Draft Rural White Paper Action Plan

Response to the Consultation by Rural Community Network

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Background to RCN

Rural Community Network (RCN) is a regional voluntary organisation established in 1991 by local community organisations to articulate the voice of rural communities on issues relating to poverty, disadvantage, equality, social exclusion and community development. Our vision is of vibrant, articulate, inclusive and sustainable rural communities across Northern Ireland contributing to a prosperous, equitable, peaceful and stable society. Our mission is to provide an effective voice for and support to rural communities, particularly those who are most disadvantaged.

RCN has 380 members across Northern Ireland. Its Board is representative of its membership base with more than half of its representatives (12) elected democratically from the community. The remaining representatives are a mix of organisations that provide support or have a sectoral interest within rural communities. RCN’s aims are:

- to empower the voice of rural communities
- to champion excellence in rural community development practice
- to develop civic leadership in rural communities
- to actively work towards an equitable and peaceful society
- to promote the sustainable development of rural communities

Rural communities make up approximately 35% of the population of Northern Ireland.

Rural Poverty

Rural Poverty manifests very differently from poverty in urban areas:

- It is not spatially concentrated and is therefore more difficult to identify. Rural poverty is clearly associated with the remote rural regions although obviously not confined to them. The New Policy Institute\(^1\) found, for example, that disadvantage was more prevalent in western districts of Northern Ireland.
- The average gross weekly earnings of people in rural areas in Northern Ireland from 2001 to 2006 was consistently below those living in urban, with the lowest rate of growth occurring in ‘less accessible rural’ areas where, according to the local government based definition of rural, 32% of the Northern Ireland population live.
- Rural poverty exists amongst relative affluence.
- People in rural communities are less likely to identify they are in poverty and there is a culture of “making do”.

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In 2007-08 in Northern Ireland, of those who earned 50% below the United Kingdom (UK) Mean Income Before Housing Costs, almost half (46% of individuals) lived in rural areas.  

54% of households living in rural areas were in Fuel Poverty.

**Introduction**

RCN welcomes the opportunity to comment on the draft Rural White Paper Action Plan (hereafter referred to as the Action Plan). RCN has long lobbied government for the introduction of a Rural White Paper. RCN’s Network News of Spring 2004 called for the introduction of a Rural White Paper for Northern Ireland. The view of the organisation then was that a Rural White Paper should begin to develop an integrated approach to the development of rural areas. We stated that, in effect, a Rural White Paper should be a blueprint for the future of rural society that represents a holistic approach to the needs of rural communities across government. RCN’s Annual General Meeting and conference in 2008 was themed around the introduction of a Rural White Paper following the commitment given by Minister Gildernew to introduce a Rural White Paper.

This response is based on extensive consultations carried out across Northern Ireland in May and early June 2011. RCN, in partnership with Northern Ireland Rural Women’s Network and the local Rural Support Networks, carried out a series of workshops that included input from DARD officials as well as facilitated discussion with participants to gather a wide range of opinions on the content of the Action Plan. The workshops were also a means to foster debate amongst rural stakeholders on the Action Plan and to encourage groups and individuals to respond to the consultation. Workshops were held with:

- East Down Rural Community Network in Downpatrick on 10.05.11
- The Armagh Down and Antrim Rural Network in Bleary Co Armagh on 11.05.11
- Omagh Forum for Rural Association, Strabane & District Community Network and Community Organisations of South Tyrone and Areas in Newtownstewart on 11.05.11
- Fermanagh Rural Community Network in Enniskillen on 16.05.11
- North Antrim Community Network and South Antrim Rural Network in partnership with North East Region LAG and GROW South Antrim LAG in Ballymena on 17.05.11
- Strabane & District Community Network and North West Community Network in Benedy, Co Derry on 25.05.11
- Cookstown & Western Shores Area Network in Stewartstown on 26.05.11

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2 Source Family Resources Survey Urban Rural Report Northern Ireland 2007-2008 (DSDNI)

3 2009 Northern Ireland House Condition Survey Statistical Annex NIHE
We also facilitated workshops in partnership with several sectoral groups to ensure a broad spread of opinion and views were heard. Workshops were held with groups of women, young people, disabled people and older people. Finally a workshop was held focusing on environmental issues. Details of the sectoral workshops are as follows:

- Northern Ireland Rural Womens’ Network in Dungannon on 09.05.11
- Youth Action NI and COSTA Rural Support Network in Caledon on 18.05.11
- Disability Action in Cookstown on 23.05.11
- Ards Peninsula Connecting Seniors Group in Ballywalter, Co. Down on 25.05.11
- Northern Ireland Environment Link in Belfast on 01.06.11

Throughout the consultation process, we spoke to over 180 people.

Our response to the consultation will make general points on some of the over-arching issues relating to the Action Plan. We will then comment in detail on the vision, policy priorities and the actions under each theme.
RWP Action Plan General Comments

RCN is concerned to see that this is not in fact a Rural White Paper and has emerged as an Action Plan. The fact that no Rural White Paper is planned is unfortunate as we believe the introduction of a Rural White Paper would have put the issues faced by rural communities more firmly on the agenda of the NI Executive. In our view, a Rural White Paper should be a framework for Ministers and their officials to take a strategic and cross cutting look at policies that affect rural areas and the changing context within which they operate. A Rural White Paper should give new drive to rural policy, develop new ways of working across Departments and set new targets for achievement. It is unclear whether or not the Action Plan in its current format can achieve these ambitions.

