

Armagh City, Banbridge &
Craigavon Borough Council

Local Development Plan 2035

Draft Plan Strategy

TECHNICAL SUPPLEMENT 2

Housing

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 Borough Council's 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 spatial growth strategy and planning policies proposed within it.

This Technical Supplement includes key updates relating to Housing 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 housing in the Borough and the development of a Housing Strategy and associated planning policies, since the publication of the POP.

In order to reflect the broad range of matters that were taken into account in the development of the Council's approach towards housing the Borough 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 housing within the Borough;
- **Section 5** provides an overview of survey work and studies on housing relevant to the Borough;
- **Section 6** outlines the relevant Key Issues and Preferred Approach as detailed in the POP, alongside a summary of POP Commitments and a summary of some of the POP responses that were received, with a focus on those offering suggestions in respect of spatial growth strategy and policy development.
- **Section 7** provides an overview of the policy review, and the ongoing consultation and engagement that has been carried out in preparation of the dPS policies. Furthermore, it also details the approach of neighbouring councils to housing, briefly outlining their position, followed by a brief consideration of any key differences in approach.
- **Section 8** summarises how the dPS strategic and operational policies for housing 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 9** sets out how the dPS policies for housing 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 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 transportation in the Borough is managed in an appropriate and sustainable manner throughout and beyond the plan period of 2035.

The Council will continue to work with neighbouring councils and relevant key stakeholders to ensure that housing is delivered and supported in an appropriate and sustainable manner throughout and beyond the plan period of 2035.

Housing

Setting out the quantity and distribution of housing across the Borough is a key function of the LDP. The distribution of housing across the settlement tiers within the settlement hierarchy is essential to meet the demand for housing according to the level of employment and services such as community and cultural facilities, open space, etc. The Borough has the largest council resident population (218,656)¹ outside of Belfast and a faster growth rate than the Northern Ireland average, therefore housing will be a primary concern for the duration of the plan and will be subject to strict monitoring and review to make improvements where necessary.

With housing zonings from the extant area plans within the Borough being retained until the adoption of the Local Policies Plan, understanding and setting a direction in terms of housing growth is a key step in addressing housing requirements within the Borough. The Regional Development Strategy 2035 expresses regional housing needs as Housing Growth Indicators (HGI), which are produced as a guide for the preparation of the LDP. These indicators are used as part of a plan, monitor and manage mechanism of housing land release within the LDP process. The HGI is an estimate of the housing need for the Borough over a fixed period (2016-2030 inclusive).

The LDP has an important role to proactively facilitate the delivery of land for housing which meet the full range of anticipated housing needs over the Plan period. It also provides a policy approach to help deliver good quality housing in a range of sizes and tenures that strengthens community cohesion and supports the creation of more balanced communities

¹ NISRA 2021

2.0 Legislative Context

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

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 Planning (Local Development Plan) (Amendment) Regulations (Northern Ireland) 2016

The Planning (Local Development Plan) (Amendment) Regulations (Northern Ireland) 2016 amend the transitional provisions in the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 to include development plans prepared and adopted by the Department under the Planning (Northern Ireland) Order 1972 within the definition of a departmental development plan under the Planning Act (Northern Ireland) 2011.

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 the following three long term Missions, underpinned by a cross-cutting commitment to Peace, through which improved wellbeing, long term sustainability, and a thriving economy will be delivered.

People: Working to support everyone at all stages of their life to ensure they have the chance to succeed by improving life opportunities.

Planet: Harnessing the potential of a green growth economy while ensuring we provide an equitable transition to a sustainable and affordable society as we take responsibility for decarbonising our economy and society.

Prosperity: Improving our economic productivity while making sure that we have an economy that works for all.

These Missions are supported by nine cross-cutting priorities, including growing a competitive and sustainable economy, delivering high-quality childcare, reducing health waiting times, ending violence against women and girls, supporting children with special educational needs, providing affordable housing, promoting safer communities, protecting the environment (including Lough Neagh), and reforming public services.

Within the PfG there are a wide range of actions aimed at addressing the above priorities and delivering the missions, including multi sector investment and reform, the delivery of a Sub-Regional Economic Action Plan, 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.

The Regional Development Strategy 'Building a Better Future' 2035

The Regional Development Strategy 2035 (RDS) prepared under the Strategic Planning (Northern Ireland) Order 1999 by the Department for Regional Development (2012) is the spatial strategy for the Executive and provides an overarching strategic planning framework to facilitate and guide the public and private sectors and is material to decisions on individual planning applications.

The RDS acknowledges that housing is a key driver of physical, economic and social change and emphasises the importance of the relationship between the location of housing, jobs, facilities, services and infrastructure and must be taken into account when preparing a local development plan.

The RDS sets regional direction that aims to deliver housing in a more sustainable manner. It recognises that the right environment can help strengthen community cohesion, through the development of integrated services and facilities; fostering a stronger community spirit and sense of place; and encouraging mixed housing development (RG6).

It supports urban and rural renaissance (RG 7), through the process of development and re-development in urban areas and revitalising the centres of small towns and villages. It seeks to manage housing growth to achieve sustainable patterns of residential development, with the promotion of more sustainable housing development within existing urban areas (RG 8). In the context of the RDS Spatial Framework (Metropolitan Belfast, Derry/ Londonderry, Hubs and Clusters of Hubs, the rural area, and Gateways/Corridors), key strategic guidance seeks to grow the population in the Hubs and cluster of Hubs (SFG 12) and to sustain rural communities living in smaller settlements and the countryside (SFG 13).

The RDS also sets regional guidance that aims to 'manage housing growth to achieve sustainable patterns of residential development' (RG8). This will be achieved by:

- Promoting more sustainable housing development within existing urban areas;
- Ensuring an adequate and available supply of quality housing to meet the needs of everyone; and
- Use of a broad evaluation framework to assist judgements on the allocation of housing growth.

The RDS also recognises that there are significant opportunities for new housing on suitable vacant and underutilised land, and sets a regional target of 60% of new housing to be located in appropriate 'brownfield' sites within the urban footprints of settlements greater than 5000 population.

This implies a sequential approach to the allocation of land for housing in cities and towns, focusing firstly on the re-use of previously developed land and buildings informed by capacity studies, and consideration of previously undeveloped land within the existing urban area, before deciding the location and scale of settlement extensions.

In order to assist Councils in planning for future housing growth the RDS defines Housing Growth Indicators (HGIs). These provided an estimate of the new dwelling requirement for the period 2012 to 2025. The latest HGIs use 2016 based household projections and have been calculated for the time period 2016-2030 to align with the timeframe for the majority of Local Development Plans, which are considered latter in this Technical Supplement. The proposed housing allocations identified in the POP were based on the revised Housing Growth Indicator (HGI) published by the Department for Infrastructure (DfI) in April 2016. This provided for 14,400 dwellings over the period 2012 to 2025, equating to an annualised housing requirement of approximately 1,103 dwellings per year. Applying this annual rate on a pro rata basis to the end of the Plan period in 2030 resulted in an indicative housing requirement of 19,850 dwellings.

It is important to note that the HGIs are purely for guidance and should not be considered as a cap or a target on development. Instead, they provide a robust starting point which can subsequently be adjusted, taking account of the full range of factors that may influence housing requirements over the plan period.

RDS provides a Housing Evaluation Framework, to aid an assessment of the potential capacity of each settlement to accept housing growth, which helps to inform the distribution of housing growth to each settlement. This assessment is based on the resources, environmental capacity, transport links, economic development potential, character, and community services that each settlement possesses.

Application of the HGIs and the Housing Evaluation Framework is provided in Section 8 of this Technical Supplement. This includes a breakdown of our methodology and how each tier has been allocated housing in conformity with the RDS.

Strategic Planning Policy Statement for Northern Ireland - Planning for Sustainable Development (SPPS)

The SPPS was published in September 2015 and updated in December 2025 and is intended to consolidate 20 different planning policy statements into one document and sets out strategic subject planning policy for a wide range of planning matters.

The SPPS identifies that in order to further sustainable development in the long term public interest requires the integration and balancing of complex social, economic and environmental factors when plan-making and decision-taking. It acknowledges that housing is one of the key drivers of physical, economic and social change in both urban and rural areas and in order to further sustainable development it is important to manage housing growth in a sustainable way, placing particular emphasis on the importance of the inter-relationship between the location of local housing, jobs, facilities and services, and infrastructure.

The SPPS also sets out the core planning principles to underpin delivery of the two-tier planning system with the aim of furthering sustainable development and provides the strategic direction for the new councils to bring forward detailed operational policies within future local development plans. Of particular relevance are the following Core Planning Principles:

- **Improving Health and Well-being**
- **Creating and Enhancing Shared Space**
- **Supporting Good Design and Positive Place-Making**

The Regional Strategic Objectives for housing in settlements, consistent with the RDS, are to:

- Manage housing growth to achieve sustainable patterns of development;
- Support urban and rural renaissance; and
- Strengthen community cohesion.

The SPPS directs that the LDP should bring forward a strategy for housing, together with policies and proposals that reflect the policy approach of the SPPS, tailored to meet the specific circumstances of the plan area. In doing so, Planning Authorities are required to deliver:

- **Increased housing density without town cramming**
- **Sustainable forms of development**
- **Good design**
- **Balanced communities**

The SPPS also identifies that the LDP process is the main vehicle for assessing future housing land requirements and managing housing growth to achieve sustainable patterns of residential development, as well as fulfilling other SPPS objectives.

In order to assist with this process, the SPPS indicates that housing allocations in LDPs should be informed by:

- **RDS Housing Growth Indicators (HGIs)**
- **The RDS housing evaluation framework**
- **Allowance for existing commitments**
- **Urban capacity studies**
- **Allowance for windfall housing**
- **Application of a sequential approach and identification of suitable sites**
- **Housing Needs Assessment (HNA)/Housing Market Analysis (HMA)**
- **Transport Assessments**

The SPPS regional objectives for development in the countryside are to:

- manage growth to achieve appropriate and sustainable patterns of development which supports a vibrant rural community;
- 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;
- facilitate development which contributes to a sustainable rural economy; and
- promote high standards in the design, siting and landscaping of development.

Under regional strategic policy, the SPPS states that the LDP must promote a sustainable approach to development in the countryside through the clustering, consolidation and grouping of new development with existing buildings, together with the re-use of previously used buildings. This approach must seek to utilise existing infrastructure, reduce the cumulative impact of sporadic development on rural amenity and landscape character, ensure development integrates with its setting and respects rural character, and maintain a clear distinction between settlements and the open countryside by preventing urban sprawl.

Revised Definition of Affordable Housing in NI (2021, DfC)

The definition of affordable housing contained in the SPPS, detailed above, was revised in April 2021 following a consultation exercise launched in June 2019 by the Department for Communities (DfC).

The following revised definition of affordable housing has now been adopted for the purposes of planning and the Department for Infrastructure's SPPS:

"Affordable housing is:

- (a) Social rented housing; or
- (b) Intermediate housing for sale; or
- (c) Intermediate housing for rent that is provided outside of the general market, for those whose needs are not met by the market.

Affordable housing which is funded by Government must remain affordable or alternatively there must be provision for the public subsidy to be repaid or recycled in the provision of new affordable housing".

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 3 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 Statements

The following policies provide the current planning policy context for the assessment and determination of housing proposals.

These policies, as well as the SPPS, have been taken into consideration in the formulation of the detailed development management policies, which are contained within the draft Plan Strategy document.

Planning Policy Statement 7 (PPS 7) 'Quality Residential Environments

PPS 7 sets out regional planning policies for achieving quality in new residential development. The PPS, together with the advice contained in associated Supplementary Planning Guidance documents, including Creating Places and Living Places, complements existing Government policy and initiatives aimed at achieving attractive and sustainable places through better design.

The main objectives of PPS 7 are as follows:

- To promote an integrated approach to achieving sustainable and quality residential environments.
- To promote quality residential development that:
 - creates places for people which are attractive, locally distinctive and appropriate to their surroundings, safe, convenient, adaptable and easy to maintain;
 - respects and enhances features of value and local character and promotes biodiversity;
 - and

- reduces reliance on the private car, supports movement by pedestrians and cyclists, provides adequate and convenient access to public transport and connects well with the wider locality.
- To promote the comprehensive planning and development of residential areas and ensure that adequate information accompanies planning applications which will enable the delivery of an improved design quality.
- To ensure that adequate provision is made for infrastructure and appropriate local neighbourhood facilities as an integral part of residential development.

PPS 7 Addendum ‘Residential Extensions and Alterations’

‘Residential Extensions and Alterations’, designed to be read alongside PPS 7 ‘Quality Residential Environments’, provides planning policy for the extension and/or alteration of a dwelling house or flat, including those in multiple occupancy. The key objectives of the Addendum are to:

- promote high quality design of residential extensions and alterations;
- ensure that such works are sympathetic to the original property;
- respect the character of the local area; and
- protect neighbouring residential amenity.

PPS 7 Addendum ‘Safeguarding the Character of Established Residential Areas’

‘Safeguarding the Character of Established Residential Areas’, designed to be read alongside PPS 7 ‘Quality Residential Environments’ and ‘Residential Extensions and Alterations’, sets out additional provisions to protect areas of established residential character, environmental quality and residential amenity. It also sets out policy on the conversion of existing buildings to flats or apartments.

The addendum also seeks to promote greater use of permeable paving within new residential developments to reduce the risk of flooding from surface water run-off. The key consideration is to continue to ensure that new residential schemes are sensitive in design terms to people living in existing neighbourhoods and are in harmony with the local character of established residential areas, villages and smaller settlements.

Planning Policy Statement 8 (PPS 8) ‘Open Space, Sport and Recreation’

Policy OS 2 in PPS 8 sets assessment criteria for the provision of integral open space and equipped children’s play provision in new residential development, including normal thresholds for provision based on scale and a variety of design considerations that seek to achieve a high standard of siting, design and landscaping.

Planning Policy Statement 12 (PPS 12) ‘Housing in Settlements’

PPS 12 Housing in Settlements has been prepared to assist in the implementation of the RDS to guide the future pattern on housing by managing future housing growth and distribution, support urban renaissance and achieve balanced communities.

The regional policy objectives of PPS12 are to:

- manage housing growth in response to changing housing need;

- direct and manage future housing growth to achieve more sustainable patterns of residential development;
- promote a drive to provide more housing within existing urban areas;
- encourage an increase in the density of urban housing appropriate to the scale and design of the cities and towns of Northern Ireland; and
- encourage the development of balanced local communities.

The policy approach is to facilitate an adequate and available supply of quality housing to meet the needs of everyone; promote more sustainable housing development within existing urban areas; and the provision of mixed housing development in a range of sizes and tenures. This approach to housing supports the need to maximise the use of existing infrastructure and services, and the creation of more balanced sustainable communities.

PPS 12 highlights that the development plan process is the main vehicle for assessing future housing land requirements and that housing allocation in development plans will be determined by:

- (a) Application of the HGIs;
- (b) Allowance for existing commitments (including dwellings already built);
- (c) Use of urban capacity studies;
- (d) Application of a sequential approach and identification of suitable sites for housing;
- (e) Housing needs assessment;
- (f) Allowance for windfall housing sites; and
- (g) Residual housing need.

Policy HS 3 (Amended) Travellers Accommodation (PPS12) (2013)

Policy HS 3 (Amended) Travellers Accommodation acknowledges that travellers have distinctive needs which are assessed as part of the local housing needs assessment undertaken by the Northern Ireland Housing Executive (NIHE). It highlights that where a need is identified and a development plan is under preparation, the plan should identify a suitable site(s).

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

PPS 21 sets out the planning policies for development in the countryside, i.e. outside of settlement limits. It seeks to strike a balance between the need to protect the countryside from unnecessary or inappropriate development, while supporting rural communities.

PPS 21 sets out the following policy objectives:

- to 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.

Through this approach, PPS 21 seeks to facilitate appropriate rural development while safeguarding the environmental, landscape and heritage qualities of the countryside.

The development plan process plays a key role in identifying the countryside assets and balancing the needs of rural areas and communities with protection of the environment. This is facilitated by the preparation of the Countryside Assessment, which consists of:

- Settlement Hierarchy and Strategic Settlement Evaluation (Technical Supplement 1)
- A Landscape Character Assessment (Technical Supplement 9)
- Development Pressure Analysis (Technical supplement 8).
- Environmental Assets (Technical Supplement 10)

The Planning Strategy for Rural Northern Ireland (PSRNI)

Policy DES 2 (Townscape) requires development proposals in towns and villages to make a positive contribution to townscape and be sensitive to the character of the area surrounding the site in terms of design, scale and use of materials. Policy DES 10 (Landscaping) seeks to protect existing trees and make provision for new planting in new developments.

Supplementary Planning Guidance/Technical Advice

- **Creating Places - Achieving Quality in Residential Development (2000)** describes the contributions to quality and sustainability that developers in Northern Ireland will be expected to make through the design of new residential developments. It seeks to ensure that what is designed and built today will be cherished by both present and future generations. It is the principal guide for use by prospective developers in the design of all new housing areas.
- **Living Places: An Urban Stewardship and Design Guide for NI (DoE / DfI 2014)** aims to clearly establish the key principles behind good place making. It seeks to inform and inspire all those involved in the process of managing (stewardship) and making (design) urban places, with a view to raising standards across Northern Ireland. The focus of the guide is urban areas, by which is meant all of our cities, towns, villages and neighbourhoods. It recognises the wider economic, cultural and community benefits of achieving excellence in the stewardship and design of these important places, be they existing or newly proposed.
- **Building on Tradition – A Design Guide for the Northern Ireland Countryside (2012)** promotes quality and sustainable building design in Northern Ireland's countryside
- **Development Control Advice Note (DCAN) 8: Housing in Existing Urban Areas (2002)**, is also a material consideration in the determination of planning applications for small unit housing within existing urban areas. DCAN 8 advocates a design-led approach that promotes the philosophy of working within context and fitting development in with the prevailing neighbourhood character and appearance.

Other Strategies, Programmes, Plans and Documents

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

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

One of the priority areas for action is to 'strengthen society so that it is more tolerant, inclusive and stable and permits positive progress in quality of life for everyone', acknowledging that 'to create the conditions under which people can pursue positive progress in their quality of life, we need to ensure that everyone has access to decent housing that enables them to live sustainably.'

Promotes the development of sustainable communities by ensuring that quality housing is provided in appropriate locations and supported by the necessary infrastructure, services and employment opportunities. The Strategy emphasises that housing development should contribute to social wellbeing, economic prosperity and environmental protection, meeting the needs of current generations without compromising the ability of future generations to meet their own needs. Within a rural context, this supports development that strengthens the vitality and sustainability of rural communities while safeguarding environmental assets and the character of the countryside.

Sustainable Water - A long Term Water Strategy for Northern Ireland 2015 – 2040 (DRD 2016)

'Sustainable Water – A Long-Term Water Strategy for Northern Ireland (2015- 2040)' sets out a range of initiatives to deliver the Executive's long term goal of a sustainable water sector in Northern Ireland.

This strategy acknowledges that although water is essential to life it can cause widespread damage if not managed appropriately. As the responsibility for the water sector is spread across a number of Government Departments, the strategy seeks to deliver a more joined up approach, setting out a range of initiatives to deliver the Executives long term goal of a sustainable water sector in Northern Ireland. The strategy intends to achieve this by encouraging a sustainable and integrated approach to managing all our different water needs in a way that promotes regional development, without compromising the environment or increasing flood risk.

The Strategy identifies that growing the economy is one of the Northern Ireland Executive's main priorities and modern and sustainable infrastructure is required in order to support economic growth. As such it highlights that adequate investment is made in the water, sewerage and drainage infrastructure to facilitate new industrial and residential development, promote tourism and attract inward investment to Northern Ireland

The Strategy recognises how planning can impact on flood risk and water quality and aims to ensure that existing water and sewerage infrastructure and investment proposals inform future planning decisions and the preparation of LDPs.

The Strategy sets out a number of matters that are relevant in developing the Councils approach towards housing:

- Ensuring planning decisions are informed by up to date information on the risk from all significant sources of flooding;

- Prevention of inappropriate development in high flood risk areas and ensuring that future development does not increase flood risk;
- Exceptional development within high flood risk areas must make provision for adequate mitigation measures;
- Ensure surface water drainage is adequately addressed; and
- Planning policy should promote sustainable water and sewerage services by making appropriate space for water and sewerage infrastructure including sustainable drainage systems.

Developer Contributions for Affordable Housing in Northern Ireland (DSD, 2016)

‘Developer Contributions for Affordable Housing in Northern Ireland’ acknowledges that Northern Ireland is the only region in the United Kingdom that does not have a contribution scheme to provide affordable housing in mixed tenure development, delivered through the planning system.

The report considers whether a scheme of developer contributions can be successfully introduced in Northern Ireland without impacting the economic recovery of the local housing market, and if so, what type of scheme would deliver a successful outcome. It also acknowledges that the Local Development Plan may set out a locally defined developer contribution scheme.

The report highlights the various attitudes, both in favour and against, the introduction of a developer contribution scheme and also the mixture of views as to how such a scheme could be applied and also the thresholds at which a contribution scheme could apply.

It makes several recommendations and concludes that the introduction of a developer contribution scheme with a single percentage of affordable housing across NI will not work given current market conditions. Furthermore, it acknowledges that the timing, percentage targets and form of provision (e.g. units on site versus land) is best left to local decision makers working through the Local Development Plan process- where targets, delivery mechanisms and issues of tenure versus community ‘mixing’ can be fully debated.

Local Policy Context

Existing Area Plans

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

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

The Dungannon and South Tyrone Area Plan (DSTAP) 2010 applies to the area incorporated into the north-west corner of the Borough following local government reform. This area, which formed part of the former Dungannon and South Tyrone District Council area, includes the settlements of Derrylee, Tamnamore and Clonmore. A significant proportion of the Borough remains covered by the Banbridge, Newry and Mourne Area Plan (BNMAP) 2015. As a result of the 2015 local government boundary changes, the settlements of Ballyward, Dechomet,

Finnis and Leitrim, previously located within the Banbridge District, were transferred to the Newry, Mourne and Down District Council area. Consequently, the emerging Local Development Plan for the Borough encompasses all lands formerly covered by both the Armagh Area Plan 2004 and the Craigavon Area Plan 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 taken into account in the development of the draft Plan Strategy. Policies within the respective Development Plans that are related to housing are laid out below.

The Armagh Area Plan (AAP) 2004

The Principal Objectives of the AAP 2004 in relation to housing are as follows:

- to identify a settlement strategy consistent with the Regional Physical Development Strategy (NI) taking account of the local characteristics and circumstances prevailing within the Armagh District Council Area;
- to identify land within defined limits in urban areas to meet planned future development requirements in respect of housing; and
- to encourage the efficient use of existing infrastructure and make provision for new infrastructure.

The aim of the Principal Objectives was to identify sufficient land for new housing in the main and local towns to provide a choice of housing sites in convenient locations to support a range of dwelling types to meet different housing needs, and to protect the character of existing residential areas. A small amount of land was also zoned in villages and smaller settlements in order to provide options and allow flexibility. It was envisaged that the Small Settlements would be suitable for the development of small groups of houses and single dwellings and that the scale of development was expected to be commensurate with the character of the settlement. Within villages it was anticipated that demand for development would be limited and primarily for housing and in keeping with the size and character of the settlement.

Section 20.0 of the AAP provides local policy direction, including considerations around housing layout, house types, local character, landscaping standards, pedestrian links, open space and comprehensive development. The provisions of PPS 7, 8 and 12 would largely supersede these quality considerations.

The Banbridge, Newry and Mourne Area Plan (BNMAP) 2015

The key objectives of the BNMAP 2015 in relation to housing are as follows:

- to facilitate sustainable patterns of growth and development throughout the Plan Area;
- to promote Banbridge and Newry as main hubs within Northern Irelandand;
- to allow for the expansion of Dromore to accommodate housing need related to the Belfast Metropolitan Area;
- to allocate land for additional housing development over the Plan period in accordance with the strategic objectives and guidelines contained in the RDS;
- to facilitate integration between land use and transportation in order to reduce congestion and the need for car journeys and to encourage a shift to more sustainable modes of transport, particularly walking, cycling and public transport.

