Response to the DARD 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 350 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 40% of the population of Northern Ireland.

Rural Poverty

Promoting social inclusion, poverty reduction and economic development in rural areas are key priorities of the proposed Rural Development Programme 2014-2020. RCN welcomes the focus on poverty reduction and social inclusion as rural poverty manifests very differently from poverty in urban areas:

- It is not spatially concentrated and households in poverty in rural areas exist alongside households that are relatively affluent. It is, therefore, and is more difficult to identify.
- People in rural communities are less likely to identify that they are in poverty and there is a culture of “making do”.
- Rural poverty is clearly associated with the remote rural regions although obviously not confined to them. Work carried out by the New Policy Institute1 and published by the Joseph Rowntree Foundation found that poverty is higher in the west of Northern Ireland than in the east. For example, in the rural west 24% of people are in poverty as are 23% in the urban west compared with 17% in poverty in both the rural and urban east of Northern Ireland.

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In 2010-11 in Northern Ireland, of those who earned 60% below the United Kingdom (UK) median income after housing costs 36% of individuals lived in rural areas, 30% in the Belfast Metropolitan Urban Area and the other 34% in urban areas.  

44% of households located in rural areas were in Fuel Poverty.  

No rural wards fall within the top 10% of the most deprived wards in Northern Ireland as defined by the NI Multiple Deprivation Measure. Even if examined at census output area level only 15 rural output areas fall within the top 10% of the most deprived output areas. Census output areas are very small level geographies of about 150 households. This is contradicted by the fact that, according to the Family Resources Survey quoted above, 36% of individuals in relative poverty live in rural areas.

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RCN Response to the Consultation

RCN’s consultation response is informed by our membership of the NIRDP 2014-2020 stakeholder group, our participation on the NIRDP Monitoring Committee and Equality Monitoring Committee as well as comments made by members of the public at 6 consultation seminars hosted by DARD in Aug/Sept 2013. RCN along with RDC, local RSNs and NIRWN facilitated round table discussions as part of these consultation seminars.

We welcome this opportunity to respond to the consultation and commend DARD’s commitment to public consultation on the programme. The large numbers in attendance at all of the consultation seminars demonstrates the wide interest in the Rural Development Programme across rural NI.

RCN accepts that the NIRDP cannot solve all the problems of rural areas, nor is that the intention of the programme. We do believe, however, that we should use the funding to maximise the benefit of the Programme to rural communities to meet the needs of farmers and the wider rural community as well as safeguarding and enhancing the environment.

The comments in this consultation response are qualified by the lack of detail at this stage in the consultation document. We understand the constraints that the Department were working under when drafting the consultation document and the limitations that has imposed. RCN are keen to see further detail on the final schemes proposed by the Programme, the funding attached to all the various priorities and schemes and the final implementation arrangements.

General comments

From our facilitation of focus groups at the NIRDP consultation seminars in August and September the following general themes emerged from many of the participants and their experiences of the current Rural Development Programme:

1. The need to reduce bureaucracy for applicants, unsurprisingly, was a constant theme. The need for business plans for relatively modest amounts of funding was deemed to be off-putting to smaller farmers, small businesses and less experienced community organisations. These were often the more marginalised groups that the NIRDP is aiming to help.

2. The recession has led to severe difficulties for project promoters in accessing match funding. The inability of project promoters to raise the required levels of match funding has been a huge brake on progress during the current RDP and will continue to be a problem at least in the medium term. Problems with project promoters raising match funding caused considerable difficulties for the administration of the previous programme with many promoters having to return funding which had been committed due to their inability to raise match funding. RCN recommends that DARD and LAG staff monitor the progress of project promoters in raising match funding to identify earlier potential funding that may be de-committed. We also recommend that DARD consider increased rates of contribution in kind or voluntary
hours worked in community organisations as a contribution to match funding that could be evidenced by groups and which would reduce the burden of raising match funding. The Department should also explore the potential for other Departments/Agencies to develop targeted programmes to support the match funding requirements of RDP. An example of this approach developed during the last Programme was the NIHE who used a budget stream within their control to allow groups to match fund Village Renewal or Basic Services projects if they contributed to regeneration in local areas that would benefit social housing tenants. For example, if RDP is funding childcare in rural communities, a case could be made for DE to provide at least some match funding potential to maximise the impact of the Programme in rural communities and encourage cooperation between department and agencies.