Recommendation 1: That DARD moves forward with a legislative framework to move the final Action Plan to a full Rural White Paper passed through the NI Assembly.

RCN is of the view that the most important yardstick for the Action Plan will be the difference it makes to rural communities and especially disadvantaged people living in rural communities. Despite our reservations on its status and the fact that it is not to be backed up with a Rural White Paper, RCN broadly welcomes the Action Plan. For the first time the NI Executive has brought forward an over-arching statement of policy priorities and actions that focus on the needs of rural communities and includes commitments from all government departments except OFMDFM. This, in itself, is a significant achievement by the former Minister and her officials and represents a foundation on which to build the case for a renewed focus by policy makers on the needs of rural communities.

The Action Plan, in RCN’s view, moves rural policy and rural issues, long perceived within government as the primary responsibility of DARD, onto the agenda of all the other Assembly Departments. We believe this to be a move in the right direction which should encourage all Departments to start focusing on how they deliver their statutory commitments to meet the needs of rural areas. We hope that the consensus building approach adopted by the Department in the development of the Action Plan will lead to more cross departmental working on rural issues.

RCN welcomes the recognition afforded by the Action Plan to the linkages between rural and urban areas. We concur that rural communities do not exist in isolation and that rural dwellers travel to towns and cities to access employment, education and services. However RCN is of the view that linkages between urban and rural communities and between rural communities are also important and that rural dwellers linkages are complex and non linear.
Recommendation 2: RCN recommends that the Action Plan acknowledge that the linkages and movement of rural dwellers is more complex than rural dwellers moving from rural hinterlands into urban areas. Linkages between rural areas and linkages between urban areas and urban dwellers and rural communities are just as important.

RCN welcomes the fact that one of the policy priorities is addressing disadvantage, poverty, social exclusion and inequality amongst those living in rural areas and, in particular, amongst vulnerable groups. However we are concerned that the language used “seek to minimise, where it exists” indicates that the Executive is not convinced that poverty in rural areas is a significant issue. Poverty, disadvantage, social exclusion and inequality remain a major issue in rural Northern Ireland and there are a range of government statistics and academic studies to underpin this assertion. We believe that the Executive should be setting itself the target of eradicating poverty in rural areas rather than seeking to minimise poverty. We welcome the commitment of the DARD Minister in bringing forward the Rural Anti-Poverty and Social Inclusion Programmes in the last Assembly term and we hope that the commitment given in the DARD budget to continue this fund still stands. The Rural Anti Poverty and Social Inclusion Programmes have enabled innovative approaches to be implemented in rural communities that have made a difference and we believe the Action Plan should include reference to this fund and the plans the Department has for its implementation in the incoming Assembly term.

Recommendation 3: That in the final Action Plan the wording “seek to minimise where it exists” is replaced with “eradicate poverty in rural Northern Ireland by 2020”.

We are heartened that the Action Plan contains some actions to address poverty within rural areas but we believe that it needs to consider how poverty and inequality in rural areas will be tackled in a systematic way, rather than as a programme within the Department and how the learning from the Rural Anti Poverty and Social Inclusion Programmes should be disseminated across all government Departments. Without this focus, the rural poor will continue to remain on the margins to policy makers. The Action Plan could be improved by prioritising between objectives and actions to ensure that the needs of vulnerable groups are sufficiently recognised in policy design and delivery.

Some actions identified in the plan are very specific and others are much more general. Whilst we accept that the nature of such an Action Plan, focusing across a wide range of issues, is complex we believe that many of the more specific actions would have happened regardless of the Action Plan and we would question the value of including them here. In our view, the Action Plan should focus on the added value and the new initiatives it is developing.

In the current economic climate, the tighter budgets available to the Assembly Departments were a recurring theme at the consultation workshops. We accept that the Action Plan
addresses this under the budgetary issues section and caveats around funding are included against some of the actions. We believe this is important in setting the context for the Action Plan and flags up the challenges that Departments face in delivering more with fewer resources.

**Recommendation 4: RCN encourages the Executive to continue to target resources at rural areas where disparities exist.**

We are concerned that the Action Plan makes very little reference to local government, the community sector or other “rural actors”. The absence of actions related to local government is a weakness in the Action Plan. In the context of further powers being devolved to local councils in the near future under the RPA process and the roll out of community planning, the Action Plan needs to re-consider how Departments can work more closely with councils who provide significant services to rural populations. Similarly the community and voluntary sector, sporting organisations, churches and other civil society institutions make an important contribution to resilient, sustainable rural communities.

**Recommendation 5: That additional actions are listed within the final Action Plan which emphasise the increasing role of local government in the delivery of localised programmes and resource allocation which impact on the sustainability of rural communities. The Action Plan should also identify the role of local government in delivering on the relevant actions.**

**Recommendation 6: That additional actions are listed within the final Action Plan which recognises, acknowledges and supports the role of the community and voluntary sector, sporting and cultural organisations and churches in promoting the well being and sustainability of rural communities.**

The Action Plan needs to address the specific challenges that coastal and fishing communities face. There is very little reference to marine or coastal issues although we welcome the action to implement the Rathlin Island Action Plan.

