

Armagh City, Banbridge &
Craigavon Borough Council

Local Development Plan 2035

Draft Plan Strategy

TECHNICAL SUPPLEMENT 8

Development Pressure Analysis

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 and other relevant Technical Supplements to understand the rationale and justification for the approach within it. It is one of the four interrelated strands of the Countryside Assessment which also includes a Strategic Settlement Evaluation, an Environmental Assets Appraisal and a Landscape Character Assessment¹. This Technical Supplement provides an update relating to development pressure analysis in the countryside within the Borough since the publication of the Council's original evidence base set out within Preparatory Paper No.13 Pressure Analysis. 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.

In order to reflect the broad range of matters that were taken into account in the development of the Council's approach towards the countryside in the Borough and the formulation of associated dPS planning policies this Technical Supplement has been organised into the following sections:

- Section 2 provides an analysis of the residential planning applications that were determined in the countryside from 1st April 2004 – 31st March 2024. It also provides an analysis of development pressure in the countryside from residential development (1st April 2010 to 31st March 2024) to identify areas where significant development pressure has occurred and/or where local rural character is under threat from significant change.
- Section 3 provides an analysis of the wind energy planning applications that were determined in the countryside from 1st April 2004 – 31st March 2024. It also provides an analysis of development pressure in the countryside from wind energy development (1st April 2004 to 31st March 2024) to determine if there are any significant pressures from wind energy development (single wind turbines and wind farms) in the countryside, and whether any patterns are emerging that may cause damage and unacceptable change to local rural character.
- Section 4 provides a summary and conclusion of the pressure analysis for both residential and wind energy development (Sections 2 & 3), including setting out how the outworkings of the Development Pressure Analysis will inform the LDP's strategic approach towards the countryside.

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 development pressure within the Borough's countryside is managed in an appropriate and sustainable manner, supporting and sustaining the needs of rural communities, while protecting the environment, landscape character and rural amenity throughout and beyond the plan period of 2035.

Development Pressure Analysis

The Development Pressure Analysis seeks to identify areas in the countryside where significant development pressure has occurred and/or where local rural character is under threat from significant change. As set out above it is one of the four interrelated strands of the Countryside Assessment which also includes a Strategic Settlement Evaluation, an Environmental Assets Appraisal and a Landscape Character Assessment.

As residential development is the predominant form of new development in the countryside, Development Pressure Analysis typically involves an assessment of its spatial distribution, and cumulative impacts. However, given the prevalence of wind energy applications within the Borough over the last 15-20 years, and the potential for such development to have a significant visual impact upon the rural area, it is deemed

¹ For further information in respect of the LDP Strategic Settlement Evaluation, Environmental Assets and Landscape Character Assessment see Technical Supplements 1, 10 and 9, respectively.

appropriate to include an assessment of wind energy development as part of the Development Pressure Analysis.

It is important to note that it was not considered necessary to carry out an analysis of development pressure from solar energy development. Whilst a desk-top study was carried out in relation to solar development within the Borough, the volume and scale of planning applications determined for solar energy development in the countryside (as of January 2025) was not considered to be at a level that merited further analysis as part of this study². Whilst the demand for solar energy development within the Borough has been relatively low, this position will be re-evaluated where appropriate as part of any future Development Pressure Analysis carried out by the Council.

It is also acknowledged that other types of development, such as mineral extraction, industrial type development and agriculture, can have an unacceptable adverse impact upon the visual amenity and character of the countryside. However, until such times as the LDP Plan Strategy is adopted it is considered that such forms of development can be sufficiently managed by prevailing regional policy and the existing Areas of Constraint on Minerals Development (ACMD) designated within the extant Craigavon Area Plan 2010 and the Dungannon and South Tyrone Area Plan 2010. These existing ACMD designations will be reviewed at Local Policies Plan stage. This Development Pressure Analysis therefore focuses on the impact of single rural dwellings and wind energy development within the countryside.

The Development Pressure Analysis will serve primarily to identify areas of the countryside that have experienced significant development pressure from residential and wind energy development. It will seek to highlight any impacts resulting from this development pressure and analyse the vulnerability of sensitive landscapes to the impacts of such development. The Development Pressure Analysis will assist in informing the Councils decisions regarding countryside policy and the provision of additional policy protection for areas of the countryside vulnerable to the adverse impacts of development.

'The countryside' as referred to in this document, is defined as the land outside of the designated settlement development limits³. It is important to note that the area defined as 'countryside' may change for future Development Pressure Analysis studies, depending on any changes to settlement development limits that are made during the Local Development Plan (LDP) process.

Policy Context

Regional Policy Context

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

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

Although the SPPS is silent on the need for a Development Pressure Analysis, it directs that the policy approach to new development in the countryside (paragraph 6.64) should reflect differences within the region, be sensitive to local needs and be sensitive to environmental issues including the ability of settlements and landscapes to absorb development. This regional policy context therefore provides scope for developing policies in the LDP which are tailored to particular local circumstances; for example, through restricting development in areas that are particularly sensitive to change or accommodating sustainable development in rural areas with lower sensitivity.

² Note: Applications submitted, but not yet determined, are not included in development pressure analysis

³ As defined in the existing Armagh Area Plan 2004 and associated Alteration No1. Countryside Proposals March 2001, Craigavon Area Plan 2010, Banbridge, Newry and Mourne Area Plan 2015 and the Dungannon South Tyrone Area Plan 2010

The aim of the SPPS (paragraph 6.65) regarding the countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, while supporting and sustaining rural communities, consistent with the Regional Development Strategy 2035, (RDS).

The regional strategic objectives of the SPPS 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.

It highlights that planning and other environmental policies (paragraph 6.67) must therefore play their part in facilitating sustainable development in the countryside but not at the expense of the region's rich natural assets and not at the expense of the natural and built environment.

The SPPS published in December 2025 sets out new policy provisions on Renewable and Low Carbon Energy (pages 86 – 91).

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

The regional strategic objectives of the SPPS are to:

- ensure that sustainable renewable and low carbon energy development is facilitated at appropriate locations in order to increase the contribution to the transition to a net zero carbon economy, in accordance with the Climate Change Act;
- secure the delivery of an appropriate mix of energy provision that supports the Energy Strategy where this benefits our environment, economy, and communities;
- ensure that the environmental, landscape, seascape, visual, safety and amenity impacts associated with or arising from renewable and low carbon energy development are appropriately assessed and addressed;
- ensure appropriate protection of the region's built, natural, and cultural heritage features;
- facilitate the integration of renewable and low carbon energy technology into the design, siting, and layout of new development, and promote greater application of the principles of Passive Solar Design; and
- facilitate the appropriate onshore development required to enable offshore renewable and low carbon energy proposals.

Inter alia, paragraph 6.221 of the SPPS highlights that planning authorities must help facilitate delivery of the necessary increase in appropriate renewable and low carbon energy developments (electricity and heat) so that the contribution of this sector to the transition to a net zero energy is optimised. Additionally, paragraph 6.222 requires councils, to set out policies and proposals in their LDPs to enable the plan area's optimum contribution to achieving the renewable energy targets to be realised.

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

Planning Policy Statement (PPS) 21 'Sustainable Development in the Countryside' (2010)

PPS 21, published in June 2010, sets out operational planning policies for development proposals in the countryside. It will continue to provide the policy context for all development in the countryside until such times as the Council's operational policies contained in the LDP Plan Strategy have been adopted.

The policy objectives of PPS21 are retained under the transitional arrangements set out in the SPPS and are:

- 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

PPS 21 aims to manage development in the countryside in a manner which balances the need to protect countryside from unnecessary or inappropriate development whilst supporting rural communities.

PPS 21 “Sustainable Development in the Countryside” sets out the need for a Development Pressure Analysis, acknowledging that it is one of four strands of a Countryside Assessment.

Previous Policy Provisions

Given that the data which will be analysed dates back to 2004 for all determined residential planning applications it is appropriate to consider previous policy provisions prior to the publication of PPS 21.

Prior to PPS 21, proposals for residential development in the open countryside were considered under the policy provisions of the Planning Strategy for Rural Northern Ireland (1993) (PSRNI), draft Planning Policy Statement (PPS) 14 ‘Sustainable Development in the Countryside’ and draft PPS 21. Under the PSRNI stricter planning policy criteria applied within Green Belts and Countryside Policy Areas compared to the ‘rural remainder’, within which, planning policy was more relaxed in regard to, for example, accommodating single dwellings in the countryside. This approach facilitated significant growth in rural single dwellings which adversely impacted the environment and rural character of some areas of the open countryside. The adoption of PPS 14 in 2006 introduced more stringent and restrictive policy criteria for development in the countryside, which applied to all areas of the open countryside.

With regards to renewable and low carbon energy development, prior to the revised SPPS published in 2025, PPS 18 ‘Renewable Energy’ (published in 2009) set out the operational planning policies for developments that generates energy from renewable sources. Prior to this, Policy PSU 12 ‘Renewable Energy’ of ‘A Planning Strategy for Rural Northern Ireland’ (PSRNI) set out the relevant policy provisions.

Supplementary Planning Guidance

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

‘Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside’ provides assistance to all those involved with sustainable development in the Northern Ireland countryside to understand the requirements of PPS 21, referred to above. The guide promotes quality and sustainable building design in Northern Ireland’s countryside with the aim to conserve the rural landscape and its natural resources, facilitate a sustainable rural economy and promote high standards in the design, siting and landscaping of development in the countryside.

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

The Best Practice Guidance provides background information on the various renewable energy technologies, including wind energy development, that may come forward in Northern Ireland. It is also designed to contribute to the development management process.

Whilst Planning Policy Statement 18: Renewable Energy (August 2009) was cancelled following the publication of the revised SPPS in 2025 the guidance contained in Best Practice Guidance to PPS 18 - Renewable Energy will continue to have effect (where relevant) unless and until such guidance is updated, revised or replaced by new Departmental guidance

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

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

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

Overview of Landscape Character within Armagh City, Banbridge and Craigavon Borough

Armagh City, Banbridge and Craigavon Borough comprises a diverse mix of landscapes, from the Lough Neagh basin and wetlands to drumlins, river valleys and apple orchards. The Borough's landscapes provide a rich resource of productive agricultural land, habitats for nature conservation, archaeological and historical features and remains which illustrate ways in which the landscape has been shaped by human occupation and activity.

The Northern Ireland Landscape Character Assessment 2000 (NILCA 2000) published by the Department of the Environment (DOE) defined 130 separate landscape character areas across Northern Ireland, each with a distinctive character, based upon local patterns of geology, landform, land use, cultural and ecological features.

Of these 23 Landscape Character Areas (LCAs) are located, wholly or partially, within Armagh City, Banbridge and Craigavon Borough and have been reviewed through the Council's own Landscape Character Assessment. As part of the development pressure analysis, a spatial analysis of pressure from both residential and wind energy development in the countryside was carried out in the context of the Boroughs LCAs. A summary of the main findings of these analyses are set out in greater detail in Sections 2.0 and 3.0.

Within the NILCA 2000 Report, Two Areas of Scenic Quality (AoSQ's) within our Borough are identified; The Lough Neagh Shores and The Blackwater Valley. The AoSQ's represent a second tier below Areas of Outstanding Natural Beauty (AONB) in the hierarchy of landscape classifications. They are characterised by visually pleasing patterns or combinations of landscape elements, and by their generally unspoilt character, free from major intrusion. In addition, they may include significant sites or features of nature conservation, historic or cultural importance. Often, they are visually prominent landscapes or open, distinct areas such as the Lough Neagh shores, which are particularly sensitive to change.

The following paragraphs provide a brief overview of the location and extent of the LCAs found, wholly or partially, within Armagh City, Banbridge and Craigavon Borough. For further detail on the LCAs relevant to the Borough refer to the Council's Landscape Character Assessment.

LCA 46: Blackwater Valley

The Blackwater Valley Landscape Character Area is divided by the River Blackwater, the eastern side lies within the Armagh City, Banbridge and Craigavon Borough Council area and the western side lies within the Mid Ulster District Council area. LCA 46 extends from the Battleford Bridge and stretches southward, along the Blackwater to include the settlements of Tynan and Middletown.

LCA 47: Loughgall Orchard Belt

The majority of LCA 47 lies within the Borough. It includes Portadown, extends westwards towards the boundary with Mid Ulster District Council and north-west towards the motorway. To the south the LCA includes a number of settlements which include Blackwatertown, Loughgall and Laurelvale.

LCA 62: East Lough Neagh Points

The southern portion of LCA 62 is located within the Borough on the eastern shore of Lough Neagh. It includes the settlement of Derrymore and Montiaghs Moss, a large ASSI and international designated Special Area of Conservation (SAC).

LCA 63: Portmore Lough Fringes

The Portmore Lough Fringe LCA is an area of pasture and fen on the low-lying flat landscape on the shores of Portmore Lough. The area is underlain by Lough Neagh Clay and becomes increasingly waterlogged towards the margins of the lough. There are numerous drainage channels and many of the straight, narrow roads are raised on embankments and bordered by ditches. The south-western half of this LCA lies within the Armagh City, Banbridge and Craigavon Borough Council area, the remaining portion lies with Lisburn and Castlereagh City Council area.

LCA 64: Lough Neagh Peatlands

The majority of the Lough Neagh Peatlands LCA lies within the Borough, the remainder extending westwards into Mid Ulster District Council. The landscape is strongly influenced by the traditional road pattern, which mirrors that of the peat workings - a pronounced backbone down the Lough Gullion peninsular with laterals running off at right angles. Within the Northern Ireland Landscape Character Assessment 2000, an Area of Scenic Quality was identified in this and other LCAs around the lough shore.

LCA 65: Upper Bann Floodplains

The Upper Bann Floodplain LCA stretches from Portadown, southwards along the River Bann and Newry Canal, reaching into Tandragee and towards Gilford and concluding at Scarva Lough. The entire LCA lies within the Borough and does not share a boundary with any other Local Government District.

LCA 66: Armagh Drumlins

The entire landscape character area of the Armagh Drumlins lies within the Borough. It is a large area, stretching from the River Blackwater at Milltown southwards towards Derrynoose and the boundary with the Republic of Ireland, including Keady. Stretching eastwards the LCA includes the settlements of Armagh, Hamiltonsbawn, Markethill and Richhill.

LCA 67: Armagh/ Banbridge Hills

The entire landscape character area of Armagh/Banbridge Hills lies within the Borough. The area stretches from Gilford to Scarva, along the south of Tandragee south to Clare and further south to include Poyntz-Pass, ending at the boundary with Newry, Mourne and Down. The LCA also stretches eastwards, taking in the western side of Banbridge, Loughbrickland and along the A50 towards Katesbridge.

LCA 68: Carrigatuke Hills

The Carrigatuke Hills LCA stretches from south of Keady northwards between Armagh and Markethill and eastwards towards Mountnorris. Only approximately half of this LCA is within the Borough, the remaining portion is with Newry, Mourne and Down.