The aim of the BNMAP 2015 Plan Objectives was to identify sufficient land for new housing in the main and local towns to provide a choice of housing sites in convenient locations to support a range of dwelling types to meet different housing needs, and to protect the character of existing residential areas. A small amount of land was also zoned in villages and smaller settlements in order to provide options and allow flexibility. It was envisaged that the Small Settlements would be suitable for the development of small groups of houses and single dwellings and that the scale of development was expected to be commensurate with the character of the settlement. Within villages it was anticipated that demand for development would be limited and primarily for housing and in keeping with the size and character of the settlement.

BNMAP 2015 includes policy 'HSG 2 Social Housing Allocation' which outlines that land has been allocated for social housing on identified sites, through the imposition of Key Site Requirements.

The Craigavon Area Plan (CAP) 2010

The key objectives of the CAP 2010 in relation to housing are as follows:

- the encouragement and facilitation of sustainable patterns of development;
- the maintenance of compact urban forms that respect the individual character and identity of settlements, avoid urban sprawl and reduce the need for expansion into the countryside;
- the most efficient use of existing infrastructure, buildings and transportation systems;
- the integration of land use and transportation to reduce congestion and the need for car journeys and encourage a shift towards more sustainable modes of transport, including walking and cycling; and
- the achievement of a high quality of layout, design and landscaping in new development.

The aim of the CAP 2010 housing objectives was to identify sufficient land for new housing in the main and local towns to provide a choice of housing sites in convenient locations to support a range of dwelling types to meet different housing needs, and to protect the character of existing residential areas. A small amount of land was also zoned in villages and smaller settlements in order to provide options and allow flexibility. It was envisaged that the Small Settlements would be suitable for the development of small groups of houses and single dwellings and that the scale of development was expected to be commensurate with the character of the settlement. Within villages it was anticipated that demand for development would be limited and primarily for housing and in keeping with the size and character of the settlement.

The key elements in the CAP 2010 Plan Strategy, insofar as it relates to housing, are:

- recognition of the sub-regional significance of the Craigavon Urban Area (CUA);
- the high growth potential of CUA, reflecting its role as the major service centre in mid-ulster; and
- the role of the CUA in meeting a significant proportion of the Boroughs housing need.

CAP 2010 also contains Policy HOU 1 which provides for both Phase 1 and Phase 2 housing zonings, while Policy HOU 2 allows for 'Residential Development on Derelict, Vacant or Under-Utilised Land within Settlement Limits' subject to criteria.

The Dungannon and South Tyrone Area Plan (DSTAP) 2010

The key objectives of the DSTAP 2010 in relation to housing are as follows:

- the maintenance and enhancement of Dungannon and South Tyrone Borough and its distinctive urban and rural environs as an attractive and pleasant place to live, work and visit;
- the promotion of development within existing settlements which benefit from ease of access to an appropriate range of services and community facilities and maximise use of existing infrastructure;
- the maintenance of compact settlement forms that respect the individual character and identity of settlements, avoid urban sprawl and unnecessary ribboning and reduce the need for expansion into countryside; and
- the provision of development opportunities to meet housing and employment needs within a quality and sustainable living and working environment.

The key elements in the DSTAP 2010 Plan Strategy, insofar as it relates to housing, are:

- promote Dungannon as a main hub within Northern Ireland and strengthen its role as the principal administrative, trade, employment and residential centre within the Borough;
- consolidate the role of Coalisland as the Borough's second largest settlement, providing appropriate development opportunities for housing, employment and leisure activities, in keeping with the scale and character of the settlement;
- concentrate large-scale land use zonings within Dungannon and Coalisland, using a sequential and phased approach, particularly for housing, that gives priority to development within the existing urban area;
- sustain a living and working countryside whilst protecting from inappropriate development those areas that are vulnerable to development pressure or that are visually or environmentally sensitive.

In addition to the regional operational policy in PPS 7, 8 and 12, the DSTAP contains 2 specific policies. Policy HOUS 1 'Housing Zonings' provides for both Phase 1 and Phase 2 housing zonings and Policy HOUS 2 'Town Centre Housing' designates protected town centre housing areas and seeks to protect these areas from the pressures of other land uses.

Other Council Documents and Strategies

'Our People, Our Place, Our Future' – The Councils 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. It is the roadmap for delivering Council's Community Plan 2017 – 2030 and sets out the Councils commitment to uphold the highest standards of service delivery, facilities, projects, and programmes for the benefit of our people, our place and our future.

The Vision of the Corporate Plan is to create "a happy, healthy and connected community, a vibrant and sustainable economy and appealing places for living, working and learning" aligning with the aspirations of the Community Plan.

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. Two core priorities within the Corporate Plan are Environment and Place, and Economic Growth. Under each respectively, the Corporate Plan identifies 'Shape our places to be attractive, accessible, healthy, safe and clean', and 'seek investment in infrastructure and connectivity' as two of the main commitments that have a direct impact on housing.

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.

One of the Long term outcomes of the Community Plan, under the 'Place' Strategic Theme, is that 'Our distinctive, inclusive and vibrant urban and rural areas are at the heart of community and economic life'. The Community Plan acknowledges that our borough has a rich offering of settlements including our city, towns and villages. The aspiration of the Community Plan is that each urban and rural area values and protects its distinct identity and assets so that the Borough's full potential as a vibrant place for living, working, visiting and investing can be achieved.

The Community Plan recognises that a revitalised place is important as it contributes to a sense of community, improving quality of life, attracting visitors, businesses and creating economic opportunities. Additionally it recognises that place-shaping improves the social, economic, environmental and cultural wellbeing of the place, ensuring aspirations of the community are being realised and included in the process

It identifies that our Borough must be accessible, multifunctional and balanced. It recognises that sustainable development and regeneration will be a catalyst for further social, cultural and environmental renewal.

The Community Plan acknowledges that housing remains a huge challenge for the Borough despite sustained levels of investment in new social housing in Northern Ireland. It states that engagement has indicated that there is a requirement for an increased supply of affordable homes which offer a mix of sizes, types and tenures to address the housing needs of a diverse population and contribute to vibrant and cohesive communities. It also recognises that the increase in our ageing population demands more accessible, adaptable homes that are future proofed. It identifies that the current ageing housing stock poses challenges in terms of energy efficiency and accessibility and we need to work with our partners to ensure that everyone has access to a home that is suitable for their current and future needs.

Furthermore, the Community Plan highlights its ambition for all residents, including those living in rural areas, to benefit from good services, transport links and digital accessibility to ensure they fully participate in all aspects of civic life and future economic growth

The LDP, as the spatial reflection of the Community Plan, will have a pivotal role in achieving the long-term outcomes of the Community Plan through the allocation of housing across the Borough, the management of housing land supply and the provision of a planning policy framework against which housing development proposals are considered.

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.

Craigavon Integrated Development Framework (CIDF) 2010

The aim of the CIDF is to guide how the 3 town centres of Central Craigavon, Portadown and Lurgan will develop and thrive over the next 20 years and sets out a strategy for regeneration.

The Armagh Place Plan (March 2022)

The Armagh Place Plan, launched by The Armagh, Banbridge and Craigavon Community Planning Partnership, is the first community planning led Place Shaping Plan in Northern Ireland.

The Armagh Place Plan has been developed to help us understand and align key messages from policies such as Council's Connected – A Community Plan, and the Strategic Planning Policy Statement for Northern Ireland 2025 which identifies 'supporting good design and positive place making' as one its five core planning principles and what these may mean for local places.

The four key themes for development focus on making Armagh; a connected city, a greener city, an engaged city and a healthy city. Collectively the plan developed seven typologies and thirty actions which will be delivered collaboratively across the partners to embrace the vision of the outcomes.

One of the key strategic projects and initiatives proposed for delivery in the City by the Armagh Place Plan is 'CW3 Housing For Armagh', the aim of which is to enhance mixed tenure and increase accessible and affordable housing in the City Centre and to establish a NIHE city centre waiting list that is shared housing. The Place Plan acknowledges that sustainable growth of the City will require an active and vibrant centre, that adopts a town centre first approach and can support businesses. It also recognises that keeping streets safe and welcoming and at the same time encouraging city centre housing would increase vibrancy, and address young people's desire to build relationships across the city.

Banbridge Place Plan

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 split across 13 'Big Ideas' to bring about positive change in Banbridge. These actions include physical and non-physical interventions, and they have been thematically clustered;

- Arts, Heritage and Leisure
- Green Innovation
- Spaces, Places and Natural Environment
- Living Here
- High Street and Investing

In relation to Housing, the Banbridge Place Plan has identified 'New Housing for Banbridge' as one of the 'Big Ideas': 'mixed tenure low embodied energy housing development which would reduce housing need and creating liveable, walkable neighbourhoods, where residents have amenities to shop, work, rest and play within close range of home.'

Dromore Place Plan

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

It outlines a strategic vision for Dromore 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. Action BS7: Housing for Dromore, recognises there is a need to carry out a feasibility study to identify opportunities to increase the supply of affordable housing in Dromore.

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; agrifood, 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.

4.0 Borough Profile – Housing Profile of the Borough

Population and Households

On 21st March 2021 (Census Day), the usual resident population of the borough was 218,656. This accounted for 11.5% of the Northern Ireland population². The Borough has the largest population of any local government council area in Northern Ireland (NI), outside of Belfast. The Borough's population density is 1.64 residents per hectare, higher than the Northern Ireland average of 1.4.

The Borough's population increased by 18,863 persons from the 2011 to the 2021 Census, with the largest population increase in Craigavon District Electoral Area (15.4% increase). This was the second highest increase after Lisburn and Castlereagh and significantly higher than the average increase for Northern Ireland overall (5.1%).

The population increase was greatest in the older age groups, with the number of people aged 65+ increased by 7,363 or 26.7%. For those aged 75+, there was a 34% increase. The proportion of the population aged 15-29 fell by 6.4% between 2011 and 2021. As depicted in Table 1, below, on Census Day 2021 there was a total of 48,243 children aged 0-15 in the Armagh City, Banbridge and Craigavon Borough³, representing 22% of the Borough's Population.

Age Group	Armagh City, Banbridge and Craigavon	%
0 – 15 years	48,243	22.06%
16 – 24 years	21,774	9.96%
25 – 49 years	72,023	32.94%
50 – 64 years	41,626	19.04%
65 and over	34,990	16.0%
Total	218,656	100.0%

Table 1: Age profile of Armagh City, Banbridge and Craigavon Borough at Census Day 2021. Source: Table MS-A06 Age Structure, Census 2021

The population is projected to increase to 242,707 persons by 2035⁴, an increase of approximately 24,500 people (11.2%). The proportion of the Borough's population in the 0-15 age group is projected to decline from 23% in 2020 to 20% by 2035. Likewise, the proportion of those in the 16-64 age group is projected to decline from 62% in 2020 to 61% by 2035. In contrast the percentage of the Borough's population in the 65+ age group is projected to rise from 15% in 2020 to 19% over the same period.

As depicted in Table 2, below, on Census Day 2021 there were 84,642 occupied households in Armagh City, Banbridge and Craigavon borough. This was an increase of 9,136 households since the 2011 Census which represents a 12.1% increase compared to an increase of 9.3% in Northern Ireland overall.

² Census NISRA 2021

³ [Census 2021 main statistics demography tables – age and sex | Northern Ireland Statistics and Research Agency](#)

⁴ www.nisra.gov.uk/publications/2016-based-population-projections-areas-within-northern-ireland

	2011	2021	% Change
Armagh City, Banbridge and Craigavon	75,506	84,642	12.1%
Northern Ireland	703,275	768,810	9.3%

Table 2: Number of households in Armagh City, Banbridge and Craigavon & NI, 2011 & 2021. Source: Census 2011 & Census 2021

The average household size in Armagh, Banbridge & Craigavon Borough decreased from 2.62 usual residents per household in 2011 to 2.56 usual residents per household in 2021. The average household size in Northern Ireland was 2.44 in 2021.

One person households account for 27.7% of the 84,640 households in the borough (compared to 25.9% on census day 2011) while two person households account for 29.5% and households with six or more people account for just 3.4%. These proportions have remained much the same since 2011.

On Census Day 2021, detached properties accounted for almost 45% of occupied households with just over 50% of all usual residents in Armagh City, Banbridge and Craigavon Borough living in detached houses. Flats, maisonettes or apartments accounted for just 5.3% of occupied households housing just 3.2% of all usual residents⁵.

Between Census Day 2011 and Census Day 2021, there has been a 19.6% increase in the number of flat, maisonette or apartment spaces in Armagh City, Banbridge and Craigavon borough. The largest increase has been in the number of semi-detached properties which has increased by almost 22% over the decade from 2011-2021. The number of terrace properties has fallen by 5.5%⁶.

In terms of the urban / rural split, 77.5% of residents lived in settlements and 22.5% lived in the countryside. The majority (53.7%) of residents lived in larger settlements (i.e. over 5,000 population).

Figure 1 illustrates the historic and projected annual population change within the Borough, based on the Northern Ireland Statistics and Research Agency (NISRA) 2018 based population projections for the period 2018 to 2035. Over this period, the population of the Craigavon Urban Area Housing Market Area (HMA), which is coterminous with the Armagh City, Banbridge and Craigavon Borough Council area, is projected to increase.

The Strategic Housing Market Analysis (SHMA) attributes this population growth to the Borough's relatively young age profile, which is expected to generate a positive natural increase through births exceeding deaths, together with continued net inward migration.

⁵ Source: Table MS-E05 & Table MS-E06, Census 2021.

⁶ Source: Census 2011 & Table MS-E07, 2021.

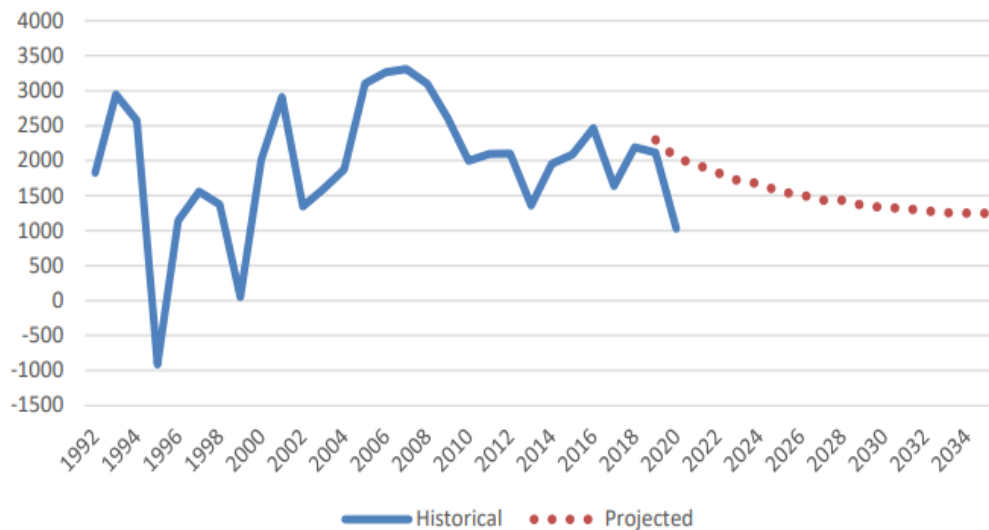


Figure 1: Historic and Projected Annual Population Change Armagh City, Banbridge and Craigavon Borough⁷

Other key points identified⁸:

- The pace of population growth was slower in the period 2011-2020 compared with the previous decade from 2001-2011.
- Population growth was especially strong between 2001 and 2011, up by 14 % which was almost double the Northern Ireland average of 7.4 %.
- Between 2011 and 2020, population growth slowed to 8.5 % in Craigavon Urban Area HMA reflecting reduced rates of in-migration and natural increase.
- Between 2001 and 2011, population growth was faster in rural than in urban areas however the pattern was reversed between 2011 and 2020, when the urban population grew at a slightly faster pace than rural areas (9.3 % vs 7.5 %).
- Population ageing has been a key feature shaping the age composition of the population over the last three decades. The 2018-based population projections anticipate a continuation of this ageing trend, with the population aged 65+ projected to exceed the child population in the early-2030s. It is however worth noting that the Borough is projected to have a younger population profile than the NI average.

The growth in the number of households in the Borough is projected to be fastest in the period up to 2025. From the mid-2020s onwards, household growth is projected to slacken in tandem with a slower pace of population growth, see Figure 2, below.

⁷ Source: NIHE Strategic Housing Market Analysis, 2019

⁸ Strategic Housing Market Analysis (SHMA) (NIHE, 2019)- review of population trends

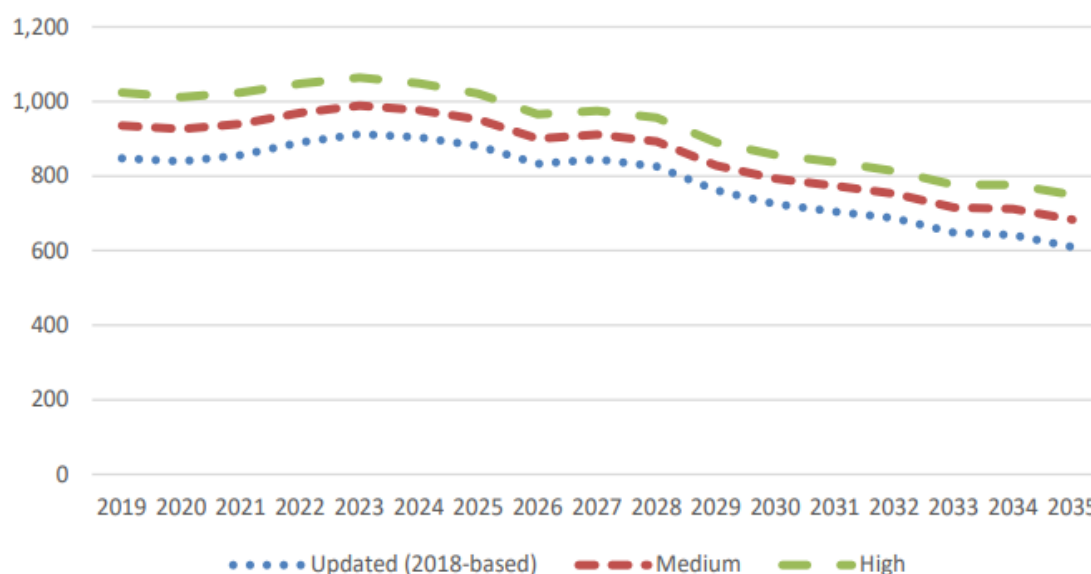


Figure 2: Household Projection Scenarios, Craigavon Borough⁹

In generating the household projection scenarios detailed above, the Strategic Housing Market Analysis (SHMA) (NIHE, 2019) updated the NISRA 2016-based household projections to take account of the 2018-based population projections. Medium and high growth scenarios for household growth, linked to the official population projections, but with varying assumptions around the trend in average household size, were also generated. Between 2018 and 2035 the medium growth scenario projects growth of 18 % in the number of households (+14,650 newly arising households), the updated scenario yields a slower rate of growth (+16.6 % or 13,410 newly arising households) while the fast growth scenario projects a rise of 19.4 % (+15,840 newly arising households).

Dependent Children

On Census Day 2021, approximately 52% of households in the Borough had no children with a further 16% having no dependent children (all children in household are non-dependent). In Northern Ireland overall, 55% of households had no children and almost 16% had no dependent children. Approximately 32% of households in the borough had 1 or more dependent children with 63% of those having 2 or more dependent children.

Household Composition

On Census Day 2021 there were an estimated 84,643 households in Armagh City, Banbridge and Craigavon borough. Table 2 below shows the composition of these households. Single family households, either married or in a civil partnership with children accounted for the largest proportion of households at 28.7% while those with no children accounted for a further 9.7% of the total households in the borough. One person households were the next biggest grouping accounting for a total of 23,407 households or 27.7% of the total. Lone parent families both with dependent and non-dependent children accounted for 13.2% (11,152) of the total households. Of these, a total of 9,582 (86%) were female lone parent households compared to 1,570 (14%) male lone parent households.

Living Arrangements

⁹ Source: Strategic Housing Market Analysis (SHMA) (NIHE, 2019)

The 2021 Census included questions on the relationships between people in the household and the figures below show the relationship status of household members for all residents aged 16 and over. In Armagh City, Banbridge and Craigavon borough, 57% of the adult population were living in households as a couple, either married, civil-partnered or co-habiting. Of those just 0.5% were living in a same-sex couple household.

Housing Stock and Tenure

42.6% of domestic properties in the borough as at April 2025 were detached. According to the 2021 Census results, 35.6% of properties in the borough are owned outright while 32.1% are owned with a mortgage or loan¹⁰.

The number of domestic properties in Armagh City, Banbridge and Craigavon Borough was 91,465 in April 2025, accounting for 10.9% of all domestic properties in Northern Ireland. This proportion has remained fairly stable over the years. Between 2015 and 2025, the number of domestic properties in the Borough has increased by 11.7% from 81,857 to 91,465. The number of domestic properties in Northern Ireland overall increased by 9.2% over the same period.

Year	Armagh City, Banbridge and Craigavon	Northern Ireland
2015	81,857	771,133
2016	82,489	776,526
2017	83,447	783,272
2018	84,398	790,328
2019	85,507	798,971
2020	86,663	807,812
2021	87,618	814,210
2022	88,731	822,083
2023	89,707	828,829
2024	90,582	835,988
2025	91,465	841,827

Table 3: Number of domestic properties in Armagh City, Banbridge and Craigavon Borough and Northern Ireland 2015 to 2025. Source: Northern Ireland Valuation List, Land and Property Services.

Data from the second phase of main statistics from Census 2021 was published on 15 December 2022 and provides key statistics for a number of census topics including housing and accommodation at Northern Ireland and Local Government District levels (LGD).

On Census Day 2021 there were a total of 84,642 occupied households in the Armagh City, Banbridge and Craigavon Borough. Of these, 58,110 (68.7%) were owner occupied while 26,532 (31.3%) were rented accommodation with 1,936 of these households living rent free. Table 4 compares the findings for Armagh City, Banbridge and Craigavon with Northern Ireland overall. As can be seen, a higher proportion of households in the borough are owner occupied compared to the Northern Ireland average. The borough has a lower proportion of socially rented households compared to Northern Ireland overall and a slightly higher proportion of private rented households.

¹⁰ Borough Statistics – Housing | Armagh City, Banbridge and Craigavon Borough Council

Tenure	Armagh City, Banbridge and Craigavon	Northern Ireland
Owner Occupied	68.7%	65.2%
Owns outright	35.6%	34.7%
Owns with a mortgage or loan	32.1%	29.6%
Part-owns and Part-rents	1.0%	0.9%
Rents	31.3%	34.8%
Social rented (NI Housing Executive)	8.3%	10.8%
Social rented (Housing Association/ Trust)	2.2%	4.5%
Private rented	18.6%	17.2%
Lives rent free	2.3%	2.3%

Table 4: Tenure of occupied households in Armagh City, Banbridge and Craigavon and Northern Ireland, 2021. Source: Table MS-E15 Census 2021

House Types

In 2025 detached houses accounted for 42.6% of all domestic properties in the Borough, followed by terrace (26.6%), semi-detached (25.8%) and apartments making up just 5%. In Northern Ireland overall detached properties are also the largest house type (35.9%). While the proportion of semi-detached and terrace houses are broadly similar to the Borough, Northern Ireland overall has a higher proportion of apartments (11%) than the Borough¹¹.

	Armagh City, Banbridge and Craigavon		Northern Ireland	
	Number	%	Number	%
Apartment	4,555	5.0%	92,565	11.0%
Detached	38,982	42.6%	302,009	35.9%
Semi-Detached	23,631	25.8%	217,468	25.8%
Terrace	24,297	26.6%	229,785	27.3%

Table 5: Domestic properties by type of property in Armagh City, Banbridge and Craigavon Borough and Northern Ireland 2025. Source: Northern Ireland Valuation List, Land and Property Services.

All property types have shown an increase over the last nine years with semi-detached homes in the Borough showing the biggest increase (23.2%) since 2015, followed by detached properties (12.2% increase). In 2015, in Armagh City, Banbridge and Craigavon Borough, apartments accounted for 5.1% of all properties, detached houses accounted for 42.5%, semi-detached 23.4% and terrace 29%. While these proportions are much the same in 2025, the 2.5 percentage point fall in terrace properties has been met with a 2.4 percentage point increase in semi-detached properties.