3. RCN would echo the concerns of many attendees at the DARD consultation events who questioned how the Programme would address the issues of migration out of rural communities as a result of the recession as well as the loss of vital rural services such as banks, post offices and schools.

4. The Programme does not make reference to young people although the Mid-term Evaluation of the current programme identified young people as a group in rural communities who had not benefited from the Programme

5. RCN is concerned that the Programme makes no reference to the issues of community relations, contested spaces and the legacy of the conflict in rural communities. The Equality Impact Assessment on the NIRDP 2014-2020 sets out in detail the equality issues affecting groups of differing religion and political opinion. It also states how some of these equality impacts between differing groups might be mitigated through the NIRDP. None of this detail is included in the NIRDP 2014-2020 consultation document. Community relations and the legacy of the conflict are fundamental issues that need to be addressed by all statutory agencies working in rural communities. RCN is of the view that schemes related to Priority 6 should include as a cross cutting principle the need to ensure all communities locally benefit from NIRDP investment. We accept that there are questions in the current programme applications about how programme promoters will ensure that the project will bring benefit to the wider community. This is particularly relevant to the community development/capacity building scheme, the Village Renewal scheme and the Basic Services scheme under Priority 6.

6. 94% of rural dwellers are no longer directly involved in farming so RCN would be of the view that the Department should reserve the right to transfer funding from Pillar one to pillar two if a case can be made for that transfer.

**Specific Comments on the Consultation Document**
As a rural community development organisation our comments will focus mainly on Priority 6 Promoting social inclusion, poverty reduction and economic development in rural areas. We will also make detailed comments on the Delivery Framework.

**Section 2 National Policies/Strategies Affecting the Development of the Rural Development Programme 2014-2020**

This section needs to reference the *Together Building a United Community Strategy* launched by OFMDFM in May 2013 which reflects the Executive’s commitment to improving community relations.

This section should also give an undertaking that any proposals arising from the Haass Talks process currently underway should inform the final draft and implementation of the Rural Development Programme.

**Section 3 Regulation Framework**

RCN welcomes the commitment from the Department to work with the Special EU Programmes Body to aim for complementarity between the proposed interventions under the Rural Development Programme and those proposed under the INTERREG V and Peace IV programmes.

**Section 4 Programme Development**

On the section on Strategic Direction (p23) we believe that the importance of building on the current schemes in both the rural development programme and tackling poverty and social isolation programme for the broader rural areas should stand alone as a separate point. It is crucial that the lessons from previous programmes for rural development and tackling poverty are learned.

RCN welcomes the Key targets for 2014-2020 Rural Development Programme to Develop and improve our rural areas through:

- Promoting economic growth through the provision of support for rural businesses and the rural tourism sector.
- Reducing poverty and social isolation through the provision of targeted support and pro-active measures to tackle existing inequalities; deprivation, and access to and standards of key services.
- Improving rural access through the provision of support for improvements to broadband infrastructure, the development of efficient rural transport systems and the provision of effective public e-government solutions.

We believe that the key target to promote economic growth should include a specific reference to support for the social economy in rural communities.

**Section 6 Proposed Rural Development Programme**
Priority 1

RCN strongly supports priority 1 Fostering Knowledge Transfer and Innovation as a cross cutting priority throughout the programme. We are strongly of the view that this priority should underpin all proposed schemes including those in Priority 6 which is focussed on promoting social inclusion, poverty reduction and economic development in rural areas. We believe that Priority Six should include a specific commitment to fostering knowledge transfer and innovation and that innovative demonstration projects tackling poverty and social exclusion need to be included under Priority one.