**Recommendation 7: That the Action Plan addresses the conservation of marine and coastal resources and the protection of landscape character recognising and supporting the important contribution these make to rural tourism.**

We welcome the recognition of the important role rural proofing can play in ensuring the differential impact of policy on rural areas is identified and appropriate mitigation is put in place. We commend the Department for its work on re-invigorating rural proofing by developing a toolkit for policy makers and tailored training courses for civil servants with a policy remit.
Recommendation 8: RCN recommends that DARD continues not only to share learning on rural proofing as the Action Plan suggests but also that DARD develops an analysis of how rural proofing has impacted on policy across Departments to lead to better outcomes for rural communities.

Issues over the definition of rural are still not fully resolved and this was a recurring theme throughout the consultation workshops. RCN would ask the Department to consider the following consultation comments:

- Some consultees were concerned that the Vision in the Action Plan refers to strong inter-linkages with urban areas and market towns implying that market towns were seen as part of “urban” when consultees considered them integral to rural communities.
- In a similar vein, the view was expressed that when using the “settlement pattern” definition a town like Coalisland is considered urban which consultees in that area strongly disagreed with.

Recommendation 9: As a consequence of these discussions which were expressed at several workshops and whilst accepting that the definitions of rural and urban will always be blurred, RCN recommends that DARD and other government departments continue to refine their thinking on this issue and examine any anomalous effects on policy making or resource allocation that the definition of rural throws up.

We welcome the discussion of the “degree of rurality” in the Setting the Scene section. We believe this should further explore how the “degree of rurality” affects the delivery of government policy and programmes e.g. in rural communities that are in close proximity to urban areas and which may be subject to development pressure compared with more remote rural communities where access to services and out-migration may be the key issues. Whilst this context setting is important, we are concerned that there are few actions in the Action Plan that take account of that diversity.

We believe the Action Plan could be strengthened further by more analysis of the specific challenges faced by the vulnerable in rural communities. For example, rural communities have an older demographic with issues relating to older people and fuel poverty, health, community safety, isolation and care. No specific reference was made to the needs of people with disabilities in rural communities and the additional challenges they face. Similarly the
document does not address issues of sectarianism and racism which, whilst less visible in rural communities, are still important issues that need to be addressed\textsuperscript{4}.

RCN believes that in terms of presentation, the Action Plan could be improved by;

- Including the policy priorities under each theme so the reader can clearly link them to the proposed actions.
- Being more definitive around the short, medium and long term timescales used in the Action Plan and removing any current overlap.
- Listing all the Departments, NDPBs and local government actors required to work together to effectively address each individual action.

\textsuperscript{4} For further discussion of these issues see Beyond Belfast; Contested Spaces in Urban, Rural and Cross Border Settings Bell J. et.al. published Nov 2010 by Community Relations Council and Rural Community Network
Rural Vision

We welcome the reference to a fair and inclusive rural society where rural dwellers enjoy the same quality of life as others in the region. However RCN believes that the vision should be strengthened by an explicit statement of support for the rights of rural dwellers to equity of service provision with their urban counterparts. We welcome the recognition of the importance of improved infrastructure and transport systems to ensure rural dwellers can avail of employment opportunities and key services.

It may be better to structure the vision around a series of commitments to rural people in areas such as health, education, employment, environment etc. so that the vision can be more grounded in the reality of the experience of rural communities. We believe the vision needs to make explicit reference to tackling the legacy of sectarianism in rural communities and exploring how services in rural communities can be delivered more efficiently if sectarian barriers are addressed.

Whilst the vision alludes to the beauty and uniqueness of rural places, we recommend that it explicitly recognises the importance of conservation of the natural environment and the sustainable development of land, coastal and marine resources across rural NI.

Recommendation 10: That the vision for rural is strengthened by an explicit statement that supports the rights of rural dwellers to equity of service provision with their urban counterparts.

Recommendation 11: That the vision for rural is strengthened by an explicit statement that recognises the continued cost of division within rural communities and commits to tackling sectarianism, racism and the legacy of the conflict to deliver services that are shared, efficient and effective.

Recommendation 12: That the vision for rural is strengthened by an explicit statement that recognises and supports the conservation of the natural environment sustaining land, coastal and marine resources across rural NI.

Policy Priorities

Whilst RCN welcomes the fact that tackling poverty, disadvantage, social exclusion and inequality is identified as a policy priority, we are concerned that there seem to be relatively few actions addressed towards this priority throughout the Action Plan. RCN contends that the lack of detail on how this important area will be addressed weakens the message around cross-departmental working to eradicate poverty, disadvantage, exclusion and inequality within and between rural communities.
We welcome the reference to fair and equitable access to key services but would ask that the Department considers strengthening this statement by changing the wording to “delivering fair and equitable access” rather than promotion.

RCN welcomes the reference to maximising employment opportunities for rural dwellers. RCN would ask that this commitment is strengthened by a specific reference to the Bain Review on the re-distribution of public sector jobs across the region and the inclusion of specific action(s) which commit Departments to the full implementation of this Review.

The policy priority to safeguard the beauty and fabric of our rural areas needs to include a reference to the importance of conservation and sustainable development. This must be balanced by the importance of the development of sustainable productive farming.

