

# DERRY CITY AND STRABANE DISTRICT COUNCIL

## LOCAL DEVELOPMENT PLAN (LDP) 2032



### Rural Proofing – Baseline and Interim Report for LDP POP Stage

May 2017



**Purpose:** To consider the legislation and procedure for rural proofing, as well as setting out a baseline of rural characteristics / issues and initial assessment of the proposed policies / proposals in the Council's LDP POP.

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## 1.0 Introduction

- 1.1 Rural areas differ from urban areas due to their greater geographical isolation and dispersed settlement patterns, population dispersal, longer distances from key services like health, education or leisure facilities and limited employment opportunities. There are also many other challenges that exist in rural areas such as a reliance on private transport and limited public transport, lower household incomes, and population growth and its associated demands on public services. The LDP needs to demonstrate that sufficient evidence has been considered to make effective policies which provide for equitable treatment of both rural and urban areas. There are differences between urban and rural areas that can affect how a particular LDP policy can impact those living in these areas.
- 1.2 This is an interim report and a full Rural Proofing consideration of all the proposed draft LDP policies will be published at the draft Plan Strategy Stage.

## 2.0 Rural Proofing

- 2.1 Rural proofing is the process by which policies, strategies and plans are assessed to determine whether they have a differential impact on rural areas and, where appropriate, adjustments are made to take account of particular rural circumstances. Rural Proofing has been a requirement for all Government Departments in Northern Ireland as an integral part of the policy development process since 2002. In 2016, this commitment to rural proofing was strengthened with the introduction of rural proofing into legislation through a new Rural Needs Act (Northern Ireland) 2016. It is now a statutory obligation which establishes a duty on Public Authorities to have “due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and designing and delivering public services. The Act applies to government departments and councils from June 2017. Source:<https://www.daera-ni.gov.uk/publications/guide-rural-needs-act-northern-ireland-2016-may-2017>
- 2.2 The Rural Needs Act does not explicitly refer to rural proofing or prescribe any specific process to be used by public authorities in having ‘due regard to rural needs’. However, rural proofing is a process which is well- established in Northern Ireland as a means of identifying rural needs and impacts, based on analysis of evidence; considering the scale and significance of those impacts; and considering potential adjustments or mitigation to address those impacts.
- 2.3 Rural proofing will be an ongoing and integral component of Derry City and Strabane District Council’s Local Development Plan. It will be considered at the outset as the integration of rural proofing with rural stakeholders leads to good

policy by effectively engaging with those who have a view and may be affected. It will apply not just to policy but also to the development and implementation of plans and strategies. This will include:

- Assessing the evidence of rural need and circumstances at the start of designing or developing a policy or strategy (new or existing);
- Considering the options for fair impacts on the ground in rural areas; and
- Where appropriate, adjusting policies or delivery

### **3.0 Rural Needs**

- 3.1** The Act defines ‘rural needs’ as “the social and economic needs of rural areas”. It is important to be clear what this means and to be able to distinguish between a need and something that is desirable. In general terms, a need can be considered to be something that is essential to achieve a standard of living comparable with that of the population in general. For example, it can relate to the ability to access key public services such as health and education, the ability to access suitable employment opportunities, and the ability to enjoy a healthy and active lifestyle.

Source: <https://www.daera-ni.gov.uk/publications/guide-rural-needs-act-northern-ireland-2016-may-2017>

### **4.0 Definition of Rural**

- 4.1** In order to identify and analyse ‘rural needs’, a public authority must have a clear understanding of how it classifies whether an area is urban or rural. The default definition of “rural” used in Northern Ireland is that developed by the Inter-Departmental Urban-Rural Definition Group. Initially proposed in 2005 and amended in 2015, this definition classifies those settlements with fewer than 5,000 residents together with the open countryside as rural. Settlements have been classified into a number of bands (see Table), with bands A-E classified as urban and bands F-H classified as rural.

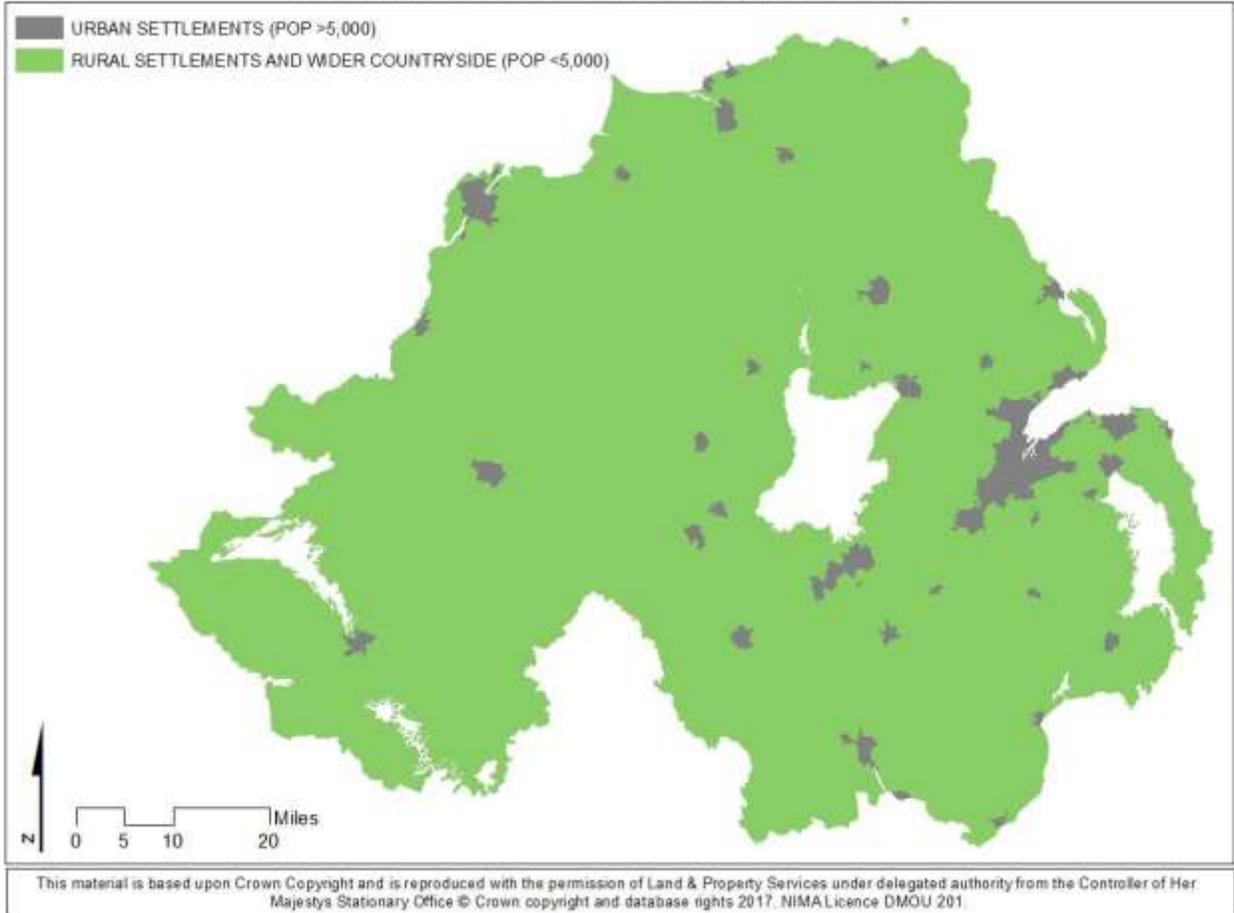
**Table 1: Settlement Development Limit Classification**