	Apartment	Detached	Semi-Detached	Terrace	Total
2015	4,147	34,754	19,186	23,770	81,857
2016	4,150	35,000	19,524	23,815	82,489
2017	4,198	35,375	20,009	23,865	83,447
2018	4,227	35,810	20,473	23,888	84,398
2019	4,277	36,251	21,033	23,946	85,507
2020	4,309	36,773	21,573	24,008	86,663

¹¹ Northern Ireland Valuation List, Land and Property Services 2025

2021	4,321	37,215	22,028	24,054	87,618
2022	4,353	37,747	22,508	24,123	88,731
2023	4,400	38,201	22,948	24,158	89,707
2024	4,458	38,616	23,292	24,216	90,582
2025	4,555	38,982	23,631	24,297	91,465

Table 6: Number of domestic properties by type of property in Armagh City, Banbridge and Craigavon Borough 2015 to 2025. Source: Northern Ireland Valuation List, Land and Property Services.

House Prices and Affordability

Residential Property

The standardised residential property price in Armagh City, Banbridge and Craigavon Borough in quarter 1 of 2026 stood at £184,745, an increase of 2.7% on quarter 4 2025 (£179,915). The standardised residential property price in Northern Ireland overall was £198,015 in Q1 2026 which is an increase of 1.5% since Q4 2025. In Q1 2026, Armagh City, Banbridge and Craigavon Borough had the third lowest standardised house prices in Northern Ireland, after Belfast at £181,033, and Mid and East Antrim at £173,893¹².

Affordable Housing – Social Rented Housing

Northern Ireland Housing Executive published the Commissioning Prospectus: Affordable Social and Intermediate Housing for Social Housing Development Programme Period (2024/25 - 2026/27). It states that in March 2023 there were 3,687 Housing Executive and 1,237 Housing Association tenants in the Borough in receipt of Housing Benefit. There were 38 new social homes completed in the year to March 2023, with 99 units on-site. A further 186 units are programmed to start over the next three years. Also, as shown in Table 7, below, there were 3,712 applicants on the Borough's waiting list, 2,311 of whom were in housing stress¹³.

Category	Single	Small Adult	Small Family	Large Adult	Large Family	Older Persons	Total
Applicants	1,472	228	946	153	345	568	3,712
Housing Stress Applicants	920	123	606	100	215	347	2,311
Allocations	136	26	105	14	35	68	384

Table 7: Armagh City, Banbridge and Craigavon Borough Affordable Housing Waiting List March 2023

General Housing Need (Urban and Rural)

The Commission Prospectus also sets out that the housing need within Armagh City, Banbridge and Craigavon Borough has remained at a relatively high level. The Northern Ireland Housing Executive identifies a five-year projected social housing need of 1,498 units (2023-2028) for the borough. The highest levels of need are concentrated in North Lurgan (316 units), Portadown 2 (229 units), Banbridge Town (197 units), Armagh 1 (135 units), Central Craigavon (124 units), Portadown 1 (100 units) and South Lurgan (90 units).

¹² Northern Ireland House Price Index historic reports | Department of Finance

¹³ Northern Ireland Housing Executive | Commissioning Prospectus: Affordable Social and Intermediate Housing for Social Housing Development Programme Period (2024/25 - 2026/27)

Settlement	Housing Need Assessment Area	Total 5 Year Projection
Armagh 1	Armagh 1	135
Armagh 2	Armagh 2	49
Banbridge Town	Banbridge Town	197
Central Craigavon	Central Craigavon	124
North Lurgan	North Lurgan	316
South Lurgan	South Lurgan	90
Portadown 1	Portadown 1	100
Portadown 2	Portadown 2	229
Aghagallon	Aghagallon	12
Derrymacash / Derrytrasna / Kinnego*	Derrymacash / Derrytrasna / Kinnego*	20
Dromore	Dromore	57
Gilford	Gilford	13
Keady	Keady	17
Loughbrickland	Loughbrickland	10
Middletown	Middletown	10
Portadown Rural	Portadown Rural	11
Rathfriland	Rathfriland	28
Richhill	Richhill	14
Remaining Settlements (need <10)	Various smaller settlements	66
Total	Armagh City, Banbridge and Craigavon Borough	1,498

Table 8: Projected (5-Year) Social Housing Need 2023-2028 - Armagh City, Banbridge and Craigavon Borough

**Some settlements may include a number of small settlements grouped together for waiting list purposes – where this occurs all settlements within the grouped HNA are listed. ** Remaining settlements include Annaclone, Bleary, Charlemont / Blackwatertown / Carrickaness / Donnelly Hill*, Clady / Corran / Ballymacnab*, Dollingstown, Donaghcloney, Lawrencetown, Loughgall, Madden / Milford / Ballyards*, Magheralin, Markethill, Poyntzpass, Tandragee, Tullylish and Waringstown where need in each settlement is less than 10.*

Table 8 sets out the greatest concentration of need is located within the main settlement hubs. North Lurgan has the highest projected requirement with 316 units, accounting for over one-fifth of the Borough's total need. This is followed by Portadown 2 with 229 units and Banbridge Town with 197 units. Other significant areas of need include Armagh 184, Central Craigavon (124 units) and Portadown 1 (100 units), 406 units in Lurgan. Together, these locations account for almost three-quarters of the borough's projected social housing requirement.

Overall, the Commission Prospectus projections indicate that while housing demand is concentrated primarily within the major urban settlement hubs of Armagh City, Banbridge Town and Craigavon Urban Area, there remains a continuing need for social housing provision across both urban and rural areas.

During March 2023 there were 3,712 applicants on the housing waiting list, with 2,311 applicants in housing stress as set out in Table 7.

The Borough also experiences significant rural housing need. The projected five-year need for rural areas is 201 units, with 399 applicants in the rural area in housing stress, representing 17.3% of the total housing stress waiting list.

Intermediate Housing Demand

The Northern Ireland Housing Executive Commission Prospectus also estimates intermediate housing demand of approximately 180 units per annum within the Borough. The longer-term Strategic Housing Market Analysis identifies a need for 2,680 intermediate housing units between 2020 and 2035, one of the highest levels of demand in Northern Ireland.

Wheelchair Housing Need

The Commission Prospectus March 2023 also set out that there were 81 housing stress applicants and 25 transfer applicants requiring wheelchair accessible accommodation. After accounting for allocations, this leaves an identified requirement for 85 wheelchair accessible units across the Borough.

Irish Traveller accommodation

No current need is identified within the Commissioning Prospectus although it is stated that this will continue to be monitored.

5.0 Survey Work and Studies on Housing

Housing Land Availability Study (Housing Monitor)

The Northern Ireland Land Use Database (NILUD) was initially set up by the former Department for Environment (DOE) to capture housing land availability data, however responsibility for maintaining these records passed to each of the Local Council Planning Departments in 2015. The SPPS states that a plan, monitor and manage approach to housing is necessary to ensure that, as a minimum, a 5 year supply of land for housing is maintained. It further states that monitoring should be an ongoing process with annual reporting and review. The Council has undertaken a housing monitor in relation to housing development in all settlements across the Borough.

The Housing Monitor Report (see Appendix 2) monitors the progress of housing development in each of the settlements within the Borough, providing details on completions and remaining potential. The figures provided in this report are based on the survey and subsequent analysis of housing monitor sites for the period 1 April 2023 to 31 March 2024, informed by new housing approvals and completions data. This survey end date aligns with the evidence base used to inform the LDP draft Plan Strategy.

The Housing Monitor is carried out on an annual basis to monitor the progress of housing development in respect of the RDS and Development Plans, inform the housing allocation within the LDP and to provide information on the available potential for further housing development within settlements.

Table 5 provides a high-level summary of the remaining units and land identified in the 2023-2024 Housing Monitor. Full details of the Annual Housing Monitor Report can be found in Appendix 2.

Housing Monitor 2023/2024	Completed		Remaining Potential		
	Units	Area Developed (ha)	Units	Overall %	Area Remaining (ha)
Tier 1 Main Settlements (Hubs) Total	410	21.51	11170	62.62%	459.51
Tier 2 Small Towns Total	43	1.92	2548	14.28%	109.13
Tier 3 Villages Total	32	1.69	2317	12.99%	124.08
Tier 4 Small Settlements Total	16	0.85	1805	10.12%	102.37
Overall Tier 1-4 Totals	501	25.97	17840	100%	795.09

Table 9: Summary of the remaining housing potential at each tier level identified within the Annual Housing Monitor Report 2023-2024

Housing in the Countryside

The Borough's countryside is a precious resource made up of distinctive landscapes, rich in heritage, cultural and environmental assets, including internationally important and designated nature conservation sites. It contributes to a unique sense of place and identity for rural communities, and acts as an important recreational and tourism asset. It supports important agricultural and agri-food industries, with many rural dwellers employed in farming and local enterprises.

24% of the Borough's population live in the countryside (outside of settlements), with 3,048 active farms¹⁴

In terms of the LDP the countryside is defined as land outside settlement limits. The countryside has experienced some development pressure, particularly from single dwellings. In some parts of the Borough, this has contributed to suburban sprawl, landscape degradation, habitat loss, impacts on water quality from non-mains sewerage systems, and reduced support for the sustainable growth of towns and villages. The LDP must therefore facilitate appropriate rural development that supports the Borough's character, economy and communities while protecting its natural resources and environmental assets.

It is worth noting that although the Borough has a large number of settlements (104), relative to other Council areas, a large number of these are classed as Small Settlements (66 in total), these settlements are very small in size, with very limited services and infrastructure.

The annual housing monitor is limited to settlements within the borough, and no equivalent rural housing monitor is currently undertaken to assess the number of houses being built in the countryside. The Council undertook a detailed analysis of countryside housing completions over the period 2016-2024 to establish an evidence base for the countryside housing allocation. The assessment adjusted completion data to exclude developments that do not generate a net gain in housing stock, including replacement dwellings. Using the resulting net completion figures, an average annual build rate was derived and projected forward to the end of the Plan period. The analysis indicated that 1,732 countryside dwellings were completed during the period 2016-2024. This figure has been therefore used to assist with the countryside overall allocation. This approach ensures that the allocation reflects both housing already delivered and the continuation of established countryside housing delivery trends over the remainder of the Plan period.

Urban Capacity Study

The draft Plan Strategy policy approach is to promote more sustainable development within existing urban areas, in line with the RDS and the SPPS. To facilitate this, the SPPS suggests that Council should undertake an urban capacity study to assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing.

During the preparation of the dPS an interim Urban Capacity Study was undertaken (Appendix) within the Main Settlements (Hubs) and Small Towns to inform the housing growth strategy. This primarily involved the identification of sites within the urban footprint that are suitable for

¹⁴ 2025 DAERA Agricultural Census

new residential development and their potential yield, along with an estimate of the likely yield from unidentified sites within the urban footprint; i.e, windfall housing.

In addition, the maximum potential yield from windfall sites was also considered as part of this Study. Windfall sites as defined in the RDS 2035 refer to Housing sites that were neither zoned nor anticipated during the formulation of the development plan, but which have become available during the lifetime of the plan. This is based on an average figure collected from the Housing Monitor Report data and historic NILUD data which is then extrapolated across the remaining duration of the Plan period. It is important to note however that windfall was calculated on a maximum yield and does not consider constraints that may arise.

Whilst this Study was completed in 2024/2025, it is not a static sample and will be updated as required as the Plan is progressed. Further detail on how the findings of the various studies and survey work is set out in Section 8 of this Technical Study.

Armagh City, Banbridge and Craigavon Housing Investment Plan 2023-2026

The Northern Ireland Housing Executive have a statutory responsibility to report to Council's on its performance of the previous year and its proposals for the year ahead. In alignment with the Council's Community Plan, the Housing Investment Plan is how the NIHE fulfils this legislative requirement, demonstrating how it supports the Community Plan objectives and sets out the affordable housing need for the Borough.

The report identifies an intermediate need of and a requirement of 2,860 over the plan period and a need of 1,101 social housing units.

Armagh City, Banbridge and Craigavon Housing Investment Plan 2024 Update

This is the first update required to be submitted to the Council by the NIHE. It details that whilst the intermediate housing need remains unchanged from the original document, there has been an increase in the need for social housing units to 1,498 over the duration of the plan period.

NIHE Housing Market Analysis (HMA)

The Housing Market Analysis is produced by the NIHE as an additional resource to inform the development of affordable housing policies within the Borough. It provides both a regional and local overview of the housing market, describing current market trends and risks to the housing market in the future. The Housing Market Analysis for the Borough is covered entirely by the Craigavon Urban Area HMA and is reported in the South Eastern Area Report – Craigavon and Newry HMAS. The key statistics from this report can be found within Section 4.0 Borough Profile.

The SPPS states that Housing Needs Assessment/Housing Market Analysis (HNA/HMA) provides an evidence base that must be taken into consideration in the allocation, through the development plan, of land required to facilitate the right mix of housing tenures including open market and special housing needs such as affordable housing, social housing, supported housing and travellers.

Strategic Housing Market Analysis (SHMA) Report

The SHMA was commissioned by the Northern Ireland Housing Executive and sets out the projections of future housing need and demand using a net stock model to determine the future housing projections. The report provides projections in total and by tenure (private, intermediate and social housing need).

The net stock model projects future housing requirements based on three main components:

- Newly arising need and demand due to projected net growth in the number of households.
- Existing unmet need, most often referred to as the backlog of unmet need, i.e. the shortfall between current provision and the accommodation needs of existing households as well as individuals or families that have not yet formed as separate households.
- Accompanying demand (second homes) and supply-side adjustments (vacant dwellings, conversions, etc.).

The backlog of unmet need for social housing can be considered to encompass three main components:

- Households and potential households without self-contained accommodation.
- Owner-occupiers and private renters in need of social rented housing.
- Social rented sector tenants in unsuitable accommodation.

The net new dwelling requirements by tenure have been projected based on a household affordability model, with income tests deployed to assign the following categories:

- Market – can afford market rent or has sufficient income to enter and sustain home ownership.
- Intermediate – cannot afford market rent but can afford more than social rent.
- Social – cannot afford intermediate or market rent.

Houses in Multiple Occupation (HMOs)

In May 2004 the Northern Ireland Housing Executive (NIHE) introduced a statutory registration scheme for HMO's and since 1 April 2013 this scheme was extended to cover all areas in NI and all HMO properties. A new licensing scheme was subsequently introduced in April 2019 which replaces this registration scheme, and in addition local councils across NI took over responsibility for HMO's from the NIHE.

In September 2025 there were 3614 HMOs registered in Northern Ireland, of which 57 are located within Armagh City, Banbridge and Craigavon Borough Council area. HMOs form an important component of the housing market and contribute to meeting the needs of a diverse range of residents, including students, young professionals, single-person households, key workers and those seeking more affordable housing options. They provide flexibility within the housing stock and can make efficient use of existing residential properties.

Local Elected Members have also expressed concerns and have reported receiving numerous complaints in relation to HMO planning applications and the increasing concentration of such developments within established residential areas. Further information is set out within the Draft Plan Policy Approach section.

6.0 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.

The Key Issues addressed in the POP that of particular relevance to this Technical Supplement are:

- Key Issue SGS 2 'Allocating Housing.'
- Key Issue SOC 1 'Supporting quality sustainable urban housing and balanced communities.'
- Key Issue SOC 2 'Supporting sustainable rural housing.'

A brief overview of the responses received in respect of these Key Issues and the Councils consideration of the feedback received, is set out below.

Key Issue

Key Issue SGS 2 'Allocating Housing.'

Preferred Option

The preferred approach to Key Issue SGS 2 (Option SGS 2A) was to focus housing growth on the Hubs (Armagh City, Banbridge Town and Craigavon Urban Area) whilst sustaining rural communities to reflect regional direction.

The preferred approach recognised that the Borough's Hubs are the best locations in terms of infrastructure provision, connectivity, access to services/goods and employment to accommodate housing in a sustainable manner. Table 10, below, sets out the suggested

housing allocation, as presented in the POP, across the four tiers of the Settlement Hierarchy¹⁵.

The preferred approach proposed increasing the HGI¹⁶ (%) housing allocation in the Hubs from 51% to 52%¹⁷ (equating to approximately 10,300 units up to 2030¹⁸) to further support the spatial framework of the Regional Development Strategy (RDS) to grow the population in the Hubs and cluster of Hubs (SFG 12). The proposed housing allocation to the Local Towns remained at 10% (equating to approximately 1,985 units) and the proposed housing allocation to the Villages was increased by 2% to 13% (equating to approximately 2,580 units). The preferred approach proposed reducing the housing allocation to the Small Settlements and Rural Area from 28% to 25%.

Settlement Hierarchy Tiers	Preferred Housing Allocation (%)	Preferred Housing Allocation (No.)
1. Hubs (Armagh City, Banbridge Town & Craigavon Urban Area)	52	10,322
2. Local Towns	10	1,985
3. Villages	13	2,581
Total of Hubs, Local Towns & Villages	(75)	(14,888)
4. Small Settlements & Rural Area	25	4,962
Borough Total	100	19,850

Table 10: Preferred Approach to SGS 2- Preferred Housing Allocation (HGI 19,850 units) across the Settlement Hierarchy

It was considered that the preferred approach was in keeping with RDS direction which acknowledged the disproportionate amount of growth in smaller settlements and significant growth in the open countryside. If this pattern were to continue, it could affect the role of larger settlements and be contrary to the objectives of the Strategy for strong growth in larger urban areas.

Summary of POP Commitments

Commitments outlined in respect of housing allocation included:

- Setting out the precise number of dwellings that will be allocated to each settlement at a later stage in the plan-making process, taking account of the size of the settlement, the

¹⁵ Further information in respect of the Settlement Hierarchy is set out in Technical Supplement 1 'Settlement Hierarchy and Strategic Settlement Evaluation.'

¹⁶ The RDS expresses regional housing needs as Housing Growth Indicators (HGIs), which are produced as a guide for the preparation of the LDP. The HGI is an estimate of the new dwelling requirement for the Council area over a fixed period, which can then be used to extrapolate housing allocation over the Plan period. They are guidance, rather than a cap on housing development in the area or a target to be achieved.

¹⁷ See POP Table 5.4 (P42) which details the number of households within each of the four tiers of the Settlement Hierarchy in 2011.

¹⁸ The proposed housing allocations in the POP were based on the revised HGI figure published by DfI in April 2016, i.e., 14,400 dwellings over the period 2012 to 2025, giving an annualised projection of 1,103, which was extrapolated to 2030 to give a figure of 19,850 dwellings to be allocated.

availability of services and facilities, the level of committed housing and its environmental capacity for development.

- Undertaking further evidence gathering to ascertain how the past rural approval trend /rates sit with the suggested rural housing yield over the plan period.

POP Representations

Of the 201 representations received, 69 made comments in respect of Key Issue SGS 2, representing a response rate of 34%. Only 30% of the responses were categorised as being supportive of the preferred approach and over half of the responses (51%) were categorised as being unsupportive. The remaining 19% of responses were categorised as being non-committal or unclear.

Whilst there was a low level of support for the preferred approach towards SGS 2, a number of the respondents offered constructive feedback and suggestions. One respondent, whilst acknowledging that the preferred approach is logical and directs growth in the main Hubs, emphasised that levels of growth across the Borough should be commensurate with their place in the settlement hierarchy (POP ref 148).

Another respondent agreed that housing growth should be directed to the Hubs to protect their function, but with some allocation to small settlements and rural areas. The respondent also highlighted that allocating housing to rural areas will help to sustain and support rural communities and assist their sustainability (POP ref 174).

One of the respondents welcomed the drive to focus housing growth on the places with better infrastructure and access to services whilst not ignoring the smaller settlements of the wider rural area (POP ref 079), whilst another considered that the preferred approach, as a broad-brush methodology, has significant merit. The respondent also suggested, however, that appropriate caveats are built in to ensure that planning pinch points, such as affordable housing, can be examined specifically and sensitively (POP ref 012).

Although in agreement that the preferred approach to focus housing development in the Hubs, one respondent highlighted that housing numbers can be delivered at variance to the HGI and still meet the tests of Plan soundness (POP ref 118).

A significant number of the respondents who provided comments on this key issue were unsupportive of the preferred approach. A number of the respondents (including but not limited to POP refs 112, 119, 121, 136 and 139) considered that robust evidence to justify the housing requirement is not provided and considered that the evidence underpinning the POP is out of date. The respondents also considered that the evidence base fails to acknowledge the inter-relationships between different aspects of the POP, in particular the housing and employment policies. Furthermore the respondents considered the planned provision for new housing has not given adequate consideration to the implications of recent under provision.

One of the respondents highlighted that the LDP must address current and future residential needs by ensuring that vacant buildings, unused, underused land, backland and brownfield land are prioritised to provide sufficient suitable land to meet future requirements (POP ref 147) whilst another cautioned that the high percentage of the allocation to the Hubs can only lead to further infrastructure issues due to the needs for upgrading of existing drainage system, problems with flooding and increased traffic flows (POP ref 173).

A significant number of representations (including but not limited to POP refs 065, 066, 067, 068, 069, 070, 072) queried housing allocation methodology and made a number of recommendations on how it should be adjusted. One suggestion, included in a number of representations, involved the following steps:

- Projecting the social housing need figure to cover the plan period- respondents queried whether the proposed housing growth figure of 19,850 includes the 327 units for projected social housing need, which is only based on a 5 year figure. Considers that it should be projected to 981 units- providing an overall figure of 20,831.
- Basing the overall housing figure on a longer period of growth- respondents considered that the HGIs used by the Council are based on house build out and completion data rates for a period that included global recession. Respondents considered that the inclusion of this data, alongside the limited review period has resulted in skewed growth projection for future housing requirements. As such, respondents suggested basing the overall housing growth figure on a longer period of growth (1998-2013), providing a figure of 22,120 dwellings.
- Allowing for a margin of unexpected growth- Respondents suggested that housing growth projections should consider plans of neighbouring councils and allow for a margin of unexpected growth from cross boundary relationships- suggesting a further 15% of housing growth on this basis (extra 3318 units). On this basis respondents suggested that the housing growth figure should be 26,419 dwellings.

One respondent considered that the RDS housing Evaluation framework is a very flexible assessment of capacity to assist each borough, but it is not subtle enough to deal with the idiosyncrasies of each settlement and on this basis the Council should review the housing allocation (POP ref 103). The respondent also considered that the Housing Market Symposium has undermined the housing projections and urged the Council to review the housing allocation.

Another respondent highlighted that the HGI is based on the 2012 HGI figures and noted that they were not subject to public scrutiny, which therefore offered a lower and more conservative figure taking account of the abnormal period of recession / slow growth. On this basis the respondent suggested that the housing allocation should be uplifted in line with the original HGI figures outlined in the RDS 2035 (POP ref 128). The respondent considered that the use of the RDS 2035 figures will permit a more robust allowance of future housing which will not restrict the potential growth of the Borough over the Plan period.

Another respondent highlighted that the HGI figure is for guidance and is not a cap or target and therefore councils can allocate more than the stated figure if this can be justified, given the particular circumstances of the individual council. The respondent considered that the specific circumstances of the Borough and the evidential basis for the HGI were not taken into account, or the need to ensure a 5-year land supply to the end of the LDP period (POP ref 110).

A number of the respondents queried the preferred allocation of housing within each tier, as detailed in SGS 2A, many of which suggested alternative allocations. Examples include a greater allocation to larger villages (including Donaghcloney) in order to sustain growth (POP ref 065), a greater allocation towards the growth of Local Towns, which represent a more sustainable location for growth than widely dispersed settlement in smaller settlements and in the countryside (POP ref 098) and greater allocation to both the Hubs and Local Towns, where the most sustainable infrastructure is located (POP ref 146). This respondent also considered that the Craigavon Urban Area should receive the largest share of the allocation for hubs given

its size, strategic location and potential for further growth. One of the respondents considered that the housing allocation apportioned to the Local Towns is too low, while the allocation to Villages and Small Settlements and the Rural Area is too high. The respondent also considered that the LDP should encourage more growth in the larger settlements, especially those with good service provision and quality transportation links (POP ref 180).

