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Rural Community Network

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27th November 2024

Consultation on Rural Needs Impact Assessment of Programme for Government 2024

We refer to our previous response submitted 4th November 2024 to the draft Programme for Government (hereinafter referred to as draft PfG) and now make our response for your consideration in relation to the draft Rural Needs Impact Assessment (hereinafter referred to as draft RNIA).

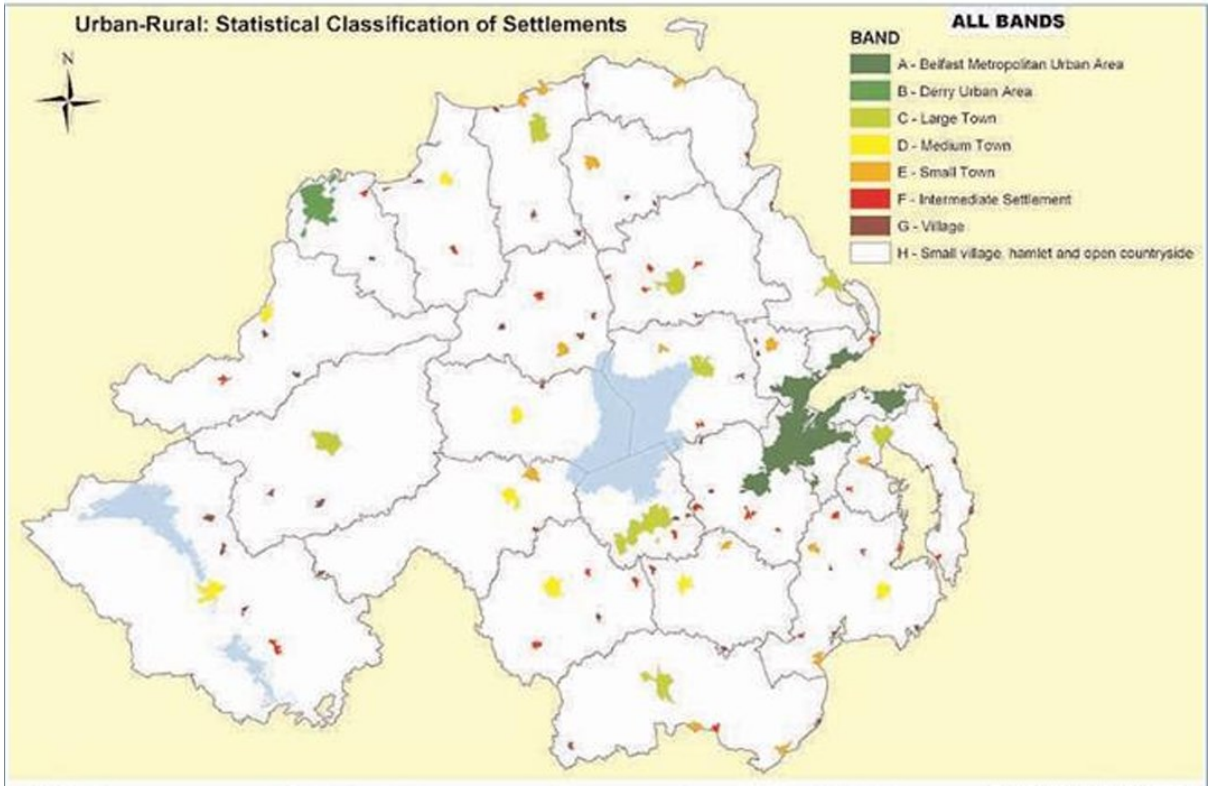
As you will be aware from our previous response, Rural Community Network (RCN) is a regional membership-based organisation supporting rural communities across Northern Ireland. RCN works with rural communities to address issues relating to poverty, inequality, community and good relations and strives to develop the capacity and skills of groups to articulate their voice at a policy influence level. We have over 200 member groups across rural Northern Ireland and as a result represent thousands of rural people.

We have held/attended the following consultation engagement sessions to help us form this response:

1. 1 online Engagement Session specifically on the draft RNIA with our Rural Support Networks who are members of RCN working on the ground in the heart of rural Northern Ireland
2. Discussions with rural advice sector
3. Discussions with rural housing sector
4. 3 joint online engagement sessions alongside NICVA, CO3, Volunteer Now and Development Trusts NI
5. 1 online Engagement Session with Rural Support Networks on draft PfG
6. 2 Face to Face Sessions: 1 Fermanagh 1 Cookstown
7. 1 online Engagement Session with CDHM

8. 1 online Engagement Session with Peace Summit

The Rural Needs Act (Northern Ireland) 2016[i] requires you, as Duty Holder, to give due regard to rural needs. It was concluded at the above sessions that the draft RNIA carried out as part of the draft PfG is not fit for purpose. There was a general consensus amongst the RSNs that it was not reflective of rural life and appears to misunderstand or misrepresent rural life. As such, it could not possibly be considered as giving "due regard" to rurality. All acknowledged significant disappointment given how vastly rural Northern Ireland is (see map[ii] below).