Classification	Population
Band A – Belfast	280,211 (2011 census)
Band B – Derry City	83,125 (2011 census)
Band C – Large Town	>18,000
Band D – Medium Town	10,000 – 17,999
Band E – Small Town	5,000 – 9,999
<b>DEFAULT URBAN-RURAL SPLIT</b>	
Band F – Intermediate Settlements	2,500 – 4,999
Band G – Village	1,000 – 2,499
Band H – Open Countryside	<1,000 and open countryside

Source: Adapted from Table 2 of the Review of the Statistical Classification and Delineation of Settlements

- 4.2 Whilst a default definition is provided, the review also recommended that a prescriptive urban-rural definition should not be given. Rather, it was advised that users should consider defining urban and rural areas in ways which are appropriate for different projects and programmes. In instances that public authorities apply an alternative definition or modified version of this definition, it may be helpful to clearly set out the rationale for doing so as part of the Rural Needs Impact Assessment for the relevant policy, strategy, plan or service. The full report of the 2015 review is available on the NISRA website at <https://www.nisra.gov.uk/publications/settlement-2015-documentation>

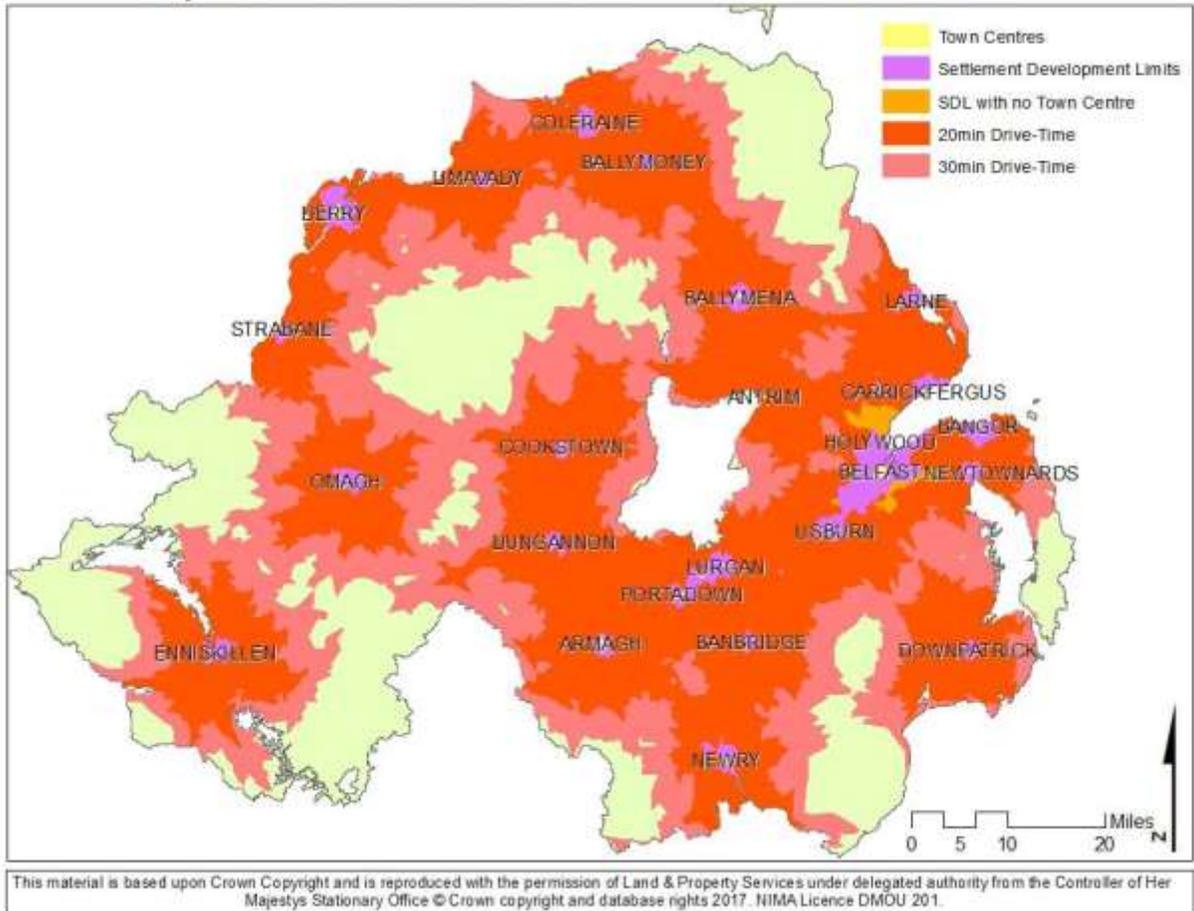
### Rural settlements and wider countryside



The above map shows the proportion of land mass in Northern Ireland which is categorised as 'rural' under the default definition.

