity to customers in both the domestic and non-domestic sectors

Table 1, below, details the various elements of Northern Ireland's electricity network.

Transmission Lines (275kV, 110kV)	2,200km
Distribution Lines (33kV, 11kV, 6.6kV and 400/230V)	47,000km
Major Substations	300

Table 1: Northern Ireland's Transmission and Distribution Assets (Source of information: Future of Renewables in Northern Ireland (Prepared for Department for the Economy, 2020)

Renewable energy in Northern Ireland- Future network development

The level of network investment that is required to accommodate renewable energy development will depend on the extent to which renewable energy is rolled out.

Future of Renewables in Northern Ireland (Prepared for Department for the Economy, 2020) identifies that the extent of the transmission system development from 2020 to 2030 will depend on the following factors: -

- NI's renewable energy electricity targets for 2030;
- Connection method and location of renewable energy generation capacity required to meet the renewable energy electricity targets; and
- Connection policy adopted for new renewable energy generation capacity

As highlighted in Shaping Our Electricity Future Roadmap (Version 1.1, July 2023, SONI & EirGrid), the electricity grid requires unprecedented change in order to meet the renewable energy and carbon budget targets. It identifies that many projects are needed to reinforce the network infrastructure, acknowledging that whilst optimising the use of existing network infrastructure is key the use of innovative technologies could help to manage network congestion and maximise capacity.

The Shaping Our Electricity Future Roadmap (Version 1.1) proposes, alongside other committed projects, four large scale renewable hubs, and 16 network projects in Ireland alongside 3 three network projects in Northern Ireland. The projects proposed in Northern Ireland involve the uprating of existing circuits so that an existing line or cable is capable of taking more power at the same voltage and the development of new substations, which would allow new electricity generators or users to connect to the grid.

Further detail in respect of Northern Ireland's Electricity / Gas Generation and Consumption, Electricity Network Capacity and Gas Transmission / Distribution is detailed in Technical Supplement 14 'Telecommunications, Utilities and Infrastructure.'

Renewable Energy Generation and Consumption Statistics

Energy in Northern Ireland 2024⁸ (DfE, 2024⁹) highlighted a number of key points regarding renewable electricity in Northern Ireland:

- In 2023, 45.8% of electricity consumption in NI was generated from renewable sources.
- In 2022, there were slightly higher proportions of renewable electricity generation in Northern Ireland (44.3%) compared to 41.5% for the UK.
- In 2022, 10.9% of electricity generation in Northern Ireland was from coal compared to only 1.7% for the UK. However 14.7% of electricity generation in the UK was from nuclear sources, with no such generation in Northern Ireland.
- The rise in the volume of renewably generated electricity from 2009 to 2020 has been driven mainly by wind generation supplemented with an increasingly diverse mix of generation seen since 2015. Wind speeds significantly above or below average (which occurred in 2021) can have a marked effect on wind generation.
- In 2022, the low carbon and renewable energy economy turnover was £1.6 bn (2.3% of UK total) with 5,200 employees (1.9% of the UK total).
- In terms of electricity generation by fuel, in 2022 44.3% was generated by renewables compared to 44.6% by gas and 10.9% by coal.

⁸ Energy in Northern Ireland is a biennial publication that aims to provide a comprehensive and accessible overview of key statistics and information relating to energy in Northern Ireland. Current and previous versions of the publication are available on the Department for Economy Website.

⁹ Energy in Northern Ireland 2024 is informed by a number of sources, including SONI, NI Networks, the Office for National Statistics and the Department for Energy Security and Net Zero. Refer to <https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Energy-Northern-Ireland-2024-Report.pdf>

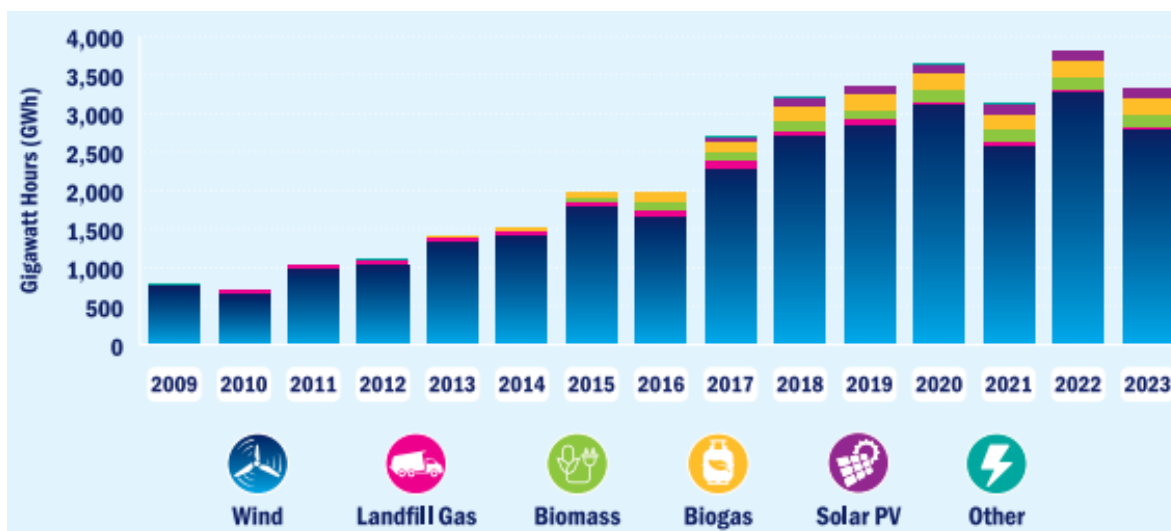


Figure 1: Annual Volume of Renewable Electricity Generated by Type of renewable source (Gigawatt Hours, GWh) 2009-2023 (Source: Energy in Northern Ireland 2024, DfE)

Figure 1 above, sourced from Energy in NI 2024, depicts the total volume of renewable electricity generation in Northern Ireland by type of renewable source from 2009 to 2023. It demonstrates that total renewable electricity generation volumes have increased substantially over this period. Whilst there was a fall in annual renewable generation between 2020 and 2021 this was due to the fall in wind generation due to lower wind speeds in 2021. Although wind energy remains the predominant contributor of renewable energy generation, it is evident in more recent years that the volume of electricity derived from other renewable sources, such as biomass, biogas and solar PV, is increasing, particularly from 2015 onwards.