We welcome the policy priority to enhance and refine the Rural Development Programme to ensure the maximum benefit from future programmes for rural communities. To add weight to this policy priority RCN would recommend the Department include a specific statement which will ensure equity of support within any future RDP to both agricultural and rural development activities. This policy priority should also consider the creation of a better balance between capital investment in projects to improve access to basic services (e.g. community hall improvements etc.) and resource investment to improve the delivery of basic services (such as the delivery of community based health and wellbeing services) in rural communities.

We recommend the inclusion of a policy priority focusing on the specific community safety needs of rural communities.

We welcome the policy priority to support the development of a more sustainable agricultural sector. However RCN believes that this can be substantially strengthened by a specific reference to the importance of developing food security into the future.

The Action Plan needs to include a specific policy priority that recognises the importance of addressing sectarianism in rural communities as important in itself as well as the impact this has on service delivery in rural communities. This action should be led by OFMDFM.
Urban/Rural Linkages

Whilst there are specific rural references in the draft 10 Year Review of the Regional Development Strategy, in RCN’s view, the spatial framework in the RDS does not fully recognise the important function of rural communities beyond their role as consumers of services within sub regional centres and cities. In our response to the consultation, we stated that:

“Whilst we welcome the reference to maximising the potential of rural communities and areas we believe that this aim must, in order to be effective, commit to the need to sustain a strong and vibrant rural community. We accept that the strategic guidance on the rural area acknowledges the need to sustain rural communities and improve accessibility and connectivity but the lack of an overall aim and a positive statement recognising the contribution rural communities make is a retrograde step from the previous RDS. Only five paragraphs are given over to rural compared with a chapter on rural in the 2001 document. This needs to be expanded and synchronised with other policy documents including the Rural White Paper.”

RCN is concerned that the draft RDS fails to make clear connections to the importance of agriculture, forestry or fishing that remain important drivers in the rural economy.

RCN welcomes the action to better co-ordinate urban and rural regeneration funding where possible. The location of the Local Action Groups within Council clusters with key responsibilities for Delivery of Axis 3 of the Rural Development Programme should allow better co-ordination to occur when urban regeneration functions are devolved from DSD to local councils as part of the RPA.

RCN supports the actions to develop a new Community Safety Strategy that will take into account the needs of rural communities and we have made our views known through the consultation on the new Community Safety Strategy.
Access to Services

We welcome the commitment to the need to “promote fair and equitable access to key services for all rural dwellers, not only in terms of physical infrastructure, the road network and the provision of public transport”. However RCN is concerned that the majority of actions under this theme relate to either transport or broadband. Whilst access to better transport and improved telecommunications networks is important these issues should not be seen as solving all the problems rural dwellers have in accessing services.

Action 9: RCN is supportive of the need for road improvements, more innovative public transport services, more Park & Ride sites, better management of our transportation networks and improved road safety measures as alluded to under the delivery of the forthcoming Regional Transportation Strategy and we will make our response to this consultation.

Action 11 & 12: Rural transport needs to be efficient, accessible and affordable and we welcome this action that implies that DRD will “join up” transport resources in rural areas to sweat the available transport assets. This has been an issue that RCN and many other rural stakeholders have flagged up for many years. We would like to see further detail on how this might operate in rural areas but, in principle, we support this action. We also support the development of local public transport plans to ensure effective use of public transport in rural areas. Such plans need to include reference to the important role played by Community Transport in rural areas in linking isolated rural dwellers with public transport hubs. In addition these plans need to demonstrate the involvement of local people as transport users in the design and evaluation of a rural transport system. RCN is encouraged that DRD appears to be willing to engage with other Departments such as education and health to make best use of the transport assets already available in rural areas.

Action 14-21: RCN broadly welcomes the Actions to improve broadband connectivity and the telecommunications infrastructure for rural areas. However we would raise the following points:

- Promoting access to NI Direct and increasing the number of government services delivered online is not a “magic bullet”. Only 51% of NI households in 2009 had access to broadband internet, 37% of people who didn’t access the internet said this was because they had no access to a computer\(^5\). The Action Plan needs to recognise that older people, people with literacy problems and people living in poverty are less likely to have access to the internet. The implications of this rural digital divide need to be considered by policy makers.

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\(^5\) Source Continuous Household Survey 2008/09 Bulletin, Bulletin 8 July 2009, Published by the Central Survey Unit, NISRA
• A level of key statutory services will still need to be delivered in rural communities and improved broadband will be no substitute for that.
• Many people in our consultation workshops considered that improving mobile phone coverage across rural areas was a higher priority than improving broadband services.

**Recommendation 13:** That the priority within actions 14-21 should be to eradicate broadband and mobile phone “not-spots” within rural communities before further actions are taken on 3rd generation systems. A failure to address “not spots” will further exacerbate the digital divide within rural communities, increase geographical inequality and diminish the potential of those rural areas to attract inward investment.

**Action 23:** RCN welcomes the commitment to support the roll out of the Maximising Access to and Uptake of Benefits and Services Project as a means to address poverty and disadvantage in rural communities. In continuing this support RCN recommends the Department be aware of the potential of “the new poor” in rural areas who find themselves in these circumstances as a consequence of the recession and public sector cuts. This may require looking outside the areas of rural deprivation currently covered by the service.

