



Your Ref:  
Our Ref: Misc/1  
Date: 6<sup>th</sup> November 2009

Neighbourhood Statistics  
NISRA  
2 -14 Castle Street  
BELFAST  
BT1 1SA

Dear Sir/Madam

**Re: RESPONSE TO THE NORTHERN IRELAND MULTIPLE DEPRIVATION  
MEASURE 2009: CONSULTATION**

**Introduction**

I am writing to you on behalf of Omagh District Council in response to the 'Northern Ireland Multiple Deprivation Measure 2009' Consultation. I would also like to take this opportunity to thank Dr David Marshall and Ms Cathryn McBurney for their delivery of a very informative presentation at the public consultation event held at Omagh District Council Offices on 22<sup>nd</sup> September 2009.

The Council considers the updating of the Multiple Deprivation Measures as timely and necessary. The new Councils in May 2011 will be responsible for Community Planning and the Power of Well-being, as well as in some areas the development of new Area Plans. The Deprivation measures will be integral to the development of such Plans providing evidence and direction for Councils and other statutory bodies to target the areas and people with most need and skew resources as required.

The following comments and recommendations are the Council's formal response to this consultation.

**Geography**

The Council supports the use of Super Output Areas (SOA) as the core reporting geography as opposed to Ward populations as the SOAs provide a uniform and meaningful comparator of deprivation in areas of similar population size (2000 people). The use of Wards which range significantly in size can provide more distorted and less meaningful comparators. The new criteria will allow for meaningful comparisons across the whole of Northern Ireland.

**Methodology**

The Council is pleased to note that current data (2008/09) will be used to update the deprivation measures, as one of the faults in the construction of the previous deprivation measures was that they were based on historic, out-of-date data from the Census 2001 which did not always provide accurate or reliable comparative data, reflecting present day situations or requirements.

The Council wishes to comment on each of the seven deprivation domains as follows:-

**(i) Income Deprivation**

The Council agrees that adults and children in households in receipt of Housing Benefit should be included in the 'Income Domain' as it will provide a more accurate reflection of income deprivation within two of the most vulnerable groups, children and older people.

**(ii) Employment Domain**

The Council supports the inclusion of 'Employment & Support Allowance' claimants in the updated domain, as it provides enhanced information on a further group who are benefits-dependent. The Council would wish to see the inclusion of the new scheme, 'Steps to Work' once it has been fully implemented across Northern Ireland. The Council also believes it is important to try to capture data on those who are termed the 'hidden unemployed'. In many instances the hidden unemployed are women who do not work outside the home environment, and this information would be useful for example when trying to target 'women returners' to the work or training environment.

**(iii) Health Deprivation and Disability Domain**

The Council concurs with the inclusion of the four additional proposed indicators. The Council sees a close correlation in the emergency admissions to A&E indicator with the Proximity to Services indicator. In rural areas, such as Omagh and surrounding district, where Acute Medicine and Accident and Emergency Services have been withdrawn from the Tyrone County Hospital, there is an indicative increase in health deprivation due to the distance to travel to access emergency care at alternative acute hospitals.

**(iv) Education, Skills and Training Domain**

The Council agrees with the three proposed changes to this domain and particularly welcomes the inclusion of primary school level data. The Council also welcomes the ranking of the working age adults with no or low level qualifications as this will provide additional information for the education and training sector when targeting resources or drawing down funding towards essential skills and occupational skills.

**(v) Proximity to Services Domain**

The Council is particularly keen to see additional information included in the indicators relating to proximity to services as this is particularly relevant to the rural areas. The inclusion of the indicators proposed are welcome and particularly the frequency and timing of public transport, car ownership data and cross border data in relation to access for residents from the North to A&E hospitals and large service centres in the Republic of Ireland are all very relevant indicators. This Council is particularly mindful of how the deprivation data was utilised in the past, particularly in relation to cross border proximity to services, to make major political decisions such as the siting of the new acute hospital for the South West.

The Council is also pleased to note that in calculating geographical access, time taken to travel to a service will be used rather than road mileage. This will provide more accurate data, as many rural roads are Class B and C which means journey



times to access facilities or services are longer than travelling the same distance in an urban area or on motorways/Class A roads. With regard to 'time', being determined by the 'time it takes to travel by car', the Council would have concerns if this is the only method used. Rural areas can be heavily reliant on public transport for access to services and indeed the lack of public transport in certain areas can also result in major difficulties in accessing services such as Acute hospitals, Primary Care facilities, Post Offices, Banks, large service centres etc. There is also the issue of travel speeds on roads of varying classes, with most Grade B and C roads permitting a speed of no more than 30 mph due to poor infrastructure.

#### **(vi) Living Environment Domain**

The Council agrees with the use of the Decent Home Standard and the inclusion of the Health and Safety Rating systems when determining deprivation in terms of quality of housing, access to suitable housing and the outdoor physical environment. The Council believes that information relating to overcrowding as set out in the 2001 Census is outdated and would no longer be reliable data for inclusion. The Council notes that SOA level of homelessness will now replace District Council average level homelessness data used in NIMDM 2005.

#### **(vii) Crime and Disorder Domain**

The Council supports the need to expand the sources of data regarding crime and disorder, particularly given the limited reporting to the PSNI and less likely reporting of crime or disorder in deprived areas. The inclusion of crime and disorder data from the Northern Ireland Housing Executive and from Local Councils is welcome.

#### **Combination of Multiple Deprivation Measures**

The Council notes that the weighting of the multiple deprivation measures will remain as in 2005.

#### **Dissemination of Results**

The Council notes that the NIMDM Report will be available in March 2010. It is important that the Report is disseminated as widely as possible. It would be beneficial for NISRA to schedule a number of public awareness raising events to bring the new deprivation measures to the attention of as wide an audience as possible. The Council is aware that much of the statistical information within the deprivation measures is used to source funding for specific target groups or projects however, it would be useful if NISRA could highlight other important uses for the deprivation measures so as to increase the knowledge of end users as to the usefulness of the data.

#### **Conclusion**

The Council considers the updating of the Multiple Deprivation Measures as timely and necessary. On the whole the recommendations set out in the consultation document are valuable additions to the existing data and the use of up-to-date data is very welcome given that the Census 2001 is of questionable benefit today.

The Council would also like to take this opportunity to highlight some issues which it regards as adding to deprivation but which are not recognised in any of the domains set out. The lack of or poor broadband coverage and mobile phone coverage, the poor roads infrastructure in many of the rural areas and the lack of or limited public transport all contribute to deprivation but these are not captured sufficiently in the measures set out.

On behalf of Omagh District Council I wish to thank you for the opportunity to respond to this consultation and we await the final Report in 2010.

Yours faithfully

**D McSORLEY**  
Chief Executive