Electricity Consumption and Renewable Generation in Northern Ireland - July 2024 to June 2025 (September 2025, Statistics Information, Analysis & Research Branch, Department for the Economy)

The September 2025 publication of 'Electricity Consumption and Renewable Generation in Northern Ireland' presents information on Renewable Electricity Generation for Northern Ireland from July 2024 to June 2025. It details information on the percentage of metered electricity consumption in Northern Ireland generated from renewable sources as well as information on the type of renewable generation.

The publication also helps to measure performance against the commitments in the Northern Ireland Energy Strategy 'Path to Net Zero Energy' and the Climate Change Act (NI) 2022 which sets a target to meet 80% of energy consumption from renewable sources by 2030.

Key results of the publication include:

- The consumption of renewable energy in Northern Ireland declined during the 12-month period from July 2024 to June 2025. During this period 43.1% of total electricity consumption was generated from renewable sources located in Northern Ireland, representing a decrease of 2.8 % on the previous 12-month period (July 2023- June 2024).
- During the period July 2024-June 2025, 7,251 Gigawatt Hours of total electricity was consumed in Northern Ireland, of which 3,123 Gigawatt Hours was generated from renewable sources located in Northern Ireland.

- As depicted in Figure 2, below, over the 12-month period from July 2024 to June 2025, 81.7% of all renewable electricity generated within Northern Ireland was generated from wind, representing a decline of 0.6% from the previous 12-month period (July 2023- June 2024). During July 2024-June 2025, 6.8% of all renewable electricity generated within Northern Ireland was generated from biogas, 5.1% was generated from biomass and 4% was generated from solar PV.

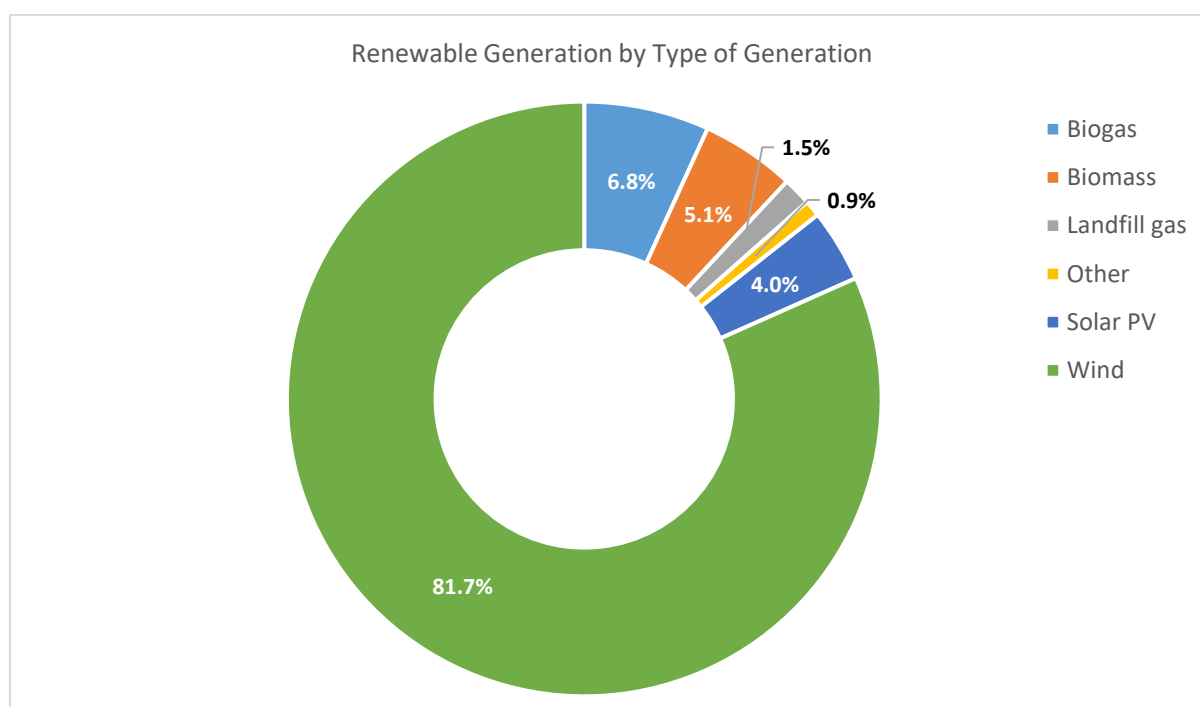


Figure 2: Renewable Energy Generation – Northern Ireland (July 2024-July 2025)¹⁰

Whilst there has been a very slight decrease in the amount of energy generated from wind it is important to note that wind energy still accounts for the majority of renewable energy generation in Northern Ireland. The publication notes that wind generation can be affected by a number of factors including changes in average wind speeds, dispatch down levels and a range of system and operational issues.

As highlighted in Figure 3 below, the Report identifies that electricity generation, from renewable sources located in Northern Ireland, has grown significantly over the last 10 years (from June 2015-June 2025). It also highlights that electricity generation from renewable sources can vary markedly from month to month, due to factors such as weather and changes in the stock of renewable generation facilities.

¹⁰ Source of Information: Electricity Consumption and Renewable Generation in Northern Ireland, Department for the Economy

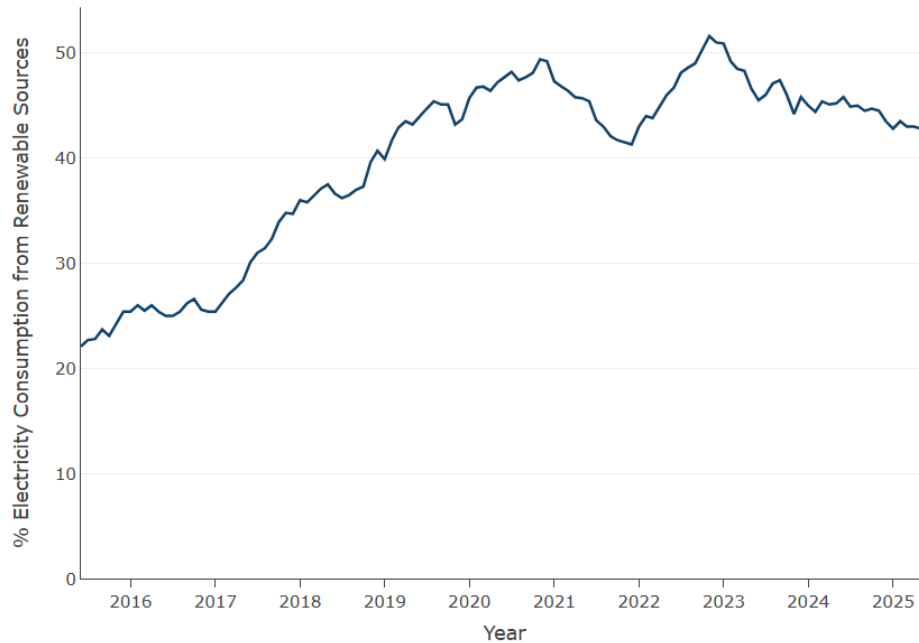


Figure 3: Indigenous renewable electricity generation as a percentage of electricity consumption in Northern Ireland (June 2015-June 2025)¹¹