One respondent highlighted that any approach must increase the ability to meet the RDS 60% Brownfield target in settlements over 5,000 and expressed concern that the preferred option lacks ambition in seeking to achieve this target. The respondent highlighted that using an evidential sequential approach to development, will help produce settlement patterns which further sustainable development, and are set within environmental limits (POP ref 135).

In addition, there were several non-committal responses that did not offer a specific opinion on the preferred approach, but highlighted areas in the Borough where there was demand for housing.

Consideration of Preferred Option SGS 2A

The preferred option relating to Key Issue SGS 2 seeks to enable the sustainable growth within our Main Settlements (Hubs) and Small Towns where the majority of industry and employment lands are located, multi-modal transportation is available moving from a strong reliance on the private car for commuting, community and cultural facilities are centred and greater retailing and commerce options are available. This has been developed so not to inhibit development within the villages, small settlements or the countryside, as sustainable development at these tiers is also considered of great importance in order to sustain these communities. The reduced allocation to the lower three tiers and increased allocation to the top two tiers is seen as the best solution in order to meet the growing demands upon these tiers with projected population increases in the Borough over the duration of the Plan period.

A number of respondents negatively viewed the use of the HGI as a baseline for the allocation figure, however, the HGI is a guide in developing an appropriate allocation for each settlement. Similarly the housing allocation is not to be seen as a limit on housing development, with the annual housing monitor returning annual data on housing development. The data gleaned from the Housing Monitor will be reviewed and the approach tailored if required.

Regarding the consideration of the other alternative options, none of the respondents indicated that the two alternatives provided a better option than the preferred option. The use of HGIs follows the direction of the RDS, in particular RG8: Manage housing growth to achieve sustainable patterns of residential development, of which the preferred option is the only option that directly supports the objectives of the RDS in terms of the allocation of housing and the management of housing supply in the Borough.

The methodology for the allocation of housing has then been developed considering any constraints on supply to provide a figure that is considered to be appropriate and will enable the extant zonings to continue to meet housing demand until the zonings have been revised during the Local Policies Plan stage of the LDP.

Whilst the Council acknowledges that the Housing Market Symposium (2017) provides useful background context on housing supply challenges in Northern Ireland, housing allocations should be based primarily on more recent and locally specific evidence, including Census 2021 data, HMA evidence, NIHE evidence, housing monitor trends and the Council's surveys. Although the Housing Market Symposium can inform the approach it would be difficult to justify

housing allocations on it alone given its age, regional focus and acknowledged evidence limitations.

Key Issue

Key Issue SOC 1 'Supporting quality sustainable urban housing and balanced communities.'
Preferred Option

The preferred approach to Key Issue SOC 1 (Option SOC 1A) was to bring forward an approach to new residential development in settlements in line with existing policies, tailored to reflect regional direction and to meet local circumstances.

Summary of POP Commitments

Commitments outlined in the preferred approach included bringing forward a similar set of policies, as contained in the existing suite of operational policy, but with some adjustment to reflect the Council's wider approach to the urban area under other Key Issues, such as design and place-making, and to build on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate.

Specifically, the POP committed to considering the following key areas:

- Bringing forward a similar set of design criteria as in Policy QD 1 of PPS 7 and the Addendum for 'Safeguarding the Character of Established Residential Areas' with a renewed focus on design quality in line with the LDP's wider approach to supporting good design and positive place-making.
- Reducing the threshold for Master Plans on major residential developments downwards from 300 to at least 250, with a renewed focus for the requirement for a Design Concept Statement for all residential schemes.
- Improving the level of provision of equipped children's play facilities in larger residential schemes (of 100 units or more, or for sites of 5ha or more) than currently required in Policy OS 2 and to broaden this provision to include Multi-use Games Areas (MUGAs)¹⁹.
- Bringing forward a general policy for all new urban development in relation to sustainable movement patterns in housing layouts, with a greater onus placed on promoting active travel within the scheme and in the surrounding area, including connectivity with adjoining lands (both developed and un-developed), as well as integration with public transport networks where possible²⁰.
- Including a threshold of scale of development for housing proposals that fall within a certain size of housing zoning or are part of a group of zonings, where the developer has to

¹⁹ The consideration of SOC 5 'Facilitating open space / play provision in new largescale residential developments' is set out in Technical Supplement 7 'Open Space, Sport and Outdoor Recreation' and the POP Public Consultation Report, available on the Council's website.

²⁰ The consideration of ECN 17 'Promoting active travel and sustainable transport' is set out in Technical Supplement 6 'Transportation'. ECN 18 'Promoting and Enhancing Access to Greenways', set out in Technical Supplement 7 'Open Space, Sport and Outdoor Recreation', is also of relevance to this commitment. Further detail is also set out in the POP Public Consultation Report, available on the Council's website.

demonstrate that the provision of local neighbourhood facilities as part of a development, would not be required²¹.

- Promoting town centre living by protecting existing housing areas, similar to Policy HSG 3 and related designations in BNMAP 2015.
- Bringing forward a similar policy to the current 'Living Over the Shop' Policy HS 1 (in PPS 12).
- Including sustainable drainage as a design consideration as a means to reducing surface water run-off and alleviating food risk²².
- Allocating Land for new social housing across housing zonings (by Key Site Requirements) at Local Policies Plan stage, in consultation with NIHE.
- Encouraging a mix of house types, tenures and sizes in line with current Policy HS 4 (PPS 12).
- Identifying suitable sites in the Local Policies Plan, to cater for any need for Travellers specific accommodation that is identified by NIHE through their local housing needs assessment.
- Bringing forward a similar criteria-based policy as in Policy HS 3 (Amended) for assessing proposals for Travellers specific accommodation.

It was considered that the proposed changes, summarised above, would allow for a more locally tailored approach to urban housing.

POP Representations

Of the 201 representations received, 34 made comment in respect of Key Issue SOC 1, representing a response rate of only 17%. Over three quarters of the representations (76%) were categorised as being supportive of the preferred approach, 6% were categorised as being unsupportive, with the remaining 18% categorised as being non-committal or unclear.

Whilst a number of the respondents did not substantiate their support for the preferred approach, several offered constructive feedback and suggestions. One of the respondents considered that emphasis should be placed on the importance of integrating development proposals to the local areas they are proposed, in a more rigorous approach than in PPS 7 or DCAN 8 so to minimise jarring interfaces between areas (POP ref 064) whilst another highlighted that design quality should be reflective of the character of the area and be flexible (POP ref 119). Another respondent, whilst supportive of the preferred approach, considered that some aspects could be strengthened to truly further sustainable development and incorporate climate change adaptation and resilience building (POP ref 135).

A significant number of the representations offered feedback on the specific key areas, outlined above in POP commitments. In respect of housing quality several respondents suggested that design quality should be reflective of the character of the area and considered in respect of energy efficiency that the requirements should not be over onerous so to affect

²¹ The consideration of SOC 6 'Facilitating community and cultural facilities' is set out in Technical Supplement 12 'Community and Cultural Facilities' and the POP Public Consultation Report, available on the Council's website.

²² The consideration of ENV 8 'Encouraging Sustainable Drainage Systems (SuDS)' is set out in Technical Supplement 15 'Flood Risk and Drainage' and the POP Public Consultation Report, available on the Council's website.

the viability of development. Additionally, in regard to local neighbourhood facilities respondents highlighted that there is a need to ensure the requirement does not affect viability and suggested, in respect to affordable / social housing provision, that the Council should consider 'need' for the entire timeframe of the plan (including POP refs 119, 121, 136, 141 and 143).

One of the respondents emphasised the demand for more social and affordable housing across the Borough, particularly in areas of high social deprivation, both urban and rural. The respondent considered that social and affordable housing must be developed in a manner which is sustainable and provides community facilities and infrastructure (POP ref 125). Additionally, the respondent highlighted that the accommodation needs of Travellers must be met across the Borough.

Another respondent considered that a mixture of new homes in accessible locations around the Borough will encourage and assist with future growth, however suggested that account will need to be taken of the tenure and location of housing allowing for fluctuations in age groups and future demands (POP ref 148).

Whilst supporting the development of housing within settlement development limits to promote connectivity, sustainable patterns of transport and travel one respondent highlighted that housing developments should be consolidated, wherever possible, to promote regeneration, enhance vibrancy, and to better sustain commercial and community amenities and facilities, with increased access to public transport (POP ref 174).

Another respondent, whilst supportive of the preferred approach, requested that developments which have their backs to main or minor roads are not allowed as this creates long stretches of ugly fencing. Additionally, the respondent highlighted that there are a number of historic buildings within the Borough that are lying idle and empty which could be used for housing, such as Gilford and Tandragee Mills (POP ref 001).

Only two (6%) of the responses to the preferred approach were unsupportive. One of the respondents, who disagreed with the preferred approach, suggested that new policy should specifically state that any new development in villages and small settlements should be very low density. The respondent considered that the appropriate density should be based on the historic character of the settlement, with less reference to any modern housing developments found within a particular settlement (POP ref 180). The other unsupportive response highlighted that the RDS and the SPPS are clear on their requirements for "Adequate and Available Housing" and as such the LDP should quantify the terms "Adequate" and "Available". The respondent considered that it is clear that lands with planning permission that built one foundation to attain "commenced" status cannot be counted if there is no genuine prospect of actual housing being occupied within a period time (POP ref 188).

A number of the non-committal responses also offered constructive advice in respect of Key Issue SOC 1. One of the respondents highlighted that the LDP must address current and future residential needs through ensuring that vacant buildings, unused, underused land, back land and brownfield land are prioritised to provide sufficient suitable land to meet future requirements. The respondent also emphasised that new residential development must be of the type, size, tenure and mix necessary to meet household sizes and range of incomes (POP ref 147).

One respondent considered that there is an opportunity to incorporate blue and green infrastructure with potential wins for biodiversity in well planned schemes (POP ref 082), whilst

another highlighted that the LDP could provide opportunities for the historic environment including the promotion of heritage led regeneration and adaptive reuse of vacant buildings (POP ref 080).

One of the respondents noted that the most up to date urban capacity figure indicates that there is sufficient land within settlement boundaries to meet identified housing need and highlighted that in order to be sound, the strategy, policies and allocations need to be realistic and appropriate having considered relevant alternatives and are founded on robust evidence (POP ref 113). Additionally, the respondent reminded the Council of the SPPS provision relating to the five year housing land supply and advised that monitoring provisions should be included within the plan to ensure that housing supply is maintained.

Consideration of Preferred Option SOC 1A

Following consideration of the POP representations, which were from a broad range of stakeholders, the Council has sought to bring forward an approach that is broadly in line with the POP Preferred Option SOC 1A, and the key elements set out. However, where the draft policy approach is not fully in accordance with the POP, this has been due to the need to take account of relevant and up-to-date regional policy direction, the most recent evidence base, current issues, engagement with stakeholders and the requirement to ensure that the draft Plan Strategy is robust, effective and sound.

Some of the key issues that have influenced the policy approach to the delivery and design of housing in settlements in the Draft Plan Strategy, since the POP, include:

- the projected ageing population trend over the plan period;
- the projected decrease in household sizes, including households with children over the plan period;
- a significant increase in affordable housing need in the Borough (along with changes to the needs composition);
- an increasing awareness of climate change and sustainability issues;
- the Council's Design and Place-making agenda; and
- the need to align with other policy requirements in the LDP.

Key Issue

Key Issue SOC 2 'Supporting sustainable rural housing.'

Preferred Option

The preferred approach to Key Issue SOC 2 (Option SOC 2A) was to bring forward an approach to rural housing in line with existing policies and further regional direction, tailored to meet local circumstances.

Summary of POP Commitments

The preferred approach recommended bringing forward a similar set of operational policies as contained in the existing PPS 21 (Sustainable Development in the Countryside) and the Addendum to PPS 7 (Residential Extensions and Alterations), but with some adjustment to reflect the Council's wider approach to the rural area under other key issues (e.g. landscape designations and design) and to build on the regional direction contained in the SPPS to best

reflect local circumstances, where appropriate. Commitments outlined in the preferred approach included:

- Bringing forward all Planning Policy Statement (PPS) 21 policies, amended as appropriate, with the exception of CTY 2 'Development in Dispersed Rural Communities', to reflect the SPPS.
- Clarifying or clearly defining what a 'small group' of social/affordable dwellings would involve.
- Clarifying what would constitute an infill development within a 'small gap site in an otherwise substantial and continuously built frontage.'
- Carrying out a detailed policy review in advance of the dPS.
- Exploring further opportunities for new dwellings in the countryside, subject to further evidence gathering.
- Addressing inconsistencies between the current policies in PPS 21 to aid interpretation of policies in the determination of planning applications.
- Taking account of any new landscape designations (brought forward at dPS) in rural policy²³.
- Bringing forward detailed design criteria to support good design in rural areas.
- Updating current policy to include residential amenity considerations.
- Updating and expanding policy considerations to ensure that all development proposals in the countryside will be sited and designed to integrate sympathetically with their surroundings, not have an adverse impact on local rural character, and meet other planning and environmental considerations, including those for drainage, sewerage, access and road safety, as directed by the SPPS.
- Reviewing Policy CTY 16 'Development relying on Non-mains Sewerage' to consider how the planning application process works alongside the separate 'Consent to Discharge' application process.

POP Representations

Of the total 201 responses received, 29 made reference to Key Issue SOC 2, representing a response rate of only 14%. Over half of the responses (52%) were categorised as being generally supportive of the preferred approach, 38% were categorised as being unsupportive, and the remaining 10% were considered to be non-committal or unclear.

Whilst a number of the respondents did not substantiate their support for the preferred approach, several welcomed the recommendation to bring forward a similar set of operational policies as contained in PPS 21 and the Addendum to PPS 7 (Residential Extensions and Alterations), building on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate. One considered that the preferred approach is consistent with the SPPS and will be tailored to local need (POP ref 079), whilst another considered that a more locally tailored approach to areas designated or recognised for their biodiversity value or acknowledged for their landscape quality would complement the ENV suite of policies (POP ref 082).

²³ The consideration of relevant Key Issues ENV 4-6 is set out in Technical Supplement 10 'Environmental Assets' and the POP Public Consultation Report, available on the Council's website.

Another respondent stated that any approach that is in line with the existing rural policies as set out in PPS 21 is welcomed. The respondent considered that the opportunities provided by the SPPS provide the appropriate balance between managing growth to achieve sustainable patterns of growth and facilitate development to support a vibrant rural community and economy (POP ref 113). The respondent also commended the Council for recognising that over development in rural areas can adversely affect water quality from the increased use of non-mains sewerage systems, however sought clarification on the nature of the local adjustment / tailoring proposed.

Whilst welcoming the Councils commitment to introducing a clear definition of 'infill development within a small gap site in an otherwise substantial and continuously built frontage', one of the respondents considered that the SPPS does not go far enough in providing more opportunities to sustain rural communities and therefore suggested that a more flexible approach needs to be taken within the existing criteria (POP ref 147).

One of the respondents, although supportive of the preferred approach to rural housing, highlighted that consideration must be given to other potential forms of land use, such as minerals development, so to ensure that housing development does not sterilise an important mineral or aggregate reserves in the countryside (POP ref 062).

A relatively high level of the respondents were unsupportive of the preferred approach to SOC 2. One considered that the approach should be focused on sustaining the established small settlements through the provision of housing, suggesting that this would better support the services and facilities within small settlements (POP ref 121). The respondent also suggested that the Council should consider provisions for housing developments within small settlements, the extension of settlement limits, the zoning of land and the development of white land within small settlements.

Another respondent, who was unsupportive of the preferred approach to SOC 2, considered that the preferred approach does not recognise and have regard to the disproportionate growth in the countryside as noted in the RDS. The respondent highlighted that environmental considerations should be taken into account in the location, siting and design of dwellings in the countryside and that policy should recognise the environmental value of the countryside (POP ref 135).

One of the respondents expressed concern that the relaxation of policy, departing from that of the SPPS, will allow too much flexibility and facilitate an increased number of one-off dwellings in the open countryside. Instead, the respondent suggested that the LDP should aim to limit the growth of dispersed, single dwellings in the countryside (POP ref 174). Additionally, the respondent considered that dispersed development in rural areas can isolate people, have a negative impact on their health, separate them from services and facilities, and increase household reliance on the private car.

Another respondent, who was unsupportive of the preferred approach, considered that in the context of fewer and larger farm businesses there is no need for significant new volumes of housing in the countryside to meet real need. The respondent considered that the needs of most farming families can be met using existing stock, replacements and conversions (POP ref 180).

A small number of the respondents expressed their support for the alternative options to SOC 2. One of the respondents stated that they were supportive of SOC 2B, which suggested an approach to rural housing in line with existing policies and further regional direction. The

respondent expressed concern that relaxation of policy which departs from that of the SPPS, would allow too much flexibility and facilitate an increased number of one-off dwellings in the open countryside. Instead, the respondent suggested that the LDP should aim to limit the growth of dispersed, single dwellings in the countryside (POP ref 174). Two of the responses stated that they were supportive of SOC 2C, which suggested a more restrictive approach to rural housing than existing (POP refs 001 and 135). Another respondent stated that SOC 2C is 'relatively close' to being the best approach to rural housing, but the policy needs to be more restrictive and promote more sustainable patterns of urban living in settlements that provide a reasonable variety of services and community facilities (POP ref 180).

Although welcoming the Councils recognition that housing should be provided to ensure the sustainability of rural communities, one of the respondents considered that insufficient evidence had been provided to support the preferred approach to rural housing and on that basis were unsupportive of the SOC 2A (POP ref 139).

One of the responses, categorised as being non-committal, highlighted that it is Important to recognise that the rural landscape is inseparable from the historic environment and forms the immediate and wider rural setting of heritage assets. It highlighted that the historic environment and the setting of heritage assets often share common pressures with regard to sensitivity to rural development, such as impacts on setting, removal of assets or impacts on previously unidentified below ground archaeological remains (POP ref 080).

Consideration of Preferred Option SOC 2A

Council recognises that to maintain and enhance the attractiveness of the countryside as a place to invest, live and work, the countryside requires a sustainable approach to new development. It acknowledges that a sustainable approach towards the countryside involves managing development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities, consistent with regional direction. This approach, insofar as it relates to this subject area, involves supporting sustainable rural development, by bringing forward suitable opportunities for residential development in the countryside in the LDP, that will sustain vibrant rural communities whilst also reflecting and complementing the overall approach to housing growth across the Borough.

The preferred approach to SOC 2A recommended bringing forward an approach to rural housing in line with existing policies and further regional direction, tailored to meet local circumstances. This involved bringing forward a similar set of operational policies as contained in the existing PPS 21 (Sustainable Development in the Countryside) and the Addendum to PPS 7 (Residential Extensions and Alterations) but with some adjustment to reflect the Council's wider approach to the rural area under other key issues (e.g. landscape designations and design) and to build on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate. It was considered that the suggested amendments to the current policy approach, as outlined in the POP commitments above, would assist the Council in managing growth to achieve appropriate and sustainable patterns of development that will support a vibrant rural community.

All responses received in respect of SOC 2 are welcomed by the Council and each have been carefully reviewed as the Councils approach towards the housing in the countryside has been developed. This includes the development of the LDP's Countryside Strategy, particularly SGS 10 'Sustainable Development in the Countryside', the suite of rural housing policies and

other relevant operational planning policies, such as Policy DES 2 'Rural Design and Character in the Countryside.'

The Council notes the support expressed for an approach that balances opportunities for rural development with the need to protect the countryside, sustain rural communities and promote the appropriate reuse of existing buildings. The importance of directing development to suitable locations and ensuring that the scale of development reflects the capacity of rural areas to accommodate growth is also acknowledged.

The Council notes the various concerns regarding potential relaxation of rural housing policy, including the potential for an increased number of one-off dwellings in the open countryside and the impact of dispersed development in terms of social isolation, increased reliance on the private car, and the inaccessibility of services and facilities. Equally, the Council also notes the requests for a more flexible policy approach, so to provide more opportunities to sustain rural communities. Whilst the Council appreciates that the countryside is viewed as a desirable place to live and work, it is cognisant that this has resulted in development pressure, particularly from single dwellings. This has led to some areas experiencing over-development, landscape deterioration and habitat loss, alongside having an impact upon infrastructure provision and the sustainable growth of our towns and villages. As such, the LDP will clearly set out appropriate opportunities for residential development in the countryside, in line with regional direction, that are considered, in principle, to be acceptable and will contribute towards the aim of sustainable development. It is considered that this represents the most sustainable approach to housing in the countryside and will adequately meet the current and future needs of our rural population, but not at the expense of the quality of the environment.

The Council notes the suggestion that consideration must be given to other potential forms of land use, such as minerals development, so to ensure that residential development does not sterilise an important mineral or aggregate reserves in the countryside. The Council recognises that in order to maintain and enhance the attractiveness of the countryside as a place to invest, live and work, a sustainable approach to all new development is necessary. In particular regards to minerals development, the LDP will seek, where appropriate, to safeguard minerals resources of economic or conservation value from sterilisation by non-minerals surface development which would prejudice future exploitation. See Technical Supplement 13 'Minerals Development' for further information, including consideration of Key Issue ECN 11: Supporting sustainable minerals development.

In response to requests for greater policy clarity, the proposed policies have been refined to provide additional guidance and certainty regarding their interpretation and application. This includes clarifying key terminology and criteria where appropriate. However, the Council considers that the fundamental approach remains consistent with regional policy direction and that there is no evidence to justify a substantive departure from regional policy.

The Council acknowledges concerns regarding the evidential basis for the preferred option and suggestions that a more flexible approach should be adopted. However, it is considered that the proposed policy strikes an appropriate balance between facilitating sustainable rural housing opportunities and protecting the intrinsic character and environmental quality of the countryside. The intention of the policy is not to introduce additional restrictions beyond those necessary to achieve these objectives, but rather to provide a clear and locally distinctive interpretation of regional policy. In terms of feedback regarding the evidence base, The Council appreciates and acknowledges that the approach must be underpinned by a robust evidence base and will ensure that the LDP is underpinned by comprehensive evidence base, developed and reviewed as the Plan is progressed.

The comments regarding the historic environment, heritage assets and their settings are noted and will be further considered as the LDP is progressed. The Council recognises that the Borough's built and natural environment (including our archaeological heritage), and their settings, are irreplaceable assets that contribute to local identity, sense of place, townscape character, and economic vitality of Borough. One of the Core Principles of the Strategic Planning Policy Statement (SPPS) is preserving and improving the built and natural environment. It highlights the important role of the planning system in conserving, protecting and enhancing the environment whilst ensuring it remains responsive and adaptive to the everyday needs of society. As such the Council acknowledges that appropriate protection must be afforded to these important assets, and their settings. In addition to bringing forward strategies for both the countryside and heritage, the dPS will bring forward a suite of operational planning policies for the Natural Heritage and Historic Environment, against which all development proposals will be assessed against, where relevant.

Having carefully considered the POP feedback and suggestions, alongside taking account of regional direction, the Council considers that the proposed policy approach should be retained. The modifications proposed are limited to providing additional clarification and improving policy wording to assist implementation and decision-making, rather than altering the overall strategic direction established through regional planning policy.

The Council acknowledges that the POP indicated that consideration would be given to updating policy provisions relating to rural housing to include specific residential amenity considerations. Through the subsequent preparation of the draft Plan Strategy, the Council reviewed the most effective means of addressing residential amenity impacts arising from development proposals. This process concluded that such matters would be more appropriately addressed through the introduction of a general policy (GP 4) applicable to all forms of development, rather than through the inclusion of separate amenity criteria within individual rural housing policies.

The Council notes the comments relating to settlement limits, white land and the zoning of land. The Local Policies Plan will detail settlement development limits, land use zonings and environmental designations as well as contain appropriate proposals for individual places. In specific regards to settlement limits, it will be the Council's intention to acknowledge existing urban development, promote and accommodate necessary development and contain it within the limits to maintain a clear distinction between the built up area and the surrounding countryside.

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.