Source: <https://www.daera-ni.gov.uk/publications/guide-rural-needs-act-northern-ireland-2016-may-2017>

### Comparison of 20 and 30 minutes drive-time boundaries



The above map shows a comparison of 20-minute and 30-minute drive times from those settlements containing a population of at least 10,000.

Source: <https://www.daera-ni.gov.uk/publications/guide-rural-needs-act-northern-ireland-2016-may-2017>

## 5.0 Derry City and Strabane District Council Context

5.1 It is important to put in context the District-wide rural situation. The composition of the population in the two old council areas differed in terms of the proportions of their population living in urban and rural areas. The former Derry City Council area had approximately 12% of its population living in areas defined as rural whereas the rural composition of Strabane was relatively larger and stood at 56%.

Table below: Urban- Rural Composition of Derry City and Strabane District (DCSD)

SOA	No. of People	% of Population	No. SOAs	% of SOAs
Rural	43,919	30%	18	24%
Urban	104,714	70%	57	76%
DCSDC	148,633	100%	75	100%

Source: NISRA, Demography and Methodology Branch

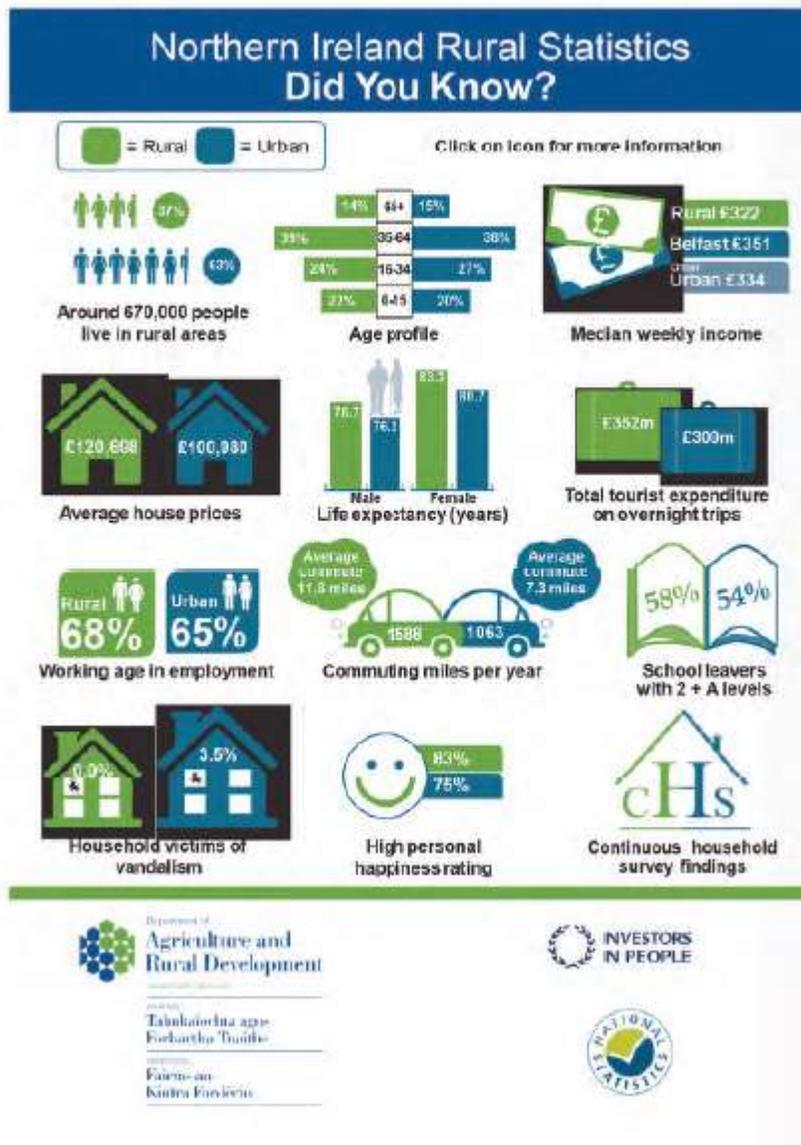
5.2 The DCSD has a large urban population, with 77% of the population living in an urban area in accordance with the NISRA definition of urban/rural. The majority of the urban dwellers are located in Derry City in the north of the District, whilst the District becomes more rural in the south. The rural area is defined by a series of small settlements of less than 5,000 people and those living in single dwellings in the open countryside.

### 5.3 Urban/Rural Differences:

The Family Resources Urban-Rural Report 2014 (April 2014) provides a range of information pertaining to rural life.