Renewable Energy Planning Statistics

Northern Ireland planning statistics April 2024 - March 2025 (Published June 2025-Analysis, Statistics & Research Branch, Department for Infrastructure)

Note: The Publication was accompanied by the following caveat ‘There have been some key events in recent years that will have impacted on planning activity and processing performance. These were the coronavirus pandemic with varying restrictions in place up until February 2022; the accessibility of the system for some users for a period during January and February 2022, and a significant change in IT planning systems with the development and implementation of two new planning systems in June and December 2022. All these factors should be borne in mind when interpreting these figures and when making comparisons with other time periods.’

Findings in respect of renewable energy planning activity in NI:

- 97 No. renewable energy applications were received during the 2024/25 period; a decrease from 126 No. received during the previous year and well below the peak of applications received in 2011/12 (820 No.).
- 86 No. renewable energy applications were decided during the 2024/25 period; similar to the number decided in 2023/24 (87 No.)

¹¹ Source: Electricity Consumption and Renewable Generation in Northern Ireland - Electricity Consumption and Renewable Generation in Northern Ireland - July 2024 to June 2025 (September 2025, Statistics Information, Analysis & Research Branch, Department for the Economy)

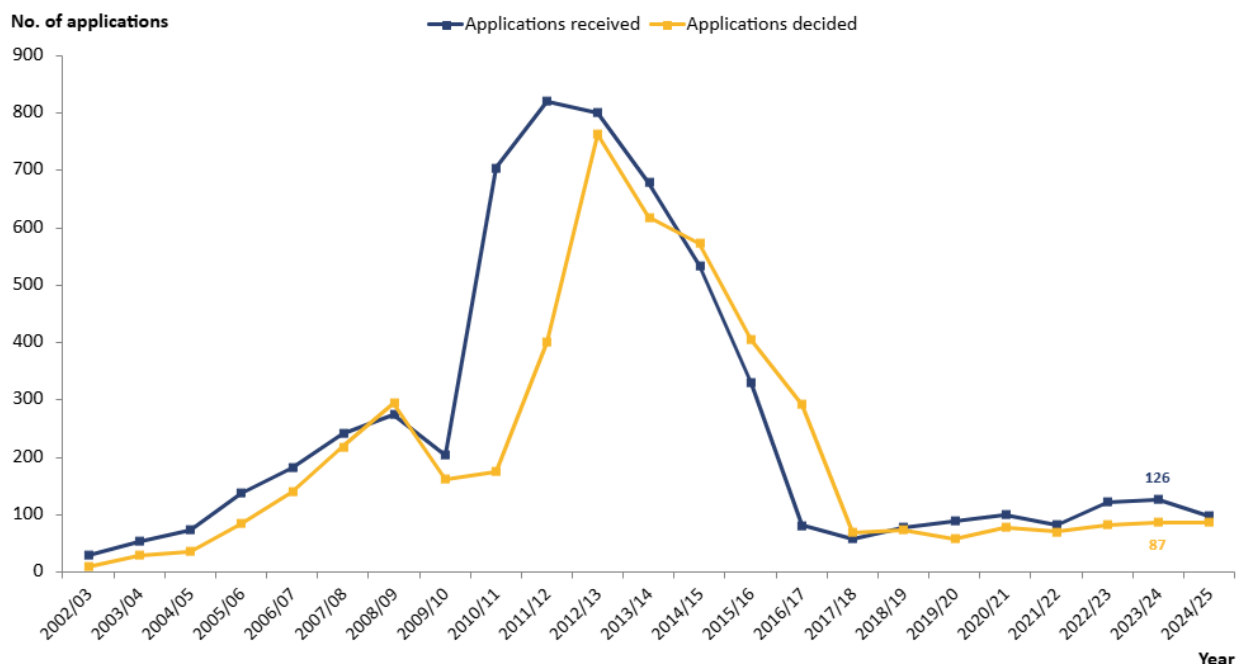
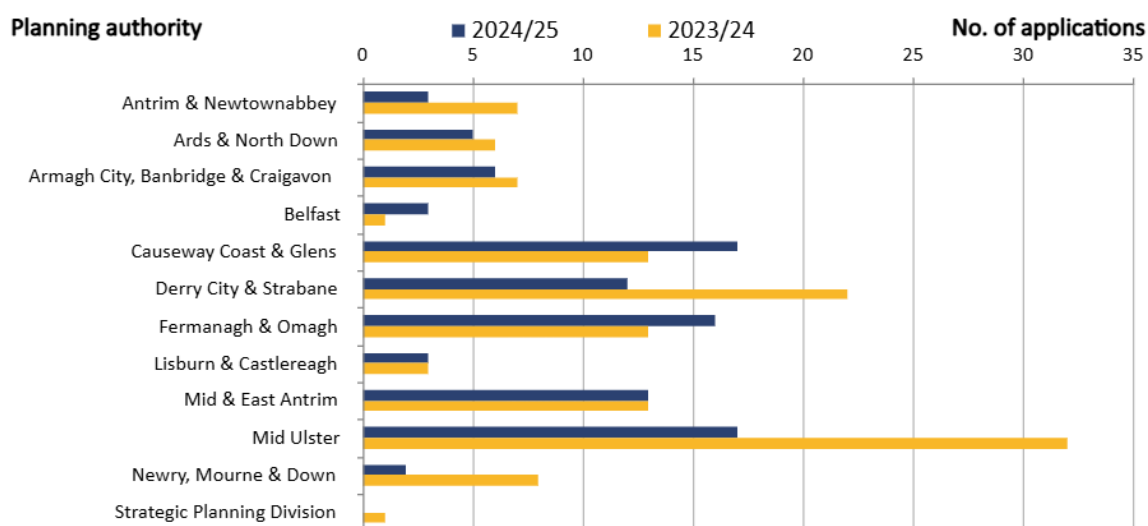