Priority 2

In light of the restrictions posed by the definition of “young farmer” in the proposed European legislation and in light of previous research and experience RCN agree that there is no case for a specific support scheme for young farmers.

We would, however, be in favour of a higher rate of support to applications from young farmers to incentivise them to take part in the various schemes within the RDP.

Priority 3

The Processing Investment Development Grant Scheme should focus investment on Tier 1 small scale food processors to encourage smaller processors to develop their businesses or encourage start-up businesses in this sector. Opportunities to develop processing capacity need timely investment. Small businesses availing of this scheme should have a funding decision as soon as is possible to ensure that market opportunities are not lost. The level of detail required in applications to this scheme should be commensurate with the level of grant support being sought.

Priority 5

The consultation seminars highlighted significant problems with renewable energy applications in the previous RDP. DARD needs to ensure that problems with connections to the grid are resolved as issues with NIE caused considerable problems to project promoters in the previous programme. RCN is supportive of allowing farmers to use electricity generated from renewables in the farm business as this may eliminate some of the issues with acquiring connections to the grid through NIE. In some areas grid may already be at capacity and there is no potential for additional micro generation to be fed into the grid.

Priority 6

We welcome the inclusion of the Priority of promoting social inclusion, poverty reduction and economic development in rural areas in this programme.

RCN supports the inclusion of a Basic Services measure and welcomes the approach adopted by the Department to work with other service providers to provide opportunities
for a community development approach for the delivery of key basic services which will improve the quality of life of rural dwellers. The adoption of a community development approach is vital to ensure that projects funded under the Basic Services measure deliver to meet locally identified need. In terms of knowledge transfer there may also be potential in DARD exploring work undertaken by the Plunkett Foundation in Britain in relation to the development of sustainable rural services such as community owned shops and pubs.

We welcome the inclusion of a community development and capacity building sub-measure which will provide support for the setting up and development of existing community infrastructure. The adoption of a community development approach should ensure flexibility for local communities to define what they view as an important local basic service and will enhance the village renewal scheme. RCN is of the view that this sub measure should support community infra-structure at both the sub-regional and local level. RCN would have liked to have seen more detail on how the community development and capacity building sub measure will be used to focus on the improvement of local basic services to tackle poverty and social isolation.

We broadly welcome the Strategic Services sub measure and the potential it offers to lever in additional resources from partner Departments and agencies. Without further detail it is difficult for us to comment further until we know the specifics of proposed projects in the areas of health solutions, transport, broadband and childcare. Proposed projects should complement the actions set out in the Rural White Paper Action Plan in relation to transport, broadband and telecommunications, health and education.

RCN recognises the importance of supporting small rural businesses through the proposed Rural Business Development Scheme, the Rural Business Investment Scheme and the Rural Tourism Scheme. We would question whether these types of schemes will have an impact on tackling disadvantage, poverty, social exclusion and inequality amongst those living in rural areas. Whilst these schemes will meet the stated objective to assist new and existing rural businesses to become sustainable and grow, there are no guarantees that any expansion in employment opportunities in the small business sector in rural areas will be taken advantage of by individuals who need it most. We believe that job opportunities and the additional wealth created by the development of small businesses in rural areas will not necessarily trickle down to the most disadvantaged in those communities.

RCN would advocate that the Department consider how these schemes can be implemented to ensure social as well as economic benefits. There may be scope for the Department to consider how rural dwellers that are further removed from the job market could be included as part of these schemes. The Department could include as part of the conditions of these schemes a stipulation which encourages employers to take on young people who have limited job experience and/or qualifications or long term unemployed people. Opportunities may exist to utilise European Social Fund monies to develop a scheme which enhances the objective of growing businesses in rural communities by ensuring that disadvantaged groups have a better chance of benefitting from this investment. This should fit with the stated aim within the consultation document to ensure complementarity with DETI, DEL and SEUPB funding programmes. Social clauses are part of the £110m Stadia Project being carried out currently by the Department for Culture, Arts, and Leisure. This
development is ring-fencing fully paid jobs and apprenticeships for the long term unemployed\(^4\). RCN would advocate that the Rural Development Programme adopt a similar approach to ensure the objectives of this priority are fully met.