LCA 69: Newry Basin

The majority of LCA 69 lies within the Newry, Mourne and Down District Council area with just the northern most section falling within Armagh, Banbridge and Craigavon Borough. Overall, the Newry Basin LCA is a large-scale rolling drumlin landscape situated between the Ring of Gullion and the Mourne Mountains. The area is drained by tributaries of the Newry River which flow in attractive river valleys. Within the Armagh, Banbridge & Craigavon Borough (ABC) this LCA extends from Poyntz-pass in the west, rising gradually to the east. The settlement of Glen lies in the southern portion of the LCA⁴.

LCA 76: Ballyroney Basin

The Ballyroney Basin occupies a lowland waterlogged area of land enclosed by the Slieve Croob Summits to the north-east, the Mourne Mountains to the south-east and the Iveagh Slopes to the west. Within the Borough, Ballyroney Basin includes Rathfriland in the south, extending northwards, along the river Bann towards Katesbridge and eastwards to include the settlements of Moneyslane and Ballyroney. The Mourne Mountains form a striking backdrop to the Basin as a whole.

LCA 77: Iveagh Slopes

The entire Iveagh Slopes landscape character area lies within the Borough. A portion of its southern boundary aligns with the boundary between Armagh, Banbridge and Craigavon Borough Council and Newry, Mourne and Down District Council area.

LCA 78: North Banbridge Hills

The North Banbridge Hills LCA is located entirely within the Borough and includes the northeastern portion of Banbridge. Extending northwards the LCA includes the southern portion of Waringstown and Donaghcloney, the northern portion of Gilford in the west and the settlements of Lawrencetown, Lenaderg and Seapatrick.

LCA 79: Craigavon Plateau

Located entirely within the Borough, Craigavon Plateau LCA, a relatively elevated flat area, encompasses the large urban areas of Lurgan, Portadown and Craigavon as well as a number of larger residential settlements.

LCA 80: Donaghcloney Valley

The majority of LCA 80 is located within the Borough with only its northern most section extending into Lisburn and Castlereagh City Council. The valley is associated with the section of the River Lagan that flows from just north of Donaghcloney through Waringstown and on to Magheralin.

LCA 81: Kilwarlin Plateau

Approximately half of the Kilwarlin Plateau LCA lies within the Borough, the remaining area extending northwest towards Hillsborough in Lisburn and Castlereagh City Council area. LCA 81 includes the settlements of Gamblestown and the eastern side of Donaghcloney.

LCA 82: Dromore Lowlands

⁴ Following the reform of Local Government in 2015, two nodes of Glen were transferred to Newry, Mourne and Down District from the former Banbridge District Council area, with only one node remaining in Armagh City, Banbridge and Craigavon Borough Council.

The Dromore Lowlands LCA lies entirely within the Borough. It includes the southern portion of Dromore and stretches from Blackskull in the east to Waringsford in the west.

LCA 83: Lower Slieve Croob Foothills

The Lower Slieve Croob Foothills LCA is situated in the east of the Borough, extending slightly into the Newry, Mourne and Down Council District. The LCA extends from Waringsford in the north to just north of Katesbridge in the south. From close to Lough Corbet in the west and to the boundary with the Mourne AONB in the east.

LCA 84: Mourne Foothills

It is important to note that the portion of the Mourne Foothills Landscape Character Area that lies within the Borough is very small. It comprises the northwestern tip of the entire LCA and lies to the east of Katesbridge and includes the settlements of Dechomet and Closkelt. This small area adjoins the Mourne AONB, within which the remainder of this LCA lies.

LCA 87: Slieve Croob Summits

The Slieve Croob Summits LCA crosses very briefly into Armagh City, Banbridge and Craigavon Borough Council area. The total area covered within the Borough however is very small (approximately 2 sqkm) and does not lend itself to a Landscape Character Assessment review.

LCA 88: Craggy Dromara Uplands

The Craggy Dromara Uplands LCA is situated along the eastern boundary of the Borough, with only a small portion falling within the council area, the settlement of Kinallen is located within this LCA. The majority of the LCA extends into neighbouring Lisburn & Castlereagh and Newry, Mourne and Down council areas

LCA 89: Hillsborough Slopes

A small portion of LCA 89 lies within the Borough with the remainder extending into Lisburn and Castlereagh City Council area towards Hillsborough. The LCA is located just north of the River Lagan and includes the northern portion of Dromore.

LCA 109: Upper Ballinderry Plateau

Upper Ballinderry Plateau is a flat area to the northeast of Lurgan and extends from the east of Aghagallon eastwards towards Moira. A large portion of Magheralin, the settlement of Ballymacbredan and a section of Dollingstown and Lurgan lie within this LCA.

2.0 Analysis of Development Pressure in the Countryside - Residential Development

Residential Development in the Countryside: 1st April 2004 – 31st March 2024

The data used to inform the Pressure Analysis has been sourced from the Department of Infrastructure (DfI). DfI's Analytical Services Branch provided data for all determined residential planning applications for the period of 1st April 2002 to 31st March 2016. For the period 1st April 2016 to 31st March 2024, the Council sourced the data relating to all determined residential planning applications from DfI's online datasets⁵. Both sets of data were processed by the Local Development Plan Team to obtain detailed information on all residential applications falling within the open countryside i.e. located outside any of the settlement development limits.

Using the processed data, information relating to all residential applications determined within the countryside⁶ over a twenty-year period, i.e. between 1st April 2004 – 31st March 2024 (inclusive) was collated. Table 1, set out below, details the number of planning applications determined (both approved and refused) for planning proposals (full, outline and reserved matters) relating to new residential development within the Boroughs open countryside. This includes all categories of new residential development, including minor alterations and extensions.

The year 2006/07 is highlighted in green as it relates to the year in which draft Planning Policy Statement (PPS) 14 'Sustainable Development in the Countryside' was published (March 2006). The year 2010/11 is also highlighted, in blue, to identify the year in which PPS 21 'Sustainable Development in the Countryside' was published (June 2010). The introduction of PPS 21 marked a significant change in the regional policy approach in regard to development in the open countryside⁷.

Table 1: Planning Applications relating to new residential development in the Countryside Determined in Armagh City, Banbridge and Craigavon Borough (1st April 2004 – 31st March 2024)

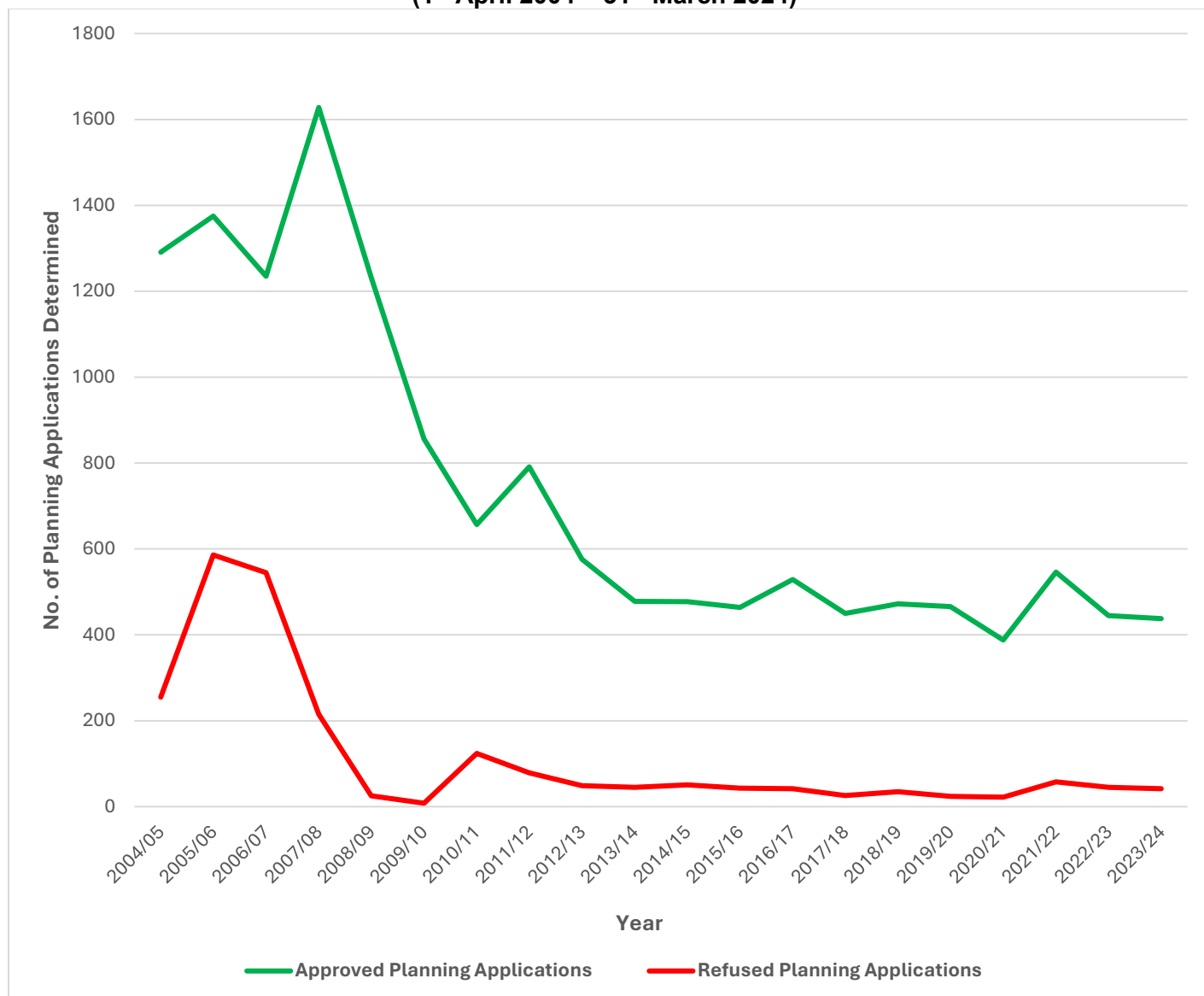
Year	Approved Residential Development Applications	Refused Residential Development Applications	Total No. Applications determined (Approved & Refused)
2004/05	1291	255	1546
2005/06	1375	586	1961
2006/07	1235	545	1780
2007/08	1628	215	1843
2008/09	1232	25	1257
2009/10	856	8	864
2010/11	657	124	781
2011/12	791	79	870
2012/13	576	49	625
2013/14	478	45	523
2014/15	477	51	528
2015/16	464	43	507
2016/17	529	42	571
2017/18	450	26	476
2018/19	472	35	507
2019/20	466	24	490
2020/21	388	22	410
2021/22	546	58	604
2022/23	445	45	490
2023/24	438	42	480
Total	14794	2319	17113

⁵ www.infrastructure-ni.gov.uk/articles/planning-activity-statistics

⁶ In April 2015 planning functions were transferred to the 11 new District Councils, including Armagh City, Banbridge and Craigavon Borough Council which then assumed the role of planning authority

⁷ Note draft PPS 21 was published in September 2009

Figure 1: Planning Applications Determined for New Residential Development in the Countryside (1st April 2004 – 31st March 2024)



Analysis of Residential Planning Applications Determined 1st April 2004 – 31st March 2024

Table 1 and its corresponding graph, Figure 1 set out above, are useful in identifying and understanding trends in residential planning applications determined under draft PPS 14 (March 2006) and PPS 21 (June 2010 onwards).

It is evident from Table 1 and Figure 1 that there was a high volume of planning applications determined during the period from 2004/05 to 2008/09, with an average of 1677 no. applications determined per year over the five-year period. This prolonged period of high-volume determinations was followed by a significant and rapid decline in 2009/10, during which 864 no. applications were determined. The high level of determinations from 2004/05 - 2008/09, followed by the subsequent rapid decline in determinations in 2009/10, is likely to reflect a combination of factors including the submission of a significant number of speculative planning applications in anticipation of a stricter revised rural planning policy (i.e. draft PPS14, March 2006), and the wider economic conditions that prevailing at that time, including the 2008 financial recession. The high levels of residential planning applications may have also been attributed to the increasing trend of people desiring to live in the countryside and the selling off of land by farmers for individual houses.

It is notable that the high volume of residential planning applications determined during the periods 2004/05, 2005/06, 2006/07 and 2007/08 (1546 no., 1961 no., 1780 no. and 1843 no. planning applications determined respectively) are in contrast with the much lower number of applications determined since the introduction of PPS 21 in 2010/11, with an average of 562 no. applications determined per year over the 14-year period (2010-2024). If the volume of planning applications determined in the countryside had continued at the 2004/05 – 2007/08 levels, and had been accompanied by correspondingly high building rates, a point would have been reached whereby unsustainable patterns of development in the countryside would have threatened its value as a regional asset by damaging landscape, biodiversity and natural habitats. This would have applied particularly in areas with a sensitive landscape character area where the landscape had a limited capacity to absorb further development.

It is also of note, that in the years preceding the introduction of draft PPS 14, 2004/05-2006/07, the number of 'refused' applications for residential development in the open countryside was markedly high compared to later periods in the study and this is also possibly due to an increase in number of speculative applications before the introduction of this more stringent policy.

The average approval rate for residential development in the countryside over the twenty-year study period (2004-2024) was relatively high (86%), with a total of 14794 no. applications approved and 2319 no. applications refused. It is notable from Table 1 and Figure 1 that there was a significant and sustained reduction in the number of 'approved' applications for residential development in the open countryside following the introduction of PPS 21 indicating that the policy is accommodating residential development in the open countryside in a regulated pattern that is inherently more sustainable than was previously the case. Whilst the number of applications determined for residential development fell post introduction of PPS 21, and never returned to pre-2010 levels, the approval rate rose from 85% to 91%⁸ in the years following the introduction of PPS 21. This is unsurprising due to the fact that both draft PPS 14 and the PSRNI (related to pre 2006 determinations) were stricter policies for development in the countryside than PPS 21.

The introduction of PPS 21 in 2010 sought to strike a balance between the need to protect the environment while simultaneously sustaining a strong and vibrant rural community. The policy provisions of PPS 21 provide for a range of different categories of residential development including dwellings on farms, replacement dwellings, dwellings in existing clusters, etc. Whilst the opportunities for infill dwellings will have diminished over time, which will have impacted the volume of residential applications submitted, it is important to note that the provision of permitting one dwelling per active farm every 10 years (under CTY 10 'Dwellings on Farms') has the potential to yield a significant number of additional rural dwellings. According to the NI Agricultural Census, there are 3452 active farms within Armagh City, Banbridge and Craigavon Borough⁹, an increase of 206 no. from the number of active farms recorded in 2015. If each active farm within the Borough received planning permission for one dwelling through the plan period, this has the potential to yield 3,452 residential units.