Figure 4: Renewable Energy Applications, received annually in NI from 2002/03 to 2024/25¹²

As detailed in Figure 4, above, the number of renewable energy applications, received annually in NI peaked in 2011/12. In a previous NI Planning Statistics report (Annual Statistical Bulletin 2020/21) this peak was attributed to the NI Executive's targets (at that time) for electricity consumption from renewable sources, with targets of 20% to be achieved by 2015, and 40% by 2020. It was also suggested that the decline in recent years (for example, from 820 applications in 2011/12 to 100 applications in 2020/21) may be partly due to a reduction in government funding available, as well as a lack of capacity on the power grid to allow for new connections.



¹² Source: Northern Ireland planning statistics April 2024 - March 2025 (Published June 2025-Analysis, Statistics & Research Branch, Department for Infrastructure)

Figure 5- Renewable Energy Applications received by Local Planning Authorities 2023/24 and 2024/25¹³

As shown in Figure 5, above, the number of renewable energy applications received by Armagh City, Banbridge and Craigavon Borough Council declined from 7 No. applications in 2023/24 to 6 No. applications in 2024/25. Only three of the Northern Ireland Local Authorities received an increased amount of renewable energy planning applications from 2023/24 to 2024/25.

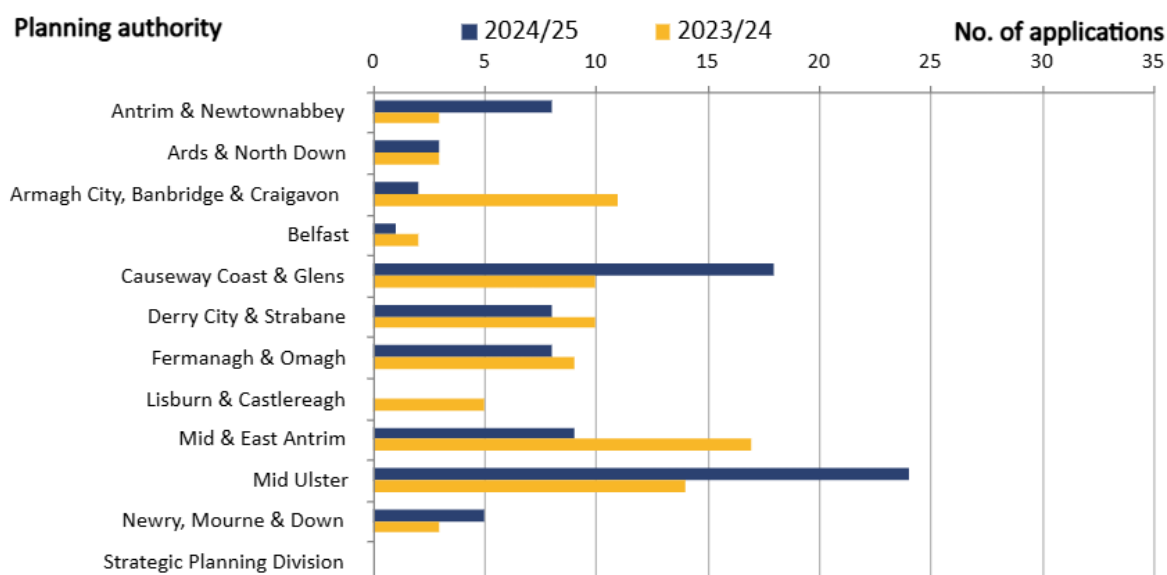


Figure 6- Renewable Energy Applications decided by Local Planning Authorities 2023/24 and 2024/25¹⁴

As shown in figure 6, above, the number of renewable energy applications decided by Armagh City, Banbridge and Craigavon Borough Council also declined from 11 No. in 2023/24 to 2 No. in 2024/25. The approval rate of renewable energy planning applications was 100% during 2024/25.

¹³ Source: Northern Ireland planning statistics April 2024 - March 2025 (Published June 2025-Analysis, Statistics & Research Branch, Department for Infrastructure)

¹⁴ Source: Northern Ireland planning statistics April 2024 - March 2025 (Published June 2025-Analysis, Statistics & Research Branch, Department for Infrastructure)

5.0 Preferred Options Paper

The Council published its Preferred Options Paper (POP) in March 2018. The main purpose of the POP was to promote focused debate on key issues of strategic significance likely to influence the direction of future development within the Borough, so to inform the next stage in the LDP process, the Plan Strategy.

The POP outlined the vision and strategic objectives of the Plan, along with 38 Key Issues and the possible options available to address them, including the Council's Preferred Option. The Key Issues emerged from our evidence base; from engagement with Elected Members and Section 75 Groups; and from formal and informal consultation with Statutory Consultation Bodies. In order to inform the POP, a preliminary review of operational planning policy was also carried out, with a commitment to complete a more detailed policy review in advance of the Plan Strategy.

The POP did not cover every issue, policy and proposal that will be included in the LDP. Instead, the POP focused upon the main planning issues that had been identified through the work undertaken in developing the evidence base for the LDP, including consultation with statutory consultees and council officials, workshops with Elected Members and through the Community Plan process.

A total of 201 responses, from members of the public and statutory consultees, were received during the 9-week public consultation period, these included a wide range of comments in relation to the POP, supporting documents and the POP consultation process.

Key Issue

Key Issue ENV 9 'Facilitating appropriate renewable energy development.'

Preferred Option

The preferred approach to Key Issue ENV 9 was to bring forward an approach to renewable energy development in line with existing policy but in addition, identify areas of sensitive landscape which may be unsuitable for particular forms of renewable energy development.

Summary of POP Commitments

POP Commitments in respect of renewable energy included:

- Support a sustainable approach to renewable technology development by protecting environmental, landscape and historic features and ensuring that the visual impact on the landscape and residential amenity is not adversely affected.
- Identify sensitive landscapes that may not be able to support certain forms of renewable energy technology, in particular wind turbines, therefore providing an opportunity to safeguard vulnerable landscapes alongside facilitating renewable energy technologies in more appropriate areas within the Borough.
- Bring forward a balanced approach to renewable energy development, in line with existing policy, with each application assessed on a case-by-case basis.