- Rural West had the highest proportion of income from self-employment in NI (15%).
- Rural West had the highest proportion of households receiving any non-income related benefit (76%), whilst Urban East had a figure of 69%.
- Rural West had the highest percentage of households owning their accommodation outright (48%).
- In the rural area one quarter of males were self-employed f/t p/t, whilst in the urban area the figure was 14%.
- Rural West and Urban West was the highest percentage of household containing one or more unemployed adults under pension age (9%).
- Highest proportion of single parent households were found in Belfast Metropolitan area (8%) with the lowest in the Rural West.
- Rural West has the highest percentage of individuals in relative poverty after housing costs (25%)

5.4 The following infographic produced by DARD provides a useful overview of overall trends in the rural/urban areas:



5.5 In terms of overall multiple deprivation (NIMDM 2010), the 20 most deprived Super Output Areas (SOAs) in Derry & Strabane all rank within the top 11% deprived SOAs for Northern Ireland. Of these 20 SOAs, 17 are located within the current development limits for Derry City and of the remaining 3, 2 are located within the current development limits for Strabane and the other is in Castlederg. It very clearly shows a significant concentration of very deprived SOAs within the Derry City development limits with a less deprived surrounding area. While the two most deprived SOAs in Strabane are located within the town itself (East and Ballycolman), the greater Strabane picture is one of significant rural deprivation.

5.6 Deprivation measures: While deprivation measures are appropriate for urban deprivation estimation they are less reliable for rural areas. Using Output Area rather than Super Output area data it is estimated there are an additional forty Output Areas (almost half within rural areas) that contain deep pockets of multiple deprivation.

Rural dwellers, compared to urban dwellers, are likely to be healthy, a house owner, self-employed (male) and culturally deprived (Cultural Deprivation Index). Seven of the most deprived Rural SAOs in NI are located within the Old Strabane LGD. They include:

SOAs amongst 20 most deprived in NI
Castleberg
Glenderg
Newtonstewart
Sion Mills
Donemana
Finn
Clare

Source: NISRA, Demography and Methodology Branch

The table below presents the correlation matrix for the Multiple Deprivation Measures. A negative figure indicates a negative relationship e.g. proximity to services (proxy for rurality) is negatively related to a poor living environment whereas Education, Skills and Training is positively associated with employment.

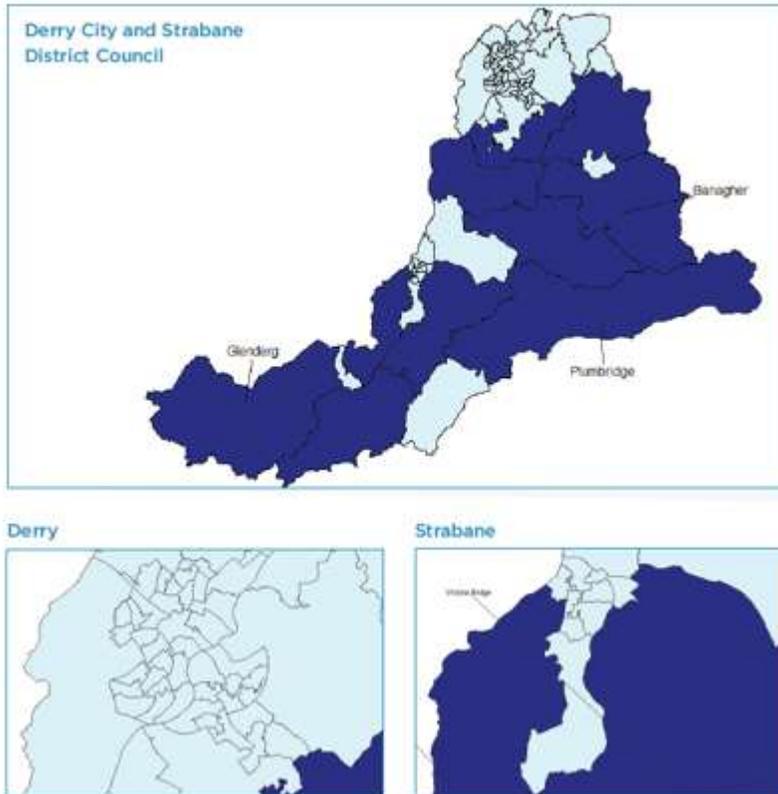
	Income	Employment	Health Deprivation & Disability	Education, Skills & Training	Proximity to Services	Living Environment	Crime & Disorder
Income	1.00						
Employment	0.94	1.00					
Health Deprivation & Disability	0.94	0.93	1.00				
Education, Skills & Training	0.88	0.84	0.85	1.00			
Proximity to Services	-0.32	-0.29	-0.37	-0.36	1.00		
Living Environment	0.61	0.54	0.59	0.64	-0.52	1.00	
Crime & Disorder	0.55	0.48	0.55	0.54	-0.66	0.63	1.00
NIMDM 2010	0.97	0.95	0.94	0.91	-0.27	0.65	0.53

Source: NISRA, Demography and Methodology Branch

- 5.7 In rural areas given that many services are located in urban centres then access to services can be difficult. The Proximity to Services Domain measures the travel time to a range of services. These include (amongst many other services) GP services, Hospital Accident and Emergency, Jobs and Benefits Offices, Council

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Table below: Deprivation – Proximity to Services (PXS) Domain Rank



Source: NISRA, Demography and Methodology Branch

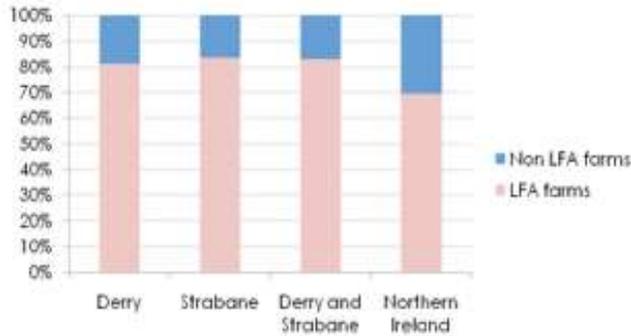
5.8 Given the extensive rural area surrounding Strabane, it is not surprising that a significant number of its peripheral SOAs rank very highly in terms of deprivation with respect to 'Proximity to Services' (i.e. long distances to key services e.g. A & E hospital, GP premises, supermarket, leisure centre, etc.) Plumbridge, Glenderg, Clare, Dunamanagh and Slievekirk are all ranked within the top 6% for NI. Similarly, in Derry District, Banagher and Claudy are ranked within the top 8% for NI.