In 2020/21 there was a decline in the number of planning applications determined, from 490 no. applications determined in 2019/20 to 410 no. applications determined in 2020/21, which was the lowest rate of residential planning applications determined during the twenty-year study period. This decline in planning applications determined could be attributed to the impact of the coronavirus pandemic restrictions on planning activity and performance.

The following year, 2021/22, experienced a significant increase in the number of planning applications determined, rising from 410 no. planning applications determined in 2020/21 to 604 no. planning applications determined in 2021/22; the highest number of planning applications determined since 2012/13 (625 no. applications determined). The increase in planning applications determined in 2021/22 may have been associated with the easing of coronavirus restrictions, which had been in place to varying degrees until January / February 2022, and the impact this would have had on planning activity and performance.

Whilst the 2022/23 and 2023/24 analysis periods indicate a return to pre-pandemic levels of planning applications determined (490 no. and 480 no. applications determined respectively), the lower determination

⁸ Average of pre-PPS 21 based on Years 2004/5-2009/10 & Average of post PPS 21 based on Years 2010/11-2023/24

⁹ Source: Agricultural Census in Northern Ireland 2024 (December 2024, DAERA)

rate may in part be attributed to the introduction of a new IT system which impacted upon planning activity and performance.

It is important to note, however, that whilst the pandemic and new IT system (2020/21-2023/24) may have impacted upon the volume of planning applications determined, the average approval rate during this specific period was 91% which is consistent with the average rate of approval from 2010-2024.

Residential Development Pressure Analysis Methodology

The Development Pressure Analysis has been informed by data received from DfI and processed by Armagh City, Banbridge and Craigavon Borough Councils Local Development Plan (LDP) Team. The outworkings of the processing was a dataset which detailed the planning applications determined for residential development in the Borough's open countryside.

For the purpose of this analysis, the determination of a planning application has been used to indicate a point of residential development pressure. Both approved and refused planning applications for residential development are included within the analysis¹⁰. Withdrawn applications were not included in the study because it is considered that they no longer represent an interest in developing the land and are therefore not a point of development pressure. Additionally, any pre-application enquiries, pre-application notifications and pre-application discussions were also excluded from the analysis, as an actual planning application had not been submitted.

For the development pressure analysis, 'outline', 'reserved matters' and 'full' applications relating to dwellings in the countryside that were received between 1st April 2004, and 31st March 2024 were extracted from the dataset. This included applications for single dwellings, replacement dwellings and conversions (to dwellings).

Certain categories of development were excluded from the residential development pressure analysis, and therefore filtered out from the dataset, on the basis that they do not contribute to the housing stock within the open countryside and therefore are not deemed to be points of residential development pressure. This included the following types of development:

- Residential extensions and alterations- excluded as they relate to existing residential units and do not increase the housing stock.
- Mobile Homes – excluded as these are normally used as temporary accommodation, for example when a new dwelling is under construction.
- Tourist accommodation / Self-catering units – excluded as these are not considered to be used for domestic accommodation.

It is acknowledged that planning applications for replacement dwellings, whereby consent is sought to replace an existing, abandoned or uninhabited dwelling, are not considered to add to the net housing stock within the open countryside. However, depending on the design and location of the proposal such development can have a significant impact on the character of the rural area, including where the proposed dwelling is larger than the dwelling to be replaced, where the proposed dwelling is an off-site replacement or where new / amended access arrangements are required. Given the potential impact on rural character, it was therefore considered appropriate to include replacement dwellings in the development pressure analysis for dwellings in the open countryside.

Whilst it was not feasible to remove all duplicate applications, due to the size of the dataset, the removal of those which were clearly identifiable as a duplicate will have served to have removed the majority of duplicate applications, thus ensuring that the data to be spatially represented is as reliable as possible.

The types of planning application considered to fall within this category include:

¹⁰ In instances where a planning application for residential development was refused and there was a subsequent application for residential development on the same site, it was taken to represent an additional point of development pressure because the principle for development had not been set at the time of the subsequent application.

- Renewal of planning permission
- Change of house type
- Variation/Removal of a condition(s)
- Proposed relocation and substitution of an approved residential unit(s)
- Application to replace a previously approved residential unit(s)

Although it could be argued that reserved matters planning applications are duplicates of their associated outline permissions, it was considered unnecessary to remove these from the dataset. Outline permissions and their associated reserved matters applications are defined by the same site boundary and therefore in the pressure analysis maps, which will be used to assess the spatial pattern of development pressure for dwellings, the applications will be represented as one dot located on top of another, i.e. they will appear as a single dot and will not skew the pressure analysis.

Table 2, set out below, details the number of planning applications determined¹¹ for planning proposals¹² relating to new residential development within the Boroughs open countryside, but with duplicate applications and applications for categories of development not considered to be points of development pressure excluded i.e. the statistics detailed in Table 1 that have been further filtered.

Once again, the years 2006/07 and 2010/11 are highlighted in green / blue as they relate to the years that PPS 14 and PPS 21, respectively, were published. As previously stated, the introduction of PPS 21 marked a significant change in the regional policy approach regarding development in the open countryside.

Table 2: Planning Applications relating to new residential development in the Countryside Determined in Armagh City, Banbridge and Craigavon Borough (1st April 2004 – 31st March 2024)- excluding duplicate application types¹³ & categories of development not considered to be points of development pressure¹⁴.

Year	Approved Residential Development Applications	Refused Residential Development Applications	Total No. Applications Determined (approved & refused)
2004/05	999	253	1252
2005/06	1093	573	1666
2006/07	973	525	1498
2007/08	1256	204	1460
2008/09	830	23	853
2009/10	563	7	570
2010/11	418	116	534
2011/12	564	72	636
2012/13	395	45	440
2013/14	293	34	327
2014/15	285	43	328
2015/16	293	40	333
2016/17	323	40	363
2017/18	273	25	298
2018/19	288	33	321
2019/20	301	19	320
2020/21	232	20	252
2021/22	339	56	395

¹¹ Approved and refused planning decisions

¹² Full, outline and reserved matters planning applications

¹³ Where there is a planning application on a site that has previously received planning permission relating to the same development proposal

¹⁴ A category of development that does not add to the domestic housing stock, such as a residential extension and alteration (apart from replacement dwellings- see narrative above explaining the rationale for the inclusion of replacements in the spatial analysis)

2022/23	261	41	302
2023/24	262	31	293
Total	10241	2200	12441

Residential Development Pressure - Spatial Analysis Scope and Methodology

Development Pressure Analysis seeks to identify areas where significant development pressure has occurred and/or where local rural character is under threat from significant change and as such involves an assessment of the spatial distribution of residential development in the countryside, including their cumulative impacts.

This section of the Development Pressure Analysis will focus on the period from 1st April 2010 to 31st March 2024, to align with the period following the publication of PPS 21 (June 2010). It is important to note that as the dataset has been filtered to align with business years (i.e. 1st April to 31st March each year) this analysis period includes residential planning applications determined during the two months prior to the publication of PPS 21 (i.e. April & May 2010). It was not considered necessary to carry out further data cleansing to remove these planning applications from the dataset, as the number of applications determined during this short period of time would have been minimal in the context of the significant overall analysis period (14 years) and the overall size of the dataset to be analysed. On this basis it was considered that the inclusion of the residential planning applications determined within the months prior to the publication of PPS 21 would therefore not have a significant impact on the findings of the Development Pressure Analysis.

Using the processed data (as set out in Table 2, above) a 'heat map' showing points of development pressure for residential development in the open countryside was produced for the period 1st April 2010 to 31st March 2024.

A 'fishnet' grid consisting of 1km² squares was overlaid on the map (see Map 1 below) to identify any spatial trends in respect to residential development pressure in the countryside. This includes the location of any areas where there is evidence of higher residential development pressure (i.e. hot spots) within an area measuring 1km². To ensure that residential development pressure could be accurately considered within the context of the Borough's rural landscape, the heat map also identified the 23 no. Landscape Character Areas (LCAs) that are located, wholly or partially, within Armagh City, Banbridge and Craigavon Borough. A brief overview of the Boroughs LCA's is set out in Section 1.0 'Introduction' however further information on each LCA is detailed in the Council's Landscape Character Assessment.

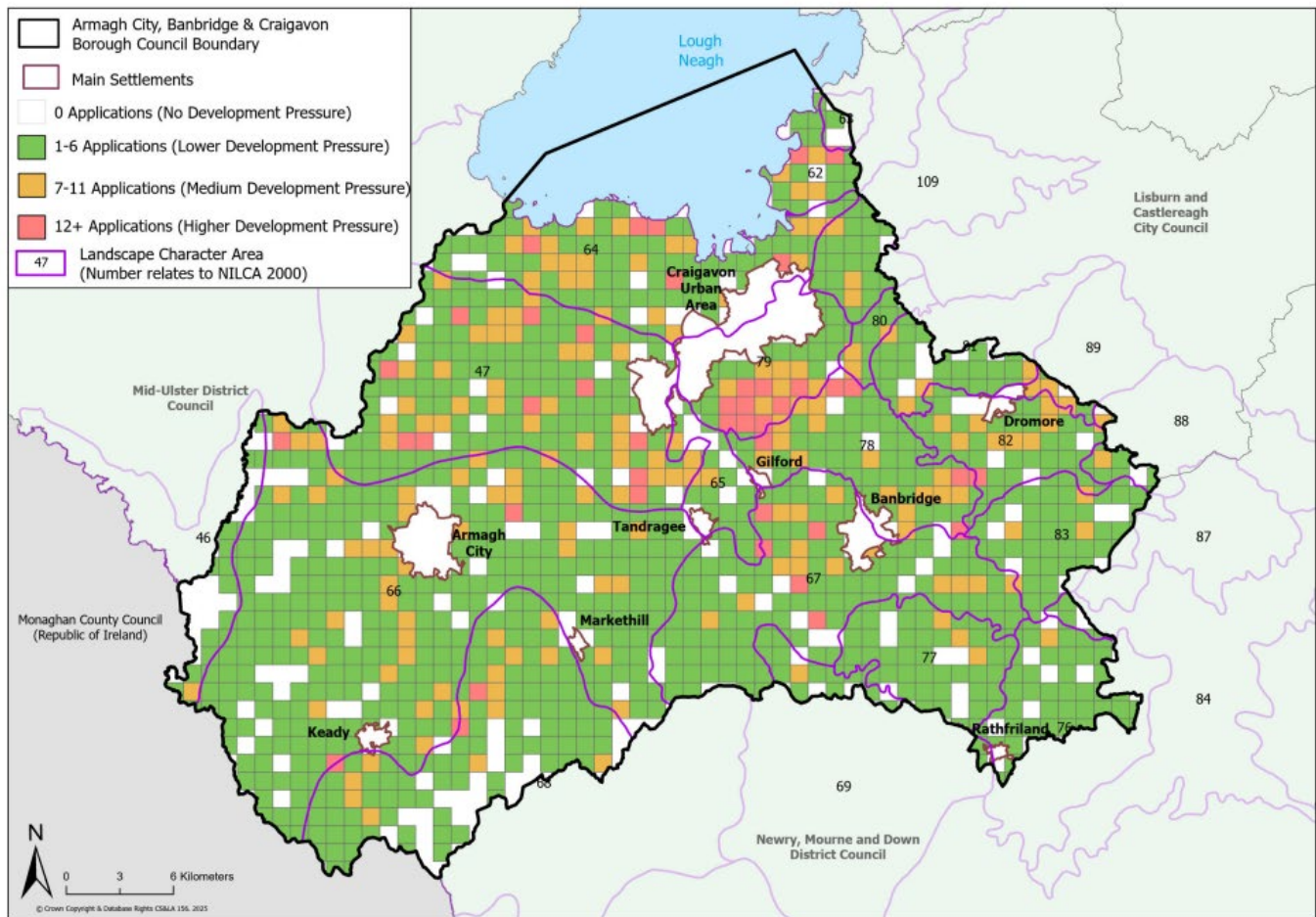
Thresholds of Residential Development Pressure

The following thresholds were used to assess the spatial pattern of development pressure from residential development in the open countryside within Armagh City, Banbridge and Craigavon Borough:

Level of pressure from residential development	ACBCBC Threshold	Heat Map Colour
No Pressure	0 residential planning applications within a defined area ¹⁵	White
Lower Pressure	1 – 6 residential planning applications within a defined area	Green
Medium Pressure	7-11 residential planning applications within a defined area	Orange
Higher Pressure	12+ residential planning applications within a defined area	Red

Whilst the above thresholds were applied to ascertain the level of residential development pressure in the countryside, it must be noted that they are appropriate to the context of Armagh City, Banbridge and Craigavon Borough. As such, what is depicted as lower, medium or higher residential energy development pressure within this analysis are relative and specific to this council area only.

¹⁵ Demarked by a single grid square



Map 1: Heat map depicting development pressure from residential development in the open countryside (1st April 2010 to 31st March 2024)

Residential Development Pressure - Spatial Analysis Consideration

A spatial analysis of residential planning applications is useful to determine if there are any significant pressures from residential development in the countryside, and whether any patterns are emerging that may cause damage and change to local rural character that need to be addressed. This could include an amendment to rural policy and / or an added layer of protection needed in specific locations to address the impact on rural character from residential development or to protect the vulnerability of the landscape.

A detailed analysis of Map 1, above, was undertaken to gain an insight into residential development pressure in the countryside following the publication of PPS 21 (1st April 2010-31st March 2024). PPS 21 introduced new planning policies for the consideration of planning applications in the countryside including policies for dwellings on farms and replacement dwellings. It sought to strike a balance between the need to protect the environment while simultaneously sustaining a strong and vibrant rural community.

The analysis not only considered residential development pressure within the Borough's LCAs but also considered the location of residential development in relation to the road network (main roads, A1 & M1) and the presence and proximity to sensitive landscapes, environmental designations and historic environments.¹⁶

To identify areas in the countryside where significant development pressure has occurred and/or where local rural character is under threat from significant change consideration was given to the characteristics of the landscape, including level of vegetation cover and topography, in addition to whether areas of higher residential development pressure related to areas that were identified as being vulnerable to change / sensitive within the Landscape Character Assessment.

¹⁶ Including: ASSI, NNR, AoSQs, SAC, SPA, AONB, RAMSAR

It is important to note that areas of higher pressure identified as part of this development pressure analysis do not necessarily translate as being excessive or inappropriate in the local context. For this reason, an area may be identified as being under 'higher' pressure from residential development, but due to the characteristics of the landscape, such as its topography, it has the capacity to absorb higher levels of this type of development. Additionally, the pressure areas have been categorised in the context of a 14-year analysis period and as such higher-pressure areas may not necessarily translate as being excessive or significant.