The Evidence highlighted that the Department for Infrastructure (Dfi) was reviewing the Strategic Planning Policy Statement (SPPS) in relation to 'Renewable Energy', following a Call

for Evidence, and acknowledged that the outcome of this could affect the Council's policy direction in due course¹⁵.

POP Representations

Of the 201 representations received, 30 made comment in respect of Key Issue ENV 9. There was significant support for the preferred approach, with 90% of the responses categorised as being generally supportive, with the remaining 10% categorised as being unsupportive.

Many of the respondents acknowledged the Borough's rich natural environment and highlighted the importance of protecting sensitive landscapes and habitats from inappropriate renewable energy development (POP ref 101). It was also suggested that renewable energy development that is appropriate in scale or location should be actively encouraged, with the ability of the landscape to absorb new development and the impacts on amenity taken into account (POP ref 148). One respondent considered that the definition of 'sensitive landscape' should be as clear as possible to avoid any ambiguity (POP ref 182) however another respondent (POP ref 004) considered that sensitive landscapes should not be identified and protected from renewable energy infrastructure, stating that renewable energy projects should be prioritised.

It was also suggested that the landscapes around historic monuments and / or areas of outstanding natural beauty and / or cultural or historically important sites should be considered as sensitive landscapes and offered full protection (POP ref 181 & 182). Another respondent raised concerns regarding the cumulative impact of renewable energy structures including tall structures, solar fields, associated groundwork, roadways in the vicinity of heritage assets and the wider historic environment (POP ref 080). The respondent also advised that instead of referring to 'cultural heritage features' the terms 'Historic Environment', 'Heritage Asset' or 'cultural identity' should be used. Another respondent considered that the existing policy wording does not go far enough- it should be clearly stated that the landscapes around historic monuments and/or areas of outstanding natural beauty and/or cultural or historically important sites will be considered to be sensitive landscapes and offered full protection (POP ref 181).

One of the respondents referred to government targets on climate change and carbon emissions, highlighting that this raises new challenges such as the effects of windfarms and single turbines in landscapes with sensitive species and habitat features, acknowledging that it is important to have the right development in the right place at the right time (POP ref 135). The respondent was also very supportive of wind farm and other renewable energy developments, provided they are sustainable and highlighted that the LDP has an important role in enabling renewable development in a way which minimises conflict with other objectives, acknowledging that this requires the collection of a robust evidence base, not only of potential to generate energy, but also of the social and environmental factors that need to be considered.

It was highlighted in one of the responses that the preferred option recognises the value of renewable energy development but also provides policy which gives greater weight to environmentally sensitive areas, essentially result in a stricter policy approach to the existing policy contained within PPS 18.

¹⁵ The Strategic Planning Policy Statement, Edition 2 (SPPS) was published in December 2025 following the conclusion of a focused review of the former SPPS (2015) on the subject of renewable and low carbon energy. The draft dPS approach towards renewable and low carbon energy took account of the new policy provisions on Renewable and Low Carbon Energy, as set out at pages 86 – 91 of the revised SPPS.

Another of the respondents (POP ref 062) strongly recommended that each proposal for renewable energy development is considered on its own merits, in line with national energy policy, and that a proper balance is taken between environmental and economic needs.

One of the respondents (POP ref 82) considered that through the preferred approach there is the potential to infer a presumption for development outside of sensitive areas which will need to be carefully managed and also suggested that the identification of sensitive areas is underpinned by local LCA evidence. Another of the respondents generally agreed that sensitive landscapes should be identified and protected from inappropriate renewable energy infrastructure, however considered that the restriction should not apply to all infrastructure, suggesting for example that solar energy may be acceptable in a particular area, while wind power of a certain size may not (POP ref 080).

One of the respondents indicated a preference for the alternative option ENV 9B (POP ref 199) which would continue the current approach to renewable energy development in line with existing policy, with each application assessed on a case-by-case basis. The respondent considered that the LDP should make direct reference to the potential for the development of solar energy across the Borough, highlighting that solar farms are quick to deploy in comparison with other energy generation technologies. The respondent was also supportive of the co-location of solar farms with wind turbines, highlighting that it is a highly sustainable use of existing infrastructure, whereby installations share grid infrastructure.

Another respondent (POP ref 174) considers that there is an opportunity for a more holistic approach to developing energy policies, which encompasses renewable energy development, energy efficiency and a reduction in energy demand. The respondent also advised that they would like the LDP to include energy strategies or energy masterplans, which examine potential locations for renewable energy supply, but also include policies aimed to reduce energy consumption by, for example, improving connectivity, integrating land use and transport and requiring all new buildings to be developed to high standards of energy efficiency.

Consideration of Preferred Option

The Council acknowledges the high level of support for the preferred approach to Key Issue ENV 9, which was to bring forward an approach to renewable energy development in line with existing policy but in addition, identify areas of sensitive landscape which may be unsuitable for particular forms of renewable energy development.

All comments and feedback were carefully considered as part of the policy review process, including the development of the draft policy for renewable and low carbon energy development. This included the comments regarding the importance of protecting sensitive landscapes / habitats / landscapes around historic monuments / areas of outstanding natural beauty / cultural or historically important sites.

The Council also notes the contrast in some of the responses with some suggesting that sensitive landscapes should not be identified and protected from renewable energy infrastructure (so that renewable energy development can be prioritised) and others suggesting a stricter policy approach to the policy contained within PPS 18, by affording greater weight to environmentally sensitive areas. The concern that the preferred approach may have potential to infer a presumption for renewable and low carbon energy development outside of identified sensitive areas was also noted, requiring further consideration in regard to its potential implications, such as the potential impact on the rural character of the wider countryside. The Council appreciates and acknowledges that any approach must be

underpinned by a robust evidence base, including the Development Pressure Analysis, the findings and conclusions of which are detailed in Technical Supplement 8. It is noted that some locations are more appropriate for certain types of renewable and low carbon energy development than others, for a variety of reasons including topography, aspect and access or grid constraints, emphasising the necessity for renewable and low carbon energy development to be considered on a case-by-case basis, taking account of the type and scale of the development and its local context. The variety of comments emphasise the important role that the LDP has in assessing the local impacts of proposals alongside the wider environmental, economic, and social benefits of renewable and low carbon energy development, whilst also ensuring that such development is supported in appropriate locations in the Borough.