SOAs amongst 20 most deprived in NI
Banagher
Claudy 2
Clare
Donemana
Glenderg
Plumbridge
Slievekirk

Source: NISRA, Demography and Methodology Branch

- 5.9 The Department of Culture, Arts and Leisure commissioned research on Cultural Deprivation within NI. The four deprivation indices for sport, arts, libraries and museums all show to some extent an urban/rural split, with the most culturally deprived areas tending to be rural and the least deprived areas being urban. The CDI highlights the urban and rural differences in the proximity to culture, arts and leisure services. The 20% most deprived areas are generally rural SOAs (171 of the 178 SOAs are rural). In contrast, there are no rural SOAs in the 40% least deprived areas.
- 5.10 DARD Rural Development Programme (RDP) 2014-2020 evaluates the current economic and social situation within the rural areas. The three most popular diversified activities are tourism, direct sales of farm products, and equine sports. However, the incidence of diversification is considerably lower in Northern Ireland than is the case for England where, using a similar definition, about 18% of farms were found to have some diversified activity in 2010. Some rural areas of Northern Ireland are uniquely picturesque with stunning landscapes and scenery. However the report states that the tourism infrastructure often does not match the potential of these rural areas to attract visitors to spend money in our rural businesses.
- 5.11 Through support from the RDP, DAERA aim to maximise opportunities for tourism development, which make best use of our natural and cultural resources. Through the sustainable development of the rural economy, they aim to attract visitors and create new employment opportunities by providing support to existing rural tourism enterprises and for individuals wishing to develop tourism activities. Rural Tourism extends beyond the City and into an expansive rural hinterland that is host to a collection of tourism attractions covering a number of different themes including a rich and diverse natural and built heritage, activities, attractions and accommodation. These assets provide the ideal setting for a range of activities such as walking, cycling, mountain-biking, fishing and other outdoor sports. The rural area is situated within a natural setting comprising of the Faughan Valley, Eglinton Historic Plantation Village and the Sperrin Mountains. In the countryside, planning authorities must carefully manage tourism development. This is necessary in the interests of rural amenity, wider sustainability objectives and the long term health of the tourism industry.
- 5.12 According to the 'Agricultural Census in Northern Ireland 2015' carried out by DAERA, our District has 1,735 farms. 73% of these would be considered very small, 14% small, 5% medium and 8% large. Out of the 11 new council areas, DCSDC would rank 7<sup>th</sup> in terms of the number of farms that it has.
- 5.13 Our countryside remains the home and livelihood for a considerable part of our population, farmers and non-farming families, living in our many rural communities. Outside the settlement limits the pattern of development has traditionally been a dispersed rural community. According to the 'Agricultural Census in Northern

Ireland 2015' carried out by DAERA, our District has 1,735 farms. 73% of these would be considered very small, 14% small, 5% medium and 8% large. Out of the 11 new council areas DCSDC would rank 7<sup>th</sup> in terms of the number of farms that it has.



Source: Farm Census, DAERA

Table above: Non LFA farms and LFA farms for Derry City Council, Strabane District Council, Derry City and Strabane District Council and NI.

## 6.0 Planning Context

- 6.1 A key aim of the Regional Development Strategy (RDS) and Strategic Planning Policy Statement (SPPS) is to sustain rural communities living in smaller settlements and the open countryside and to strike a balance between the protection of the environment from inappropriate development while supporting and sustaining rural communities. To maintain and enhance the attractiveness of the countryside as a place to invest, live and work, the countryside requires a sustainable approach to new economic development / employment. Whilst, new development is required to respect local social and environmental circumstances, facilitating development in appropriate locations is considered necessary to ensure proposals are integrated appropriately within rural settlements or in the case of countryside location, within the rural landscape.
- 6.2 The SPPS sets out that the policy approach to new development in the countryside should reflect the 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. Policy must recognise that there are certain areas which will be more sensitive to change and areas which will have lower sensitivities and thus provide opportunities to accommodate development. It is also important to take into account the role and function of rural settlements and accessibility to existing services and infrastructure reflective of the SPPS.

- 6.3 The existing policy-led approach in Planning Policy Statement 21, Sustainable Development in the Countryside, encourages farm diversification, agricultural and forestry development, and the re-use and conversions of rural buildings with an appropriate nature and scale of non-residential development. New buildings outside settlements are restricted, in order to protect rural amenity and achieve wider sustainability objectives. The related Planning Policy Statement 4, Planning and Economic Development sets out the Department's policies for economic development uses and indicates how growth associated with such uses can be accommodated in the countryside; however, there has been concern that this policy has been unduly restrictive and has acted contrary to rural enterprise and sustaining vibrant rural areas.
- 6.4 Our countryside is home and livelihood for a considerable part of our population including farming and non-farming families. The countryside provides employment through activities such as agriculture, forestry, tourism, other rural-based enterprises, as well as various home-working businesses. It provides a mixture of landscapes which includes mountains, river valleys, rolling farm land and the Sperrin AONB. These landscapes provide a rich resource of productive agricultural land, habitats for nature conservation, archaeological and historical features and remains. Additionally our countryside provides for many recreational needs including activities such as fishing, photography, walking and festivals and has the potential to become an increasingly important tourist asset.
- 6.5 The Regional Development Strategy. A principle aim of the Regional Development Strategy 2035 (RDS) is 'promoting development which improves the health and well-being of communities'. The RDS acknowledges that a healthy community is better able to take advantage of the economic, social and environmental opportunities which are open to it. Improved health and well-being is derived not only from easy access to appropriate services and facilities, although this is important, but also from the creation of a strong economy set within a safe and attractive environment. This aim also recognises that the promotion of more social and affordable housing helps build strong and balanced communities.
- 6.6 Two of the aims of the RDS which relate to sustainable development are:
- To support strong, sustainable growth for the benefit of all parts of Northern Ireland.
  - To protect and enhance the environment for its own sake.
- It also sets out a clear strategic objective for rural areas, namely:
- SFG13 – To sustain rural communities living in smaller settlements and open countryside.
- The RDS places the onus on DCSDC to address the economic, social and environmental issues aimed at achieving these sustainable development aims and objectives.