**Action 24:** Whilst RCN is supportive of the intention of this action, “to develop services to address need”, as a general principle we are concerned that there is no specific detail on how need will be tackled or identified. This statement may be better included as a policy priority and needs to link to the Northern Ireland Anti Poverty Strategy under the leadership of OFMDFM.

**Actions 28-32:** RCN is supportive of the actions to ensure all young people in rural areas are entitled to a range of subjects in post primary schools under the Entitlement Framework. We are concerned that no reference has been made to support for youth work or informal education in rural communities and the role this could play in engaging young people in their community and enhancing opportunities for the personal and social development of young people.

**Recommendation 14:** RCN recommends that the Action Plan considers how youth work and informal education in rural communities is supported and broadened as an important contribution to the personal and social development of young people.

RCN welcomes the Actions to broaden community access to rural schools and the continued support for the Extended Schools programme. These actions were welcomed almost universally in our consultation workshops.
Recommendation 15: RCN recommends that the Action Plan considers the potential for extending shared education in rural areas to tackle empty desks, keep rural schools viable and promote diversity in education.

Recommendation 16: RCN recommends that this section should include a specific action to further extend the provision of accessible and affordable rural childcare to support the progress already made under the Rural Childcare Strategy.
Rural Communities

Action 34: RCN supports the commitment to implementing an enhanced rural proofing process across all government departments. This action, if implemented consistently across all Departments, should lead to policies and programmes that take account of the differential impact of policy on rural areas and mitigate these effects.

Actions 35-38: RCN welcomes the commitment to continue to build social housing in rural areas. Demand for social housing will continue to grow with the current economic climate, increasing unemployment, falling incomes and difficulty accessing credit. We welcome the commitment to continue to improve housing conditions in rural areas but are concerned at the caveat “subject to funding” accompanying this action. Levels of housing unfitness, whilst declining, are highest in rural areas particularly Omagh and Fermanagh District Council areas and RCN believes that continued investment in the rural housing stock is required. Any social housing development in rural communities should seek to incorporate the latest carbon zero/neutral technology to mitigate the impact of climate change and combat fuel poverty. Rural Housing policy should also take into consideration the impact of developments on the wider environment including sewage disposal.

Recommendation 17: RCN recommends that DSD continues to invest in improving housing conditions in rural areas.

Recommendation 18: RCN recommends that DSD set a target for the number of social housing units to be delivered in rural communities on an annual basis.

Recommendation 19: RCN recommends that the NIHE continues to develop and provide ongoing latent demand testing in rural areas to uncover “hidden” demand for social housing.

Recommendation 20: RCN recommends that DSD continues to monitor the role of the private rented sector in providing housing in rural areas and considers if regulation of the private rented sector should operate differently in rural areas.

Recommendation 21: RCN recommends that funding for Living Over the Shop schemes and group repair schemes in rural towns and villages be re-instated. As well as the benefits these can provide for individual tenants and owners these schemes can make a significant contribution to improving the streetscape in rural towns and villages. Such schemes should

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complement work being promoted by the Rural Development Programme under the Village Renewal measure.

**Recommendation 22:** RCN recommends that DSD and NIHE consider the particular difficulties presented by homelessness in rural areas and emergency homelessness in particular. NIHE must continue to promote awareness of homelessness services available to the wider community.

**Action 35:** RCN welcomes the proposal to promote and develop further Shared Future housing in rural areas.

RCN is concerned that the Action Plan makes no reference to the scarcity of social housing for older people in rural communities.

**Action 39:** RCN supports the action to better identify and tackle the causes of poverty and disadvantage in rural areas and to promote social inclusion. One practical action that should be included is to further consider the impact of the application of the current Northern Ireland Multiple Deprivation Measures in underestimating the impact and extent of rural poverty. However RCN is concerned that the lead Department overseeing actions tackling poverty, inequality, social exclusion and community/good relations OFMdFM is listed only as a supporting department. RCN recommends that DARD ensure that OFMdFM take their rural responsibilities seriously and act as the lead department on this action with all other Departments being listed in a support role.

**Recommendation 23:** RCN recommends that NISRA, DARD and other government departments continue to refine their approach to the application of the NIMDM to allocate resources to tackle poverty in rural communities.

**Actions 40 & 41:** RCN welcomes the actions to ensure that the new Fuel Poverty Strategy takes account of the needs of rural households and houses due to the prevalence of fuel poverty in rural communities. These actions should also specifically highlight the need to promote energy conservation measures.

**Action 42:** RCN supports the intention behind the action to develop “Integrated local/regional community development structures with a strong rural component”. These structures need to be developed in partnership with the community sector in rural and urban areas to ensure community organisations buy into this process and that the new structures and community development plans at both regional and local level reflect the diverse needs of community organisations and communities.
Actions 43&44: People were strongly of the opinion that rural dwellers currently have little say in the planning and development of rural areas. RCN welcomes the review of the implementation of PPS21 but will this be anything more than an internal Planning Service Review? The Independent Review Panel established to look at how those currently not working within agriculture but living in rural areas could be accommodated within any new Planning Policy singularly failed to engage with this sector of the rural community. In light of this RCN has little confidence in a Planning Service which will serve the needs of a rural community beyond the farm gate.