RCN would propose that the Department consider an additional scheme to support the social economy in rural areas. A mapping exercise carried out by PWC and published in May 2013 identified that whilst social enterprise accounted for only 12% of the total number of third sector organisations in Northern Ireland it contributed 49% of overall turnover of third sector organisations\(^5\). This demonstrates the potential of the social economy to grow sustainably whilst delivering social objectives. If this is not achievable then we strongly recommend that the Department ensure that SMEs in the social economy sector are encouraged and supported to apply for the Rural Business Development Scheme, the Rural Business Investment Scheme and the Rural Tourism Scheme. One of the objectives of the Community Development Support provided by the Tackling Poverty and Social Isolation Framework is to promote the social economy and the RDP should seek to further this objective. There may also be scope for offering a scheme in this priority to support the development of renewable energy projects for community groups similar to the schemes offered to farmers under Priority five. Alternatively Priority Five could be made more open to the community and voluntary sector as it currently is restricted to agriculture, food and forestry.

RCN welcomes the inclusion of a Local Community Grant Fund in the Programme. We recommend that the Department apply learning from the implementation of the Rural Challenge Fund 2012/13 which also provided £10,000 grants to rural communities to address need in line with local area plans. We believe that the Department should continue to target the most disadvantaged rural communities with this scheme.

RCN supports the roll out of a further Village Renewal Scheme to provide financial support for the renewal of rural villages linked to the Village plans. RCN recommends that the Department consider how other schemes within the RDP can be used to add value to the Village Renewal Scheme and how other funding streams outside the RDP can complement Village Renewal to address the underlying issues that lead to disinvestment and dereliction in villages. There may be potential for Village Renewal and Village plans to complement or inform the wider Community planning process which will be introduced as part of the new powers of the reformed local councils. The imminent development of a Community Asset Transfer Framework by the Department of Social Development could make a significant contribution to Village Renewal. DARD needs to ensure the implications of any Community Asset Transfer proposals are factored into village renewal.

A practical concern in the implementation of the Village Renewal Scheme is that village plans should not restrict communities from undertaking initiatives which may not have been considered at the time the village plan was drafted. Bearing in mind that some Village Plans developed during the 2007-2013 Programme may be 5-10 years old at application stage.


new needs/issues are likely to have emerged. RCN recommends that some investment is
directed towards developing village plans with rural communities who have not benefited
from the previous RDP.

RCN broadly supports the concept of an All Island Co-operation scheme. We believe that
this may present opportunities to tackle back to back development that has exacerbated
poverty and social isolation in communities on both sides of the border. The Rural
Development programme in the Republic of Ireland needs to contain a similar scheme to
allow cross-border co-operation projects to be co-funded on both sides of the border. Any
All Island Co-operation scheme within the NIRDP needs to complement rather than
duplicate the work of INTERREG and Peace IV. Due to the limited amount of funding
allocated to this proposed scheme RCN is of the view that this scheme should focus on
Council areas that adjoin the border. We can only comment broadly on this proposed
scheme until further detail is presented.

**Delivery Framework**

The Leader approach and Local Action Groups, in particular, have been subject to
considerable criticism during this Rural Development Programme. These criticisms have
centred on delays in getting spend on the ground and over bureaucratic procedures and
processes. RCN is of the view that many of these issues were beyond the control of the
LAGs.

