

## Appendix I - Rural Needs Impact Assessment (RNIA) Template

### SECTION 1 - Defining the activity subject to Section 1(1) of the Rural Needs Act (NI) 2016

#### 1A. Name of Public Authority.

Department of Agriculture Environment and Rural Affairs (DAERA), Natural Environment Policy Division (NEPD), Air and Environmental Quality (AEQ)

#### 1B. Please provide a short title which describes the activity being undertaken by the Public Authority that is subject to Section 1(1) of the Rural Needs Act (NI) 2016.

Development and drafting Northern Ireland's First Clean Air Strategy

#### 1C. Please indicate which category the activity specified in Section 1B above relates to.

|                             |                                 |                                              |                               |
|-----------------------------|---------------------------------|----------------------------------------------|-------------------------------|
| Developing a                | Policy <input type="checkbox"/> | Strategy <input checked="" type="checkbox"/> | Plan <input type="checkbox"/> |
| Adopting a                  | Policy <input type="checkbox"/> | Strategy <input checked="" type="checkbox"/> | Plan <input type="checkbox"/> |
| Implementing a              | Policy <input type="checkbox"/> | Strategy <input type="checkbox"/>            | Plan <input type="checkbox"/> |
| Revising a                  | Policy <input type="checkbox"/> | Strategy <input type="checkbox"/>            | Plan <input type="checkbox"/> |
| Designing a Public Service  | <input type="checkbox"/>        |                                              |                               |
| Delivering a Public Service | <input type="checkbox"/>        |                                              |                               |

#### 1D. Please provide the official title (if any) of the Policy, Strategy, Plan or Public Service document or initiative relating to the category indicated in Section 1C above.

Draft Clean Air Strategy for Northern Ireland

#### 1E. Please provide details of the aims and/or objectives of the Policy, Strategy, Plan or Public Service.

Northern Ireland's first Clean Air Strategy aims to deliver clean air for all, in Northern Ireland and beyond, to the benefit of human health and the environment. This Strategy sets out specific air quality strategic objectives and actions to further improve air quality in Northern Ireland from today and into the future.

**1F. What definition of 'rural' is the Public Authority using in respect of the Policy, Strategy, Plan or Public Service?**

Population Settlements of less than 5,000 (Default definition).

☒

Other Definition (Provide details and the rationale below).

☐

A definition of 'rural' is not applicable.

☐

*Details of alternative definition of 'rural' used.*

Default definition used.

*Rationale for using alternative definition of 'rural'.*

Default definition used.

*Reasons why a definition of 'rural' is not applicable.*

Default definition used.

## SECTION 2 - Understanding the impact of the Policy, Strategy, Plan or Public Service

### 2A. Is the Policy, Strategy, Plan or Public Service likely to impact on people in rural areas?

Yes ☒ No ☐ If the response is **NO** GO TO Section **2E**.

### 2B. Please explain how the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas.

This Strategy strives to deliver clean air for all across Northern Ireland and beyond. Through monitoring and scientific analysis, it has been shown that air pollution is often concentrated in urban areas, for example, due to traffic congestion, domestic combustion emissions, and industrial emissions. These are all compounded by high population density which increases the adverse impact on human health due to proximity of pollution and recipient. Air quality monitoring carried out by the local councils through the Local Air Quality Management system, helps to identify this pollution, and Air Quality Management Areas (AQMA) are put in place where necessary to reduce this pollution.

While the majority of air pollution in Northern Ireland is focused in these densely populated urban areas, other sources of pollution are known, including rural sources. The main sources are as follows:

- Nitrogen oxides (NO<sub>x</sub> includes NO, NO<sub>2</sub>); domestic and industrial combustion; energy production; and transport
- Sulphur Dioxide (SO<sub>2</sub>); combustion of fuels containing sulphur; industry; household heating
- Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>); industrial combustion; domestic combustion; road transport; formation from reactions involving other pollutants e.g. ammonia, SO<sub>2</sub>, NO<sub>x</sub>
- Ground-level ozone (O<sub>3</sub>); secondary pollutant formed by chemical reactions in presence of sunlight
- Ammonia (NH<sub>3</sub>); agricultural activities; waste
- Polycyclic Aromatic Hydrocarbons (PAHs); domestic combustion

Ammonia is the main rural air pollutant of concern in Northern Ireland, however, ammonia is not within the scope of this strategy and is covered in a separate strategy. Improving air quality in urban areas will have a positive impact on air quality in rural areas, and vice versa.

### 2C. If the Policy, Strategy, Plan or Public Service is likely to impact on people in rural areas differently from people in urban areas, please explain how it is likely to impact on people in rural areas differently.