Many participants at our consultation workshops were strongly of the opinion that the current planning regime in rural areas needed to be further relaxed. This was balanced by the view that we should not go back to the pre-PPS14 planning regime which, in many cases, led to over-development and large profits for private developers in building one off houses in the countryside. RCN maintain our opinion that unchecked development in rural areas is neither desirable nor sustainable but believe that the current planning policies will determine the type of people living in rural communities rather than the type of housing they live in. This has the potential to reduce, within a generation, the social and community infrastructure of our rural communities. In addition RCN continues to have concerns around the unintended but potential impact the current planning policy will have on community/good relations not only within rural communities but also in towns and villages as rural dwellers who are not able to build within their local areas make choices as to where it is safe to reside in local towns and villages. Such movement as a result of the PPS21 restrictions has the potential to create single identity rural communities and segregated and contested urban spaces both of which contradict the wider Executive’s vision for a modern Northern Ireland.

Recommendation 24: RCN recommends that DOE in its review of the implementation of PPS21 engage with a wide cross section of rural communities to ensure that any updated PPS21 will bring to future planning implementation an equitable balance between agriculture production, environmental protection and community preference.

Actions 46-49: RCN considers that the actions related to Health are a disappointment. We are concerned that no commitment has been given to equity of provision of health services for rural dwellers or a minimum guarantee of service. Concerns were expressed repeatedly at consultation workshops that DHSSPS didn’t appear to be contributing much to the Action Plan beyond their commitment to ensure that their various health promotion initiatives are appropriately targeted at rural communities. The need for better ambulance services and better access to emergency health care to ensure rural dwellers can reach an A&E hospital within one hour was emphasised at all our consultation workshops.
Recommendation 25: RCN recommends that DARD re-engage with DHSSPS with a view to bringing forward a series of strong and measurable commitments in the final Action Plan which will ensure equity of provision of health services for rural dwellers.

Recommendation 26: RCN recommends that health services should be delivered as locally as possible and that consultant clinics should move around rural hospitals to reduce journey times for outpatients.

Recommendation 27: RCN recommends that the DHSSPS continues to invest in the NI Ambulance Service to ensure rural dwellers have equity of access to emergency health care provision within one hour that is arrival at an A&E hospital.

Action 51: RCN welcomes this action if it reverses the trend of DEL withdrawing further education provision delivered in outreach settings in rural communities.

Recommendation 28: RCN recommends that DEL should re-examine the provision and participation of all age groups in its FE courses and consider how hard to reach groups in rural areas can be supported to access lifelong learning opportunities.

RCN is concerned that there is no consideration of the potential impact of community planning under this theme.

Actions 52-54: RCN considers that these actions fit better with the access to services theme and are contiguous with actions 28-29.
**Rural Economies**

RCN considers that the actions contained under the theme of rural economies should be broader in scope. Whilst agriculture, the agri food sector and tourism are important sectors within the rural economy, other sectors have the potential to grow and develop. Rural communities need a broad economic base from which to develop sustainably, a fact brought into sharp relief by the collapse of the construction sector in recent years and the disproportionate impact that this has had on rural communities. The Action Plan recognises this context on page 29 but the actions under this theme do not reflect the diversity of the rural economy.

This theme also needs to consider the essential tension between economic development in rural areas and the environment. This can lead to conflicting agendas and the potential for economic development to impact negatively on the environment and, therefore, tourism was discussed at several consultation workshops. RCN accepts that this will always be about finding an appropriate balance between economic development in rural areas and conserving the environment and landscape character to enhance tourism but the Action Plan needs to address this fundamental issue.

In terms of agriculture, there is a need to secure better farmgate prices for producers. Whilst this is an extremely complex issue in the context of globalised food production, the Action Plan needs to identify the practical steps the Executive can take to support local producers.

RCN welcomes Action 62 and supports the Executive’s aims to secure a fair share of the Common Agricultural Policy (CAP) budget, to ensure the CAP contains sufficient flexibility to tailor it to local needs and to simplify the CAP.

Actions 64-67: Whilst RCN welcomes the actions relating to rural tourism, we would make the following points:

- Tourism can lead to income for rural communities but we would question whether or not it will lead to sustained employment. Many jobs within the tourism and hospitality sector are part time, seasonal and can be poorly paid. The people who benefit most from tourism in rural communities will be those who already have assets such as pubs, restaurants, hotels and other attractions. Any rural tourism strategy should consider how any income derived from tourism can benefit the whole community.
- RCN considers that the role of culture (in its widest sense) is a key selling point for rural tourism. This needs to be marketed by NITB to differentiate rural tourism in Northern Ireland from the urban tourism offer of retail, restaurants and entertainment.
• Any rural tourism strategy or actions need to take into account the importance of effective and efficient transport links and public transport in particular to ensure visitors have accessible and affordable transport to rural attractions.

RCN welcomes the actions to promote Small and Medium Enterprise (SME) development as SMEs are particularly important in rural areas.

Action 69 to support rural businesses, particularly SMEs in tendering for public sector contracts, is welcome. We would support the introduction of a target for the procurement of public sector contracts by SMEs in Northern Ireland and a framework to support SMEs in winning public sector contracts similar to the “Opening Doors; The Charter for SME friendly Procurement” document published by the Welsh Assembly.