RCN would recommend that one Leader structure per Council area is adopted to reduce
bureaucracy. The LAGs and JCCs should merge into one structure with the power to devise
a strategy for their LAG area and overall responsibility for how funding is spent. These
organisational issues should be planned and implemented as part of the transition
arrangements between the two programmes and in advance of the new programme
commencing.

RCN agrees that the new Leader structures should re-form in line with the new Council
areas and boundaries. Whilst we acknowledge the difficulties experienced during this
programme by the LAGs we would contend that many of the difficulties were not of the
LAGs making. We believe that the level of spend allocated to the Leader approach should
be similar to the current Programme i.e. 20% of the overall rural development programme.
To reduce the Leader share of the funding significantly or even down to the minimum level
of 5% would mean that the Leader budget would be so small across the LAGs as to
completely negate their impact.

The schemes which focus on broad rural development should be delivered using the Leader
approach. Schemes which are aimed at farmers and landowners are probably better
delivered by DARD or agencies such as the Countryside Agri-Rural Partnership.

RCN is strongly of the view that the Leader methodology and principles should be retained
and strengthened and that the LAGs should have more flexibility to respond to local need
within the Programme to meet the diverse needs of rural communities across Northern
Ireland. RCN also believes that there may be merit in investing more resource in animation
work with local communities to ensure that the right type of projects are coming through to
various schemes. LAG staff has pointed to the difficulty of assessing complicated application forms which they knew wouldn’t reach the threshold for funding but which couldn’t be excluded without being fully assessed. This added considerably to staff workload and this process issue should be addressed in advance of a new programme opening for applications.

The LAGs in the new rural development programme should review their membership to ensure it as representative as it can be of the diversity of rural communities. We recognise the tension between retaining a core of LAG members both from the local government side and the social partners who have knowledge and experience of delivering previous programmes with the need to bring new people into the decision making process. RCN recommends that as part of the animation process the new LAGs should consider their succession strategy to ensure new leaders are developed whilst retaining a bank of skills and knowledge within each LAG. RCN recognises the voluntary commitment of LAG members from the social partners and the important role they perform. We also recognise that this is a role that many young people will not want to take on and realistically young people under 25 are unlikely to put themselves forward to become LAG members. We would advocate that section 75 groups who may not ordinarily put themselves forward to become LAG members should be involved in the development of the LAGs strategy and that the LAGs could consider establishing local Equality monitoring sub groups that meet twice a year to review progress in relation to S75 groups participation in the RDP.

A further suggestion could be a proposal for an RDP scheme that solely funds young people’s projects and the development of a project board which is made up of young people who have gone through a selection and training process. This approach could achieve the twin aims of getting money onto the ground for young people’s projects and training a cohort of young leaders who may in the future become LAG members.

RCN recommends that the Department conduct an audit of all funding allocated across all schemes in the previous programme to identify where funding was allocated and to identify potential gap areas that LAGs and the Department should focus their efforts on to animate applications from these areas for this programme.

RCN is of the view that if there are insufficient funds to support the proposed programme then the schemes under Priority 6 should be prioritised. 94% of the rural population are no longer involved in farming, but the majority of the Rural Development Programme is focussed on farmers and obviously farmers also receive direct payments under Pillar 1 of the CAP. The schemes under Priority 6 will benefit farmers, farm families and the wider rural community and should be protected from funding reductions.

The low rate of return of Section 75 monitoring forms has been highlighted as a failing within the current programme. A questionnaire return rate of 27% has made it very difficult to assess the equality impacts of the current programme. Whilst recent research\(^6\) has shown that the percentage of women who are LAG members has improved (37% of LAG members are women) the evidence does not exist to say whether or not women are being

\(^6\) Reference Gender Mainstreaming CAP research by Sally Shortall
discriminated against by the RDP or not. RCN recommends that DARD undertake to make it a condition of funding that Section 75 monitoring forms are returned by project promoters. It seems to us as if this is the only way that accurate monitoring data can be collected in enough volume to ensure that we can evaluate which groups of people are benefitting from the RDP and which aren’t.