The suggestion that the LDP should bring forward policies aimed to reduce energy consumption by, for example, improving connectivity, integrating land use and transport and requiring all new buildings to be developed to high standards of energy efficiency, is also noted and has been given careful consideration in the development of the suite of draft dPS policies, including, Policy GP 1 'Mitigating and Adapting to Climate Change' (in particular Criteria a and d) and Policy DES 1 'Design Quality' (in particular Criteria h).

The comment regarding government targets on climate change and carbon emissions was also noted. It was acknowledged in the POP that the Department for Infrastructure (DfI) was carrying out a review of the SPPS in relation to 'Renewable Energy'. It was the Council's view that the outcome of this review would ultimately influence the Council's policy direction towards renewable and low carbon energy development. In December 2025, the Strategic Planning Policy Statement, Edition 2 (SPPS) was published following the conclusion of a focused review of the former SPPS (2015) on the subject of renewable and low carbon energy. In accordance with the SPPS the Council has taken account of the revised policy provisions of the SPPS, which aims to support the wider ambitions of the Northern Ireland Executive in reducing emissions and decarbonising energy use across the region, in the development of the dPS. Section 3 of this Technical Supplement provides a brief overview of the new policy provisions on Renewable and Low Carbon Energy, as set out at pages 86 – 91 of the revised SPPS.

In reviewing the Preferred Approach towards Key Issue 9, the Council also took account of Northern Ireland's renewable electricity consumption and net emission targets, as set out in Section 4 'Borough Profile'. The Council acknowledges that achieving the net zero and renewable electricity consumption targets will involve, among other measures, a commitment to significantly increasing the development of, and roll out, of renewable and low carbon technologies. It recognises that the Council has an important role in supporting the renewable and low carbon energy industry in tackling the climate emergency and supporting the drive to net zero. As such it is particularly important that the policies for renewable energy and low carbon energy development are sufficiently flexible, so they are capable of being responsive to new and emerging technologies in this sector.

In the context of the net zero and renewable energy consumption targets, and the provisions of the revised SPPS, the Council has reviewed its position in respect of the POP commitment to identify areas of sensitive landscape which may be unsuitable for particular forms of renewable energy development. Whilst it was considered that the identification of sensitive landscapes that may not be able to support certain forms of renewable energy technology may provide an opportunity to safeguard more vulnerable landscapes it is contended that this approach would be at odds with regional direction, including the undermining the Borough's ability to make optimum contribution to realising the renewable energy targets.

Instead, for the targets to be achieved, it is recognised that the dPS approach must seek to maximise sustainable renewable and low carbon energy from a wide range of technologies, at various scales, in appropriate locations within the built and natural environment, without compromising other environmental assets of acknowledged importance, in line with Regional Direction. Through draft Policy RLED 1 and other related policies, the Plan Strategy will enable the Borough's optimum contribution to achieving renewable energy targets. Further consideration will be given at the Local Policies Plan stage to how the plan area's optimum contribution can be secured, for example through applying suitable key site requirements or zonings.

However, the Council recognises that appropriate protection must be afforded to the Borough's historic, natural, and cultural heritage features. As such the dPS, aligning with the revised SPPS, will apply a cautious approach within designated landscapes which are of significant value, such as the Mourne Area of Outstanding Natural Beauty¹⁶, and their wider settings. This approach will ensure that the landscape and visual impacts of proposals will be carefully considered to avoid unacceptable adverse impact on visual amenity and landscape character. Further information on the historic and natural environment can be found in Technical Supplement 10 'Environmental Assets.'

For further detail on the POP responses, and the Council's consideration, refer to the POP Public Consultation Report, available on the Council's website.

¹⁶ A small portion of the Mourne AONB falls within the Armagh City, Banbridge and Craigavon Borough Council area. It is located within the Slieve Croob area along the Council's eastern boundary.

6.0 Stakeholder Engagement

Internal Stakeholders

Planning Officers in Development Management and Enforcement Sections

Consultation was carried out with planning officers in the Planning Department's Development Management and Enforcement Sections as part of the policy review process; to establish any difficulties they experienced in the application of existing planning policies and to provide an opportunity to critique the draft policies. Officers' views were taken into consideration in finalising draft policies prior to being presented at Council Members workshops.

Other Council Departments

Representatives from relevant Council departments have been engaged to ensure that due account has been taken of Council's Community Plan, as well as other Council strategies and initiatives.

This engagement was undertaken by way of individual meetings with council departments, in particular the Community Plan Team to ensure account was taken of the Council's Community Plan.

A meeting also took place with a 'Project Management Team.' The Project Management Team was comprised of Officers from a range of council departments, including Community Plan, Tourism, Economic Development, Environmental Health and Environmental Services.

Elected Members

Section 8 (7a) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to be adopted by resolution of the Council. As such, Elected Members have been engaged throughout the LDP process, including the preparation of the draft dPS policies.

Engagement with the Elected Members has been facilitated through a series of workshops held between 2019 and 2026. That engagement included the draft renewable and low carbon energy development policy set out below:

- Policy RLED1 'Renewable and Low Carbon Energy Development'

Whilst there was general agreement with the draft policy wording, Elected Members discussed the following:

- Processes in place, such as planning conditions or planning agreements, to ensure that redundant renewable energy development, specifically wind turbines, are fully decommissioned.
- The Council's role in contributing towards the renewable energy targets and the importance of updated guidance from DfI.
- The cumulative visual impact of wind turbines on the landscape.

External Stakeholders

Government departments and agencies

Section 8 (5) of Part 2 (Local Development Plans) of the Planning Act (Northern Ireland) 2011 requires the Plan Strategy to take account of the RDS, any policy and guidance issued by the Department and other relevant government strategies and plans. As such the Council has engaged key consultees representing relevant central government departments and agencies in the preparation of the draft Plan Strategy policies.

Cross Boundary Context and Consideration of Neighbouring Council Approaches

In developing draft-planning policies for renewable and low carbon energy development, consideration has also been given to the approaches of adjoining Councils.

The Borough adjoins the boundary of five neighbouring Council areas:

- Antrim and Newtownabbey Borough Council (by Lough Neagh);
- Newry Mourne and Down District Council;
- Mid Ulster District Council;
- Lisburn and Castlereagh City Council; and
- Monaghan County Council, in the Republic of Ireland.