In terms of a broad overview of the spatial distribution of development pressure, Map 1 illustrates that much of the countryside has generally experienced lower levels of residential development pressure since the introduction of PPS 21, particularly in southern, south-western and south-eastern areas of the Borough. This includes areas associated with LCAs 76, 77 and 83¹⁷, all of which are located within the south-east of the Borough and do not include any higher-pressure areas and few areas of medium pressure. Interestingly, in comparison to the north of the Borough, there are a greater number of locations to the south, south-west and south-east that have experienced no residential development pressure (as shaded white in Map 1). This could be due to a range of factors such as the accessibility of some locations compared to others, susceptibility to flooding, issues with poor drainage or landscape characteristics such as topography, which will dictate the suitability of locations for construction and access to services and utilities.

The lower levels of residential development pressure exhibited throughout much of the Borough, as shaded white and green in Map 1, indicates that the policy provisions of PPS 21 are generally working well in regard to safeguarding rural character. Whilst this broad overview may suggest that tightening of rural policy and / or applying an added layer of protection to safeguard rural character / protect landscape vulnerability is not necessary, it is critical that the areas experiencing more significant development pressure are scrutinised at a local / area specific level. This will assist in informing the Councils approach regarding the provision of additional protection for areas of the countryside that are most vulnerable to the adverse impacts of residential development.

As such, further detailed analysis of development pressure was carried out in relation to any areas that were identified as being 'hot spots' i.e. clusters of higher residential development pressure. For the purposes of the housing pressure analysis a 'hot spot' was interpreted as being two or more adjoining higher-pressure areas (demarked as grid squares shaded red in Map 1 above and identified in Appendix 1). The following 'hot spots' within the Borough were identified for further analysis:

- Hot Spot A- Lands North of Gilford, South / South-West of Bleary and East of Drumnacanvy
- Hot Spot B- Lands to the south of Lough Neagh
- Hot Spot C- Lands East of Lough Neagh / South – South-West of Portmore Lough¹⁸
- Hot Spot D- Lands South- West of Loughgall / South- East of Blackwatertown
- Hot Spot E- Lands South of Portadown / North- West of Tandragee
- Hot Spot F- Lands North-East of Banbridge / South-West of Dromore

A brief overview of the LCAs referred to in the following paragraphs, alongside all other LCAs located, wholly or partially within the Borough, is detailed in Section 1.0 of this Development Pressure Analysis. For more detailed information on the LCAs relevant to the Borough refer to the Councils Landscape Character Assessment.

Although the cluster of residential development located north of Gilford (South / South-West of Bleary and East of Drumnacanvy), as identified as 'Hot Spot A' in Appendix 1, is situated predominantly within LCA 79 (Craigavon Plateau) it also straddles the north-western portion of LCA 78 (North Banbridge Hills). It is notable that the concentrated areas of higher pressure associated with this cluster generally correspond with the location of the main road network and road junctions, namely the B3 Gilford / Plantation Road and the A50 Portadown to Newcastle Road. Additionally, it is noted that the cluster of higher residential development

¹⁷ LCA 76: Ballyronney Basin, LCA 77: Iveagh Slopes, LCA 83: Lower Slieve Croob Foothills

¹⁸ Whilst a 'hot spot' was generally interpreted as being two or more adjoining higher-pressure areas, the cluster at this location was considered to be a 'hot spot' on the basis that it is located within or in close proximity to Lough Neagh ASSI / Lough Neagh and Lough Beg Ramsar and it included a number of medium and higher-pressure areas within a relatively small area.

pressure is in close proximity to Craigavon Urban Area¹⁹ (Tier 1 Settlement²⁰), Gilford Local Town (Tier 2 Settlement) and the villages of Drumnacanvy and Bleary (Tier 3 Settlements). The proximity of the 'hot spot' to the main road networks and four settlements, including one of the Boroughs Hubs²¹, highlights the relationship between site selection and accessibility, provision of good transport infrastructure / linkages and convenient access to services and facilities²², which may explain the higher pressure for residential development in this area.

Whilst there are numerous listed structures throughout both the Craigavon Plateau and North Banbridge Hills LCAs there are no scheduled monuments, historic environments of national / international recognition or any national or international environmental designations within, or in the immediate vicinity of, Hot Spot A. In terms of the characteristics of the landscape associated with this higher-pressure area, the topography of the northern portion of Hot Spot A predominantly consists of a flat, open plateau, however towards the south the land becomes more undulating, particularly to the southern side of Drumnacanvy and to the south-west, south and west of Bleary. Although some small areas around Drumnacanvy and to the north-west and east of Bleary are prone to flooding, this Hot Spot is located outside of the main floodplain for both the River Bann and River Lagan. Within and in the vicinity of this cluster, there is an accumulation of development including residential properties, telecommunications infrastructure and industrial / commercial businesses. The wide variety of land uses, alongside the presence of farmland and agricultural buildings, has impacted upon the character of the area, resulting in both a rural and suburban perception. However, it is important to note that trees, well maintained, mature hedgerows and shelter belts have aided the integration of some single appropriately scaled and designed dwellings, in particular along the minor roads to the south and south-east of Drumnacanvy.

The LCA has identified this area as having a notable number of single houses, particularly along both major and minor road lines, around road junctions and the fringes of settlements. Although it highlights that the scale and design of dwellings is varied in this area, the LCA acknowledges there are many locations where residential development has been successfully managed through appropriate landscape and design. In some locations, such as the Dunkirk and Clare Roads, there is a well-defined distinction between settlement limit and rural area, which has been enhanced by well-maintained mature hedgerows and trees. Given that the quality and the condition of this landscape is mixed, and that it does not have any significant scenic characteristics in terms of natural features and attractive vistas, this area is not identified as being vulnerable / sensitive to change within the LCA.

It is acknowledged that there is limited capacity to absorb higher levels of residential development in Hot Spot A, particularly on the northern flatter, plateau portion. Whilst there is slightly more capacity to absorb higher levels of development within the southern, gently undulating areas surrounding Bleary and to the south of Drumnacanvy, this would require sensitive design, scale and siting in addition to native vegetated boundaries and planting. Taking into account the analysis above, including the findings of the LCA, it is considered that the application of more rigorous planning policies and the introduction of new local designations, brought forward in the LDP, will be effective in managing residential development and mitigating the impact of new residential development on rural character in this area. New, more stringent planning policy requirements will place a greater emphasis on high quality design and placemaking, the provision of tree and hedgerow planting and the protection, enhancement and retention of existing vegetation in new development. The

¹⁹ Incorporating Portadown, Central Craigavon and Lurgan

²⁰ Referenced Settlement Tiers are as per the dPS proposed Settlement Hierarchy

²¹ The Regional Development Strategy (RDS) 2035 'Building a Better Future' sets objectives around promoting Armagh City, Banbridge and the sub-regional Craigavon Urban Area as the main hubs for population growth and economic growth

²² Refer to the Strategic Settlement Evaluation Paper for further detail on the population of individual settlements and the assessment of the role or function of settlements including community services and facilities, environmental constraints, employment opportunities and existing physical infrastructure.

location and extent of any local designations, such as Landscape Wedges²³ or Local Landscape Policy Areas²⁴, will be considered by the LDP team and defined through the Local Policies Plan (LPP).

As illustrated in Appendix 1, 'Hot Spot B' is a cluster of residential development located within LCA 64 (Lough Neagh Peatlands), in close proximity to the southern shores of Lough Neagh. It is noted that the cluster of higher residential development pressure is located immediately east of the village of Derrytrasna (Tier 3 settlement) and the vicinity of a main road (Derrymacash Road), which provides linkage to the M1 motorway and convenient access to the services and facilities of both Derrytrasna and Craigavon Urban Area.

The cluster is close to a significant number of international and national environmental designations, an important consideration when assessing the impact from residential pressure and evaluating the necessity for additional protection through the LDP. Lough Neagh is identified as a Strategic Natural Resource in the Regional Development Strategy (RDS). The significance of the Lough and its Shores is acknowledged through the international environmental designations of Ramsar²⁵ and Special Protection Area²⁶ (SPA), as well as a national Area of Special Scientific Interest (ASSI) designation²⁷. Other designations relating to this cluster of residential development pressure include Lough Gullion ASSI, Mullenakill and Annagarraiff National Nature Reserve (NNR), Lough Neagh Islands NNR, Oxford Island NNR and Peatlands Park SAC (Special Area of Conservation). In terms of landscape characteristics, the area to which this cluster relates generally consists of a flat landscape with numerous islands or small hills, scattered throughout. Along the lough shore there are relatively large pockets of wet woodland remaining, in addition to bog land and wet grassland. In terms of vegetation cover, hedgerows are generally intact and in good condition. It is important to note that this area was identified as an Area of Scenic Quality²⁸ (AoSQ) in the NILCA 2000 Landscape Assessment²⁹ and has been identified as being vulnerable to change / sensitive within the Council's Landscape Character Assessment. Within which, there was evidence of the Lough Neagh landscapes (and shoreline) unique and distinct rural character being eroded, despite the protection that is afforded to the area through the various environmental designations.

Taking account of the factors above, including the accumulations of residential development, the unique landscape character of the area and its overall environmental and scenic vulnerability, it is considered that there is limited capacity for Hot Spot B to absorb higher levels of residential development. On this basis it is considered that there is sufficient evidence to suggest that this area is worthy of additional recognition and protection. It is therefore recommended that a new Strategic Landscape Designation and complementary policy is brought forward in the LDP to ensure development proposals will not have an unacceptable adverse impact on the special landscape character, environmental quality and visual amenity of the area and respect, maintain and where possible enhance features of importance. In addition to this, the application of more stringent planning policies, as referred to above, which will be brought forward in the LDP will also assist in mitigating the impact of new development on rural character in this area.

The cluster of residential development situated south / south-west of Portmore Lough, identified as 'Hot Spot C' in Appendix 1, is located within LCA 62 (East Lough Neagh Points) and is in close proximity to the eastern shores of Lough Neagh. It is notable that the concentrated area of higher residential pressure generally corresponds with the location of the main road (Derrymore Road) and its associated road junctions.

²³ Landscape Wedges separate distinct areas within and between settlements that have an open aspect / consist of an undeveloped natural area.

²⁴ LLPAs are designated to protect those features and areas which are considered to be of greatest amenity value, landscape quality or local significance and therefore worthy of protection from undesirable or damaging development. They are designated within or adjoining settlements, where development pressures are normally greatest.

²⁵ Lough Neagh and Lough Beg Ramsar - A wetland site designated of international importance under the Ramsar Convention 1971

²⁶ Lough Neagh and Lough Beg Special Area Protection Area (SPA)

²⁷ Lough Neagh Area Special Scientific Interest (ASSI)

²⁸ AoSQ's are characterised by visually pleasing patterns or combinations of landscape elements, and by their generally unspoilt character, free from major intrusion. In addition, they may include significant sites or features of nature conservation, historic or cultural importance. Often, they are visually prominent landscapes or open, distinct areas such as the Lough Neagh shores, which are particularly sensitive to change.

²⁹ The Northern Ireland Landscape Character Assessment 2000 (NILCA 2000) published by the Department of the Environment (DOE)

The cluster of residential development is in close proximity to a significant number of international and national environmental designations, including Lough Neagh and Lough Beg Ramsar, Lough Neagh and Lough Beg SPA, Lough Neagh Islands NNR, Lough Neagh ASSI, Portmore Lough ASSI, Montiaghs Moss ASSI and Montiaghs Moss SAC. In terms of landscape characteristics associated with Hot Spot C, the topography on the eastern side of Lough Neagh very gently undulates giving rise to large, open flat agricultural land, at both lower and higher elevations. Although the hedgerows within the vicinity of this cluster are generally well managed, their removal along roadsides and replacement with boundary walls and fences, is conspicuous in areas of residential development. There are also mature trees present, with occasional pockets of willow / birch woodland. In the general vicinity of Hot Spot C, there are pockets of residential development, much of which is linear development. Some of which are coupled with limited screening / sparse natural boundary treatments and the scale and design of modern dwellings, which has created a suburban perception. Additionally, this area has been specifically identified as being sensitive / vulnerable to change in the Landscape Character Assessment.

Considering the factors above, including the evidence of higher residential pressure, the vulnerability of the landscape to new development and the presence of environmental designations it is considered that there is limited capacity to absorb higher levels of development in this location, particularly in terms of roadside development. On this basis it is considered that there is sufficient evidence to suggest that this area is worthy of additional recognition and protection³⁰. It is therefore recommended that a new Strategic Landscape Designation and complementary policy, as referred to above in relation to Hot Spot B, is brought forward in the LDP to ensure development proposals will not have an unacceptable adverse impact on the special landscape character, environmental quality and visual amenity of the area and respect, maintain and where possible enhance features of importance. Additionally, it is considered that the application of more rigorous planning policy requirements, also referred to above, will also assist in mitigating the impact of new development on rural character in this area.

As illustrated in Appendix 1, 'Hot Spot D' is situated within the south- western portion of LCA 47 (Loughgall Orchard Belt), south- west of Loughgall / south- east of Blackwatertown. It is notable that the concentrated area of higher pressure associated with this cluster closely corresponds with the main road network and road junctions, namely the A29 Moy Road, which provides connectivity to Armagh City to the south and the M1 to the north. Additionally, it is noted that the cluster of higher residential development pressure is located immediately north / north-east / north-west of the small settlement of Tullygoonigan (Tier 4 Settlement) and is approximately 3 miles north of Armagh City (Tier 1 Settlement). The proximity of the 'hot spot' to both the main road network and two settlements, including one of the Borough's Hubs³¹, highlights the relationship between site selection and accessibility, provision of good transport infrastructure / linkages and convenient access to services and facilities, which may justify the higher pressure for residential development in this area.

Whilst there are numerous industrial / defence / domestic sites, monuments and listed structures, throughout the Loughgall Orchard Belt LCA, there are no scheduled monuments, areas of national / international recognition or national / international environmental designations within, or in the immediate vicinity of, this higher-pressure area. In terms of landscape characteristics, this area generally consists of gently rolling drumlins and pockets of rough, wet grassland on lower grounds, much of which is used for grazing. The level of vegetation is generally good, with well-established hedgerow and tree cover, which alongside the drumlin topography assists integration of both residential and agricultural development. Whilst pockets of residential development are evident, particularly close to road junctions, this area is not identified as being vulnerable to change / as being sensitive within the Landscape Character Assessment.

Although some specific areas within Hot Spot D have limited capacity to absorb higher levels of residential development, particularly in terms of maintaining rural character, generally this landscape does have capacity

³⁰ Under the transitional arrangements set out in the SPPS, applications determined following the adoption of the LDP Plan Strategy, will be assessed against that document and the extant statutory Plan for the area. extant Development Plans will continue to operate as the statutory development plans for the Borough until such time as they are fully replaced by the adopted Local Policies Plan.