Recommendation 29: RCN recommends that the Action Plan commits to developing a framework for SME public sector procurement and sets a target to increase the proportion of public contracts won by local SMEs by 2016.

Action 78: RCN further welcomes the proposal to ensure public sector organisations source local food where possible to further boost the agri-food sector.

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The Countryside

Whilst mention is made of renewable energy, the actions listed under this theme appear to omit reference to several important issues in relation to the countryside. The Rural White Paper Stakeholder Advisory Group - Places Sub-Group Report made recommendations under ten topic areas, yet many of these recommendations have not been addressed by the Action Plan. Recommendations addressing the themes of biodiversity, sustainable rural environment and climate change in particular should be contained within the Action Plan.

**Recommendation 30:** RCN recommends that DARD re-visits the Places Sub group Report and include actions to address the themes of biodiversity, sustainable rural environment and climate change.

**Recommendation 31:** RCN recommends that an action exploring the feasibility of cycling tracks and paths off road in rural areas that link villages and towns is included in the Action Plan. This would provide potential for farm diversification and greener transport options in rural areas.

RCN is concerned that there is no action referring specifically to the importance of environmental designation (ASSIs etc.) as an important component of conservation in the countryside.

Action 82 should specifically seek to develop forestry for recreation as this would have health benefits for rural communities and could enhance rural tourism.

**Recommendation 32:** RCN recommends that the Action Plan seeks to develop forestry for recreation purposes.

**Recommendation 33:** RCN recommends that higher targets are set for re-cycling to reduce the need to send waste to landfill.

Action 85: Clarification of the roles and responsibilities around waste management targets would strengthen this action as local authorities hold responsibility for local waste targets.

Action 86: Whilst many consultees welcomed the proposal to reduce the bureaucratic burden on those working within the confines of EU Directives, scepticism was expressed as to how this would be achieved. RCN would like to see further detail of how this action will be implemented before commenting further.

Actions 87-90 on rural sustainable energy could be strengthened by including a commitment to developing community feed in tariffs which could generate revenue to subsidise local community services and projects. This would provide direct tangible benefits to local
communities from the harnessing of wind, wave and water resources. These actions could be further developed by linking the need to develop renewable energy resources with the manufacturing of renewable energy generating equipment that could support the SME engineering sector in rural communities and develop new products for export.

Recommendation 34: RCN recommends that the Action Plan examines the potential of developing community feed in tariffs for the generation of revenue for community benefit from harnessing renewable energy resources.

Recommendation 35: RCN recommends that as agri-environment measures, such as those in the Northern Ireland Countryside Management Scheme (NICMS), will be a key mechanism in halting biodiversity loss by 2016, a specific action on agri-environment measures should be included within this theme.
Implementation and Monitoring

RCN believes that the Action Plan should become integrated into the process of cross departmental working to address need and deliver policy and programmes to meet the needs of rural communities. We believe that DARD, led by the Minister, should conduct a major review of the Action Plan at the end of this Assembly term to enable progress to be gauged and new priorities and actions identified.

**Recommendation 36:** RCN recommends that actions agreed within the final Rural White Paper Action Plan are included within the Programme for Government currently being developed by the Executive.

RCN welcomes the fact that the Executive will monitor the implementation of the Action Plan on an annual basis or more regularly should specific issues arise in relation to the actions. The involvement of the DARD Minister as chair of the Interdepartmental Committee on Rural Policy is, we believe, fundamental to the delivery of the Action Plan. The Minister and Departmental officials must drive the Action Plan within government to ensure it remains on the Executive agenda in what will be a busy Assembly term. We recommend that the minutes of discussions at interdepartmental committee meetings be made available to the public through the Assembly website (in the same way as departmental committee minutes are available). This should enable stakeholders and citizens to at least keep track of the monitoring and implementation of the Action Plan and contribute further to transparency and accountability within government.

We are concerned that the implementation of the Action Plan makes no reference to how DARD will hold other departments to account for the commitments they have made in the Action Plan beyond the Interdepartmental Committee. We welcome the fact that the Interdepartmental Committee will hold at least two meetings per year jointly with representatives from the Rural White Paper Stakeholder Advisory Group.

**Recommendation 37:** RCN recommends that additional actions are included outlining how the Action Plan will be implemented with specific guidance on how non-compliance is both monitored and addressed.
CONCLUSION

RCN’s vision is of vibrant, articulate, inclusive and sustainable rural communities across Northern Ireland contributing to a prosperous, equitable, peaceful and stable society. Rural life is not a lifestyle choice for the vast majority of rural dwellers. Rural communities are where people were born, have their family and social networks and connections to community and land holding is very strong. We welcome the introduction of the Action Plan and RCN along with other rural stakeholders and rural people will watch with interest how it is implemented. The true test of the Action plan will be, as the former Minster points out in her foreword, if it can meaningfully improve the quality of life of those living and working in rural areas.
APPENDIX 1 RECOMMENDATIONS

Recommendation 1: That DARD moves forward with a legislative framework to move the final Action Plan to a full Rural White Paper passed through the NI Assembly.

Recommendation 2: RCN recommends that the Action Plan acknowledge that the linkages and movement of rural dwellers is more complex than rural dwellers moving from rural hinterlands into urban areas. Linkages between rural areas and linkages between urban areas and urban dwellers and rural communities are just as important.