The Preferred Options Papers (POPs), supporting evidence base and draft Plan Strategies (where published) of adjoining Councils have been taken account of, in addition to regional guidance, in order to identify any cross-boundary issues / conflict.

Table 2, below, outlines adjoining Councils position in regard to renewable and low carbon energy development.

Adjoining Council	Position
Antrim and Newtownabbey Borough Council	Antrim and Newtownabbey Borough Council (ANBC) published its Local Development Plan- draft Plan Strategy on 28 June 2019 for a four-week period of pre-consultation. A formal period of public consultation also ran from 26 July 2019 to 20 September 2019. The Draft Plan Strategy was submitted to DfI on 8th March 2021. The Planning Appeals Commission (PAC) have now completed their Independent Examination of Antrim and Newtownabbey Borough Council's Draft Plan Strategy, with hearings held during May and June 2022. Draft Policy DM 45 'Renewable Energy Development' sets out ANBCs approach to renewable energy development. The policy seeks to support the development of a diverse range of renewable energy technologies in appropriate locations provided they do not have a detrimental impact on natural heritage assets, landscape or the historic environment, and

	where any impacts are avoided or satisfactorily mitigated. Policy DM 45 does not refer to unacceptable impact on human health or water quality, as per the SPPS and includes additional considerations relating to the impact on operations of Belfast International and Belfast City Airport. The policy also applies a Spatial Framework for wind energy development, which defines 3 groups: areas where wind energy development will not be acceptable (including Strategic Landscape Policy Areas and Coastal Policy Area) and there will be a presumption against new wind turbine proposals; areas where proposals will generally only be appropriate in specific circumstances (where any significant effects on the amenity and qualities of these areas can be substantially overcome by siting, design and other forms of mitigation), including International and National Sites of Nature Conservation Importance, Historic Parks, Gardens and Demesnes and 1 km area around settlements; and areas where wind turbine proposals are generally likely to be acceptable. The extent of Strategic Landscape Policy Areas will not be defined until the Local Policies Plan; however it is noted that they will be introduced around Lough Neagh and Lough Beg. In addition, Policy DM 45, imposes a separation distance of 10 times the rotor diameter to all occupied properties for <i>all</i> wind turbine development <i>with a hub height over 25m</i>. DM 45 also highlights that ANBC welcomes proposals for microgeneration or technology integrated into the fabric of buildings, where this will not impact adversely on neighbouring amenity. On 3 July 2025 ANBC adopted their Local Development Plan 2030 - Plan Strategy, in accordance with Section 12 of The Planning Act (Northern Ireland) 2011 and Regulation 24 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.
Newry, Mourne and Down District Council	Newry Mourne and Down District Council (NMDDC) published its Local Development Plan 2035 draft Plan Strategy in June 2025. The consultation period was carried out over a twelve-week period, from Friday 27 June 2025 to Monday 22 September 2025. NMDs Renewable Energy Strategy encourages greater use of renewable energy technologies to reduce the dependency on imported fossil fuels and bring diversity and security of supply to their energy infrastructure. NMDs strategic approach to renewable energy includes supporting renewables infrastructure whilst affording protection to the environment, which is supported by Strategic Policy renewable & low carbon energy strategic policy RES 1 and operational policies RE1- Renewable and Low Carbon

	Energy and RE2-Renewable Energy and Energy Efficiency Measures in all Development. RE1 applies a cautious approach towards renewable and low carbon energy in Areas of Outstanding Natural Beauty and their wider settings and also includes additional policy direction for solar energy and anaerobic digestion. NMD have carried forward the signpost to PPS 18 BPG, as it is regional in focus. RE2 Requires that proposals fully consider and, where possible, incorporate renewable energy technology and energy efficiency measures including micro-generation and passive solar design into its design, siting and layout and where it meets the provisions of Policy RE1.
Mid Ulster District Council	Mid Ulster District Council published its Local Development Plan 2030 – Draft Plan Strategy on 22nd February 2019, the Council re-consulted on its Draft Plan Strategy, which closed at 5pm on 24th September 2020. The draft Plan Strategy has now been submitted to the Department for Infrastructure on 28th May 2021. MUDCs approach to renewable energy development is set out in draft Policy RNW 1 ‘Renewable Energy’. The dPS introduces Special Countryside Areas (SCA’s) and Areas of Constraint on Wind Turbines and High Structures (AOCWTHS). In SCAs there will be constraints on all renewable energy development whilst in AOCWTHS there will be an area where renewable development with a low impact will be accommodated but development of a height of greater than 15m will be resisted. In addition, Policy RNW 1 adopts a cautious approach towards all renewable energy development proposals within the Sperrin AONB, Slieve Beagh and the along the Clogher Valley ridge line. In addition, draft Policy GP1 ‘General Principles Planning Policy’ requires, where appropriate, the siting, design and layout of all new development should have regard to the principles of passive solar design and the use of renewable energy technologies.
Lisburn and Castlereagh City Council	The draft Plan Strategy was published for formal consultation on Friday 8th November 2019, and it was submitted to the Department for Infrastructure on 22nd March 2021. Independent examination of the dPS began on 28th March 2022 and the public hearing sessions completed in May 2022. Draft Policies RE 1 ‘Renewable Energy Development’ and RE2 ‘Integrated Renewable Energy’ set out LCCCs approach towards renewable energy proposals and the integration of renewable technology in new development. The aim of RE 1 is to facilitate the delivery of renewable energy generating