7.0 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 the 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 Workshops

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 housing policies set out below:

- Strategic Housing Allocation
- Protecting Zoned Housing Land
- Protected Housing Areas in city and Town Centres
- Design Concept Statements Concept Master Plans and Comprehensive Planning
- Quality in Residential Development
- Residential Mix
- Affordable Housing in Settlements
- Conversion or Change of Use of Existing Buildings to Flats or Apartments
- Houses in Multiple Occupation
- Specialist Residential Accommodation
- Travellers Accommodation
- Householder Development

- New Dwellings in an Existing Cluster
- Replacement Dwellings
- Infill and Ribbon Development
- Dwellings on a Farm
- Dwellings for Non-Agricultural Enterprises
- Personal and Domestic Circumstances
- Affordable Housing in the Countryside
- Residential Caravans and Mobile Homes

Whilst there was general agreement with the draft policy wording, Elected Members highlighted the importance of affordable housing policies and HMO policies.

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 operational policies as well as engaging with NI Water on the Strategic Policy SGS 3.

Cross Boundary Context and Consideration of Neighbouring Council Approaches

In developing the approach towards the allocation of housing and relevant operational policies, 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 of adjoining Councils have been taken account of, in addition to regional guidance, in order to identify any cross boundary issues / conflict.

Table 11, below, outlines adjoining Councils position in regard to housing.

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.

	Antrim and Newtownabbey Borough Council adopted the Local Development Plan 2030 - Plan Strategy on 3 July 2025 Housing Allocation ANBC identifies the need for 9,750 dwellings over the plan period and distributes the largest growth allocation to Metropolitan Newtownabbey (40% of the allocation), Antrim (28.2% of the allocation) and Ballyclare (11.3% of the allocation) which are the top three tiers of the settlement hierarchy. 7.7% of the allocation would be allocated to the countryside. ANBC acknowledges that land will be identified and zoned for housing purposes in the LPP, and the Council will support proposals for the development of new homes in a sustainable fashion within such areas. ANBC also identifies that a critical consideration in bringing forward future housing zonings will be those committed housing sites in Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin and Randalstown; and where appropriate within the villages of the Borough. Policy DM 17 is the overarching operational policy that deals with all housing in settlements. Various subsections sit below the DM 17 which deal with various planning considerations. This is as follows: Affordable Housing; Public Open Space Provision in New Residential Developments; Private Open Space; and Living over the Shop. Under Policy DM 17.3 requires developments of 40 units or greater to provide a minimum of 10% of the units as affordable housing. If this is not viable, a reduced or alternative provision of affordable housing may be acceptable. Operational Policies: Housing in the Countryside • DM 18 Homes in the Countryside • DM 18A Farm Dwellings • DM 18B Replacement Dwellings • DM 18C Dwellings within a built up frontage • DM 18D Dwellings within an Existing Cluster • DM 18E Dwellings in Exceptional Circumstances • DM 18F Conversion of Vernacular and Locally Important Buildings to Dwellings • DM 18G Affordable Housing in the Countryside • DM 19 Residential Caravans and Mobile Homes
Newry, Mourne and Down District Council	Newry Mourne and Down District Council published their draft Plan Strategy on 27th June 2025. The public consultation on the draft Plan Strategy took place from 27 June 2025 to 22 September 2025.

	Housing Allocation NMDDC identifies the need for 11,000 new homes over the LDP period, with 4,512 (38%) being allocated to Newry (city) and Downpatrick (main town); 3,070 (27%) to local and small towns, 2,032 (16%) to villages, 725 (6%) to small settlements and 1,686 (13%) to the countryside. To date, 39% of the total housing supply for the LDP period has either been completed or benefits from planning permission. The dPS identifies that the phasing of development will be reviewed and monitored, with phase 1 sites primarily consisting of committed housing sites and phase 2 sites being reviewed at the LPP stage. Villages and small settlements do not benefit from phasing; however Housing Policy Areas may be identified at the LPP stage. Policy HOU 5 (Affordable Housing) requires a 20% provision within Newry and district towns on sites over 0.5ha or comprising 10 units or more; or on sites 0.2ha or comprising 5 residential units or more in villages and small settlements. Operational policies for urban settlements • Policy HOU1 Quality in Residential Development • Policy HOU2 Design Concept Statements and Concept Masterplans • Policy HOU3 Residential Extensions and Alterations • Policy HOU4 Conversion or Change of Use of Existing Buildings to Flats or Apartments • Policy HOU5 Affordable Housing • Policy HOU6 Housing Type, Size and Tenure • Policy HOU7 Adaptable and Accessible Homes • Policy HOU8 Specialist Residential Accommodation • Policy HOU9 Accommodation for the Travelling Community Operational Policies: Housing in the Countryside • COU1 Dwellings in Existing Clusters • COU2 Replacement Dwellings • COU3 Affordable Housing in the Countryside • COU4 Personal and Domestic Circumstances in the Countryside • COU5 Dwellings for Non-Agricultural Rural Enterprises • COU6 Ribbon Development • COU7 Residential Caravans and Mobile Homes • COU8 Dwellings on Farms • COU9 Design and Integration of Buildings in the Countryside • COU10 Rural Character • COU11 Setting of Settlements
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Mid Ulster District Council	Mid Ulster District Council (MUDC) 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. Housing Allocation The aim of MUDCs Growth Strategy and Spatial Planning Framework is to manage housing growth to achieve sustainable patterns of residential development. MUDC identifies a need for approximately 11,000 dwellings over the plan period, acknowledging that at present less than 30% of the Districts households are located in the three towns and focusing growth in the three hubs means that opportunities should be provided in the Local Policies Plan for 60% of the Districts' Housing Growth Indicator (HGI) to be located within the three towns, around double the figure of existing households living in the three towns. MUDCs approach to housing is supported by a suite of policies related to housing in settlements and housing in the countryside, including the provision of social housing at a rate not less than 25% of the total number of units in residential developments of 50 units or more or on sites of two hectares and over units within settlements. Operational Policies: Housing in Settlements • HOU1 – Protection of Land Zoned for Housing • HOU2 - Quality Residential Development • HOU3 – Residential Extensions • HOU4 – Conversion of Existing Buildings to Falts, Apartments or Houses in Multiple Occupation • TH1 – Travellers Accommodation Operational Policies: Housing in the Countryside • CT1 – General Policy • CT2 – Dwellings in the Countryside • CT3 – Social and Affordable Housing in the Countryside • CT4 – Dispersed Rural Communities • CT5 –Temporary/Residential Caravans/Mobile Homes

Lisburn and Castlereagh City Council	Lisburn and Castlereagh City Councils (LCCC) 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. The Plan Strategy was adopted on the 26th of September 2023 following resolution by full council. Housing Allocation LCCC commissioned a Housing Growth Study which examined the robustness of the RDS Housing Growth Indicators (HGI). The study sought to update the 2012-based HGI through the use of 2016-based household projections data together with adjustments set out within the 2012 HGI methodology, identifying a new baseline future growth of 10,380 households over the Plan period (692 dwellings per annum) for LCCC, rounded up to 700 dwellings per annum equating to 10,500 dwellings for the plan period. LCCC applied a buffer of 10% over-supply to the HGI baseline figure to take into account the possibility that an element of the identified potential might not come forward during the plan period. This gave a resultant strategic housing allocation figure of 11,550 units, which falls just under the potential units remaining in LCCC of 11,578. In order to facilitate LCCCs strategic economic ambition at West Lisburn up to 50 hectares of land has been identified for residential use. Operational Policies: Housing in Settlements • HOU1 New Residential Development • HOU2 Protection of Land Zoned for Housing • HOU3 Site Context and Characteristics of New Residential Development • HOU4 Design in New Residential Development • HOU5 Public Open Space in New Residential Development • HOU6 Design Concept Statements, Concept Masterplans and Comprehensive Planning • HOU7 Residential Extensions and Alterations • HOU8 Protecting Local Character, Environmental Quality and Residential Amenity in Established Residential Areas • HOU9 The Conversion or Change of Use of Existing Buildings to Flats or Apartments • HOU10 Affordable Housing in Settlements • HOU11 Specialist Accommodation • HOU12 Accommodation for the Travelling Community
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	Operational Policies: Housing in the Countryside • COU1 Development in the Countryside • COU2 New Dwellings in Existing Clusters • COU3 Replacement Dwellings • COU4 The Conversion and Reuse of Buildings for Residential Use • COU5 Affordable Housing • COU6 Personal and Domestic Circumstances • COU7 Dwellings for Non-Agricultural Business Enterprises • COU8 Infill/Ribbon Development • COU9 Temporary Caravan • COU10 Dwellings on Farms
Monaghan County Council	Monaghan County Council adopted its Country Development Plan on 26th May 2025. Due to differing regional requirements in terms of housing demand, availability of land, population and demography and accommodation type, it is not directly comparable, however due to Monaghan County Council abutting the Borough to the south, the delivery of housing and services may impact on housing demand within our Borough. The Housing Strategic Objective (HSSO 1) seeks 'To plan for future housing in the County within defined settlements, making efficient use of infrastructure and services in towns and villages, and enabling their plan led growth, whilst facilitating sustainable rural housing where it supports rural communities.' Monaghan County Council uses the Economic and Social Research Institute (ESRI) NPF new household demand from 2017 up to 2031 figure of 268 households per year. This figure has been adjusted to account for the 7 years between 2017 to the publication of the Plan and the homeless households, and estimated unmet demand as a Census 2022 added to the figure to produce an overall demand of 2,558 households for the remainder of the Plan period or 426 households per year. In response to social housing, policy HSO 8 to enable development of new social housing. HSO 8 reads as follows: 'To provide social housing in partnership with voluntary and co-operative housing bodies as well as through agreements with private developers and the local authority's own house building programme.' The objectives for Housing are as follows: • HSO1 – HSO12: Housing Strategy Objectives. • RSO1 - To support a balanced approach to the development of rural areas to retain vibrancy, to

	accommodate within the rural area people who are functionally or socially part of the rural community, and to direct urban generated housing demand into established rural settlements. • RSO 2 - seeks to deliver at least 20% of all new housing in rural areas on brownfield sites through the encouragement of the renovation of vacant or derelict dwellings, the provision of on-site replacement dwellings, the redevelopment of previously developed residential sites and former homesteads, and the redevelopment of sites containing industrial or agricultural buildings. • RSP 7 - RSP 7: Single Dwellings in Rural Areas Under Strong Urban Influence will only be permitted where the development complies with one of the following: • A new rural dwelling will only be permitted where the applicant can demonstrate a genuine local or functional need. Permission may be granted where one of the following applies: ○ The applicant is a landowner or an immediate family member of a landowner. ○ The applicant has lived in the local rural area for at least 5 years. ○ The dwelling is needed by someone whose main employment is in a local rural-based enterprise (e.g. agriculture, business, industry, or other work closely linked to the rural area). ○ The dwelling is for a retiring farmer, or the widow/widower of a farmer who last farmed principally in the local area. ○ There are exceptional personal or domestic circumstances where refusal would cause genuine hardship, and no reasonable alternative accommodation solution exists. ○ The proposal is to replace an existing dwelling that retains the essential characteristics of a house. ○ The proposal involves the conversion of a protected structure or valuable vernacular building to residential use, helping to secure its preservation. ○ The applicant is a returning emigrant who previously lived in the local rural area for a continuous period of at least 5 years
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Table 11: Adjoining Councils Position – Housing

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

Although there are some differences in the draft policy wording and strategic housing policy of adjoining Councils dPSs, it is not considered that there are any significant conflicts with

Armagh City, Banbridge and Craigavon Councils Draft Plan Strategy insofar as it relates to housing.

8.0 Draft Plan Strategy Approach to Housing

Planning for housing is a fundamental role of the LDP. It is a complex and multifaceted area of planning, requiring the consideration and alignment of a wide range of factors. These considerations must be carefully integrated to inform a coherent growth strategy, policies and proposals that support regional policy objectives whilst meeting local housing needs.

The Council's approach to housing within the Borough's settlements is guided by and is consistent with the RDS. In line with the SPPS:

- it seeks to facilitate an adequate and available supply of quality housing to meet identified needs,
- to promote sustainable patterns of residential development within existing urban areas, and
- to encourage an appropriate mix of housing types, sizes and tenures to support balanced and inclusive communities.

The Council's approach to housing in the countryside reflects the strategic objectives of the SPPS, which seek to balance the protection of the rural environment with the need to sustain rural communities.

The draft housing policies 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 (SFG 10, SFG 11, SFG 12, SFG13, SFG14, RG7 RG8 and RG11) and the revised SPPS.
- Planning Policy Statement 7 (PPS 7): 'Quality Residential Environments, PPS 7 Addendum 'Safeguarding the Character of Established Residential Areas', PPS 8: Open Space, Sport & Recreation, Planning Policy Statement 12 (PPS 12) 'Housing in Settlements', PPS 21 Sustainable Development in the Countryside, The Planning Strategy for Rural Northern Ireland (PSRNI) (as detailed in the Regional Policy Context) and 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 our 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.

This section details the evidence base that supports the strategic policy approach of the Plan Strategy.

Strategic Housing Allocation

A range of factors have been considered by the Council to inform the strategic housing allocation within the Spatial Growth Strategy. These factors, together with representations received to the POP, as outlined in Section 6.0, are set out below.

Housing Growth Indicators

The RDS 2035 Housing Growth Indicators (HGI) provide an indication of future housing need in Northern Ireland and are based upon projections produced by NISRA. These estimates are based on current population and household formation trends with the assumption that such trends will continue into the future. However, given the long-term period that LDPs must plan for, it is highly likely that these assumed trends will fluctuate due to factors beyond DfI or Council's control.

In 2018, options relating to housing allocations in the Preferred Options Paper, were informed by the Department of Infrastructure (DfI) HGI figures published in 2016 for the period 2012 to 2025, which estimated a need of 14,400 housing units. However, these were subsequently revised by (DfI) in 2019. The use of the revised HGIs is considered appropriate, on the basis that they are the most up to date published figures.

The HGI figures published by DfI in 2019 estimate the requirement of 17,200 dwellings in the Borough during the 15-year period 2016 - 2030 (1146.67 average per year). Furthermore, due regard must be given to the revised notional end date of the LDP, which has been revised to 2035.

Therefore, to calculate the housing requirement for the plan period, the Council's 17,200 HGI figure has been projected on a pro rata basis for the period of 2016 to 2035 resulting in a gross figure of 22,940 (20 years x 1147 dwellings). As an element of this period lies outside the 15 year plan period, it was considered appropriate to deduct the dwellings completed in the 5 year period, i.e. between 1 January 2016 to 31 December 2020.

An analysis of completions within the Borough between the period 2016 – 2020 were significantly less than the annual HGI figure of 1146.67 dwellings per year.

From this analysis, it is clear that the housing requirement for this period (2016-2020) was not delivered which has resulted with an unmet need within the Borough. During this period there were a range of distinct factors at a national and global level which influenced the delivery of housing, primarily relating to the uncertainties of Brexit and the onset of the Covid-19 pandemic.

The UK's decision to leave the EU created uncertainties arising from Brexit generally and influenced housing delivery across Northern Ireland during 2016 – 2020. These effects were also felt within the Borough. The referendum result created a climate of economic uncertainty which affected investor confidence, slowed decision-making which contributed to delays in capital investment, including in the construction and development sectors.

The NIHE report “Brexit and the Northern Ireland Housing Market” (2019) identified significant risks to the housing market, including economic confidence and cross-border dynamics. It also highlighted the potential for disrupted labour availability, reduced market confidence, and pressures on investment across the region. It recognised that such factors tend to slow build-out rates and suppress housing delivery.

Meanwhile, the year 2020 was heavily disrupted by the onset of the Covid-19 pandemic, resulting in construction delays, staff redeployment, supply chain issues, social-distancing restrictions, which resulted in delays in the delivery of both private and affordable housing units. During this period the NIHE also emphasised that lockdown measures and operational adjustments contributed to major delays in estate upgrades and repairs, which significantly reduced capacity for new build projects.

Although Covid-19 affected only part of the timeframe outside the plan period, its impact on completions in 2020 was severe, which straddled into the plan period. The trend of lower build rates continued during 2020 - 2024 when an annual average of only 503 dwellings were built throughout the Borough. Both figures for the periods 2016-20 & 2021-24 are considerably below the average HGI need figure of 1146.67 dwellings per year. For the total period 2016-2024, an annual average of only 599 dwellings were built throughout the Borough.

By its very nature, residential completions data will lag behind planning approvals data. There are many factors that contribute to and influence the degree of lag, including the delay in applicants commencing their planning approval, the construction process itself, the delay in Building Control completions certificates being applied for, as well as delays and system errors in the Building Control and LPS processes. It is also likely that lock downs and social distancing during the pandemic also played a part.

Additionally, the conflict in Ukraine, particularly since 2022 has caused further upheaval and uncertainty in fuel supply which has affected the global economy, cost of living and the construction industry.

Given the unique circumstances and to ensure a robust housing strategy to meet housing needs over the plan period, it is considered appropriate to carry forward this unmet need from 2016 – 2020. Therefore, the Council has subtracted the housing built from 2016-2020 to determine the unmet need during this period. This approach should help compensate for the low levels of dwellings built during this suppressed house building period and allow for the unmet need to be provided during the remainder of the plan period to 2035.

In addition, consideration has been given to the number of units that have been delivered during the plan period, 2021 – 2024, which has also been deducted from the allocation of 22,940, refer to Table 15.

While HGIs are purely for guidance and should not be considered as a cap on development or as a target, they provide a robust starting point which can subsequently be adjusted, taking account of the full range of factors that may influence housing requirements over the plan period. Consultations to the POP also noted that the HGI figures are not a cap-

Allocation of housing to settlement tiers and the countryside

In keeping with the POP, the settlements have been classified into four tiers, (except for the allocation to the countryside has been separated from tier 4, in response to POP representations):

- Tier 1: 3 x Main Settlements – settlements with a population range between 16,438 & 72,721;
- Tier 2: 6 x Small Towns – settlements with a population range between 1906 and 6,492;
- Tier 3: 30 x Villages – settlements with a population between 131 and 3,787; and
- Tier 4: 65 x Small Settlements – settlements with a population between 52 and 541.

In addition to the above settlements, the 2021 Census indicated that 22.51% of our households are located outside of settlement development limits within the countryside.

The draft Plan Strategy seeks to proportionally increase the number of dwellings in each settlement based on the number of households within each settlement during the 2021 census. It is recognised that the RDS seeks to promote more sustainable housing development within existing urban areas. On this basis a housing allocation to the countryside based on the full 2021 percentage of dwellings is not considered to be appropriate or in keeping with regional direction in this instance. The Council calculated the number of rural dwellings completed in the countryside from 2016 to 2024 and adjusted the figure to exclude completions that did not result in a net gain of housing units. Therefore, on this basis, the Council also adjusted the total new countryside dwelling completion data provided by Building Control over the same time period. The allocation of dwellings to the countryside is therefore based on the average rural dwellings completed each year, which results in an allocation of 4193 dwellings over the period 2016-2035. For the Plan period countryside housing allocation was worked out on the basis the number of completed units 1732 was subtracted the countryside allocation 4193 to leave an allocation figure of 2461. This figure allows for a continuation of the historic average build rate in the countryside (2016-2024) to the end of the plan period.

Based on the 2021 Census data, households in the countryside accounted for 22.51% of households in the Borough. The allocation of 4193 dwellings to the countryside within the draft Plan Strategy equates to 18.28% of the HGI allocation meaning that the surplus 4.23% of the housing allocation can be reallocated to other tiers. In keeping with strategic direction, an additional 3.23 % has been allocated to the Main Settlements (Hubs) and 1% has been allocated to Small Towns. This is on the basis that these settlements have the services and infrastructure to sustain additional housing and this approach is in keeping with the objective of the RDS to promote more sustainable housing development within existing urban areas. This approach is also in keeping with several responses received regarding the POP.

In light of the above, Table 12 below shows the household percentage of each tier and the proposed housing allocation to each tier within the draft Plan Strategy:

Tier	Borough Households 2021 Census (%)	HGI Allocation (%)	Adjustment in HGI allocation and Borough Households (%)	HGI Allocation (no. of units) 2016-2035
Main Settlements (Hubs)	50.54%	53.77%	3.23%	12335
Small Towns	9.66%	10.66%	1.00%	2446
Villages	13.07%	13.07%	0.00%	2998
Small Settlements	4.21%	4.21%	0.00%	966
Countryside	22.51%	18.28%	-4.23%	4193
ABC Total	100.00%	100.00%	0.00%	22940

Table 12: HGI allocation to each tier.
Please note figures in the table may not add exactly due to rounding

Allocation of Housing between Settlements in Each Tier

To calculate the housing allocation to each settlement within each tier, the Council initially calculated the household share percentage for that settlement using data from the 2021 Census and Land Property Services (LPS) pointer data. The household share percentage was applied to the total HGI figure to calculate the preliminary housing allocation to each settlement. As detailed above, an additional 3.23% was allocated to the Main Settlements (Hubs) and an additional 1% was allocated to small towns following the adjusted housing allocation to the countryside. These percentage increase in allocations were divided across each settlement in these tiers based on the household percentage from the 2021 Census. Table 13 below shows the adjusted allocation to each settlement following completion of the above methodology:

Settlement	HGI Allocation (%)	Initial HGI Allocation 2016-2035 (units)
Main Settlements		
Armagh City	8.23%	1888
Banbridge	9.19%	2108
Craigavon Urban Area****	36.35%	8339
Main Settlements Total	53.77%	12335
Small Towns		
Keady	1.72%	387
Markethill	1.03%	237
Tandragee	1.91%	439
Dromore	3.54%	812
Gilford	1.11%	255

Rathfriland	1.35%	310
Small Towns Total	10.66%	2446
Villages Total	13.07%	2998
Small Settlements Total	4.21%	966
Countryside Total	18.28%	4193
Borough Total	100%	22940

Table 13: Initial HGI allocation for each tier, settlement and the countryside.

Please note figures in the table may not add exactly due to rounding

**** Aghacommon H/hold numbers removed from CUA total as proposed as separate dPS Village.

Application of the RDS Housing Evaluation Framework

The Regional Development Strategy (RDS) 2035 provides a Housing Evaluation Framework (HEF) 'to assist judgements on the allocation of housing growth'. The HEF in Table 14 below aids assessment of the potential capacity of each settlement to accommodate housing growth, which helps to inform the allocation of housing growth. This assessment is based on the resources, environmental capacity, transport links, economic development potential, character, and community services tests for each settlement.

The six tests within the RDS HEF Table are based on the capacity of a settlement to accommodate additional housing growth, with the overall aim of ensuring that the concept of sustainable development is built into the housing allocation process.

As discussed above, the reallocation of the 4.23% of additional countryside housing allocation to the settlements was informed by the RDS HEF and strategic direction.

Housing Evaluation Framework		
1	Resource Test	Studies should be carried out to assess and detail the existence of community assets and physical infrastructure such as water, waste and sewage, including spare capacity.
2	Environmental Capacity Test	An assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made.
3	Transport Test	Studies should be carried out to assess the potential for integrating land use and public transport and walking and cycling routes to help reduce reliance on the car.

4	Economic Development Test	The potential to facilitate an appropriate housing and jobs balance and to unlock any major strategic development opportunities should be assessed and detailed.
5	Urban & Rural Character Test	Assessment should be made of the potential to maintain a sense of place, and to integrate new development in a way that does not detract from the character and identity of the settlement.
6	Community Services Test	The potential to underpin and, where necessary, reinforce the community service role and function of the settlement should be assessed and detailed.

Table 14: Housing Evaluation Framework, RDS 2035

The existing settlements in the Borough have been assessed against the RDS Housing Evaluation Framework as part of the settlement appraisals. Full details of our Boroughs settlement appraisals and services relating to the HEF tests are set out in Technical Supplement 1 Settlement Hierarchy and Strategic Settlement Evaluation.

The assessment reaffirmed the position of the majority of settlements within the four tier hierarchy. Craigavon Urban Area (CUA) sits at the top of the hierarchy along with Armagh City and Banbridge Town as our three main centres. In addition, there are six towns, 30 villages and 65 small settlements. The results of the Settlement Evaluations (Technical Supplement 1) have been considered, and Council is satisfied that no re-allocation of housing numbers is currently required on the basis of the Housing Evaluation Framework. This will be assessed further at LPP stage.