³¹ The Regional Development Strategy (RDS) 2035 'Building a Better Future' sets objectives around promoting Armagh City, Banbridge and the sub-regional Craigavon Urban Area as the main hubs for population growth and economic growth

for further residential development provided that the existing natural hedgerows and trees are supplemented, and new development is well designed and carefully sited. As such, it is considered that the application of more rigorous planning requirements, such as design and place-making policies, and the introduction of new local designations, referred to above, will be effective in managing residential development and mitigating the impact of new residential development on rural character within Hot Spot D.

'Hot Spot E', as identified in Appendix 1, is situated South of Portadown / North- West of Tandragee and is located within the south-east of LCA 47 (Loughgall Orchard Belt). It is notable that the concentrated area of higher residential development pressure corresponds with the location of the Markethill Road, the main road network that provides connectivity from the Local Town of Markethill (Tier 2 Settlement), located approximately 5 miles to the south-west of the cluster, to the A27 Mahon Road, which provides connectivity to Portadown, one of the Borough's Hubs (Tier 1 Settlement), which is located approximately 3 miles north-east of the cluster. It is also noted that the cluster is sited in very close proximity to the settlement development limits of both Laurevale village (Tier 3 Settlement) and the small settlement of Derryhale (Tier 4 Settlement). The very close proximity of the 'hot spot' to both the main road network and two settlements highlights the relationship between site selection and accessibility, provision of good transport infrastructure / linkages and convenient access to services and facilities.

In respect of the historic environment, there are a number of listed buildings, monuments, defence and domestic sites in the general vicinity of the hot spot, in addition to a relatively dense concentration of industrial sites (due to the proximity of the cluster to both used and disused railway line and canal). There are, however, no scheduled monuments or areas of national / international recognition within, or in the immediate vicinity of, this higher-pressure area. In terms of environmental designations Brackagh Bog NNR and ASSI, sites which are of national importance, are located in close proximity to the cluster of residential development. In relation to landscape characteristics, the topography in the vicinity of the Hot Spot E predominantly consists of low rolling drumlins with a mix of agricultural land uses, most notably being numerous apple orchards. In terms of vegetation cover, the hedgerows are mature and generally well maintained, and there are numerous mature native deciduous trees within field boundaries, which assist integration of development. However, in some areas hedgerows and trees have been removed along residential boundaries and replaced with fencing and urban style walls.

Whilst there is evidence of development pressure associated with this cluster, including pockets of residential development and dense road / utility infrastructure which have impacted upon rural character, it is important to note that this area is not identified as being vulnerable to change / sensitive within the Landscape Character Assessment. Furthermore, although it is acknowledged that there is limited capacity to absorb higher levels of residential development in this location, it is considered that the application of more rigorous planning policies and the introduction of new local designations, brought forward in the LDP, will be effective in managing residential development and mitigating the impact of new residential development on rural character.

As identified in Appendix 1, 'Hot Spot F' is located north-east of Banbridge / south-west of Dromore and straddles both LCA 78 (North Banbridge Hills) and LCA 82 (Dromore Lowlands). It is notable that the concentrated area of higher residential development pressure corresponds with the location of the A1 dual carriageway and several road junctions / road linkages in the vicinity of this main transport corridor³². Additionally, it is important to note that the cluster of higher residential development pressure is in close proximity to (approximately 3 miles), and midway between, Dromore Local Town (Tier 2 Settlement) and Banbridge (Tier 1 Settlement). The proximity of the 'hot spot' to both a major network and two settlements, including one of the Borough's Hubs³³, once again highlights the relationship between site selection and accessibility, provision of good transport infrastructure / linkages and convenient access to services and facilities.

³² The A1 carriageway provides linkage between Belfast and Dublin

³³ The Regional Development Strategy (RDS) 2035 'Building a Better Future' sets objectives around promoting Armagh City, Banbridge and the sub-regional Craigavon Urban Area as the main hubs for population growth and economic growth

Whilst there is a mixture of monuments, listed buildings, industrial, defence and domestic sites within LCAs 78 and 82, there are no scheduled monuments, historic environments of national / international recognition or any national or international environmental designations within, or in the immediate vicinity of, this higher-pressure area. In terms of landscape characteristics, the topography of the area generally consists of a rolling drumlin landscape comprised of wetland, pasture and woodland. The drumlin tops provide long views and traditionally development is located along these ridges however, the vernacular would be low, linear type development. Whilst there are pockets of modern residential development that have created a suburban perception and impacted rural character, it is important to note that this area has not been identified as being vulnerable to change / sensitive within the Landscape Character Assessment.

It is acknowledged that there is limited capacity for higher levels of residential development in Hot Spot F, however it is considered that the application of more rigorous planning requirements, such as design and placemaking policies and the introduction of new local designations, such as landscape wedges and LLPAs, brought forward in the LDP, will be effective in managing residential development and mitigating the impact of new residential development on rural character.

3.0 Analysis of Development Pressure in the Countryside – Wind Energy Development³⁴

Wind energy development in the Countryside: 1st April 2004 – 31st March 2024

The data used to inform the Pressure Analysis has been sourced from the Department of Infrastructure (DfI). DfI's Analytical Services Branch provided data for all determined renewable energy development planning applications for the period of 1st April 2002 to 31st March 2016. For the period 1st April 2016 to 31st March 2024, the Council sourced the data relating to all determined renewable energy development planning applications from DfI's online datasets³⁵. Both sets of data were processed by the Local Development Plan Team to obtain detailed information on all wind energy development applications falling within the open countryside i.e. located outside any of the settlement development limits.

Using the processed data, information relating to all wind energy development planning applications determined within the countryside³⁶ over a twenty-year period, i.e. between 1st April 2004 – 31st March 2024 (inclusive) was collated. Table 3, set out below, details the number of planning applications determined (both approved and refused) for proposals relating to wind energy development within the Borough's open countryside. This includes both single wind turbines and wind farm applications³⁷, and *all* wind energy related planning applications including proposed amendments to approved or existing single wind turbines / wind farms and proposals for any associated plant, buildings or infrastructure ancillary to proposed, approved or existing wind turbines / farms.

Table 3: Planning Applications determined for wind energy development in the Countryside in Armagh City, Banbridge and Craigavon Borough (1st April 2004 – 31st March 2024)

Year	Approved Wind Energy Development Applications	Refused Wind Energy Development Applications	Total No. Applications determined (approved & refused)
2004/05	0	0	0
2005/06	6	0	6
2006/07	15	0	15
2007/08	22	0	22
2008/09	28	0	28
2009/10	11	2	13
2010/11	12	1	13
2011/12	26	3	29
2012/13	37	5	42
2013/14	32	6	38
2014/15	36	7	43
2015/16	17	5	22
2016/17	26	9	35
2017/18	3	0	3
2018/19	2	0	2
2019/20	4	0	4
2020/21	3	0	3
2021/22	2	0	2
2022/23	1	1	2
2023/24	11	0	11
Total	294	39	333

³⁴ Single wind turbines and wind farm applications

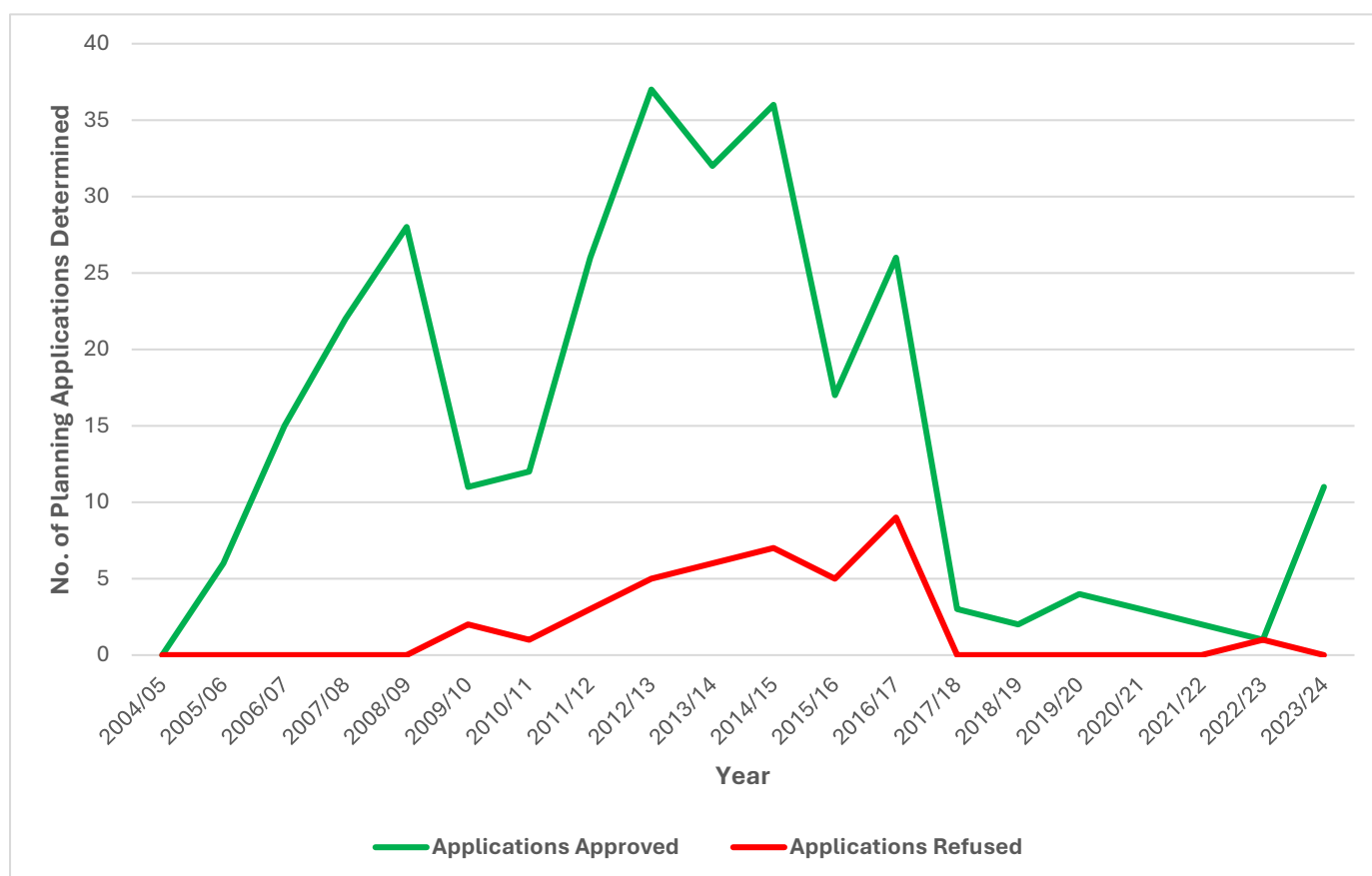
³⁵ www.infrastructure-ni.gov.uk/articles/planning-activity-statistics

³⁶ In April 2015 planning functions were transferred to the 11 new district councils, including Armagh City, Banbridge and Craigavon Borough Council which then assumed the role of planning authority and the responsibility for processing the majority of planning applications

³⁷ Defined as development comprising more than 2 turbines

The year 2009/10 is highlighted in green as it relates to the year in which Planning Policy Statement (PPS) 18 'Renewable Energy' was published (August 2009). PPS 18 superseded Policy PSU 12 'Renewable Energy' of the Planning Strategy for Rural Northern Ireland (PSRNI). The aim of PPS 18 is to facilitate the siting of renewable energy generating facilities in appropriate locations within the built and natural environment in order to achieve Northern Ireland's renewable energy targets and to realise the benefits of renewable energy. It should however be noted that PPS 18 was cancelled with the publication of the revised SPPS in December 2025.

Figure 2: Planning Applications determined for all wind energy development³⁸ in the Countryside (1st April 2004 – 31st March 2024)



Analysis of Wind Energy Development Planning Applications Determined 1st April 2004 – 31st March 2024

Table 3 and its corresponding graph, Figure 2 set out above, are useful in identifying and understanding trends experienced before and after the publication of PPS 18 (August 2009 onwards) in respect of wind energy development.

Table 3 and Figure 2 illustrate that a very low number of wind energy development applications were determined throughout the two-year period from April 2004 - April 2006, with only 6 no. applications

³⁸ Includes both single wind turbines and wind farm applications, and *all* wind energy related planning applications including proposed amendments to approved or existing single wind turbines / wind farms and proposals for any associated plant, buildings or infrastructure ancillary to proposed, approved or existing wind turbines / farms.

determined in 2005/06 and no applications determined in 2004/05. This was followed by a relatively significant increase in wind energy development applications determined in 2006/07. In this period 15 no. applications were determined, representing an increase of 9 no. applications (150% increase) compared to the previous year (6no. applications in 2005/06). The number of wind energy development applications that were determined continued to rise year on year from 2006/07 until 2008/09, with an average of 22 no. applications per year over the three-year period (1st April 2006- 31st March 2009). The significant increase in the number of applications determined post 2005, aligns with the introduction of the Northern Ireland Renewables Obligation (NIRO), which was the main support mechanism for encouraging increased renewable electricity generation in Northern Ireland. During the years that this scheme was operational, and after the introduction of PPS 18 in 2009, the number of wind energy applications generally remained relatively high.

It is notable from Table 3 and Figure 2, that there was a brief, but sharp decline in the number of wind energy development applications determined in 2009/10 and 2010/11, with only 13 no. applications determined in both years (Total 26 no.). This significant decline in wind energy applications may be attributed to the effects of the recession. Following this period there was a noticeable increase in wind energy development applications determined, with an increase from 13 no. applications in 2010/11 to 29 no. applications in 2011/12, representing a significant 123% increase. It can be seen from Figure 2 that the number of wind energy development applications determined remained at a relatively steady and high level from 2011/12 through to 2014/15, the year in which there was the highest number of wind energy applications determined (43 no. applications).

In addition to the NIRO, referred to above, the high and sustained levels of applications determined during this period was likely driven by the Northern Ireland Executive's targets for renewable electricity consumption, which required NI to achieve 20% of its electricity from renewable resources by 2015 and 40% by 2020. Electricity generated from onshore wind farms had been identified as the most established, large-scale renewable source in Northern Ireland and the main source to achieving this target. As such, the increase in the number of planning decisions for wind energy development during this period could be attributed to a drive by the former DOE to prioritise decisions on all renewable energy applications.

Both Table 3 and Figure 2 illustrate that the number of wind energy development applications determined have dramatically declined from 2017/18 onwards, from 35 no. applications determined in 2016/17 to an average of only 3 no. applications determined each year over the following six years (2017/18-2022/23). This rapid, significant and sustained decrease in wind energy applications determined may be due to reductions in government funding, the costs of installing this type of technology and the lack of capacity on the grid to allow for new connections, all of which are circumstances beyond the control of planning policy. Additionally, the significant decline in the number of applications determined coincided with the closure of the NIRO to new large scale onshore wind (in March 2016) and to new small scale onshore wind on (in June 2016). It is important to note that DfE is currently designing a replacement support scheme to help drive growth in renewable energy production and encourage new connections³⁹, which will likely impact upon the volume of planning applications submitted for renewable energy development.