- 6.7 The Strategic Planning Policy Statement for Northern Ireland (SPPS) was published in September 2015. It sets out the Department of the Environment's regional planning policies for securing the orderly and consistent development of land under a reformed two-tier local planning system. The SPPS reaffirms the regional strategies contained within the RDS 2035 and sets out strategic subject planning policy for a wide range of planning matters. It sets the strategic direction for the new councils to bring forward detailed operational policies within future local development plans. The aim of the SPPS with regard to the Countryside is to manage development in a manner which strikes a balance between protection of the environment from inappropriate development, whilst supporting and sustaining rural communities consistent with the RDS
- 6.8 It is intended that the LDP will be the spatial reflection of the Community Plan and that the two should work in tandem towards the same vision for the District and its communities and set the long term social, economic and environmental objectives for an area. The Community Planning Team of DCSDC carried out a public consultation in Autumn 2016 in preparation of the draft Community Plan. In relation to development in the countryside the following key relevant issues were raised:
- Provide quality housing in sustainable urban and rural neighbourhoods that are attractive places to live and are within easy access to local services and amenities.
  - Map underutilised /derelict/suitable vacant properties to help address the current social housing demand and commercial need.
  - Develop a programme to seek the repair and/or re-development of underutilised/derelict/suitable vacant properties.
- 6.9 The DCSD has a population of 149, 500 and a land area of approximately 1,245 square kilometres. It is estimated that 71% of the population live in urban areas whereas 29% reside in the rural area. However, based on the 49 settlements in the District, 85% of the population live within designated settlements with the remaining 15% of the population living in the rural area. Outside the larger population centres such as Derry and Strabane, the dispersed pattern creates challenges for service provision especially in the more rural and remote areas of the District. The dispersed rural nature of the District not only impacts on connectivity by road but also on telecommunications and broadband provision. Rural deficiencies in both mobile infrastructure and broadband are pertinent issues for rural dwellers with implications for rural businesses; certain areas currently receive minimal or no broadband coverage.

### Population for DCSDC in terms of defined settlement limits

Total population (2011 Census)	Population within defined settlement limits	Population outside defined settlement limits	% of Population within defined settlement limits	% of Population outside defined settlement limits
147,720	126,355	21,365	85%	15%

### District Population % per Settlement Hierarchy.

Settlement Hierarchy	Population (Census 2011)	% of District Population
City	83,163	56.3%
Main Town	13,172	8.9%
Local Towns	6,434	4.4%
Villages	20,169	13.7%
Small Settlements / Hamlets	3,584	2.4%
Countryside	21,178	14.4%
Total	147,700	100%

6.10 It can be seen that approximately 21,000 people or 14.4% of the District's population live in the open countryside. If we add in the population of the settlements other than Derry and Strabane, this gives us 51,000 or 35% being 'rural'. NIPSA also use a definition of urban-rural SOA's, which defines 35,000 or 23% of our population being 'rural'.

6.11 Rural Housing: RDS Housing Growth Indicators (HGIs) – have been incorporated within the RDS as a guide to councils in preparing development plans. They provide an estimate for the new dwellings requirement for each area and provide a guide for allocating housing distribution across the plan area. The indicator covers both urban and rural housing. In the allocation process due weight needs to be given to reinforcing the leading role of the Hubs and the clusters of Hubs. Another important step in this allocation process is making judgements to achieve a complementary urban/rural balance to meet the need for housing in the towns of the district and to meet the needs of the rural community living in smaller settlements and countryside. The varied housing needs of the whole community need to be met.

- 6.12 Rural Community infrastructure: The RDS states that the right environment can help strengthen community cohesion, foster a stronger community spirit and increase our sense of place. The village concept is important for both rural and suburban areas as it can bring people together and strengthen communities by sharing a sense of place and identity. Health and Social Services in rural areas are important and are influenced by a critical mass of potential patients. Housing allocation in these areas will have an impact on the delivery of health services.
- 6.13 Rural Transport: RDS SFG14 aims to improve accessibility for rural communities. Rural communities can be disadvantaged by virtue of their remote location from a range of facilities and essential services. This disadvantage can be lessened by innovative use of existing services and the application of new and developing technologies. It is likely that the primary form of transport will remain the private car for most people, especially for the rural dweller, particularly in the remoter parts of the District. As such, complementary measures should be introduced in the plan which are aimed at reducing the need to travel long distances in order to access work, shops, recreation facilities and public services within the district.
- 6.14 Rural Industry: The RDS recognises the importance of sustaining rural communities by facilitating rural industries, business and enterprises in appropriate locations. This means not only businesses connected to farming, forestry and fishing but other industries such as tourism and renewable energy which can provide further jobs and opportunities in rural areas as long as they are integrated appropriately within a settlement or rural landscape.
- 6.15 Our countryside is home and livelihood for a considerable part of our population including farming and non-farming families. The countryside provides employment through activities such as agriculture, forestry, tourism and other rural based enterprises. The Local Development Plan will need to recognise that while there are certainly economic benefits to mineral extraction and production, this industry also provides a number of challenges, including impact on the environment, visual implications and impact on the amenity of local residents. The majority of energy derived from wind in Northern Ireland comes from large-scale generation as opposed to small-scale or micro-generation. Large scale generation consists of wind farms whilst small scale or micro-generation consist of a range of renewable technologies including single turbines or even micro turbines. To-date, 18 wind farms have received planning permission and / or are built within the Derry City and Strabane District, with a further 6 proposals under consideration.
- 6.16 This Preferred Options Paper (POP) is the first formal consultation stage in the preparation of the Council's Local Development Plan (LDP) for Derry City and Strabane District. The POP provides the basis for consulting with the public and stakeholders on a series of options for dealing with key issues in the Plan area. It