Housing Unit Completions

The HGI allocation to each settlement required further adjustment to reflect that our initial HGI allocation was extrapolated to 2035 based on the 2016 HGI figure and the Plan period being amended from a notional end date of 2030 to 2035. Therefore, dwelling units built between 2016 and 2024 were subtracted from the overall total for each settlement, as shown in Table 15 below. This adjustment is required on the basis that development completed from 2016 to 2020 is outside the plan period and 2021 to 2024 has already been delivered within the plan period. The units completed in each settlement is taken from the Housing Monitor and includes units completed between 2016 and 2024.

A total of 6531 dwellings has been completed across the Borough between 2016 and 2024, which equates to an approximate average of 816 dwellings per year. Main Settlements represent the tier with the largest rate of completions at 49.3%, followed by the countryside at 26.5%. Small Towns accounted for 7.9% of completions, villages accounted for 10.9% and small settlements accounted for 5.4% of completions.

As previously outlined the initial HGI figure was calculated from 2016 (to align with the start date of the revised DfI HGI figures) through to 2035, the revised notional end date of the plan. It is therefore appropriate to reduce the initial HGI figure to take account of completions since 2016. The adjusted HGI figure is shown in Table 15 and therefore represents the appropriate housing allocation to 2035.

Settlement	Initial Housing Allocation (2016-2035)	Completed Units (2016-24)	Adjusted HGI Allocation (2021-2035) - April 26 Revised
Main Settlements (Hubs)	*Moved 0.23% of surplus c'side allocation % from village to Hubs Tier = 53.77% HGI allocation.		
Armagh City	1887	551	1336
Banbridge	2108	365	1743
Craigavon Urban Area	8340	2301	6039
Main Settlements Total:	12335	3217	9118
Small Towns	HGI allocation =10.66%.		
Keady	394	38	356
Markethill	237	81	156
Tandragee	439	67	372
Dromore	812	232	580
Gilford	255	41	214
Rathfriland	310	54	256
Small Towns Total:	2447	513	1933
Villages	2998	715	2283
Small Settlements Total:	960	354	612
Overall Settlement total:	18747	4799	13948
Countryside (HGI allocation = 18.28%)	4193	1732	2461
Total	22940	6531	16409

Table15: Adjusted indicative HGI allocation following consideration of completions.

The Council acknowledges that the overall housing allocation for villages is greater than that for the Small Town tier. This reflects the fact that, collectively villages account for a larger household share than the Small Towns, as there are significantly more villages (x30) compared to small towns (x6). Several factors have influenced the distribution of housing growth, including historical growth patterns established through legacy plans, the geographical location of settlements, how they function with nearby towns and whether they serve a rural hinterland. Further details relating to the settlement hierarchy and settlement appraisals are detailed in Technical Supplement 1.

Housing Commitments

Housing supply is provided by considering the remaining potential within settlements (i.e. those existing housing commitment sites with planning permission to erect dwellings which

have not been completed), urban capacity studies and windfall housing. These will each be considered in turn.

Regional policy as set out in the SPPS requires an allowance for existing commitments. This includes dwellings already constructed, approvals not yet commenced and residential development proposals likely to be approved. In addition to dwelling completions, the Council have also considered other housing commitments in the form of approved dwellings within settlements. In addition to dwelling completions, the Council has also considered other housing commitments in the form of approved dwellings within settlements that have yet to be implemented. The remaining potential is shown in Table 17 for each settlement within the Borough. In total, the Housing Monitor (2024) shows that 17,840 dwellings have been approved within settlements in the Borough and remain uncompleted. The majority (62.6%) of these approvals are located within the Main Settlements (Hubs) which accounts for 11,170 dwellings.

The completion of these approved units remains beyond the control of the Council. While a significant number of dwellings will be completed, other permissions will lapse or will be the subject of subsequent applications. The existing figures are however useful in contributing to an understanding where potential over provision or under provision of land for housing exists within our settlements. Whilst it is likely that some of these units may never be built, the level of housing commitment in these larger settlements is one of the main reasons why it is necessary to adopt a managed approach to housing supply. Failure to take account of such commitments and to zone additional land to meet identified housing need would inevitably result in gross over provision of housing land.

Urban Capacity Study

In keeping with the RDS and the SPPS, the draft Plan Strategy policy approach is to encourage more sustainable development within existing urban areas. To enable this, the SPPS directs that Councils should undertake an urban capacity study (UCS) to assess the potential for future housing growth within the urban footprint and the capacity for different types and densities of housing. The preparation of the study is an essential early step in the sequential approach to site identification and the managed release of housing land.

At draft Plan Strategy stage, an interim urban capacity study has been undertaken within our three Main Settlements and six Small Towns to inform the housing growth strategy. This was primarily through the identification of sites within the urban footprint that are suitable for new residential development and their potential yield along with an estimate of the likely yield from unidentified sites within the urban footprint (i.e. windfall allowance).

Table 16 below details the results of the interim UCS undertaken to inform the housing growth strategy. UCS sites across the top two tiers could potentially return a total of 1324 units and windfall could provide 523 units. The combined figure for both unconstrained windfall and UCS sites for Main Settlements (Hubs) and Small Towns is 1847. 78% of this is in the Main Settlements, with 58% of this being within the Craigavon Urban Area alone.

Further consideration of urban capacity sites will be sought at LPP stage before finalising the estimated urban housing yield.

Settlement	Windfall (unconstrained)	UCS Estimate	Total UCS & WF (unconstrained)
Armagh City	75	223	298
Banbridge	69	83	152
CUA	264	805	1069
Main Settlements Total	407	1111	1518
Small Towns			
Keady	11	93	104
Markethill	10	51	61
Tandragee	14	10	24
Dromore	47	6	53
Gilford	17	26	43
Rathfriland	19	27	46
Small Towns Total	116	213	329
OVERALL ABC TOTAL	523	1324	1847

Table 16: ABC LDP 2035 dPS Settlement estimated UCS & Windfall Total *Please note the estimated figures in the table may not add exactly due to rounding*

See Appendix 1 Urban Capacity Study for a summary on the background, methodology and estimated UCS / windfall numbers.

Windfall Sites

The RDS 2035 defines Windfall Housing sites as those that were neither zoned nor anticipated during the formulation of the development plan but which have become available during the lifetime of the plan.

In line with the RDS, it is necessary to make allowance for windfall when deciding the number of sites to identify for development in the plan to prevent excessive allocation of housing land. In making a windfall site allowance, assessment will be confined to within the Urban Footprint.

Windfall housing allowance can be made on the basis of examining past trends in windfall coming forward for development and estimating likely future windfall potential over the remaining plan period. The methodology used should be robust and care should be taken to avoid an under-estimation of windfalls.

See Appendix 1 Urban Capacity Study for a summary on the background, methodology and estimated UCS /windfall numbers.

It is proposed to review windfall and our urban capacity following the Plan Strategy stage and at regular intervals during plan implementation.

Non-Delivery Allowance

It is reasonable to assume that all sites included within the remaining potential will come forward for development or be delivered during the plan period. In response to this, an exercise was carried out by the Council to consider past trends and noted that a significant number of units that contribute to the remaining potential figure within our settlements relate to older

permissions which have not been developed. Additionally, some zoned housing lands may not be available for development due to constraints, lost to other uses (e.g. community & cultural uses) or not delivered for another reason. On the basis of this exercise, it was considered appropriate to reduce the supply figure by 10% to allow for the non-delivery of some of these units. The 10% non-delivery allowance has therefore been taken from the remaining potential within all of our settlements. The impact of the use of the 10% non-delivery buffer is that the remaining potential dwellings and urban capacity dwellings decreases from 19163 to 17247. This 10% reduction makes an allowance for dwellings which may not come forward during the plan period

Settlement	Housing Allocation minus completions = Requirements (2021-35)	Remaining Potential Total (NILUD)	Urban Capacity Study (UCS) Units	Sub-total (NILUD + UCS)	Adjusted supply = Removal of non-delivery allowance (10%)	Windfall Sites	Subtotal (Windfall + Adjusted supply)	Difference between Allocation and Commitments
Main Settlements								
Armagh City	1336	1925	223	2148	1933	75	2008	-672
Banbridge	1743	918	83	1001	901	69	970	773
Craigavon Urban Area	6039	8327	805	9132	8219	264	8483	-2444
Main Settlements Total:	9118	11170	1111	12281	11053	407	11460	-2342
Small Towns								
Keady	356	643	93	736	662	11	673	-317
Markethill	156	284	51	335	302	10	311	-155
Tandragee	372	563	10	573	516	14	529	-157
Dromore	580	569	6	575	518	47	564	16
Gilford	214	289	26	315	284	17	300	-86
Rathfriland	256	200	27	227	204	19	223	33
Small Towns Total:	1934	2548	213	2761	2485	116	2601	-667
Villages Total:	2284	2413	0	2413	2172	0	2172	112
Small Settlements	612	1708	0	1708	1537	0	1537	-925
Overall Settlement total:	13948	17839	1324	19163	17247	523	17770	-3822
Countryside	2461							2461
Overall Borough Total	16409						17770	(-1361)

Table 17: Plan Allocations Vs Housing Commitments

Difference between Allocations and Commitments/Supply

As shown in Table 17 detailed consideration was given to the remaining potential for housing units in settlements and urban capacity units, and a 10% non-delivery buffer was applied to account for those dwellings which may not be completed or delivered during the plan period. A windfall allowance was then added to this figure to establish the total housing supply.

The total supply number has then been contrasted with the adjusted HGI allocation. Those settlements with a negative number suggest that there is over provision of housing land in that settlement and those with a positive number suggest that there is a requirement for additional housing lands within those settlements.

Within the Main Settlements (Hubs), it appears that there is an over provision of 2342 housing units when comparing the allocation to the housing supply. Banbridge is the only Main Settlement (Hub) recording a positive number of +773, i.e. requiring additional housing lands. The difference in Armagh is -672 units while Craigavon is -2444 indicating overprovision of potential housing.

Small towns have an overall minus figure of -667 (over provision) and only two small towns have a positive number (Dromore at +16 and Rathfriland at +33) suggesting under provision, suggesting a need for additional housing in these locations.

The village tier was the only settlement tier with an overall positive number (+112), suggesting a need for additional housing.

The small settlements had an overall negative figure of -925.

Overall, the settlements within the borough had a minus figure of -3822 suggesting that there is over provision of potential housing. This overall figure clearly does not account for need in certain settlements or specific local needs.

This information will be updated as the Plan progresses and will be used to inform the LPP stage of the plan and the need for additional housing land.

Application of a Sequential Approach and Identification of Suitable Sites for Settlements of Over 5,000 Population

The draft Plan Strategy has identified there is currently an overall sufficient supply of housing land across the Borough over the Plan period.

In line with the RDS and the Spatial Growth Strategy housing growth will be focused in the Borough's main settlements of Craigavon Urban Area (CUA), Armagh City and Banbridge (>15,000 population). Within the revised Settlement Hierarchy, the second tier (small towns) contains one small town (>5,000 population) and five small towns (<5,000 population), these settlements will also see growth but to a lesser degree than the Main Settlements (Hubs).

Sustainable growth will be delivered across the Borough's villages reflecting their size, function, catchment and physical capacity to grow. A limited portion is allocated to our small settlements with opportunities largely focused on appropriate small scale development.

A proportion of new housing development is also allocated to the countryside (beyond settlement limits) in order to sustain our rural communities in line with the regional policy approach.

Housing Needs Assessment (HNA)/ Housing Market Analysis (HMA)

The SPPS states that the Housing Needs Assessment/Housing Market Analysis provides an evidence base that must be taken into consideration in the allocation of land required to facilitate the right mix of housing tenures. It is difficult to predict affordable housing needs over the plan period due to available data, and needs can fluctuate over time in response to changing economic and market trends.

The NIHE are responsible for carrying out a Housing Needs Assessment. The NIHE Housing Investment Plan (HIP) Update 2025 contains a five-year assessment for 2024 - 2029 and shows a social housing need for 1,622 units in our Borough. The projected need is concentrated in our larger settlements including Lurgan (399), Portadown (353), Armagh City (239), Banbridge Town (194), Central Craigavon (149) and Dromore (56). The HIP also sets out the cross-tenure 15 year housing requirement (2020-2035) for our Borough of 15,920 dwellings made up of market (10,310), social (2,680) and intermediate (2,940) dwellings.

The NIHE Strategic Housing Market Analysis (SHMA) summary report, published in June 2022, sets out new dwelling requirements across 11 Housing Market Areas (HMAs) for the period 2020-2035. The SHMA reports provide housing requirement projections both in total and by tenure i.e. market (private), intermediate and social need. The Armagh City, Banbridge & Craigavon Borough Council area boundary corresponds exactly with the Craigavon Urban Area HMA.

The SHMAs set out a medium growth requirement for the borough (15,920) alongside a high growth requirement (16,840). The NIHE SHMA also provides a breakdown of the overall need into market, intermediate and social over the Plan period (see Table 18). Unlike the HGIs, the new dwelling requirement set out in the SHMAs includes a backlog component. This is the level of existing unmet need and is the shortfall between current provision and the accommodation needs of existing households or families not yet formed as separate households.

	Market	Affordable		Total Affordable	All
		Intermediate	Social		
Medium Growth 2020-35	10,310	2,680	2,940	5,620	15,920
Medium Growth Annual	690	180	200	370	1060
Medium Growth (%)	65	17	18	35	100

Table 18: New dwelling requirements by tenure, South Easter Area HMAs and subareas, including backlog, 2020-2035

Source: NIHE SE Strategic Housing Market Analysis Report²⁴

In establishing the level of need across the Borough over the Plan period the Council has taken account of the NIHE SHMA and the housing need figures.

We would highlight that the projected SHMA figure for our Borough (Table 8.19 of NIHE South-East Strategic Housing Market Analysis Report) refers to an annualised DFI HGI figure for the

²⁴ [NIHE SHMA NI-Summary-Report-\(PDF-1-4MB\).pdf](#)

Borough of 1,220 units. This equates to 18,300 units over the 15 year HGI period which is higher than the 17,200 units for our Borough detailed in the official DfI HGI figures for 2016-2030. The SHMA report also states at paragraph 8.7 that '*The HGIs project new dwelling requirements for the 14-year period 2016 to 2030*'. This appears to be at odds with DfI confirmation that the HGI figures relate to a 15 year period from 2016-2030 inclusive.

Because of this anomaly and uncertainty with the Borough SHMA figures, the Council has used the HGI figure of 17,200 as the primary guide to determining housing allocation over the plan period.

It is acknowledged that the level of affordable housing need, identified in the NIHE SHMA, is high when set against overall need. This is not a position unique to the Council area and is a challenge for planning authorities across Northern Ireland. The deliverability of affordable housing will largely depend on zoned sites still to be developed, windfall sites outside of these zonings and potential from additional new zonings over the Plan period. The Council will continue to monitor the position and any identified shortfall may be addressed at LPP stage through the zoning of land for affordable housing.

Transport Assessments

The LDP seeks to focus new development where it is most accessible, directed through the provisions within the strategic policy on Furthering Sustainable Development & Climate Change Resilience and a range of operational policies. As part of the assessment of development proposals, the Council may require the developer to submit a Transport Assessment to assist in the assessment of transport impacts. Further detail on the transport measures to be considered in the LDP are outlined in the Transport Strategy and in the accompanying Local Transport Study, see Technical Supplement 6 – Transportation

Further detail on commitments, urban capacity and windfall is set out in Appendix 1.

Reasonable Alternative SGS 3b: Strategic Housing Allocation (16,159 dwelling units)

This reasonable alternative approach results in a need for 16,159 units over the plan period. This contrasts with the chosen option SGS3 housing indicative allocation of 16,409 units over the plan period, which makes provision for 13,948 dwellings within our settlements and 2461 dwellings in the countryside for the period 2021 - 2035.

The reasonable alternative has considered the need for housing lands over a 15 year plan period. This reasonable alternative methodology was estimated using Council's Building Control (BC) completion data from 1999-2024, a 26 year period (inclusive). There were 28,009 dwellings completed over the 26 years period (1999-2024). This was an average completion rate of 1077.27 units per year. We then calculated the housing allocation for the 15 year plan period based on historic building control dwelling completion rates. This approach results in a need for 16,159 units over the plan period.

The reasonable alternative allocates 250 dwellings less than the chosen option. The Council considers that the chosen option SGS3 housing allocation of 16,409 units is more aligned with the DfI Housing Growth Indicators (HGI) figure of 17,200 dwelling need figure for the Borough (2016-2030), which is an average of 1147 units per year. The HGI annual housing need figure is slightly higher than the average reasonable alternative option allocation of 1107 per year. The chosen alternative for SGS 3 Strategic Housing Allocation sets out an indicative allocation figure of 16,409 new homes for settlements and the countryside over the plan period. It makes

provision for 13,948 dwellings within our settlements and 2461 dwellings in the countryside for the period 2021 - 2035.

Our chosen alternative housing allocation figure of 16,409 is considered in keeping with regional direction including DfI's Housing Growth Indicator figure of 17,200 units for our Borough over the 15 period (2016-2030). It also directs more housing to our most sustainable main settlements which is also in keeping with regional direction.

Details on how the reasonable alternative is apportioned across the tiers is set out below (table 20). It also provides a comparison to the chosen approach.

1.Tier	2.Borough Households 2021 Census (%)	3.HGI Allocation (%)	4.) Housing allocation 2021-2035 based on option SGS 3B (BC average completions)	5 Housing Allocation 2021-2035 based on chosen option SGS 3 (HGI approach)
Main Settlements	50.54%	53.77%	8689	9118
Small Towns	9.66%	10.66%	1723	1933
Villages	13.07%	13.07%	2112	2283
Small Settlements	4.21%	4.21%	680	612
Countryside	22.51%	18.28%	2954	2461
ABC Total	100.00%	100.00%	16159	16409

Table 19: Comparison between Reasonable Alternative Approach to Housing Allocations at Each Settlement Tier *Please note the estimated figures in the table may not add exactly due to rounding*

In addition to the detail set out above the SPPS requires Local Development Plans (LDPs) to integrate housing allocations with economic development strategies, placing strong emphasis on supporting sustainable economic growth, job creation and balanced regional development. It also highlights the critical inter relationship between the location of homes and employment opportunities. To ensure consistency across the Economic Strategy and Housing Strategy, the latter being primarily informed by DfI's Housing Growth Indicators (HGIs). Aligning strategies along with timeframes helps maintain coherence across the plan (soundness considerations) and avoids a disjoint that could undermine the delivery of sustainable communities or weaken the spatial relationship between housing growth and employment provision.

Further details can be found in the Sustainability Appraisal Report.

Management of Housing Supply

The SPPS requires the LDP to identify and zone sites in larger settlements that are sufficient to meet general and special housing needs over the Plan period. LDPs are also required to provide for a managed release of housing land, in line with a 'plan, monitor and manage'

approach to ensure that, as a minimum, a five-year supply of available land for housing is maintained as set out within SGS 4 Management of Housing supply. This includes the adoption of a sequential approach for the release of housing land within the top two settlement tiers. This means initially focusing the housing growth within urban footprints in the Main Settlements (Hubs). This is in line with the RDS regional target of 60% of new housing in appropriate 'brownfield' sites within the urban footprints of settlements greater than 5,000 population. This will be delivered by zoning suitable sites of an appropriate size within the urban footprint of these urban centres as phase 1 housing land. These lands are generally the most sustainable and accessible.

It is recognised that unforeseen circumstances may arise during the Plan period which affect the growth strategy. In such cases, the controlled release of Phase 2 housing sites can provide a long-term reserve for our higher tier settlements to offer necessary flexibility and ensure that housing supply remains responsive to local housing needs.

In managing the supply of housing land across the Borough, the Council will adopt a phased approach to the release of housing lands with a Phase 2 land reserve held in the Main Settlements (Hubs) and Small Towns to ensure we can meet future housing needs.

Operational Policies

This section details the evidence base that supports the operational policy approach of the Plan Strategy.

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 Strategy. 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.

Housing Within Settlements

In line with the POP (Preferred Option SOC 1), the approach to the Housing in Settlements policy set is in line with existing policies, tailored to reflect regional direction and to meet local circumstances. The key aim of the policies is to meet the full range of housing needs of the Borough over the plan period in a manner that aligns with the wider objectives of the LDP. One of the key local circumstances is the ageing population trend across the Borough, which will have significant implications for the delivery of housing into the future.

New policies are proposed in response to local circumstances, including Houses in Multiple Occupation (HMOs) and Specialist Residential Accommodation. Other policies have been updated to address current issues, the local evidence base and to reflect regional direction in the SPPS.

The policy review process has also included a review of existing regional planning guidance, including the 'Creating Places' Design Guide. The existing DfL Development Control Advice Notes on Housing in Existing Urban Areas (DCAN 8) and Residential and Nursing Homes

(DCAN 9) – which will cease to have effect once the Council adopts the LDP Plan Strategy – have been integrated into the new policies, where appropriate. See Policies HOU 4 and 9.

The Council's rationale for the policy approach to the topic is set out below under each of the Policies HOU 1-11. A number of key considerations relating to housing are now housed in the new General Policies and Design/Place-making Policies²⁵ because they also relate more generally to non-residential development proposals. This approach consolidates and streamlines requirements that apply more generally, which helps improve the structure, clarity and usability of the Plan. Other key policies are summarised after Policies HOU 1-11.

HOU 1 Protecting Zoned Housing Land

The zoning of housing land is a key component of the Council's Housing Strategy, to ensure sufficient land is available within settlements to meet local housing need, in a sustainable manner, over the plan period. It is important that these designated lands are safeguarded for this purpose. The policy however includes two exceptional criteria to ensure alignment with other LDP Policies.

Exceptional Criterion a): It makes provision for a non-residential use forms an integral part of and remains ancillary to the main use of the land for housing – which may include local neighbourhood facilities and public open space (as assessed under Policy HOU 4, Criteria a) and b)).

Exceptional Criterion b): There may be limited instances where zoned housing land sits vacant and it may be suited to accommodating a community use (including recreational, health and educational facilities) where there are no suitable sites elsewhere. The zoned land may be a more sustainable option than a green-field site. However, to ensure that the zoned land is protected as far as possible; the applicant will be required to demonstrate a local community need for the use; that no other suitable sites exist within the local area for the community use; that the use is compatible with the housing zoning (which should not be totally lost as a result of the development); and that it will not result in a shortage of housing land required to meet future local need. Exceptional Criterion b) aligns with Policy CCF 1 Community and Cultural Facilities.

This new recommended policy will apply to existing Housing Zonings designated in extant Area Plans during the intervening period between adoption of the Plan Strategy and Local Policies Plan, to ensure that these zoned lands remain protected.

HOU 2 Protected Housing Areas in City and Town Centres

Policy HOU 2 seeks to protect a valuable and sustainable housing stock in city and town centres from change of use from housing. These areas provide residents with convenient access to our urban centres, which helps support local retail, services, facilities and the evening/night-time economy, and can improve surveillance from crime and anti-social behaviour. Without this policy protection, these areas would be vulnerable to the spread of commercial activity – which can impact on local character also. This policy is an example of a locally tailored approach to urban housing as proposed in the POP.

The policy brings forward the same wording as current local Policy HSG 3 in Banbridge/Newry and Mourne Area Plan 2015 (adopted Oct 2013), which applies to existing designated

²⁵ Exceptions to the General Policies and Design and Place-making Policies are set out in the Draft Plan Strategy.

Protected Housing Areas in Dromore Town and Rathfriland Town – so that the policy can be applied Borough-wide. The Armagh Area Plan 2004 also refers to existing established residential areas within Armagh Central Area, in Section 34.0, that warrant being retained and protected. These areas are shown in the Armagh Central Area Map.

Protected Housing Areas (PHAs) will be designated in the Local Policies Plan, including a review of the existing PHAs in Dromore and Rathfriland Towns, as well as the existing housing areas in Armagh City. These existing PHAs/areas will continue to apply in the intervening period between adoption of the Plan Strategy and Local Policies Plan to ensure that these areas remain protected.