Whilst the low level of wind energy development applications determined has been prolonged and sustained from 2017/18, it is evident from both Table 3 and Figure 2 that there was a rapid increase in determinations in 2023/24. Whilst there was an average of 3 no. wind energy development applications determined each year in the six years preceding 2023/24, this rose relatively significantly to 11 no. applications determined in 2023/24 (267% increase). Although it remains to be seen whether this increase will continue in the coming years, it is recognised that in order for net zero carbon and renewable energy consumption targets⁴⁰ to be achieved, it will be necessary for the supply and consumption of sustainable green energy to be enhanced.

³⁹ Source: draft NI Climate Action Plan (DAERA, 2025)

⁴⁰ The Climate Change Act (Northern Ireland) 2022 set a legislative target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030. To achieve 'net zero', greenhouse gas emissions must be reduced as close as possible to zero, with any remaining emissions absorbed by natural carbon sinks or carbon capture technologies. The Northern Ireland Energy Strategy 'The Path to Net Zero Energy' established a renewable electricity consumption target of 70% by 2030 which was then increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022.

Whilst it is anticipated that these targets will have a significant impact on the number of planning applications submitted for renewable and low carbon energy in Northern Ireland, it should be noted that due to its topography and prevailing winds Armagh City, Banbridge and Craigavon Borough has less capacity for wind energy development in comparison with other council areas.

The approval rate for wind energy development over the twenty-year study period (2004-2024) was 91%, with a total of 294 no. applications approved and only 39 no. applications refused. In the five-year period prior to the publication of PPS 18 (2004/05-2008/9) the approval rate was 100%, with no applications for wind energy refused. Although the average approval rate fell in the years following the publication of PPS 18 (2009/10 - 2023/24) it did remain relatively high, at an average of 88% over 15 years, which is only marginally lower than the average approval rate throughout the whole twenty-year study period (91%). It is important to note that the lower average approval rate following the publication of PPS 18 is largely attributed to three specific periods in which the approval rate was deemed to be relatively low⁴¹ when compared to other post PPS 18 years⁴². The periods in which lower approval rates were exhibited were 2015/16 (77% approval rate), 2016/17 (74% approval rate) and 2022/23 (50% approval rate). It is important to note that these approval rates relate to the refusal of 15 no. planning applications (total number refused over the three periods).

An analysis of the planning applications refused within these periods was carried out to gain an understanding of their lower approval rates. It highlighted the range of reasons planning applications for wind energy development have been refused, including impact on biodiversity, conservation, visual amenity, landscape character and residential amenity.

The objectives of PPS 18 are to ensure that the environmental, landscape, visual and amenity impacts associated with, or arising from renewable energy development, are adequately addressed, and to ensure adequate protection of the Region's built and natural, and cultural heritage features. As such, the lower rates of approval in some years does not necessarily translate as PPS 18 being overly stringent or restrictive. Rather it is indicative of planning applications being appropriately assessed against prevailing planning policy, having taken account of all relevant planning considerations and the merits of individual proposals.

Given that the revised SPPS was only published in December 2025, it is too early to analyse how regional policy provisions for renewable and low carbon development will influence planning outcomes within the countryside.

Wind Energy Development Pressure Analysis Methodology

The Development Pressure Analysis has been informed by data received from DfI and processed by Armagh City, Banbridge and Craigavon Borough Councils Local Development Plan (LDP) Team. The outworkings of the processing was a dataset which detailed the planning applications determined for wind energy development in the Borough's open countryside.

For the purpose of this analysis, the determination of a planning application has been used to indicate a point of wind energy development pressure. Both approved and refused planning applications for wind energy development were included within the analysis⁴³. Withdrawn applications were not included in the study because it was considered that they no longer represent an interest in developing the land and are therefore not a point of development pressure. Additionally, any pre-application enquiries, pre-application notifications and pre-application discussions were also excluded from the analysis, as an actual planning application had not been submitted.

As with Table 3, above, this section of the study focused on planning applications relating to wind energy development in the countryside, determined between 1st April 2004 and 31st March 2024. However, certain categories of development were excluded, and therefore filtered out from the dataset, on the basis that they

⁴¹ Under 80% approval rate

⁴² Ranged from 84%-100% approval rate

⁴³ In instances where a planning application for wind energy development was refused and there was a subsequent application for wind energy development on the same site, it was taken to represent an additional point of development pressure because the principle for development had not been set at the time of the subsequent application.

do not contribute to the number of wind turbines within the open countryside and therefore are not deemed to be points of wind energy development pressure. This included the following types of development:

- Applications for overhead lines associated with wind energy development
- Applications for replacement turbines
- Applications for infrastructure / apparatus associated with wind energy development
- Applications for new accesses to wind energy development sites

Additionally, to ensure that the spatial analysis depicted a true reflection of the development pressure from wind energy development certain types of planning application were removed from the dataset on the basis that they represented a 'duplicate' point of development pressure. For the purposes of this analysis, a duplicate point of development pressure is where a planning application is associated with a previous approved application for wind energy development at the same location.

The types of planning application considered to fall within this category include:

- Renewal of planning permission
- Amendments to planning approvals, such as a change to the hub height or type of turbine
- Variation/Removal of a condition(s)
- Relocation of turbines within the boundary of approved or existing wind turbine / wind farm sites

Removal of these types of planning application ensured that in instances where a site was associated with multiple applications relating to a previously approved planning application for wind energy, they would only be represented by a single point of pressure.

In respect of wind farm applications, the number of wind turbines that were proposed was also recorded, to ensure that development pressure was accurately considered as part of the analysis and that the thresholds of wind energy development pressure, as set out below, were accurately applied.

Table 4, set out below, details the number of planning applications determined⁴⁴ for planning proposals relating to wind energy development (single wind turbines and wind farms) within the Borough's open countryside, but with duplicate applications, as set out above, and applications for categories of development not considered to be points of development pressure, excluded. Once again, the year 2009/10 is highlighted in green as it relates to the year in which Planning Policy Statement (PPS) 18 'Renewable Energy' was published (August 2009).

Table 4: Planning Applications determined relating to wind energy development (single wind turbines and wind farms) in the Countryside in Armagh City, Banbridge and Craigavon Borough (1st April 2004 – 31st March 2024)- excluding duplicate application types and categories of development not considered to be points of development pressure.

Year	Approved Wind Energy Development Applications	Refused Wind Energy Development Applications	Total No. Applications determined (approved & refused)
2004/05	0	0	0
2005/06	6	0	6
2006/07	12	0	12
2007/08	22	0	22
2008/09	28	0	28
2009/10	11	2	13
2010/11	12	1	13
2011/12	24	3	27
2012/13	35	5	40
2013/14	31	5	36
2014/15	28	7	35

⁴⁴ Approved and refused planning applications

2015/16	13	5	18
2016/17	13	5	18
2017/18	0	0	0
2018/19	2	0	2
2019/20	0	0	0
2020/21	0	0	0
2021/22	0	0	0
2022/23	0	0	0
2023/24	1	0	1
Total	238	33	271

Wind Energy Development Pressure - Spatial Analysis Scope and Methodology

Development Pressure Analysis seeks to identify areas where significant development pressure has occurred and/or where local rural character is under threat from significant unacceptable change and as such involves an assessment of the spatial distribution of wind energy development (single wind turbines and wind farms) in the countryside, including their cumulative impacts.

This section of the Development Pressure Analysis will focus on the twenty-year period from 1st April 2004 – 31st March 2024, to take account of the distribution of wind energy development applications in the years leading up to, and following, the publication of PPS 18.

Using the processed data (as set out in Table 4) a ‘heat map’ showing points of development pressure for wind energy development in the open countryside was produced for the period 1st April 2004-31st March 2024 (see Map 2 below).

A ‘fishnet’ grid consisting of 5 km² squares was overlaid on the map in order to identify any spatial trends in respect to wind energy development (single wind turbines and wind farms) in the countryside. This includes the location of any areas where there is any evidence of higher wind energy development pressure (i.e. hot spots) within an area measuring 5 km². To ensure that wind energy development pressure could be accurately considered within the context of the Boroughs rural landscape, the heat map also identified the boundaries (and codes) of the 23 no. Landscape Character Areas (LCAs) that are located, wholly or partially, within Armagh City, Banbridge and Craigavon Borough. A brief overview of the Boroughs LCA’s is set out in Section 1.0 ‘Introduction’ however further information on each LCA is detailed in the Council’s Landscape Character Assessment.

Thresholds of Wind Energy Development Pressure

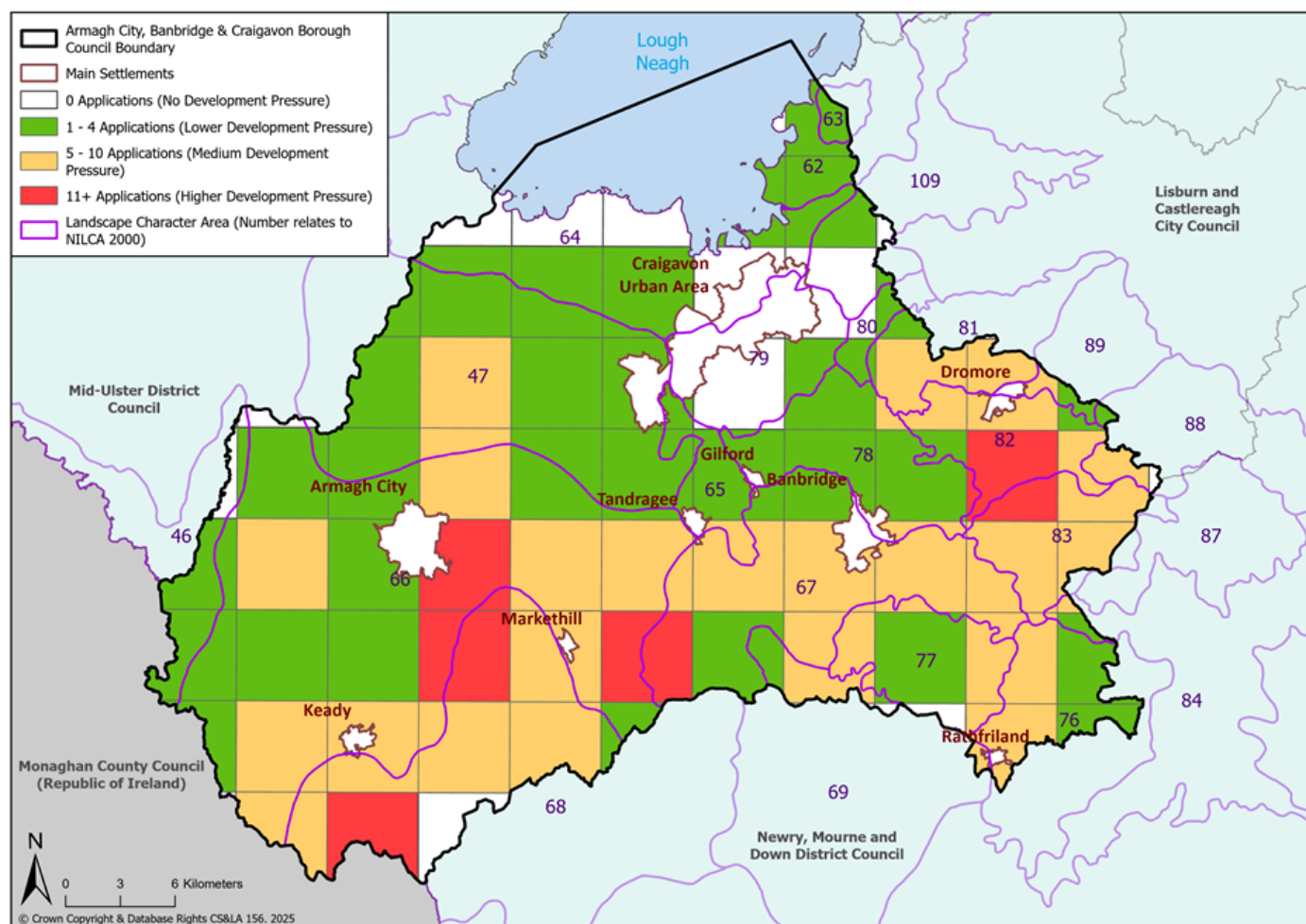
The following thresholds were used to assess the spatial pattern of development pressure from wind energy development in the open countryside within Armagh City, Banbridge and Craigavon Borough:

Level of pressure from wind energy development	ACBCBC Threshold	Heat Map Colour
No Pressure	0 wind energy planning applications / 0 wind turbines proposed within a defined area ⁴⁵	White
Lower Pressure	1 – 4 wind energy planning applications / 1-4 wind turbines proposed within a defined area	Green
Medium Pressure	5-10 wind energy planning applications / 5-10 wind turbines proposed within a defined area	Orange
Higher Pressure	11+ wind energy planning applications / 11+ wind turbines proposed within a defined area	Red

⁴⁵ Demarked by a single grid square

Whilst the above thresholds were applied to ascertain the level of wind energy development pressure in the countryside, it must be noted that they are appropriate to the context of Armagh City, Banbridge and Craigavon Borough. As such, what is depicted as lower, medium or higher wind energy development pressure within this analysis are relative and specific to this council area only.

It is important to note that when applying the above thresholds, the number of wind turbines associated with wind farm applications was carefully recorded, to ensure that the correct level of pressure from wind energy development was applied to each 5 km² grid square and the spatial trends depicted in the following map (Map 2) are accurate.



Map 2: Heat map depicting development pressure from wind energy development (single wind turbines and wind farms) in the open countryside (1st April 2004 to 31st March 2024)

Wind Energy Development Pressure - Spatial Analysis Consideration

A spatial analysis of development pressure is useful to determine if there are any significant pressures from wind energy development (single wind turbines and wind farms) in the countryside, and whether any patterns are emerging that may cause damage and unacceptable change to local rural character that need to be addressed. This could include an amendment to rural policy and / or an added layer of protection needed in specific locations to address the impact on rural character from wind energy development or to protect the vulnerability of the landscape. It is important to note that rural character naturally evolves over time in response to shifting functions, services, and wider societal needs. The LDP must ensure that this shift is done so sustainably, without unacceptable impact on rural characteristics.

A detailed analysis of Map 2 above, was undertaken to gain an insight into wind energy development pressure in the countryside, over a twenty-year period from 1st April 2004 to 31st March 2024. PPS 18, introduced in

2009, sought to ensure that the environmental, landscape, visual and amenity impacts associated with, or arising from renewable energy development, are adequately addressed, and to ensure adequate protection of the Region's built and natural, and cultural heritage features. Prior to PPS 18, planning applications for wind energy development were considered under Policy PSU 12 'Renewable Energy' of 'A Planning Strategy for Rural Northern Ireland' (PSRNI).