sets out the Council's initial proposals and policy direction, therefore aiming to stimulate public comment and help interested parties to become involved in a more meaningful way at this earliest stage of Plan preparation. The POP does not cover every aspect, issue and policy that will be included in the LDP but instead, it seeks to identify and address the main Planning issues that will make up the LDP. Effective community and stakeholder engagement also strengthens the evidence base and enhances the 'soundness' of the Local Development Plan.

6.17 A significant LDP Stakeholder event took place on 4<sup>th</sup> April 2017, whereby feedback from the Rural Development Group and other attendees raised the following rural issues:

1. PPS 21 Policy is too restrictive to allow people to live and work in the countryside.
2. PPS 21 Policy should be more open to allow people from non-farming backgrounds to live in the countryside.
3. Rural schools are the hub to rural communities and are facing closures.
4. Important to create a vibrant rural community, cannot have a vibrant community without businesses and retain skills. Economic development – expansion can mean that the business has to relocate to an urban area. The nearest urban area may require a move to another council district.
5. Perceived ageing population therefore need regenerative rural policy. People will need their families around them not miles away in towns.
6. Balanced development promoting the re-use of buildings and re-claim heritage. However this is usually more costly. Concern re: loss of old buildings which, while not protected by listed status are nonetheless culturally important.
7. Need improved services. Provision of infrastructure e.g. broadband, street lighting sewage essential for rural economy.
8. Current policy discriminates against people from non-farming backgrounds.
9. Issues with Design in the Sperrins, ridge height restrictions to dwellings (6.5m) while turbines are considered to 'integrate'.
10. Infrastructure to accommodate turbines is acceptable whereas, it's not acceptable for a dwelling, once again unfair biased toward this form of development.
11. Settlements are not evenly distributed throughout the district, therefore it is not an option for some people to relocate/build within the settlement limit.
12. Consider relaxing the clustering policy.
13. Consider stricter control over design in the countryside in that any new building should use the highest quality materials and appropriate colours.
14. Entrepreneurship amongst rural dwellers should be encouraged with policy which facilitates 'start up' businesses in the countryside. The Rural Development Programme offers grants for businesses in the countryside but there may be a conflict in obtaining planning permission. The grant is lost if a business locates within the settlement limits.
15. Need to consider the provision of social housing in the countryside.
16. Kinship tests.

17. The onus should be placed on the individual to be sustainable.
18. Rural areas experience 'stagnation' not necessarily 'decline'.
19. If the planning policy is relaxed (i.e. return to rural strategy type policy) they do not perceive that there will be an overwhelming influx of people into the countryside, living in the countryside comes with its own difficulties, i.e. proximity to services, child care, septic tanks etc. and is therefore a 'lifestyle choice'
20. South of the District the service pull (including schools) is Omagh.
21. Non-agricultural business should be encouraged.
22. Rural infrastructure and services need improved for example the rural area has the worst broadband, this will have implications for homeworking which should be encouraged.
23. Promote the rural in partnership with urban areas.

6.18 The opinions of Members were also sought in relation to a 'call for evidence' exercise for the 'Development in the Countryside' section of SPPS. This workshop raised a number of comments in relation to rural policy in general and specifically on the provisions within the SPPS. They are summarised as follows:

- Depopulation of rural communities, rural fabric being eroded
- Difficulties with getting planning permission
- Children of farmers can't get permission
- PPS21 not working, too rigid
- Right to live in the countryside as it will affect schools etc
- Clustering is an issue
- Donegal system, church records, indigenous letter to allow planning permission should be considered
- Consensus from all Cllrs present that kinship is a key consideration and an issue to be raised with Department for Infrastructure
- The aim of the SPPS in the countryside does not reflect the reality of this side of the Bann and is too prescriptive and doesn't reflect the reality on the ground.
- One house every 10 years is not enough
- Need a more active rural community
- What is the evidence to prove that it is planning policy that is causing schools to close and the depopulation?
- Replacement buildings – a lot looser policy required
- Infill development and ribboning – look at opportunities in this policy?
- Concerns about the 6 years farm diversification policy.

## 7.0 Steps in Rural Proofing – Completing a Rural Needs Impact Assessment

7.1 This guidance <https://www.daera-ni.gov.uk/publications/rural-needs-impact-assessment-template> recommends a step-by-step process to follow in order to effectively take rural needs into account. A Rural Needs Impact Assessment is the document produced when rural proofing is carried out. There are six steps involved in completing a Rural Needs Impact Assessment. The level of analysis undertaken in the impact assessment should be proportionate to both the scale of the potential impact and significance to rural areas.