HOU 3 Design Concept Statements, Concept Master Plans and Comprehensive Planning

Policy HOU 3 brings forward and updates current Policy QD 2 in PPS 7 Quality Residential Environments, with minor amendments. It brings forward the requirement for a Design Concept Statement and, where appropriate, a Concept Master Plan to accompany housing proposals²⁶ in the interests of promoting quality design and the comprehensive development of larger sites (to avoid piecemeal development).

The main change to the policy wording involves a reduction to the threshold for a Concept Master Plan for proposals of 200 dwellings or more or on sites of 10 hectares or more (zoned and unzoned), down from 300 dwellings or more or 15 hectares or more (as in current Policy QD 2). These reduced thresholds better reflect the local land profile and application history of the Borough and the smaller scale of development proposals that will likely be received by the Council over the plan period. This proposed change will ensure that Concept Master Plans will be required for more developments. The threshold of 200+ units/10ha+ is still deemed to be a significant scale of development to justify a CMP and to warrant careful consideration of the wider impacts and opportunities associated with the scheme, and where appropriate, how the overall lands will be comprehensively developed. Only 7 of the 96 Housing Zonings in the extant Area Plans (not including Phase 2 Zonings) are 15 hectares or more in area. By reducing the threshold for a Concept Master Plan to 10 hectares or more would have included an additional 6 zonings (13 in total). Also, analysis of the housing applications approved during the period 2020-2024 shows that only 2 applications were for 200+ units and 1 application was for 300+ units.

The Council notes that the same (revised) thresholds have been brought forward by a number of other NI Councils in their adopted Plan Strategies (DCSDC and MEABC), with no Councils having higher thresholds.

The recommended content of a DCS has been amended slightly to align with the recommended content of a Design and Access Statement (D&AS), as required by legislation (and associated guidance)²⁷, and to reflect terminology in other LDP Policies.

²⁶ With the exception of single dwellings in the countryside.

²⁷ The statutory provisions which set out the requirements for a D&AS are found in:

- The Planning Act (Northern Ireland) 2011 – Sections 40(3) and 86(2);
- The Planning (General Development Procedure) Order (Northern Ireland) 2015 (the 'GDPO') – Articles 3(3)(f), 6 and 24(1)(a); and
- The Planning Listed Building Regulations (Northern Ireland) 2015 – Regulation 4.

See relevant DfI Development Management Practice Note 12 (April 2015), or as amended, for detailed information, including good practice guidance contained in 'Design and Access Statements – a guide for Northern Ireland'.

Where an applicant is also required to submit a D&AS, in addition to a DCS, the J&A indicates that a single statement will be sufficient. This will help avoid duplication of information and reduce cost for the applicant.

HOU 4 Quality in Residential Development

Policy HOU 4 brings forward and updates a number of housing-specific considerations within current Policy QD 1 Quality in New Residential Development (PPS 7) as well as Policy LC 1 Protecting Local Character, Environmental Quality and Residential Amenity (PPS 7 Addendum) in respect of established residential areas and consolidates these into one policy. Other key considerations, that also apply to non-housing proposals, are contained in the General Policies and Design/Place-making Policies, primarily Policy DES 1 Design Quality for housing proposals within settlements²⁸ and Policy GP 4 Amenity.

Three considerations are retained within Policy HOU 4, relating to:

- Public and private open space and landscaped areas: This is a similar consideration to Criterion c) in Policy QD 1), however the J&A expands on what is expected in terms of good quality private open space, namely garden space;
- Local neighbourhood facilities: This brings forward the same consideration as in Criterion d) of Policy QD 1) with no material change; and
- Residential Space Standards: This brings forward the same consideration as in Criterion c) in Policy LC 1 but extends the minimum space standards to all new residential units, not just those within established residential areas. It is logical that these standards should be applied more generally to all new residential units in the interests of providing acceptable living standards for occupants no matter the location. The Space Standards (within Appendix 5 of the draft Plan Strategy) are brought forward from Policy LC 1/Annex A (PPS 7 Addendum), which are currently in DfC Housing Association Guide (HAG) Design Standards. The Council has adapted the standards to apply the lower limit of the DfC Area Band, as a minimum standard. Explanatory notes on how to measure the unit floor area are adapted from, but closely align with, the DfC HAG Design Standards.

The standards will not be applied to Houses in Multiple Occupation (HMOs) as they are subject to statutory space standards as contained in Section 43 of the Houses in Multiple Occupation Act (Northern Ireland) 2016. The Council will also not apply the space standards to social-rented housing proposals, as DfC will apply their overall design standards (including space standards) to housing association proposals as part of their funding determination.

Finally, a specific new policy criterion has been added in relation to boundary treatment. It introduces a more stringent requirement in relation to close-boarded fencing, by restricting it to private garden areas where it would not have an aspect onto a street/road, footpath, cycleway and/or public space. This is seen as an important design and place-making measure to improve the appearance and quality of new residential developments across the Borough. A similar approach to close-boarded fencing will be applied to urban non-residential proposals through Policy DES 1 Design Quality.

The policy otherwise brings forward a very similar approach to safeguarding the character of established residential areas as in Policy LC 1 (Addendum PPS 7) and to considering housing

²⁸ Including considerations relating to appearance and character, impacts on natural environment, landscape and historic environment features; active frontage; safety and security; inclusive design, movement and hard and soft landscaping.

intensification proposals in Conservation Areas and Areas of Townscape/Village Character as in Policy QD 1 (PPS 7). These policy provisions align with Policy DES 1 Design Quality and take forward key guiding principles contained within existing Development Control Advice Note 8 (DCAN 8) - Housing in Existing Urban Areas (DfI, June 2002)²⁹ in respect of density and character considerations.

HOU 5 Residential Mix

Policy HOU 5 brings forward and updates the current Policy HS 4 (House-Types and Sizes) in PPS 12. The Council seeks to achieve good residential mix within new residential development in the interests of achieving balanced communities, strengthening community cohesion and providing a good choice of housing for people. It is also considered important in terms of introducing greater visual variety and interest within a development, thus helping to avoid large areas of housing with similar characteristics.

The threshold to activate the policy requirement to provide a suitable mix of house-types and sizes has been reduced from 25 units (or 1.0 ha) to 10 units (or 0.5ha) to better reflect the land profile and approval history of the Borough and to help better achieve the objectives above. The reduced threshold will enable the policy to be applied to more housing applications. A higher threshold than 10 units (or 0.5 hectares) would exclude a large proportion of available housing land.

The current threshold of 25 units would have applied to, on average, 11 of the 93 housing applications (approx. 12%) that were approved annually by the Council between 2019/2020 to 2023/2024 (5-year period). A threshold of 10 units would have applied to an additional 12 applications annually (i.e. 23 of the 93 applications (approx. 25%)). 60% of all applications were for 1-4 housing units and 75% were for 9 units or less. The policy however does retain the provision that in smaller schemes, which fall below the thresholds, the need to provide greater variety in type and size will be considered on individual merits.

The 10% threshold mirrors the same threshold in Policy HOU 6 Affordable Housing. It is also mirrored in the threshold for apartment/flat developments, which will normally be applied, unless the scheme forms part of a larger residential development and a suitable mix of house-types/unit-types and sizes is proposed overall.

The policy will not permit development proposals that have artificially divided the site such that it circumvents the policy requirements. However, applications will be looked at cumulatively where a phased approach to development is to be taken and design concept information demonstrates that a suitable mix of house-types and sizes will be distributed across the entire development. This is consistent with Policies HOU 3 and HOU 6.

Wheelchair users are an important consideration in relation to residential mix. Based on the 2021 Census, 9.6% of people in the Borough lived in accommodation that had been adapted internally for wheelchair use, an increase of 2.5% in 10 years (i.e. 7.1% based on the 2011 Census), with over 5% of people aged 65+ having a mobility or dexterity difficulty that requires the use of a wheelchair. An increasing older population over the LDP period is likely to increase the need for accommodation that is suited to wheelchair users. The minimum 10% requirement within schemes of 10 units or more would deliver sufficient wheelchair Standard units to meet future needs at the local level. This will avoid the need for costly and disruptive adaptations in the future. The relevant design standards are contained in DfC's Housing

²⁹ DCAN 8 will cease to have effect within the Borough once the Council adopts the LDP Plan Strategy.

Association Guide (HAG), which Registered Housing Associations already apply to meet identified wheelchair need in social-rented housing schemes.

The J&A wording addresses the potential scenario that where a minimum of 10% of the total number of units would not result in a whole number of units, this should be rounded up to the nearest whole unit.

The policy makes exceptional provision for the 'wheelchair housing' requirement to be aside where the applicant is able to demonstrate a case under a competing policy requirement. For example, the conversion or retrofitting of an historic building for apartment use may require some of the WH standards to be applied flexibly to prevent harm to the historic fabric of the building.

During the development of the policy, the Council took account of a range of consultee views, including the Council's Building Control Department and Age-Friendly Officer. NIHE and DfI Planning both indicated support for an Accessible and Adaptable Housing, like that contained in a number of other NI Councils' Plan Strategies (adopted and proposed), however the Council is not minded to bring forward such a policy – rather it will instead focus on wheelchair users – for the following reasons:

1. There is no requirement in the SPPS to have such a policy, nor to ensure that all homes are designed to Lifetime Home Standards³⁰ or any other standard.
2. NIHE advised during discussions (Oct 2023) that DfC were due to change their advice in relation to LTH Standards, indicating that they were in need of review, principally in relation to sustainability standards. The LTH Standards have not been updated since 2011. The Council is not aware of any further developments in relation to this.
3. A government review of Housing Standards in England (Aug 2013) found that there were many different versions of housing design standards that had been developed, particularly accessibility standards, across local authorities. The review ultimately determined that it would be best for LTHs to be incorporated into updated Building Control Regulations and to avoid unnecessary duplication. The English Building Control Regs. now include requirements for Access to and Use of Buildings, including Dwellings (Part M, 2015, Corrected in March 2016). Some of the current LTH Standards are contained in the BC Regs. (Part R, 2011), but these are focussed mainly on accessibility for visitors, whereas the wider LTHs Standards also focus on the needs of occupants.
4. Whilst there are currently no plans for the NI Building Control Regulations to be updated in relation to accessible and adaptable housing, it is likely that they will take a similar direction to England and incorporate enhanced accessible and adaptable standards in a future update. A singular regional approach would remove unnecessary overlap, or potential conflicts, between Planning, Housing Association requirements and Building Control and make it easier for developers and those involved in the design process.
5. Such a policy would add an additional layer of detailed compliance checking for Council for non-affordable housing proposals which would go well beyond the normal work undertaken as part of the assessment of housing applications or enforcement cases.

³⁰ Lifetime Home Standards are a recognised set of 16 detailed design criteria aimed at future-proofing homes so that they are accessible and adaptable for people throughout their lifetime. The current requirement in Northern Ireland is that all homes built by Registered Housing Associations are built to LTH Standards. This is specified in the current DfC Housing Association Guide as opposed to being a planning requirement.

HOU 6 Affordable Housing in Settlements

The Council's 'Connected' Community Plan (2017-2030) refers to the provision of social housing (now termed 'affordable housing' as per DfC definition) as a central component of achieving a 'Revitalised Place' – 1 of the 9 outcomes of the Plan. The Community Plan refers to the growing gap between housing demand and supply despite sustained levels of investment in Northern Ireland.

The Social Housing Need has increased significantly since the publication of the POP. The POP (Page 60) refers to a projected social housing need for the Borough for the period 2017-2022 of 327 units (Source: NIHE Strategy, Feb 2018), with 82 % of these earmarked for the 3 Main Settlements (Hubs). A pro-rata share of social housing across schemes of a certain size was not deemed necessary at that time, as the majority of the waiting list was for 1 and 2 bedroom households (73%).

The current 5-year projected Social Housing Need for 2023-2028 (Source: NIHE Commissioning Prospectus 2024/25-2026/27) is 1498 units – almost a 5-fold increase since the POP. Over 90% of the overall need in the Borough falls within the Tier 1 Main Settlements (Hubs) (82.7%) and Tier 2 Small Towns (7.7%). A further 4.4% of the need is within Tier 3 Villages and Tier 4 Small Settlements that have a need of less than 10 units. The current affordable housing need of the Borough would equate to 479 of the annual Housing Growth Indicator (HGI) share of 1092 units (43.9%).

Draft Policy 6 brings forward and significantly updates the current Policy HS 2 (Social Housing) in PPS 12. The policy aligns with regional direction in the SPPS and reflects the updated DfC definition of Affordable Housing (dated April 2021)³¹. In developing the policy, the Council has taken account of advice from NIHE, including its most recent Delivery of Affordable Housing Advice Note (Sept 2025). The central component of this advice note is that the Council's Affordable Housing policy will contain a normal requirement for a proportion of sites, over a certain threshold, to provide affordable housing (social and intermediate housing).

A detailed analysis of the Council's recent approval history (5 years, 2019/2020-2023/2024) was carried out to help inform an appropriate policy threshold. Different proportions were applied (between 5-25%) to compare how many affordable house units could have been delivered at different development sizes (5+ to 25+ units). This gives an indicative picture only, as the calculations are based on recent approval trends and do not take into consideration existing committed sites and site-specific issues that may have a bearing on potential affordable housing yield. The Affordable Housing Thresholds Matrix is contained in Appendix 3.

Following analysis of the approvals data, the Council considered a threshold of 20% for schemes of 10 units or more (or sites of 1.0 hectare or more) to be proportionate and appropriate. It aligns with NIHE advice, during discussions, that the threshold should not exceed 20%. It would result in approximately one quarter (25%) of urban housing applications being required to provide affordable housing units i.e. on average 23 of 93 housing applications (approved during 2019-2024). A higher proportion would place an unreasonable burden on the Council's Development Management function and developers.

The minimum thresholds in Policy HOU 6 will not meet all of the affordable housing need in the Borough – only 37% approx. of the 479 annual HGI target. Even a 25% threshold for units

³¹ The definition of affordable housing, which is provided by the Department for Communities (DfC), is contained in the NI Strategic Planning Policy Statement (SPPS). Affordable Housing is defined as: a) Social rented housing; or b) Intermediate housing for sale; or c) Intermediate housing for rent that is provided outside of the general market, for those whose needs are not met by the market.

of 5 units or more would only deliver 245 units per annum (51% of the annual HGI target). The J&A however advises that the proportion of affordable housing may be adjusted by a Key Site Requirement attached to a housing zoning in the Local Policies Plan. Applicants can also volunteer affordable housing units in smaller schemes that fall below the threshold. It is also worth noting that the policy threshold sets a minimum requirement only, and many sites will potentially be able to deliver a higher proportion of affordable housing.

The policy contains a number of other key elements that align with the SPPS, current PPSs and that take account of the views of NIHE and other consultees/stakeholders:

- it will normally require mixed tenure development, that is tenure blind (i.e. the affordable housing is not readily distinguishable from market housing), in the interests of achieving social integration, balanced communities and a high-quality built environment.
- it will not permit proposals that artificially divide a larger site such that it circumvents the policy requirements. This is consistent with Policies HOU 3 and HOU 5.
- the J&A addresses the potential scenario that where the minimum threshold would not result in a whole number of units, this should be rounded up to the nearest whole unit. This is similar to Policy HOU 5 Residential Mix.
- the policy provides flexibility in its application, by listing three exceptions where the applicant can demonstrate why the normal policy requirement can be set aside by the Council:
 1. where there is no longer a local need to be met or the local need is lower than the threshold;
 2. where meeting the policy requirement would make the scheme unviable; and
 3. where the scheme forms part of a wider phased development and design concept information is able to demonstrate that a suitable mix and distribution of affordable housing units will be provided across the entire development.
- the policy may permit an alternative provision in exceptional circumstances, where meeting the requirements of the policy in full would make the scheme unviable. Suitable alternatives will be considered on a case-by-case basis, in consultation with NIHE, with on-site provision in most cases being the primary aim.

HOU 7 Conversion or Change of Use of Existing Buildings to Flats or Apartments

Policy HOU 7 brings forward and updates Policy LC 2 *The Conversion or Change of Use of Existing Buildings or Flats to Apartments* (PPS 7: Addendum Safeguarding the Character of Established Residential Areas). The purpose of LC 2 was to facilitate appropriate intensification of residential development within settlements whilst ensuring that conversions to residential development and apartment schemes did not adversely affect local character, environmental quality or residential amenity. Policy HOU 7 continues to support the conversion and reuse of existing buildings for residential purposes in sustainable locations, whilst ensuring that development respects the character of the host building and surrounding area and provides a satisfactory residential environment for future occupants.

Three policy requirements are retained within Policy HOU 7, relating to:

- the original property is greater than 150sqm, which brings forward the same consideration as criterion c) of Policy LC 2 with no material change. The J&A expands on this and explains the policy exception which was located within the J&A of LC 2 and has been moved to the policy box of HOU 7.

- All flats or apartments are self-contained, this brings forward the same consideration as in criterion d) of Policy LC 2 with no material change; and

- Criterion d) of Policy HOU 7 is largely carried forward from criterion (e) of LC 2. The wording has been updated to require that all flats or apartments have direct, safe and secure access to the public street. This criterion is consistent with the SPPS with an emphasis on quality place-making, accessibility, inclusive communities and the creation of safe and attractive environments. The change is not intended to alter the overall policy approach of LC 2 but to provide a clearer basis for the assessment of access arrangements associated with conversion proposals.

Criterion a) of HOU 7 requires that the proposal maintains or enhances the character and appearance of the existing building, including its form, design, architectural features and setting. This criterion reinforces a place-making approach and is consistent with the Justification and Amplification of LC 2 paragraph 2.15 in terms of character and paragraph 2.19 in terms of design. While criterion a) focuses specifically on the impact of the proposal on the host building and its immediate setting, other key design and amenity considerations applicable to housing proposals are addressed elsewhere within the Plan Strategy. Proposals will also be assessed against Policy DES 1 Design Quality, which sets out broader place-making, design and environmental quality considerations, and Policy GP 4 Amenity, which seeks to safeguard the living conditions of existing and future occupants.

Criterion e) has been included in Policy HOU 7 as a new policy consideration to address proposals involving residential accommodation above shops and other business premises, commonly referred to as 'Living Over the Shop' (LOTS) development. While there is no equivalent provision within Policy LC 2 of the PPS 7 Addendum, the criterion builds upon the principles contained within HS 1 *Living Over the Shop* of Planning Policy Statement 12: *Housing in Settlements*.

Living over shops can make a positive contribution to meeting housing needs, supporting urban regeneration, and enhancing the vitality and viability of city, town and village centres through the more efficient use of existing buildings. Such development can increase residential populations within centres, support local services and businesses, and contribute to the creation of more balanced and sustainable communities. However, residential accommodation can be sensitive to the operational characteristics of commercial premises, including noise, odour, servicing activities, deliveries and extended opening hours. It is therefore important that new residential development does not prejudice the ongoing operation, expansion or viability of existing commercial businesses. Equally, future occupants must be provided with an acceptable standard of residential amenity. Criterion e) therefore requires proposals above shops and other business premises to demonstrate compatibility with commercial uses operating below or adjacent to the site. This criterion also encourages the provision of separate residential access, where practicable, to support good design, accessibility and the effective functioning of mixed-use buildings. This approach aligns with the SPPS objectives of supporting town centre living, promoting mixed-use development and ensuring the delivery of quality residential environments.

Policy HOU 7 will apply in conjunction with Policy HOU 8 where a conversion or change of use proposal would result in flats or apartments being occupied as a House in Multiple Occupation (HMO). Applicants will be required to demonstrate compliance with both policies, as applicable.

Policy HOU 7 therefore retains the safeguards established through Policy LC 2 whilst strengthening the policy through more detailed requirements relating to design quality, residential amenity, building suitability and compatibility with surrounding land uses. This

approach aligns with the SPDS objectives for sustainable development, quality residential environments and the efficient use of land and buildings within settlements.

HOU 8 Houses in Multiple Occupation

A House in Multiple Occupation (HMO) is defined by the Houses in Multiple Occupation Act (NI) 2016 as a property, which is the only or main residence of three or more people who are from more than two households and rented by at least one of the people in the accommodation.

On 1st April 2019, responsibility for Houses in Multiple Occupation regulation was transferred from the Northern Ireland Housing Executive (NIHE) to Local Councils. The NIHE HMO registration scheme has been replaced by a licencing scheme administered by Belfast City Council on behalf of all Local Councils. The purpose of the scheme is to ensure that HMOs are regulated effectively to safeguard the health, safety, and wellbeing of occupants, while minimising any adverse impacts on the character, amenity and functionality of surrounding areas.

Based on the official guidance from Belfast City Council, the following key criteria must be met for an HMO licence to be granted:

1. **Planning Compliance**
The use of the property as an HMO must not constitute a breach of planning control. This means the property must either have the necessary planning permission or be deemed lawful under planning legislation.
2. **Fit and Proper Person Test**
Both the owner and any managing agent must be assessed as fit and proper persons. This includes checks on criminal history, past housing offences, and compliance with housing law.
3. **Satisfactory Management Arrangements**
The proposed management arrangements must be adequate to ensure the property is maintained, tenants are supported, and legal responsibilities are met. This includes clear procedures for repairs, safety checks, and tenant communication.
4. **No Overprovision in the Locality**
The granting of the licence must not result in an overconcentration of HMOs in the area. Councils assess this based on local housing mix, community impact, and existing HMO density.
5. **Fitness for Human Habitation**
The property must meet minimum standards for human habitation, including safety, sanitation, heating, and structural integrity.

While the licensing regime provides a framework for regulating the operation, management and standards of HMOs, planning authorities have a distinct role in determining whether such uses are appropriate in a particular location and compatible with the character and amenity of the surrounding area. The development of planning policy for HMOs therefore requires a balanced consideration of both the benefits that this form of accommodation can provide while addressing the potential impacts that may arise from excessive concentrations.

In September 2025 there were 3614 HMOs registered in Northern Ireland, of which 57 are located within Armagh City, Banbridge and Craigavon Borough Council area. HMOs form an important component of the housing market and contribute to meeting the needs of a diverse range of residents, including students, young professionals, single-person households, key workers and those seeking more affordable housing options. They provide flexibility within the housing stock and can make efficient use of existing residential properties.

While HMOs can be purpose-built, all existing HMOs within the Borough have been formed through the conversion of properties originally designed for single household occupation. These conversions typically do not involve external alterations but instead focus on internal reconfiguration to optimise the number of bedrooms, while maintaining shared facilities such as kitchens, bathrooms, utility spaces, and communal areas including gardens or yards. On this basis, the multiple occupation of a house usually involves an intensification of its residential use, whereby the change of use of a three-bedroom property, formerly occupied by a family of four, to an HMO with four bedrooms, all occupied by couples, would increase both the number of occupants in the house and the proportion of adults.

High concentrations of HMOs within particular residential areas can result in a range of adverse impacts. These may include increased levels of noise and activity, pressure on parking provision, refuse and waste management issues, deterioration in residential amenity, and changes to the social and physical character of established communities. Where concentrations become excessive, there is potential for an imbalance in the housing stock and a reduction in community cohesion resulting from lower levels of permanent residency and owner occupation.

The Council considers that bringing forward a specific policy for HMOs in the draft Plan Strategy is necessary to provide policy guidance for managing the impacts associated with this form of development and encouraging balanced communities. Although HMO applications have represented a small proportion of the planning applications received across the Borough, they have generated a significant level of public concern and community interest. Between 2019 and 2025, 28 planning applications were submitted for the change of use of residential properties to HMOs, attracting a total of 56 objections and one petition containing 103 signatures. This level of representation is disproportionately high when compared to other forms of residential development and demonstrates the sensitivity of HMO proposals within local communities.

The concerns raised through the planning process have consistently centred on matters such as residential amenity, parking pressure, increased density, anti-social behaviour, the loss of family housing and the cumulative impact of HMOs on the character of established residential areas. These are recognised planning issues that require careful assessment and management through the development management process.

Furthermore, concerns have been raised through Elected Members regarding HMO applications and the increasing concentration of such developments within established residential areas. In particular issues relating to the Thomas Street area of Portadown have highlighted the potential impacts that can arise where HMOs become concentrated in a locality. These concerns have informed consideration of a specific HMO policy within the LDP aimed at managing concentrations of HMOs and preventing over proliferation. This policy would also serve as a proactive measure to avoid similar issues arising elsewhere across the Borough.