The Clean Air Strategy itself will have little or no different impact on people in rural areas, compared to those in urban areas. It is the policies, legislation, guidance and implementation of actions that flow from the Strategy that may have the potential to impact rural people differently. Such policies and legislation will be considered separately to the Strategy for screening purposes, and screening may not be for DAERA to undertake.

For example, in theory, people living in rural areas could experience distinct impacts from the implementation of the Clean Air Strategy depending on the precise detail of the policies being developed and how they are implemented. This can be due to differences in infrastructure, population density, and access to services compared with urban communities. While the Strategy aims to deliver clean air for all, several factors mean rural residents may have different experiences. One such difference may be access to heating sources. Rural households are less likely to be connected to the gas network, meaning the phase-out of coal and certain solid fuels may affect them more acutely. Limited availability of alternative fuels, or increased costs associated with transporting them, could heighten the risk of fuel poverty. If affordable alternatives are not accessible, some households may tend to burning wet wood sourced from their own land, creating pockets of highly localised air pollution with adverse human health impacts. Housing and energy efficiency challenges also differ. Many rural homes are older, off-grid, or structurally less suited to quick upgrades. Retrofitting to accommodate cleaner heating technologies—such as heat pumps—may cause greater disruption and expense for rural families. However, rural properties often have larger plots of land, offering greater potential for ground source heat pumps, which could deliver long-term benefits if adequately supported.

For these reasons, this policy, once developed, will be screened separately.

Transport could be another issue. Rural workers rely more heavily on private vehicles for commuting due to reduced public transport availability. Longer travel distances mean higher exposure to fuel costs and transport-related emissions, both of which contribute to overall air quality and household expenditure. These pressures may intensify if cleaner transport options or refuelling infrastructure are slower to roll out in rural regions.

Overall, while the Clean Air Strategy provides health and environmental benefits for all, rural communities may experience more complex transitions depending on the exact implementation of the actions by the relevant departments involved. All relevant policies etc will be screened separately at the appropriate time.

**2D. Please indicate which of the following rural policy areas the Policy, Strategy, Plan or Public Service is likely to primarily impact on.**

|                                                     |                                     |
|-----------------------------------------------------|-------------------------------------|
| Rural Businesses                                    | <input checked="" type="checkbox"/> |
| Rural Tourism                                       | <input type="checkbox"/>            |
| Rural Housing                                       | <input checked="" type="checkbox"/> |
| Jobs or Employment in Rural Areas                   | <input checked="" type="checkbox"/> |
| Education or Training in Rural Areas                | <input type="checkbox"/>            |
| Broadband or Mobile Communications in Rural Areas   | <input type="checkbox"/>            |
| Transport Services or Infrastructure in Rural Areas | <input checked="" type="checkbox"/> |
| Health or Social Care Services in Rural Areas       | <input checked="" type="checkbox"/> |
| Poverty in Rural Areas                              | <input checked="" type="checkbox"/> |
| Deprivation in Rural Areas                          | <input checked="" type="checkbox"/> |
| Rural Crime or Community Safety                     | <input type="checkbox"/>            |
| Rural Development                                   | <input checked="" type="checkbox"/> |
| Agri-Environment                                    | <input checked="" type="checkbox"/> |
| Other (Please state)                                | <input type="text"/>                |

**If the response to Section 2A was YES GO TO Section 3A.**

**2E. Please explain why the Policy, Strategy, Plan or Public Service is NOT likely to impact on people in rural areas.**

N/A

## SECTION 3 - Identifying the Social and Economic Needs of Persons in Rural Areas

**3A. Has the Public Authority taken steps to identify the social and economic needs of people in rural areas that are relevant to the Policy, Strategy, Plan or Public Service?**

Yes ☒ No ☐ If the response is **NO** GO TO Section **3E**.

**3B. Please indicate which of the following methods or information sources were used by the Public Authority to identify the social and economic needs of people in rural areas.**

|                                                                              |                                     |                      |                                     |
|------------------------------------------------------------------------------|-------------------------------------|----------------------|-------------------------------------|
| Consultation with Rural Stakeholders                                         | <input checked="" type="checkbox"/> | Published Statistics | <input checked="" type="checkbox"/> |
| Consultation with Other Organisations                                        | <input checked="" type="checkbox"/> | Research Papers      | <input checked="" type="checkbox"/> |
| Surveys or Questionnaires                                                    | <input checked="" type="checkbox"/> | Other Publications   | <input checked="" type="checkbox"/> |
| Other Methods or Information Sources (include details in Question 3C below). |                                     |                      | <input type="checkbox"/>            |