The analysis not only considered wind energy development pressure within the Borough's LCAs but also considered the location of wind energy development in relation to the topography / terrain⁴⁶ of the landscape, the road network (main roads, A1 & M1) and the presence and proximity to sensitive landscapes, environmental designations and historic environments⁴⁷.

In analysing Map 2 above, it is important to acknowledge that this pressure analysis is a spatial record of wind energy applications that have been determined (both approved and refused) during the twenty-year period. It illustrates the desire or demand for wind energy development in the Borough, rather than the planning permissions that have been enacted (i.e. have resulted in wind development on the ground). As detailed in Table 4, above, 33 wind energy planning applications were refused during this period, all of which were considered when applying the pressure thresholds (i.e. identifying No Development Pressure- Higher Development Pressure Areas). As such, a particular location / Hot Spot may be identified as being under higher development pressure (as shaded red on Map 2) however this does not necessarily translate as the area accommodating a higher number of wind turbines, instead it is reflective of the demand for wind energy development in that particular location, whether planning permission was granted or not.

To identify areas in the countryside where significant development pressure has occurred and/or where local rural character is under threat from significant, unacceptable change consideration was given to the characteristics of the landscape, including level of vegetation cover and topography, in addition to whether 'hot spots'⁴⁸ of wind energy development pressure related to areas identified as being vulnerable to change / sensitive within the Landscape Character Assessment.

It is important to note that areas of higher pressure or hot spots identified as part of this development pressure analysis does not necessarily translate as being excessive or inappropriate in the local context. For this reason, an area may be identified as being under 'higher' pressure from wind energy development, but due to the characteristics of the landscape, such as its topography, it has the capacity to absorb higher levels this type of development. Additionally, the pressure areas have been categorised in the context of 20-year analysis period and as such higher-pressure areas or hot spots may not necessarily translate as being excessive or significant.

In terms of a broad overview of the spatial distribution of wind energy development pressure, Map 2 illustrates that the northern portion of the Borough, north of Armagh City and Banbridge, has generally experienced a lower level of wind energy development pressure than the southern portion of the Borough, which has a significant number of medium and higher-pressure areas (depicted in orange and red respectively). It is notable that a number of areas, including lands adjoining Craigavon Urban Area, the edge of the Blackwater Valley and along the shores of Lough Neagh have experienced no development pressure (as depicted in white) from wind energy development. The presence of environmental designations to the north of the Borough and / or lack of prevailing winds and topography has undoubtedly impacted the demand for wind energy development in certain locations.

It is acknowledged that other factors will have impacted the demand for, distribution and feasibility of wind energy development within the Borough, many of which are beyond the control of planning policy. These factors include accessibility issues, the presence of environmental designations, landscape characteristics such as topographical constraints and the viability of the wind resource, for example the lack of prevailing wind in certain locations. Wind Energy Development in Northern Ireland's Landscapes (2010) also acknowledges that wind energy development can usually only occur where wind speeds are sufficiently fast. In the context of Northern Ireland, it identifies that the areas of highest wind speed, and therefore the best wind energy resource, are located mainly in upland areas. Grid access constraints, such as timescales for

⁴⁶ Source- OSNI Terrain datasets

⁴⁷ Including: ASSI, NNR, AoSQs, SAC, SPA, AONB, RAMSAR

⁴⁸ For the purposes of this wind energy pressure analysis a 'hot spot' was interpreted as being a single higher-pressure area (demarcated as a single grid square shaded red in Map 2 above and identified in Appendix 2)

grid connection or the high cost of connecting to the grid may have been a further limiting factor in the distribution and feasibility of wind energy development in the Borough.

The levels of wind energy development pressure exhibited throughout significant parts of the countryside indicates that the policy provisions of PPS 18 are generally working well to safeguard rural character by ensuring that the environmental, landscape and visual impacts associated with wind energy development are adequately considered and addressed. The broad overview of wind energy development pressure above may suggest that tightening of wind energy policy and / or applying an added layer of protection to safeguard rural character / protect landscape vulnerability is not necessary, particularly in the northern portion of the Borough. However, it is critical that areas experiencing higher levels of development pressure are scrutinised further, to establish if they are of particular landscape value and to evaluate their sensitivity to wind energy development (for example the impact of wind energy development on their landscape character, landscape qualities / features and visual amenity). Assessing the sensitivity of such areas and their vulnerability to change will assist in informing the Council's approach regarding the provision of additional protection for areas of the countryside that are most vulnerable to the adverse impacts of wind energy development. The findings of the Council's Landscape Character Assessment have informed this consideration.

As such, further detailed analysis of development pressure was carried out in relation to any areas that were identified as being 'hot spots' i.e. areas of higher development pressure. For the purposes of the wind energy pressure analysis a 'hot spot' is defined as a single higher-pressure area (demarked as a single grid square shaded red in Map 2 above and identified in Appendix 2). The following wind energy 'hot spots' within the Borough were identified for further analysis:

- Hot Spot A- East / South-East of Armagh City
- Hot Spot B- South of Armagh City / West of Markethill
- Hot Spot C- South of Keady (adjoining border with the Republic of Ireland)
- Hot Spot D- East / South-East of Markethill
- Hot Spot E- South of Dromore

A brief overview of the LCAs referred to in the following paragraphs, alongside any others located, wholly or partially within the Borough, is detailed in Section 1.0 of this Development Pressure Analysis. For more detailed information on the LCAs relevant to the Borough refer to the Council's Landscape Character Assessment.

As illustrated Appendix 2, 'Hot Spot A' is a cluster of wind energy development located within LCA 66 (Armagh Drumlins), to the east / south-east of Armagh City. Although there are some scattered monuments to the south of Armagh City, there are no national or international environmental designations associated with this area of higher wind energy development pressure. In terms of the characteristics of the landscape associated with this higher-pressure area, it generally consists of rolling drumlins overlooked by the Carrigatuke Hills, with some open and exposed drumlin tops. Wind turbines are widely dispersed, creating a strong and consistent visual presence across the rolling drumlins. Their introduction has become a noticeable feature in the area, influencing scenic quality and indicating a shift in rural character. While perceptions of this impact vary, it is not considered unacceptable, as the rural character is maintained and the existing level of policy protection and guidance remains sufficient.

Although the cluster of wind energy development located south of Armagh City (West of Markethill), as identified as 'Hot Spot B' in Appendix 2, is situated predominantly within LCA 68 (Carrigatuke Hills) it also straddles the central portion of LCA 66 (Armagh Drumlins). There are numerous scattered monuments to the south of Armagh City, including Danes Cast but there are no national or international environmental designations associated with this area of higher wind energy development pressure. In terms of the characteristics of the landscape associated with 'Hot Spot B' these are very similar to the adjoining Hot Spot A in that the turbines have a notable presence across the rolling drumlin landscape with a slight difference in that those turbines located within the Carrigatuke Hills LCA begin to benefit from the more upland backdrop of the Carrigatuke Hills to the south. This change in rural character is not considered an unacceptable change and that the current level of policy provision and guidance is sufficient.

As illustrated Appendix 2, 'Hot Spot C' is a cluster of wind energy development located within LCA 68 (Carrigatuke Hills), to the south of Keady and adjoining the border with the Republic of Ireland (County

Monaghan). Although there are two scheduled monuments within this area of higher wind energy pressure, there are no national or international environmental designations associated with this hot spot. In terms of the characteristics of the landscape associated with this higher-pressure area, it generally consists of both elevated, rolling, steep slopes and open landscape with panoramic views. The large scale rolling hills and deep valleys accommodate the large turbines without them becoming dominant or overwhelming features within the area and therefore is not considered an unacceptable change in rural character.

The cluster of wind energy development located east / south-east of Markethill, as identified as 'Hot Spot D' in Appendix 2, straddles both LCA 67 (Armagh / Banbridge Hills) and LCA 66 (Armagh Drumlins). Within this hot spot, there is a sparse scattering of scheduled monuments however there are no national or international environmental designations. In terms of the characteristics of the landscape associated with 'Hot Spot D' large scale rolling hills and ridges transitioning to smaller scale, broader slopes have seen the introduction of a notable number of turbines, made even more notable due to some located on hilltops. As with the introduction of any large scale feature these have had an impact on rural character however this is not considered unacceptable and therefore the current level of policy provision and guidance is sufficient.

Although the cluster of wind energy development located south of Dromore, as identified as 'Hot Spot E' in Appendix 2, is situated predominantly within LCA 82 (Dromore Lowlands) it also straddles the northern portion of LCA 83 (Lower Slieve Croob Foothills). Although there are five scheduled monuments to the south and south-east of Dromore, there are no national or international environmental designations associated with this area of higher wind energy development pressure. In terms of the characteristics of the landscape associated with this higher-pressure area it generally consists of small, rounded drumlins set within extensive low-lying areas of moss and regenerating scrub in the Dromore Lowlands LCA, transitioning to smooth, rolling ridges at the fringes of the Slieve Croob uplands within the Lower Slieve Croob Foothills LCA. The presence of wind turbines challenges the coherence of this otherwise pleasant landscape, which is characterised by open views to surrounding areas. In particular, turbines interrupt views across the rolling ridges and glens, including those extending into the adjoining AONB. While the area is identified as sensitive within NIEA guidance and should continue to be treated as such, change in rural character is not considered unacceptable, and existing policy and guidance is sufficient.

As highlighted above, 33 wind energy planning applications (based on Table 4 filtered data) were refused during this period, representing 12% of the total wind energy applications that were determined during the twenty-year analysis period. The refusal rate does not necessarily translate as PPS 18 being overly stringent or restrictive, rather it is indicative of planning applications being appropriately assessed against prevailing planning policy, having taken account of all relevant planning considerations and the merits of individual proposals / circumstances of individual sites, in particular detailed consideration of landscape and visual impacts.

It is notable that the areas of higher pressure wind energy development, generally align with the more elevated, sloped and upland areas of the Borough, including the landscapes of LCA 68 (Carrigatuke Hills), LCA 66 (Armagh Drumlins) and LCA 83 (Lower Slieve Croob Foothills)⁴⁹. Supplementary Planning Guidance 'Wind Energy Development in Northern Ireland's Landscapes' (2010) acknowledges that the areas of highest wind speed, with the best wind energy resource, are mainly located in upland areas and as such it is unsurprising that there is demand for wind energy development within such areas of the Borough. It must therefore be acknowledged that an element of impact on the landscape will be unavoidable in such areas.

⁴⁹ LCA 68 (Carrigatuke Hills) includes landscapes rising to 365m AOD (Above Ordnance Datum), LCA 66 (Armagh Drumlins) includes landscapes rising to 222m AOD and LCA 83 (Lower Slieve Croob Foothills) includes landscapes rising to 200m AOD – source: SPG Wind Energy in Northern Ireland's Landscapes, 2010

4.0 Summary and Conclusion

This Development Pressure Analysis assessed the spatial distribution of residential and wind energy development in the countryside and the cumulative impacts of such development. This was particularly important given the adverse visual impacts that have resulted from the cumulative impact of new residential development in the countryside and the increasing numbers of wind turbines.

The Development Pressure Analysis has served to identify areas of the countryside that have experienced significant development pressure from residential and wind energy development. It has sought to highlight any impacts resulting from this development pressure and considered the vulnerability of sensitive landscapes to the impacts of such development. Whilst it is accepted that rural character naturally evolves over time in response to shifting functions, services, and wider societal needs, it is important that the LDP ensures that this shift is done sustainably, without unacceptable impact on rural characteristics.

Residential Development in the Countryside

In respect of residential development in the countryside the analysis has highlighted that following the introduction of PPS 21 in 2010, there was a significant and sustained reduction in the number of 'approved' applications for residential development in the countryside indicating that the policy is accommodating residential development in the open countryside in a regulated pattern that is inherently more sustainable than was previously the case.

The spatial analysis of residential development pressure was useful in determining if there are any significant pressures from residential development in the countryside, and whether any patterns are emerging that may cause damage and change to local rural character that need to be addressed. The analysis illustrated that there have been lower levels of residential development pressure exhibited throughout much of the Borough from 2010 (Post PPS 21) onwards, indicating that the policy provisions of PPS 21 are generally working well in regard to maintaining and safeguarding rural character.

However, the spatial analysis also highlighted that there are a small number of locations within the Borough that have experienced higher levels of residential development pressure. A detailed analysis of these 'Hot Spots', taking account of the findings of the Council's Landscape Character Assessment (LCA), demonstrated that there was limited capacity to absorb higher levels of residential development within these locations. However, within Hot Spots *not* identified as being sensitive / vulnerable to change in the LCA (Hot Spots A, D, E & F⁵⁰) it was determined, having taken account of all relevant factors⁵¹, that the application of more rigorous planning policies and the introduction of new local designations, brought forward in the LDP, would be sufficient to manage residential development and mitigate the impact of new residential development on rural character.

The analysis highlighted that two of the Hot Spots were identified as being sensitive / vulnerable to change in the LCA (Hot Spots B & C⁵²). The landscapes associated with these Hot Spots, regardless of the protection that is afforded to them through various designations, have experienced higher levels of residential development pressure, are unique landscapes that are highly sensitive / vulnerable to change and have limited capacity to absorb higher levels of residential development.

On this basis it is considered that there is sufficient evidence to suggest that these areas are worthy of additional recognition and protection. It is therefore recommended that a new Strategic Landscape Designation and complementary policy is brought forward in the LDP to ensure development proposals will not have an unacceptable adverse impact on the special landscape character, environmental quality and visual amenity of these areas and respect, maintain and where possible enhance features of importance. It is also considered that the application of more stringent planning policies, which will be brought forward in the LDP, will also assist in mitigating the impact of new development on rural character in these areas.

⁵⁰ Refer to Section 2.0 and Appendix 1 for further detail

⁵¹ Including landscape characteristics, environmental and historical designations etc, as set out in Section 2.0

⁵² Refer to Section 2.0 and Appendix 1 for further detail

Wind Energy Development in the Countryside

The analysis of planning applications determined for wind energy development⁵³ assisted in identifying and understanding any trends experienced before and after the publication of PPS 18. It found that the volume of applications determined in the open countryside has fluctuated throughout the study period (1st April 2004 – 31st March 2024). Notable shifts include the sharp rise in wind energy determinations after 2005, in line with the introduction of the Northern Ireland Renewables Obligation (NIRO) and the sharp fall in determinations between 2009 and 2011, possibly due to the recession. It also highlighted a significant and sustained rise in determinations from 2012 to 2015, which may be due to a combination of factors including the NIRO, renewable electricity consumption targets⁵⁴ and the drive to prioritise decisions on renewable schemes. The findings also indicated a significant decline in determinations from 2017/18 onwards, which may be due to reduced government funding, high installation costs and limited grid capacity, all of which are circumstances beyond the control of planning policy. Whilst the analysis identified a sharp incline in wind energy development applications determined in 2023/24, it remains to be seen whether this increase will continue in the coming years.