These concerns are supported by evidence of geographical concentrations of HMOs emerging within parts of the Borough, most notably within the Thomas Street area of Portadown, where approximately 29 licensed HMOs are located (July 2025). Whilst an individual HMO may not, in isolation, have a significant impact on the character of an area, the cumulative effect of multiple HMOs can alter the balance of a neighbourhood and adversely affect its residential character, environmental quality and community cohesion.

In response to these issues a HMO policy has been developed to address an identified policy gap within the SPSS. The proposed policy will provide greater clarity and assurance for applicants, agents and local residents in the assessment of HMO proposals, while also helping

to manage concentrations of HMOs and proactively preventing similar concentrations arising elsewhere across the Borough.

Derry City and Strabane District Council Local Development Plan 2032 has two policies relating to Houses in Multiple Occupation (HMOs), specifically Policy HOU 13: Houses in Multiple Occupation (HMO) Management Areas and Policy HOU 14: Houses in Multiple Occupation (HMO). The existing HOU 13 policy would allow 30% HMOs in all streets, from now up until the adoption of the LDP Local Policies Plan, and after that, 30% would only be allowed in the HMO Management Areas (and 10% everywhere else). The council have acknowledged that they have struggled to fully achieve their objective of maintaining balanced and sustainable communities. They have recently produced a new Preferred Options Paper for a revision of the LDP Strategy regarding Policy HOU 13. The central proposal of this revision is to reduce the Policy HOU 13 limit of HMOs in any street from a 30% cap to a 10% limit, across all of the District, with immediate effect and pending the LPPs definition/designation of HMO Management Areas in certain local parts of the centre of the City – in which 30% would then be acceptable.

A review of HMO policy approaches adopted by a number of UK local authorities identified the use of concentration thresholds, commonly around 10%, as a means of maintaining balanced communities and preventing harmful over-concentration.

A key challenge for the LDP therefore is to balance the need for HMO accommodation with the protection of residential amenity and the promotion of sustainable, balanced communities. Policy HOU 8 has been developed to ensure that HMOs continue to contribute positively to housing provision while preventing harmful over-concentration and cumulative impacts.

In developing HOU 8, consideration was given to:

- The growing demand for shared accommodation and affordable housing in the council area;
- Existing patterns and concentrations of HMOs across settlements within the Council area;
- The need to maintain a mix of housing types and tenures;
- Potential cumulative impacts arising from clusters of HMOs;
- The protection of residential amenity and environmental quality;
- Parking, access and servicing considerations; and
- The HMO licensing regulations.

The Council considered a range of policy approaches, including designating Housing Management Areas with specified thresholds, a criteria-based policy, and reliance solely on the existing HMO licensing regime. While licensing controls housing standards and management arrangements, it does not address the wider planning implications associated with HMO concentrations. Consequently, a planning policy approach is considered necessary to manage the distribution of HMOs and their impact on surrounding communities, along with supporting balanced communities.

As set out above the Council considered designating Housing Management Areas (HMAs) for locations with existing concentrations of HMOs. However, the Council favours a proactive Borough wide policy approach that manages HMO development before concentrations become problematic. This will ensure that the Plan is reasonably flexible to deal with changing circumstances.

The Council considers that a criteria-based policy provides the most appropriate mechanism for assessing HMO proposals. This approach enables each proposal to be assessed on its individual merits whilst also taking account of the existing concentration of HMOs and the

potential cumulative effects on the character, function and amenity of the surrounding area. It provides sufficient flexibility to respond to changing housing needs while ensuring that new HMOs do not adversely affect established residential communities.

Policy HOU 8 seeks to achieve an appropriate balance between housing choice and community sustainability. It acknowledges the important role HMOs play in meeting housing need, whilst recognising that uncontrolled growth can have significant consequences for local communities.

The policy therefore aims to:

- Support the provision of appropriate HMO accommodation;
- Prevent excessive concentrations of HMOs;
- Safeguard residential amenity (GP 4);
- Promote mixed, balanced and sustainable communities;
- Protect the character of established residential neighbourhoods; and
- Ensure that HMO development occurs in locations capable of accommodating its impacts.

The policy incorporates a degree of flexibility by recognising that there may be circumstances where the 10% threshold set out in criterion a) of Policy HOU 8 is exceeded. In such cases, applicants will be required to demonstrate a compelling local need for the proposed HMO. Where sufficient evidence is provided, this may justify an exception to the threshold where the benefits of meeting an identified housing need outweigh potential concerns relating to HMO concentration and intensification.

This approach provides greater certainty for applicants, agents and local communities, supports the appropriate provision of HMO accommodation and helps prevent emerging excessive concentrations in residential areas. Policy HOU 8 seeks to facilitate appropriate HMO development that contributes towards meeting housing needs while safeguarding the amenity of existing and future residents and protecting the character of established residential areas. The policy supports the creation of sustainable and balanced communities by ensuring that HMOs continue to form an important component of the Borough's housing stock without resulting in unacceptable impacts on residential amenity, environmental quality or local character of an area.

HOU 9 Specialist Residential Accommodation

The RDS (Para. 3.15) states that the varied requirements of the whole community need to be met including the availability of affordable and special needs housing. Policy HOU 9 is a new operational policy that seeks to meet the housing needs of people within the Borough that cannot be met through general needs housing but require a specialised, accommodation-based solution. The policy builds on SPPS 6.147 which states that the Housing Needs Assessment/Housing Market Analysis carried out by NIHE will identify the range of specific needs, including supported housing needs. The policy however extends to other important housing options including residential care and nursing homes, hostel accommodation and sheltered housing. It applies to both public and private sector proposals, including new purpose-built schemes, conversion schemes and extensions/alterations to existing facilities to provide additional accommodation.

The policy is also a response to the projected ageing population trend within the Borough, which it is anticipated will lead to additional demand for care facilities for older people within the Borough across the plan period and beyond.³²

The new policy is similar to that included in the majority of adopted Plan Strategies of other NI Councils, and as proposed by NMDDC and ANBC in their Draft Plan Strategies.

In line with regional direction in the SPPS (incl. Paras. 6.133, 6.136 and 6.147) and the Council's Housing Strategy, the new draft policy seeks to steer new specialised residential accommodation to within settlements in the interests of sustainable development. The policy only permits the extension and alteration of existing facilities in the countryside as an exception.

Policy Criterion a) requires the applicant to demonstrate a need for the accommodation. The level of detail required in the supporting SRA Statement will depend on the nature of the proposal. The need could be confirmed by way of written confirmation from a funding body, such as the Department for Communities (DfC) or Department of Justice (DoJ). The demonstration of need may also help justify why a particular siting, design or layout is required in relation to Criterion b) – which requires the scheme to be suitable to the needs of occupants and the provision of necessary support and care – or why normal standards cannot be met.

Policy Criterion c) requires the proposal to have convenient access to local services and facilities, to benefit the occupants and to ensure that the proposal helps strengthen community cohesion. Older people may be more reliant on public transport. This criterion aligns with Policy GP 2 (Criterion a) in relation to Transport Infrastructure, Policy DES 1 Design Quality (Criterion h), in relation to 'Movement' considerations and the wider Transport Strategy.

During the development of the policy, the Council has taken account of the Development Control Advice Note 9 (DCAN 9) – Residential and Nursing Homes (DfI, 2003). This DCAN, will cease to have effect within the Borough once the Council adopts the LDP Plan Strategy. Relevant considerations within the DCAN 9 have been integrated into Policy HOU 9, for example, that small settlements (referred to as 'hamlets' in DCAN 9) are not normally suitable locations for residential and nursing homes; and the need to incorporate access provision for emergency vehicles (e.g. ambulances) where appropriate. Other relevant considerations such as design, amenity, integration and parking are adequately covered by the new LDP Policies.

HOU 10 Travellers Accommodation

Provides the operational policy for travellers³³ accommodation proposals, where a need has been identified by NIHE in a local travellers need assessment. The policy brings forward and updates the current Policy HS 3 (Amended) in PPS 12 (dated January 2013), with minor amendments. As with Policy HS 3 (Amended), and in line with regional direction in the SPPS, the new recommended policy applies a settlement-first approach to the location of travellers accommodation in the interests of sustainable development.

The policy criteria reflect those of SPPS Para. 6.144 and Policy HS 3 (Amended) but have been marginally amended to take account of DfC's Design Guide for Travellers' Sites in Northern Ireland (Oct 2020). The criteria cover the design issues particular to Travellers'

³² NISRA Mid 2018 based population projections (published 30 April 2020) show an increase in the percentage of those aged 65+ from 15.0% in 2015 to 20.7% in 2035.

³³ Definition contained in the Draft Plan Strategy Glossary i.e. A generic group as defined by the Race Relations (Northern Ireland) Order 1997 i.e. 'having a shared history, culture and traditions, including a nomadic way of life'.

accommodation proposals, including the layout of individual pitches for caravans or mobile homes; the parking and turning of caravans; and the potential need for additional site facilities (e.g. community buildings).

The compatibility test in Criterion a) has been expanded from the second criterion in current Policy HS 3 and SPPS. 6.146 to align with other LDP policies. It adds reference to:

- 'local character' and 'residential amenity' as interests that must not be detrimentally impacted, in addition to 'environmental quality';
- 'land uses' – in addition to buildings and structures; and
- 'planned' land uses, buildings and structures – in addition to existing and approved'.³⁴

The catch-all line at the end of Policy HS 3 (Amended) (i.e. In all cases planning authorities will take full account of planning, environmental and other material considerations – for example the availability of suitable infrastructure and services) is no longer needed as travellers' accommodation proposals should also be considered against all other relevant LDP policies.

The draft policy otherwise retains the same exceptional provision for a transit or serviced site in the countryside, where the need cannot be readily met in an existing settlement. The policy however removes the distinction made in the current Policy HS 3 for single family proposals not requiring to demonstrate a need, and to be assessed on their merits. As directed by the PAC in its report into the Lisburn and Castlereagh City Council Independent Examination (Pages 52/53, Suggested Minor Change MC19B) this distinction is not made in SPPS 6.146, which states where a need is identified for a transit site or a serviced site, which cannot be readily met within an existing settlement in the locality, proposals will be required to meet the policy requirements in respect of rural planning policy for social and affordable housing. The PAC notes that as the SPPS does not specify whether this provision applies to a site for a single family and/or a site for more than one family, it is reasonable to presume that it relates to all such sites. There is a tension between the provisions of the SPPS and current Policy HS (Amended). Therefore, in accordance with the transitional arrangements set out at SPPS Para. 1.12, the provisions of the SPPS prevail. There is no logical reason why a single-family proposal would not have to demonstrate a need, as well as meet all rural policy requirements (including the sequential test).

The policy brings across the same sequential test criteria in new Policy HOU 18 Affordable Housing in the Countryside (as in corresponding Policy CTY 3 of PPS 21 Sustainable Development in the Countryside).

HOU 11 Householder Development

Policy HOU 11 brings forward and updates existing Policy EXT 1 in the Addendum to PPS 7 (Residential Extensions and Alterations) with minor amendments. The minor nature of householder development proposals means that these are exempt from the General Policies GP 1-4 and Design/Place-making Policies DES 1-3.

The policy title itself has been changed to 'Householder Development' to better encompass all types of householder development, which can include works other than an extension or

³⁴ Planned land uses has the same meaning as referred to in Policies GP 2, GP 3 and DES 1, for example. It may include:

- other development proposals in the planning application process (with the weight to be attached to the proposal dependent on its stage in the process);
- the future development of zoned land; and
- other development planned in the area.

alteration to a dwelling, for example the erection of a boundary wall or fence, or a new access. In terms of the policy wording, there are a number of minor changes to enable full assessment of proposals and to align with other LDP policies.

Policy Criterion a): adds explicit reference to the 'position' of the proposal – which is absent from the current Policy EXT 1 – as it is an important consideration. The term 'overall design' is also included as a catch-all term to cover any other relevant design matters such as form and detailing, including fenestration.

Policy Criterion b): changes '... does not unduly affect the privacy or amenity of...' to '...will not...', for consistency and clear understanding.

Policy Criterion c): reference to 'biodiversity' and 'amenity value' have been added to 'environmental quality' in relation to the interests to be protected when considering the safeguarding of existing trees and other landscape features.

Policy Criterion d): reference to '...sufficient space remains within the curtilage of the property for recreational and domestic purposes...' changed to '...for amenity and other domestic purposes'. The term 'suitable' has been added to 'parking and vehicle turning' to ensure that the arrangement is suitable to the Council.

New policy wording has been added stating that the requirements set out in the four policy criteria may be relaxed where it is demonstrated by the applicant that the adaptations are needed to meet the specific needs of a person with a disability or whose mobility is otherwise impaired, and that no practicable alternatives exist. This is to ensure that the policy aligns with the J&A section (Adaptations for People with Disabilities and/or Impaired Mobility) which has been brought forward and updated from current Policy EXT 1.

Additional policy wording has also been added regarding Criterion c) (re. trees and other landscape features) to cover requirements in relation to compensatory planting and/or other works³⁵. New planting and biodiversity enhancement measures are also encouraged and will help the policy accord with the Wildlife and Natural Environment (WANE) Act 2011.

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 Strategy³⁶. 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.

Housing in the Countryside

In line with the POP (Preferred Option SOC 2), the approach to rural housing policies is set in-line with existing policies and tailored to clarify regional direction. The key aim of the policies is to manage housing in the countryside in a sustainable manner.

The policy review process has also included a review of existing regional planning guidance, including the 'Building on Tradition' A Design'.

³⁵ Other works could mean site improvement works such as level changes.

³⁶ Exceptions to the General Policies and Design and Place-making Policies are set out in the dPS.

The Council's rationale for its approach to rural housing policies is set out below for Policies HOU 12, HOU 13, HOU 14, HOU 15 and HOU 18, where significant amendments have been made. The remaining rural housing policies largely reflect established regional policy direction. Several key considerations relating to design and residential amenity have now been incorporated within the General Policies and Design/Place-making Policies³⁷. This approach rationalises and consolidates requirements that apply across a range of policy areas, improving the overall structure, clarity and usability of the Plan.

Policy HOU 12 New Dwellings in an Existing Cluster

The justification and amplification for this draft policy within the dPS provides clarification and further explanation on what is considered an existing cluster of development in the countryside in terms of visual entity, focal points and cross-roads. It also provides guidance on what a site should provide in terms of enclosure and natural landscape features, siting and appropriate screening. The issue of residential amenity is included within the policy provisions of GP 4: Amenity.

Policy HOU 13 Replacement Dwellings

This draft policy has been amended to align with the SPPS by requiring all replacement dwellings must be located within the established curtilage of the existing dwelling. This differs from PPS 21, which permitted greater flexibility in siting.

Policy HOU 14 Infill and Ribbon Development

This draft policy provides greater clarity on a substantial and built-up frontage, the definition of which is a line of three or more permanent buildings outside settlement development limits, each with its own defined curtilage. The justification and amplification further clarifies what constitutes a road frontage, circumstances that a vehicular access does not constitute a frontage and the requirement to take full account of the existing pattern of development and integration at an early design stage.

HOU 15 Dwellings on Farms

During engagement with Development Management officers, concerns were raised that the policy did not adequately address circumstances where development opportunities are sold or transferred. In response, additional clarification has been provided within the justification and amplification regarding the transfer of lands associated with the policy. Further clarification has also been included in relation to the operation of equine businesses and the circumstances in which they may qualify under the policy.

Policy HOU 18 Affordable Housing in the Countryside

The draft policy aligns with the strategic direction set out in the SPPS and does not prescribe a maximum number of affordable housing units. This approach recognises that the appropriate scale of development will be informed by the nature and extent of the identified local housing need in each case. While no specific numerical limit is incorporated within the policy wording, the justification and amplification indicates that proposals would generally be expected to comprise around 14 dwellings, consistent with the approach previously established under PPS

³⁷ Exceptions to the General Policies and Design and Place-making Policies are set out in the Draft Plan Strategy.

21 Policy CTY 5. This provides continuity with regional policy whilst allowing an appropriate degree of flexibility to respond to demonstrated local need and site-specific circumstances.

In line with the POP policy CTY 2 Dispersed Rural Communities has not been brought forward as there are no Dispersed Rural Communities identified within the Borough and none are proposed.

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 Strategy³⁸. 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.

³⁸ Exceptions to the General Policies and Design and Place-making Policies are set out in the dPS.

9.0 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 rural housing, is considered to be sound, as it satisfies the relevant tests of soundness, as summarised in Table 20 below:

Procedural Tests	
P2	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have evolved from the POP and have taken account of responses to the POP and the POP Consultation Report in particular the responses received in respect of Key Issue SGS 2 'Allocating Housing', Key Issue SOC 1 'Supporting quality sustainable urban housing and balanced communities' and Key Issue SOC 2 'Supporting sustainable rural housing.'
P3	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have been subject to Sustainability Appraisal, including a Strategic Environmental Assessment. Further details are included in the Sustainability Appraisal Report.
Consistency Tests	
C1	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have taken account of the RDS and in particular SFG10 'Identify and consolidate the roles and functions of settlements within the clusters', SFG 12 'Grow the Population in the Hubs', SFG13 'Sustain rural communities living in smaller settlements and the open countryside', SFG14 'Improve accessibility for rural communities', RG6 'Strengthen community cohesion', RG7 'Support urban and rural renaissance', RG8 'Manage housing growth to achieve sustainable patterns of residential development' and RG11 'Conserve, protect and, where possible, enhance our built heritage and our natural environment.'
C2	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 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 our future generation's ability to develop, grow and flourish. It has also taken account of the Community Plan's ambition for people to live in well-designed, sustainable and connected communities, benefiting from quality, affordable housing and accessible services and amenities. Additionally policies GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have taken account of the Community Plan's recognition that adequate housing for the future population must be provided within the Borough alongside supporting infrastructure development. Furthermore account has been taken of the aspiration of the Community Plan that each urban and rural area values and protects its distinct identity and assets so that the Borough's full potential as a vibrant place for living, working, visiting and investing can be achieved.
C3	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have taken account of existing planning policies as contained within the SPPS. In particular paragraphs 6.61–6.73 'Development in the Countryside', which recognises the countryside as one of our greatest assets and as such aims to manage development in the countryside in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting

	and sustaining rural communities consistent with the RDS, and paragraphs 6.133-6.147 'Housing in Settlements' which acknowledge that good quality housing is a fundamental human need that plays a significant role in shaping our lives and communities and as such seeks to manage housing growth to achieve sustainable patterns of residential development, support urban and rural renaissance and strengthen community cohesion. GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 have also taken account of PPS 7 'Quality Residential Environments', PPS 7 Addendum 'Safeguarding the Character of Established Residential Areas', PPS 8 'Open Space, Sport & Recreation', PPS 12 'Housing in Settlements', PPS 21 'Sustainable Development in the Countryside' The Planning Strategy for Rural Northern Ireland (PSRNI) (as detailed in the Regional Policy Context) along with extant development plans within Armagh City, Banbridge & Craigavon Borough.
C4	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 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	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 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	SGS 1, 3 and 4, GP 1–GP 4, DES 1–DES 2 and HOU 1–HOU 19 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	Information collected through the ongoing monitoring framework will be assessed against a range of indicators to determine whether LDP policies are performing as intended. This assessment will consider whether policies are achieving their stated objectives, associated targets and whether there are any unintended consequences arising from their implementation. In particular regards to this subject area the Council is committed to undertaking the following monitoring: • The number of approvals granted for conversion and replacement of existing buildings in the countryside, to ensure that appropriate and sustainable opportunities for development in the countryside are being provided so to support rural communities. will be annually monitored and assessed. • The distribution of housing across the Boroughs Main Settlements (Hubs) to establish if it generally aligns with the Strategic Housing Allocation and ensure the Hubs are fulfilling their role as the main settlements for growth within the Borough. • The distribution of new housing in Small Towns and Villages to establish if it generally aligns with the Strategic Housing Allocation and ensure the Small Towns and Villages are fulfilling their role as attractive and vibrant local service centres providing a level of development that is appropriate to their position in the Settlement Hierarchy.

	• The supply of housing land in both the Main Settlements (Hubs) and Small Towns to ensure that a 5-year supply of land is being maintained. This is necessary to ensure that a sufficient supply of land for new housing is being maintained to meet housing needs by 2035. • The provision of affordable housing within settlements to ensure that an appropriate supply of affordable housing within settlements is being facilitated. Other relevant indicators, as set out in the dPS, include those relating to the provision of traveller accommodation, the provision of specialist residential accommodation, the provision of Houses in Multiple Occupation (HMO) and the protection of residential use of dwellings within protected housing areas. Monitoring findings will inform the future review of the Plan and any necessary policy intervention.
CE4	SGS 1, 3 and 4, GP1, GP2, GP 3 & GP 4, DES 1-DES 2 and HOU1-19 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 opportunities to review existing and introduce new local policies, provided this is underpinned by robust evidence base and is consistent with the adopted Plan Strategy.

Table 20: Consideration of Soundness

Appendices

Appendix 3 - Analysis of Affordable Housing Threshold

Table 1 - Total Approved Housing Units at and above different thresholds						
Threshold	Survey Year					5 Year Average Unit Numbers
	2019/2020	2020/2021	2021/2022	2022/2023	2023/2024	
1 unit +	1033 (99 applicants.)	1677 (97 applicants.)	1155 (100 applicants.)	745 (78 applicants.)	765 (91 applicants.)	
5 units+	926 (45)	1572 (41)	1065 (41)	663 (25)	683 (39)	981
10 units+	815 (29)	1468 (24)	973 (28)	585 (15)	558 (21)	879
15 units+	766 (25)	1394 (18)	902 (22)	501 (10)	438 (11)	800
20 units+	679 (20)	1358 (16)	764 (14)	465 (8)	420 (10)	737
25 units+	592 (16)	1313 (14)	673 (10)	465 (8)	399 (9)	688

- Figures based on approval data for period 2020-2024 (5 years).

- The bracketed figures equate to the number of applications in the survey year that would fall within the associated threshold. This figure is a cumulative total that decreases as the threshold size increases.

Table 2 - Potential Social Housing Provision (Annual) based on different thresholds					
Threshold	Proportion				
	5%	10%	15%	20%	25%
5 units+	49	98	147	196	245
10 units+	43	87	131	175	219
15 units+	40	80	120	160	200
20 units+	36	73	110	147	184
25 units+	34	68	103	137	172

- Figures based on approval data for period 2020-2024 (5 years).

- Minimum threshold chosen for Policy HOU 6 Affordable Housing shown in box (175).

Appendix 4: Table A. Estimate of Housing Need by Local Government District 2016-2030³⁹

District Council	Household projection 2030	Second Homes 2030	Vacant Stock 2030	Net Conversions Closures and Demolitions 2016-2030	New Stock Estimate 2030	Housing Stock at April 2016	Projected New Dwelling Requirement 2016-2030
Antrim and Newtownabbey	59,200	400	3,200	-400	62,400	58,300	4,200
Ards and North Down	70,100	900	4,500	200	75,800	70,300	5,500
Armagh City, Banbridge and Craigavon	90,500	900	6,300	2,000	99,700	82,500	17,200
Belfast	148,200	1,500	13,000	900	163,500	156,100	7,400
Causeway Coast and Glens	58,300	2,700	5,200	2,400	68,600	62,900	5,600
Derry City and Strabane	60,000	200	4,300	100	64,600	60,500	4,100
Fermanagh and Omagh	46,200	500	4,300	1,300	52,400	48,000	4,300
Lisburn and Castlereagh	63,500	400	3,700	1,100	68,700	58,000	10,700
Mid and East Antrim	59,200	200	3,600	1,000	64,100	58,700	5,400
Mid Ulster	57,000	200	3,500	2,300	63,000	52,600	10,300
Newry, Mourne and Down	72,300	800	5,300	300	78,700	68,600	10,000
Northern Ireland	784,600	8,700	57,000	11,100	861,300	776,500	84,800

Cells are rounded to the nearest 100. Calculations have been worked out using unrounded data. Therefore summing individual figures in the table above may not add to total.

³⁹ Source: 2016 based Housing Growth Indicators, DfI, 2019

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

 0300 0300 900

 ldp@armaghbanbridgecraigavon.gov.uk

 armaghbanbridgecraigavon.gov.uk

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