**3C. Please provide details of the methods and information sources used to identify the social and economic needs of people in rural areas including relevant dates, names of organisations, titles of publications, website references, details of surveys or consultations undertaken etc.**

Public health priorities and environmental/sustainable considerations were identified from the Clean Air Strategy Discussion Document (A Clean Air Strategy for Northern Ireland – Public Discussion Document). This consultation was launched in November 2020 and ran until February 2021. This consultation gave participants the opportunity to propose their suggested solutions to air pollution in Northern Ireland. Responses to the Discussion Document are summarised in the Synopsis of Responses and informed development of the Strategy, published in June 2022 ([https://www.daera-ni.gov.uk/clean\\_air\\_strategy\\_discussion\\_document](https://www.daera-ni.gov.uk/clean_air_strategy_discussion_document))

The [Programme for Government \(PfG\) 2024-2027](#) sets out how the Executive will create a brighter future to improve wellbeing for all. Through the 2024-2027 PfG, the Executive want a society focused on well-being with an economy that can grow sustainably whilst reducing our emissions and protecting our environment. Through our proposed actions we will take steps to support a fairer, cleaner, healthier future for all. The [DAERA Corporate Plan 2025-2027](#) also support implementation of this strategy by prioritising sustainable living, air and health. Other important information sources include:

- NISRA 2021 census data (in particular <https://www.nisra.gov.uk/publications/census-2021-main-statistics-housing-and-accommodation-tables>)
- [Air Pollution in Northern Ireland reports](#) (the most recent of which is 2024)
- [Air Pollutant Inventories for England, Scotland, Wales, and Northern Ireland](#) (most recent published September 2025: 2005-2023)
- [BHFNI Air Pollution and Mortality on the Island of Ireland report](#)
- [DfI Travel Survey for Northern Ireland](#)
- [Energy strategy/consultation](#)
- [Consultation on a new Fuel Poverty Strategy for Northern Ireland](#)
- <https://www.daera-ni.gov.uk/sites/default/files/publications/daera/Key%20Rural%20Issues%202023.pdf>

**3D. Please provide details of the social and economic needs of people in rural areas which have been identified by the Public Authority?**

The Discussion Document asked a number of air quality questions and the Synopsis of Responses captured a number of concerns linked to rural needs. For example, the question 'What are your views on using a population figure of 10,000 as a threshold that triggers the requirement to monitor air quality?' received some responses said a figure of 10,000 is inappropriate as this effectively rules the majority of rural Northern Ireland out of air quality monitoring. This would disproportionately negatively affect rural communities, who are impacted by the effects of air pollution from agriculture. Another example is wider comments made e.g. regarding transport emissions prompting comments such as, public transport needs to be made accessible throughout the rural areas.

Clean Air Strategy Discussion Document highlighted the Lough Navar Rural background monitoring station which monitors ozone (O<sub>3</sub>), larger particulate matter (PM<sub>10</sub>), fine particulate matter PM<sub>2.5</sub> and heavy metals. The most recent results are available in the DAERA Air Pollution in Northern Ireland 2021 report, which shows there were no exceedances for O<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> and heavy metals.

Social and economic needs of people in rural areas also includes warmth/ability to heat homes, healthy living environment, employment, and adequate transport. There are no actions in this strategy that will negatively impact these needs. When considering phasing out certain solid fuel restrictions, the availability of alternative heat sources in rural areas and/or limited connection to the mains grid (e.g. gas) will be carefully considered and mitigated throughout. The focus will very much be on 'phasing out'. Colleagues in DfC have approved our current approach. DAERA is committed to adhering to DfC guidance.

**If the response to Section 3A was YES GO TO Section 4A.**

**3E. Please explain why no steps were taken by the Public Authority to identify the social and economic needs of people in rural areas?**

N/A

## **SECTION 4 - Considering the Social and Economic Needs of Persons in Rural Areas**

### **4A. Please provide details of the issues considered in relation to the social and economic needs of people in rural areas.**

People living in rural areas experience a distinct set of social and economic needs shaped by geography, infrastructure, and access to services.

A core issue is access to affordable and reliable heat sources. Many rural households are not connected to the gas network and depend on solid fuels, meaning that policy changes, such as restrictions on coal or certain fuel types, can disproportionately affect them. These communities may face challenges with fuel availability, distribution constraints, rising costs, and a higher risk of fuel poverty. Limited access to alternatives may also encourage the burning of wet wood or locally felled timber, creating pockets of poor air quality with associated health impacts.