Recommendation 3: That in the final Action Plan the wording “seek to minimise where it exists” is replaced with “eradicate poverty in rural Northern Ireland by 2020”.

Recommendation 4: We encourage the Executive to continue to target resources at rural areas where disparities exist.

Recommendation 5: That additional actions are listed within the final Action Plan which emphasise the increasing role of local government in the delivery of localised programmes and resource allocation which impact on the sustainability of rural communities. The Action Plan should also identify the role of local government in delivering on the relevant actions.

Recommendation 6: That additional actions are included within the final Action Plan which recognise, acknowledge and support the role of the community and voluntary sector in promoting well being and sustainability of rural communities.

Recommendation 7: That the Action Plan addresses the conservation of marine and coastal resources and the protection of landscape character recognising and supporting the important contribution these make to rural tourism.

Recommendation 8: RCN recommends that DARD continues not only to share learning on rural proofing as the Action Plan suggests but also that DARD develops an analysis of how rural proofing has impacted on policy across Departments to lead to better outcomes for rural communities.

Recommendation 9: As a consequence of these discussions which were expressed at several workshops and whilst accepting that the definitions of rural and urban will always be blurred, RCN recommends that DARD and other government departments continue to refine their thinking on this issue and examine any anomalous effects on policy making or resource allocation that the definition of rural throws up.
Recommendation 10: That the vision for rural is strengthened by an explicit statement that supports the rights of rural dwellers to equity of service provision with their urban counterparts.

Recommendation 11: That the vision for rural is strengthened by an explicit statement that recognises the continual cost of division within rural communities and commits to tackling sectarianism, racism and the legacy of the conflict to deliver services that are shared, efficient and effective.

Recommendation 12: That the vision for rural is strengthened by an explicit statement that recognises and supports the conservation of the natural environment sustaining land, coastal and marine resources across rural NI.

Recommendation 13: That the priority within actions 14-21 action should be to eradicate broadband and mobile phone “not-spots” within rural communities before further actions are taken on 3rd generation systems. A failure to address “not spots” will further exacerbate the digital divide within rural communities, increase geographical inequality and diminish the potential of those rural areas to attract inward investment.

Recommendation 14: RCN recommends that the Action Plan considers how youth work and informal education in rural communities is supported and broadened as an important contribution to the personal and social development of young people.

Recommendation 15: RCN recommends that the Action Plan considers the potential for extending shared education in rural areas to tackle empty desks, keep rural schools viable and promote diversity in education.

Recommendation 16: RCN recommends that this section should include a specific action to further extend the provision of accessible and affordable rural childcare to support the progress already made under the Rural Childcare Strategy.

Recommendation 17: RCN recommends that DSD continues to invest in improving housing conditions in rural areas.

Recommendation 18: RCN recommends that DSD set a target for the number of social housing units to be delivered in rural communities on an annual basis.

Recommendation 19: RCN recommends that the NIHE continues to develop and provide ongoing latent demand testing in rural areas to uncover “hidden” demand for social housing.
Recommendation 20: RCN recommends that DSD continues to monitor the role of the private rented sector in providing housing in rural areas and considers if regulation of the private rented sector should operate differently in rural areas.

Recommendation 21: RCN recommends that funding for Living Over the Shop schemes and group repair schemes in rural towns and villages be re-instated. As well as the benefits these can provide for individual tenants and owners these schemes can make a significant contribution to improving the streetscape in rural towns and villages. Such schemes should complement work being promoted by the Rural Development Programme under the Village Renewal measure.

Recommendation 22: RCN recommends that DSD and NIHE consider the particular difficulties presented by homelessness in rural areas and emergency homelessness in particular. NIHE must continue to promote awareness of homelessness services available to the wider community.

Recommendation 23: RCN recommends that NISRA, DARD and other government departments continue to refine their approach to the application of the NIMDM to allocate resources to tackle poverty in rural communities.

Recommendation 24: RCN recommends that DOE in its review of the implementation of PPS21 engage with a wide cross section of rural communities to ensure that any updated PPS21 will bring to future planning implementation an equitable balance between agriculture production, environmental protection and community preference.

Recommendation 25: RCN recommends that DARD re-engage with DHSSPS with a view to bringing forward a series of strong and measurable commitments in the final Action Plan which will ensure equity of provision of health services for rural dwellers.

Recommendation 26: RCN recommends that health services should be delivered as locally as possible and that consultant clinics should move around rural hospitals to reduce journey times for outpatients.

Recommendation 27: RCN recommends that the DHSSPS continues to invest in the NI Ambulance Service to ensure rural dwellers have equity of access to emergency health care provision within one hour.

Recommendation 28: RCN believes that DEL should be looking at the provision and participation of all age groups in its FE courses and considering how hard to reach groups in rural areas can be supported to access lifelong learning opportunities.
Recommendation 29: RCN recommends that the Action Plan commits to developing a framework for SME public sector procurement and sets a target to increase the proportion of public contracts won by local SMEs by 2020.

Recommendation 30: RCN recommends that DARD re-visits the Places Sub group Report and include actions to address the themes of biodiversity, sustainable rural environment and climate change.

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Recommendation 37: RCN recommends that additional actions are included outlining the Action Plan will be implemented with specific guidance on how non-compliance is both monitored and addressed.