The spatial analysis of wind energy development pressure was useful in determining if there are any significant pressures from wind energy development (single wind turbines and wind farms) in the countryside, and whether any patterns are emerging that may cause damage and unacceptable change to local rural character that need to be addressed⁵⁵.

A broad overview of the spatial distribution of wind energy development pressure illustrated that the northern portion of the Borough has generally experienced a lower level of wind energy development pressure than the southern portion of the Borough, which has a larger number of medium and higher-pressure areas. Several areas, such as lands adjoining Craigavon Urban Area, the edge of the Blackwater Valley and shores of Lough Neagh have experienced no wind energy development pressure. It is important to note that factors beyond the control of planning policy such as accessibility issues, grid constraints, wind speed, the presence of environmental designations and topography, also impact the demand for, distribution and feasibility of wind energy development in the Borough.

Whilst the broad overview of wind energy development pressure indicated that tightening of wind energy policy and / or applying an added layer of protection to safeguard rural character / protect landscape vulnerability was unnecessary, the spatial analysis highlighted a small number of locations within the Borough that have experienced higher levels of wind energy development pressure. A detailed analysis of these 'Hot Spots' (A-E) was carried out to assess their landscape value and sensitivity to wind energy development.

The analysis, as detailed in Section 3.0, found that the change in rural character within the 'Hot Spots' due to wind energy development was not unacceptable. On that basis it was concluded that the level of policy provision and guidance is sufficient and no amendment to rural policy and / or added layer of protection was needed to address the impact on rural character from wind energy development or to protect the vulnerability of the landscape.

When considering the impact of wind energy on rural character, it is important to note that there are no landscapes into which a wind farm or wind turbine will not introduce a new and distinctive feature. Given the ambitious net zero carbon and renewable energy consumption targets⁵⁶, which will require greater supply

⁵³ Analysis included both single wind turbines and wind farm applications and *all* wind energy related planning applications including proposed amendments to approved or existing single wind turbines / wind farms and proposals for any associated plant, buildings or infrastructure ancillary to proposed, approved or existing wind turbines / farms.

⁵⁴ At that time NI was required to achieve 20% of its electricity from renewable resources by 2015 and 40% by 2020.

⁵⁵ Note- the pressure analysis is a spatial record of wind energy applications that have been determined (both approved and refused) during the twenty-year period. It illustrates the desire or demand for wind energy development in our Borough, rather than the planning permissions that have been enacted (i.e. have resulted in wind development on the ground).

⁵⁶ The Climate Change Act (Northern Ireland) 2022 set a legislative target of an at least 100% reduction in net zero greenhouse gas (GHG) emissions by 2050 compared to baseline, along with interim targets including an at least 48% reduction in net emissions by 2030. To achieve 'net zero', greenhouse gas emissions must be reduced as close as possible to zero, with any remaining emissions absorbed by natural carbon sinks or carbon capture technologies. The

and consumption of renewable and low carbon energy in order to be met, it is important that wind energy development is accepted as a feature of many areas within the Borough. This does not mean, however, that areas valued for their particular landscape and/or nature conservation interest will have to be sacrificed or that attempts to lessen the impacts by integrating the development into the surrounding landscape would not be worthwhile. On the contrary, it emphasises the need for account to be taken of regional and local landscape considerations as part of site selection and through the development management process. It is important that this is reflected in the LDP's strategic approach towards renewable and low carbon energy development.

At the Preferred Options Paper (POP) Stage the Council⁵⁷ highlighted that a bespoke policy could be considered to protect those landscapes that are identified as being vulnerable from the potential harm that may be caused by high structures, such as wind turbines. However, the findings of the Landscape Character Assessment⁵⁸ have indicated that such a policy is not necessary at this stage.

The publication of the Strategic Planning Policy Statement, Edition 2 (SPPS), which emphasises the role of planning authorities in supporting the transition to net zero and meeting the renewable energy targets, may influence the volume and distribution of renewable and low carbon energy applications in the Borough, however this will be evaluated as part of any future Development Pressure Analysis carried out by the Council.

Conclusion

The outworkings of this Development Pressure Analysis, summarised above, contributes towards the evidence base that will inform the LDP's strategic approach towards the countryside. This includes the development of the LDP's Countryside Strategy, including the Strategic Landscape Designation and complementary Strategic Policy recommended above, as well as the operational planning policies relating to single dwellings and renewable and low carbon energy development.

To be consistent with the RDS and the SPPS, the LDP approach should seek to facilitate development in the countryside in a manner which supports and sustains rural communities whilst protecting the environment from inappropriate development. It is important that this is also generally reflected in the LDP Spatial Growth Strategy, insofar as it relates to the open countryside.

Following adoption, the Council will monitor and review the LDP⁵⁹ to establish if the objectives of the Plan are being achieved and whether any changes are required. This will include monitoring the number of applications approved for renewable energy or low carbon energy development in the Borough and monitoring the number of planning permissions in designated sites such as Landscape Wedges, Local Landscape Policy Areas, Strategic Landscape Policy Areas and AONB. This will not only help to evaluate if adequate volumes of renewable and low carbon energy development are being generated within the Borough so to meet regional targets but will also enable the Council to evaluate any loss or damage to sensitive landscapes, environmental quality or visual amenity through planning approvals, including those for wind energy development. The findings of the monitoring will inform the review of the LDP⁶⁰.

Northern Ireland Energy Strategy 'The Path to Net Zero Energy' established a renewable electricity consumption target of 70% by 2030 which was then increased to 80% by 2030 by the Climate Change (Northern Ireland) Act 2022.

⁵⁷ See Preparatory Paper No. 13 'Pressure Analysis' (2017). Preparatory Paper No. 13 was one of 14 topic-based Papers that provided the baseline information that formed part of the evidence base for the Council's Preferred Options Paper (POP).

⁵⁸ See Technical Supplement 9

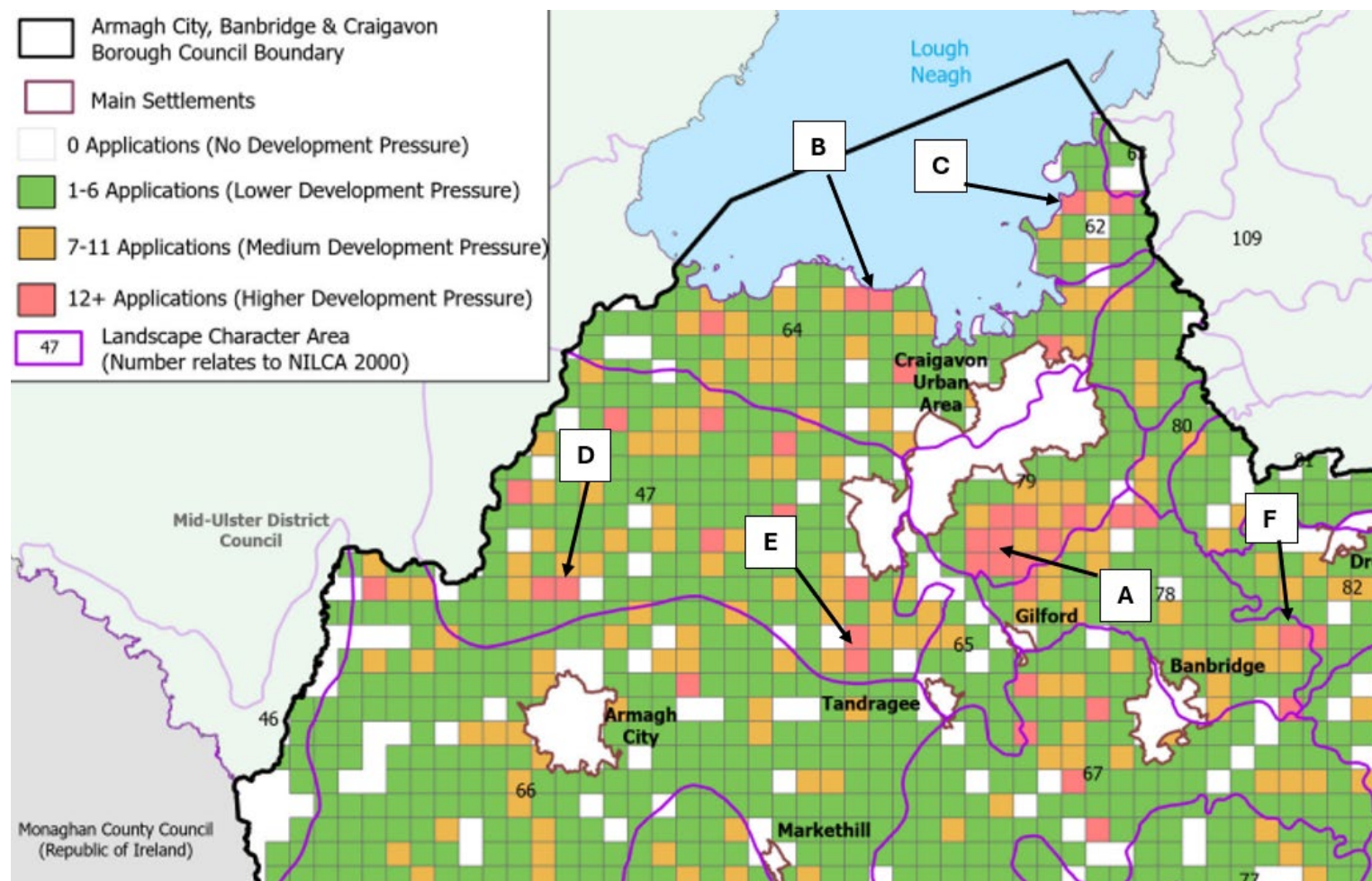
⁵⁹ The dPS Monitoring and Review Framework, setting out the targets and indicators that will be monitored, is set out in Part 4 of the dPS document.

⁶⁰ The Council will carry out a review of its LDP every 5 years and no later than 5 years from the date of adoption of the LPP and will submit its findings to DfI.

APPENDICES

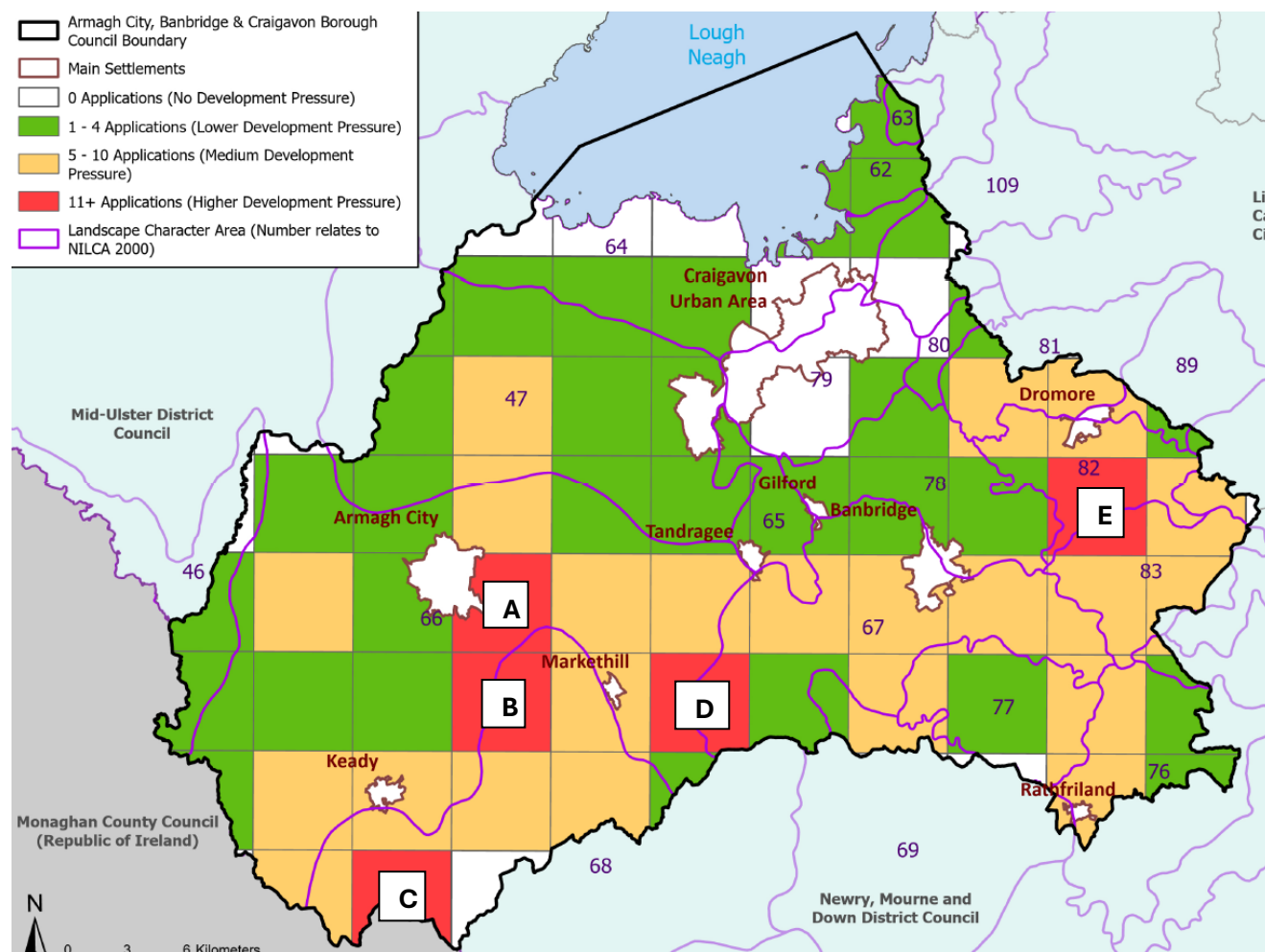
Appendix 1. Residential Development Pressure (1st April 2010 to 31st March 2024) - Location of Hot Spots (A-F)

For the purposes of this residential pressure analysis a 'hot spot' was interpreted as being two or more adjoining higher-pressure areas (shaded red), with the exception of Hot Spot C (Lands east of Lough Neagh / South of Portmore Lough). The cluster associated with 'Hot Spot C' was considered to be a 'hot spot' on the basis that it is located within or in close proximity to a number of environmental designations and it also included a number of medium and higher-pressure areas within a relatively small area, therefore warranting more detailed analysis within this Development Pressure Analysis.



Appendix 2. Wind Energy Development Pressure (1st April 2004 to 31st March 2024) - Location of Hot Spots (A-E)

For the purposes of the wind energy pressure analysis a 'hot spot' was interpreted as being a single higher-pressure area (demarked as a single grid square shaded red) i.e. there are five wind energy development hot spots within the Borough, in locations A-E.



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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