Transport is another critical need. Rural residents are significantly more reliant on private vehicles, with 90% of rural workers using their own transport compared with 82% of urban workers. Commutes are often much longer, on average more than 600 extra miles per year, due to reduced public transport, fewer local job opportunities, and greater distances between services. This has implications for household costs, time, and environmental impact, as well as for access to education, healthcare, and recreation.

Despite these challenges, rural areas also demonstrate strengths and growing opportunities. Population growth in rural Northern Ireland has outpaced urban areas by almost three to one in recent decades, signalling their attractiveness as places to live. Broadband availability has improved rapidly, with full-fibre services now available to 82% of rural households, supporting business development, remote working, and digital inclusion. Rural areas also play an important role in tourism, hosting six of the ten most visited paid attractions in 2022.

Overall, addressing rural social and economic needs requires balancing the drive for cleaner air and environmental protection with ensuring fair access to energy, transport, infrastructure, and economic opportunity for rural communities. Such issues will be considered more fully in policy specific screening during the implementation phase of the strategy.

## SECTION 5 - Influencing the Policy, Strategy, Plan or Public Service

**5A. Has the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, been influenced by the rural needs identified?**

Yes ☒

No ☐

If the response is **NO** GO TO Section **5C**.

**5B. Please explain how the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or delivery of the Public Service, has been influenced by the rural needs identified.**

The development of the Clean Air Strategy has been informed by the rural considerations and air quality impact that may affect rural communities. Throughout the drafting and development of the strategy, DAERA recognised that rural areas face unique social and economic challenges, as well as health advantages, particularly around heating, transport, infrastructure and agricultural activity, and has adapted the Strategy to ensure these needs are addressed in a balanced and evidence-based way.

Recognising that restrictions on coal and certain solid fuels could potentially create challenges such as affordability issues, supply constraints and increased risk of fuel poverty, the draft strategy recognises the need for an additional public consultation on this policy in the form of a call for evidence and further screening will be undertaken as part of that in due course. Thought will be given to potential unintended consequences such as greater use of wet wood and increased travel to access fuel supplies. By integrating these concerns, any future policies will aim to balance the protection of human health with the reality of heating needs in rural homes.

Rural transport needs also played a key role. With reduced public transport options and longer commute distances, rural residents rely heavily on private vehicles. This influenced the decision not to take forward a Low Emission Zone framework within the draft strategy, recognising that a uniform, urban-style approach would not be appropriate. Any future development of LEZs will instead fall to the Department for Infrastructure and district councils, ensuring flexibility tailored to local context.

Air quality monitoring requirements were another important consideration. While population-based thresholds for monitoring were considered, DAERA recognised that rural areas may still experience localised pollution problems. As a result, the draft strategy commits to reviewing and upgrading the monitoring network, and will consider the scope for automated stations, passive diffusion tubes and mobile monitors to ensure rural impacts are not overlooked. This demonstrates a commitment to science-based decision-making that reflects geographic diversity.

Finally, agricultural emissions, particularly ammonia, were scoped out of the draft Clean Air Strategy. Ammonia is instead addressed through the separate Draft Ammonia Strategy. This ensures rural communities receive a tailored, sector-specific approach while still contributing to shared air quality goals. Together, both strategies are designed to work in tandem to improve air quality across all of Northern Ireland, while ensuring that rural needs remain visible and integral to policy implementation.

If the response to Section **5A** was **YES** GO TO Section **6A**.



**5C. Please explain why the development, adoption, implementation or revising of the Policy, Strategy or Plan, or the design or the delivery of the Public Service, has NOT been influenced by the rural needs identified.**

N/A

## SECTION 6 - Documenting and Recording

**6A. Please tick below to confirm that the RNIA Template will be retained by the Public Authority and relevant information on the Section 1 activity compiled in accordance with paragraph 6.7 of the guidance.**

I confirm that the RNIA Template will be retained and relevant information compiled.



|                                                     |                                                                                     |
|-----------------------------------------------------|-------------------------------------------------------------------------------------|
| <b>Rural Needs Impact Assessment undertaken by:</b> | Kate Fitzsimmons                                                                    |
| <b>Position/Grade:</b>                              | Environmental Policy Advisor                                                        |
| <b>Division/Branch</b>                              | Air and Environmental Quality                                                       |
| <b>Signature:</b>                                   |  |
| <b>Date:</b>                                        | 29/01/2026                                                                          |
| <b>Rural Needs Impact Assessment approved by:</b>   | Amy Holmes                                                                          |
| <b>Position/Grade:</b>                              | 7                                                                                   |
| <b>Division/Branch:</b>                             | AEQ                                                                                 |
| <b>Signature:</b>                                   | Amy P Holmes                                                                        |
| <b>Date:</b>                                        | 6 Feb 2026                                                                          |