	facilities in the most appropriate locations whilst minimising any visual intrusion and environmental impacts to protect both the rural and urban landscape. The dPS promotes a precautionary approach towards renewable energy development proposals in designated landscapes which are of significant value, such as Areas of Outstanding Natural Beauty, which does not directly align with the SPPS which directs that there should be a cautious approach for such proposals. On 26th September 2023 LCCC adopted their Local Development Plan 2030 - Plan Strategy, in accordance with Section 12 of The Planning Act (Northern Ireland) 2011 and Regulation 24 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.
Monaghan County Council	Monaghan County Council adopted its County Development Plan 2025 - 2031 on 26 May 2025. Promoting the renewable energy sector in the County and clean technology usage in existing and proposed industrial development is one of the key aims of the County Development Plan. Environment, Energy and Climate Change Strategic Objective (EECSO 1) includes the promotion of reduced energy consumption, energy efficiency and renewable energy to deliver a low carbon future for County Monaghan. It sets out a suite of 12 Renewable Energy Objectives including: the preparation of a Renewable Energy Strategy, informed by environmental considerations, constraints and sensitivities relevant to the Plan Area (REO 2), supporting the production of sustainable energy from renewable sources such as wind, solar, bio-energy and the development of waste to energy/combined heat and power schemes at suitable locations and subject to compliance with the relevant planning policy, the Habitats Directive, and other environmental considerations (REO 4), support and promote the use of renewable energy technologies in the conversion and re-use of existing built developments (REO 6), support and promote the development and use of passive solar design principles in all new developments (REO 7) and support and facilitate proposals for hybrid energy systems and/or co-location of renewable energy where applicable where such development has satisfactorily demonstrated that it will not have adverse impacts on the surrounding environment (REO 12). The Plan also sets out a renewable energy requirement policy (RERP 1), which requires the provision of at least one energy efficient measure in the design of all new developments (solar panels, geo-thermal, passive design, wood burning installation, etc.)

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Table 2- Adjoining Councils Position – Renewable and Low Carbon Energy Development

The Council has responded to neighbouring Councils Preferred Options Papers and Draft Plan Strategies, as they have been published.

Although there are some differences in the policy wording and various approaches neighbouring councils have taken to renewable and low carbon energy development, it is not considered that there are any significant conflicts with Armagh City, Banbridge and Craigavon Council's Draft Plan Strategy. It is contended that the various approaches to renewable and low carbon energy development reflect each Councils attempt to tailor their approach towards their own landscape. The Council will continue to liaise and engage with adjoining Councils, particularly in regard to landscapes that straddle council boundaries, such as the regionally significant Lough Neagh environs, where a joined-up approach will be particularly important.

7.0 Draft Plan Strategy Policy Approach

As analysed above, the Council's draft renewable and low carbon energy development policy and relevant draft policy provisions within the suite of General Policies and Design and Placemaking Policies have evolved from a review of extant regional planning policies, other key policy and guidance documents, the POP, responses to the POP and a series of engagements with key stakeholders, including the following:

- Key statutory consultees.
- Elected Members of the Council.
- Officers from the Development Management and Enforcement sections of the planning department; and
- Officers from other relevant departments of the Council.

In preparing the draft policies, the Council has taken account of a range of relevant matters, including the following:

- The RDS (in particular RG 5 and RG 9) and the revised SPPS (in particular paragraphs 3.10, 3.13 and 6.214-6.241).
- The extant development plans within Armagh City, Banbridge & Craigavon Borough.
- The Council's Community Plan (especially in terms of the Plan's cross cutting theme of sustainability, which seeks to improve everyone's quality of life economically, environmentally and socially, without compromising future generation's ability to develop, grow and flourish and the commitment to ensure our outcomes and actions are sustainable), ongoing council initiatives and the neighbouring council context.
- The adopted /draft Plan Strategies of neighbouring councils – the draft policies are not considered to conflict with any of those.

In preparing the dPS, a range of general planning considerations, including design, integration and amenity, were incorporated into the General Policies or Design and Place-making Policies of the draft Plan Strategy¹⁷. This approach consolidates and streamlines requirements that were previously repeated across multiple Planning Policy Statements and subject policy areas within the Strategic Planning Policy Statement. It improves the structure, clarity and usability of the Plan while maintaining the existing policy objectives and regional policy direction.

The draft policies have been subject to a Sustainability Appraisal (SA), the findings of which are set out in the accompanying SA Environmental Report.

In conclusion, the draft policies are founded on a robust evidence base which includes baseline information contained in this Technical Supplement, the POP, responses to the POP and subsequent engagement with consultees.

¹⁷ Exceptions to the General Policies and Design and Place-making Policies are set out in the dPS.

8.0 Consideration of Soundness

The LDP has been prepared in accordance with the tests of soundness set out in the DfI's Development Plan Practice Note 6: Soundness (Version 2, May 2017). The draft Plan Strategy, insofar as it relates to renewable and low carbon energy development, is considered to be sound, as it satisfies the relevant tests of soundness, as summarised in Table 3 below:

Table 3: Consideration of Soundness

Procedural Tests	
P2	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have evolved from the POP and have taken account of responses to the POP and the POP Consultation Report.
P3	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have been subject to Sustainability Appraisal, including a Strategic Environmental Assessment. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have taken account of the RDS and in particular RG 5 and RG 9.
C2	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have taken account of the Council's Community Plan, particularly in terms of the Plan's cross cutting theme of sustainability, which seeks to improve everyone's quality of life economically, environmentally and socially, without compromising future generations' ability to develop, grow and flourish.
C3	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have taken account of existing planning policies as contained within the SPPS, in particular paragraphs 3.10, 3.13 and 6.214-6.241.
C4	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have taken account of the existing development plans within Armagh City, Banbridge and Craigavon Borough, ongoing Council initiatives and the neighbouring council context, including the Republic of Ireland.
Coherence and Effectiveness Tests	
CE1	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 have taken account of the emerging LDPs of our neighbouring Councils in Northern Ireland and neighbouring council in the Republic of Ireland (Monaghan County Council) and are not considered to be in conflict with those.
CE2	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 are founded on a robust evidence base which includes the baseline information contained in this technical supplement, the POP and responses to it and subsequent consultation with consultees, including DfI.
CE3	As part of the Council's ongoing monitoring framework, the number of applications approved for renewable energy or low carbon energy development in the Borough will be annually monitored and assessed to determine whether the strategy and policies are being implemented effectively, remain appropriate and continue to support the Plan's objectives. Monitoring findings will inform the future review of the Plan and any necessary policy intervention.
CE4	GP1, GP2, GP 3 & GP 4, DES 1 & DES 2 and RLED 1 will be reviewed at Plan Review stage. Where appropriate, the need for flexibility has been built into the strategic approach and draft policies to allow for changing circumstances. Local Policies Plan stage will provide further opportunity to review existing and introduce new local policies, provided this is underpinned by robust evidence base and is consistent with the adopted Plan Strategy.

INTERESTED IN DEVELOPMENT

in the Armagh City,
Banbridge and
Craigavon Borough

Please contact

ABC Planning Department - Local Development Plan Team
at Armagh City, Banbridge & Craigavon Borough Council

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