### 7.2 Step 1: Define the Issue

Key questions to consider:

- *What are the objectives of the strategy, policy plan or service?*
- *What impact do you intend it to have in rural areas?*
- *How is 'rural' defined for the purposes of this policy/strategy/service/plan?*
- *What would constitute a fair rural outcome in this case?*

### 7.3 Step 2: Understand the situation

Key questions to consider:

- *What is the current situation in rural areas?*
- *What evidence (statistics, data, research, stakeholder advice) do you have about the position in rural areas?*
- *If the relevant evidence is not available, can this be sourced?*
- *Do you have access to the views of rural stakeholders about the likely impact of the policy?*
- *Are there existing design features or mitigations already in place to take account of rural needs?*

### 7.4 Step 3: Develop and appraise options

- Key questions to consider:
- *Are there barriers to delivery in rural areas?*
- *If so, how can these be overcome or mitigated?*
- *Will it cost more to deliver in rural areas?*
- *What steps can be taken to achieve fair rural outcomes?*

### 7.5 Step 4: Prepare for Delivery

- Key questions to consider:
- *Do the necessary delivery mechanisms exist in rural areas?*
- *Have you considered alternative delivery mechanisms?*
- *What action has been taken to ensure fair rural outcomes?*

- *Is there flexibility for local delivery bodies to find local solutions?*
- *Are different solutions required in different areas?*

## **7.6 Step 5: Implementation & Monitoring**

Key questions to consider:

- *Have you set any rural specific indicators or targets to monitor?*
- *How will the outcomes be measured in rural areas?*
- *Are there any statistics or data that you will collect to monitor rural needs and impacts?*

## **7.7 Step 6: Evaluation & Review**

Key questions to consider:

- *What processes are in place to evaluate and review the implementation of the policy, strategy, plan or service?*
- *Have rural needs been factored into the evaluation process?*
- *How will lessons learned in relation to rural outcomes be used to inform future policy making and delivery?*

## 8.0 Conclusion – Rural Proofing of LDP POP Stage

- 8.1 The POP recognises that there are many issues in the rural area. It is important that the LDP for example:
- recognises the importance of self-employment and home working, particularly in rural locations;
  - protects and consolidates the role of local towns and villages so that they act as local centres for shops and community services meeting the daily needs of their rural hinterlands;
  - provides for additional homes needed to sustain / refresh the population for vital and vibrant rural communities, including in our small settlements and the countryside, whilst protecting the areas in which they live by accommodating sustainable growth within the settlements and countryside which reflects the extent of existing rural communities;
  - improves connectivity between and within settlements and their rural hinterland through accommodating investment in transportation to improve travel times, alleviate congestion and improve safety for both commercial and private vehicles as well as more sustainable modes of transport including buses, walking and cycling.
- 8.2 During Stage 1 (Evidence Base) of the LDP preparation process, over 20 workshops discussed aspects of rural planning policy, especially to get the views of the elected Members. Over the course of these various workshops, Members made it very clear to Planning Officials about the importance of the rural needs of the District, so that there was not an undue urban bias. They emphasised the need for vibrant rural communities, for a healthy living countryside as well as strong rural settlements. They gave numerous examples of de-population, aging population profile, lack of young people, falling school rolls/closures, struggling sports teams and pressure on other community infrastructure. In particular, it was requested that planning policies needed to permit more people to live in the countryside, not just on farms, and for more employment to keep people in the countryside.
- 8.3 The LDP POP is the first formal consultation stage in the process of LDP preparation; it sets out the Council's initial Planning proposals and policy direction, giving an indication of the preferred options proposed for inclusion in the eventual LDP Plan Strategy and Local Policies Plan. As such, the POP which is now released for public consultation has indeed given appropriate-level consideration of the needs of rural areas of the District, as they have been reflected in the statistical analysis and in the initial feedback from Members and stakeholders. In particular, the POP gives considerable and appropriate weight to the rural areas in terms of overall strategic direction, Vision and Objectives. A strong hierarchy of rural settlements is proposed, reflective of the District's Rural Development

Programme, and comprising Local Towns, Villages, Small Settlements, potentially Dispersed Rural Communities and the open countryside.

- 8.4 Of particular relevance, the LDP's rural development policy and several other policies will also seek to address identified rural needs. In order to sustain the rural community in our District and to meet our overall growth objectives, the Council intends to explore how to provide some additional opportunities in relation to new dwellings in the countryside, specifically in existing CTY2a nodes / clusters, dwellings on farms and dwellings for non-agricultural business enterprises, and conversions, as well as the siting requirements for dwellings. There is also a need to clarify other policies such as infill, agricultural development and active farming criteria for rural dwellings, as well as to explore the potential for DRCs as indicated in the current PPS 21.
- 8.5 With regard to other forms of development in the countryside the POP proposes to identify additional opportunities for appropriate small businesses (PPS 4) and for tourism projects (PPS 16). The POP also proposes to consider the identification of specific spatial areas of the countryside, which are under particular development pressure or landscape sensitivity where further controls will apply, including rural buildings and wind turbines.
- 8.6 In preparing the POP, the Council has also undertaken the relevant stages of Sustainability Appraisal (incorporating the Strategic Environmental Assessment). The SA is an iterative process that runs parallel with the preparation of the POP and Local Development Plan (LDP); it has formally assessed the Preferred Options against 14 SA objectives and this has included a consideration of any differential impacts on rural areas. An SA Interim Report (consisting of SA Scoping Report and assessment of alternatives) is published with the POP.
- 8.7 The Council's concurrent Strategic Growth Plan (Community Plan), to which the LDP POP is aligned, has also been screened for its rural impacts. The District's Rural Development Programme is also aligned with the Strategic Growth Plan.
- 8.8 The Preferred Option Paper indicates the Council's preferred options for growth and development in the area and will be the basis for consulting with the public and stakeholders. At this stage in the process, the public and stakeholders will have an opportunity to formally put forward views and influence the Local Development Plan when the POP is published. Along with the rural evidence base that has been identified which informs the LDP of the current situation in rural areas, any further rural issues raised will form part of the formal Rural Proofing at the Plan Strategy Stage of the LDP when it comes to developing and appraising the strategy. Potential adjustments or mitigations to address any rural impacts will be addressed. This will help us to fulfil our legal obligations for delivery of the LDP, also follow best-practice and ultimately will ensure that the LDP is implemented and monitored fully with regards to rural proofing.