Two important issues were raised by the RSNs at the outset of our consultation. Firstly, you did not consult Rural Stakeholders. The draft RNIA advises us you did consult with "other stakeholders" but not with Rural ones. We would question who it was you consulted with and what if they have the competence and understanding to comment in detail on rural complexities?

Our RSNs believe that not consulting rural stakeholders is counterproductive and as such, you have failed to grasp the concept of rurality within the assessment. The example they cited was your comment "people living in rural areas have the same economic and social needs as other people". Whilst you then go on to add that "sometimes those needs have to be met in a different way due to rurality etc", the RSNs took issue with your initial statement because the social and economic need is not the same rurally. We agree that the needs require to be met differently but the needs themselves are also different. Examples of this differential include rural poverty being higher than urban poverty. [iii]Access to services is more difficult rurally[iv] and the rural premium to go to work, access education or childcare meaning it costs more to travel

and takes longer to travel to access necessary/required services. As such, “needs” rurally will include items such as two cars in a household or prioritising travel/fuel money over other expenses whilst in more urban settings these would not be considered a “need”.

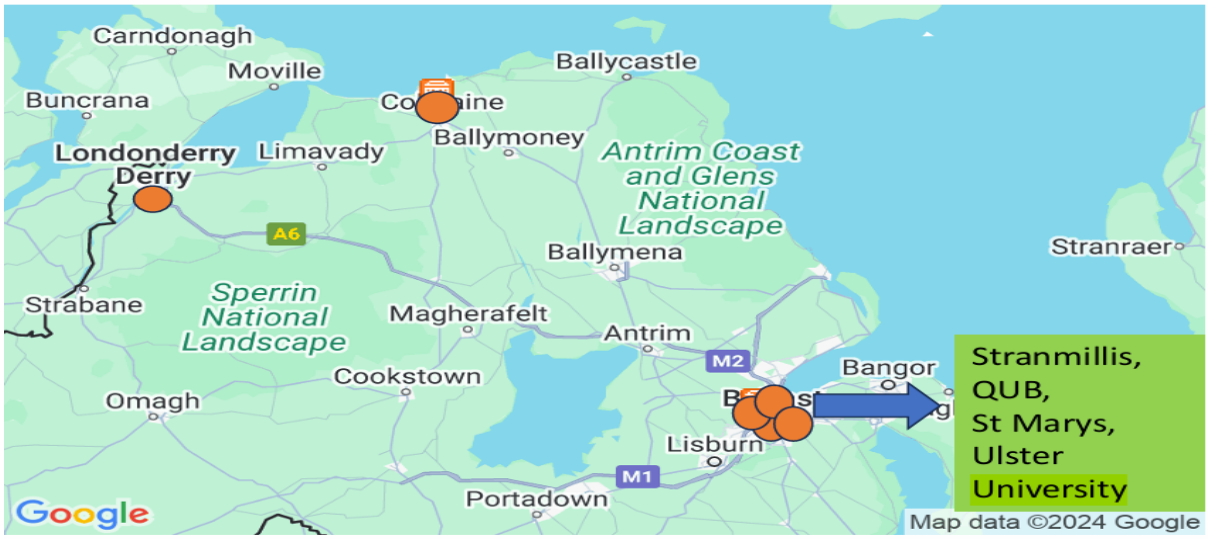
As a result of these two key points raised by the RSNs, we have taken this opportunity to respond to your consultation on the draft RNIA in such a way as to Rural Proof your draft PfG. We are, therefore, not using your Questionnaire format. We ask that you please consider that this detailed and lengthy approach to your consultation has been taken at a time when resources in our sector are stretched and thus, we trust that this response will be afforded the weight and scrutiny we believe it deserves in keeping with The Rural Needs Act (NI) 2016.

We will take each of your 9 key focus areas in turn:

<u>Economy</u>

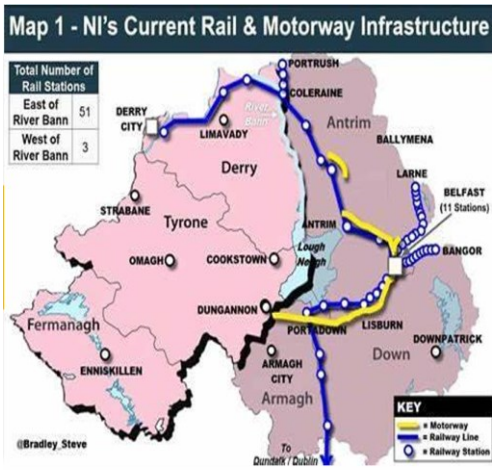
- Rural communities will need to be part of the local stakeholder engagement to achieve regional balance. They are on the ground and understand rurality and the complexities that arise out of this but also, they understand the vast economic opportunities rurality can present. They will know the skillsets within communities and the work that goes under the radar which, in turn, could be the solutions for our future especially around Green Energy, Renewables and your Net Zero Emissions Target.
- There is a large focus on Education as a means to achieving regional balance, however, the document appears to focus on Universities. A Map showing all Universities in NI[v] clearly highlights the disadvantage those living rurally will experience in trying to access them.

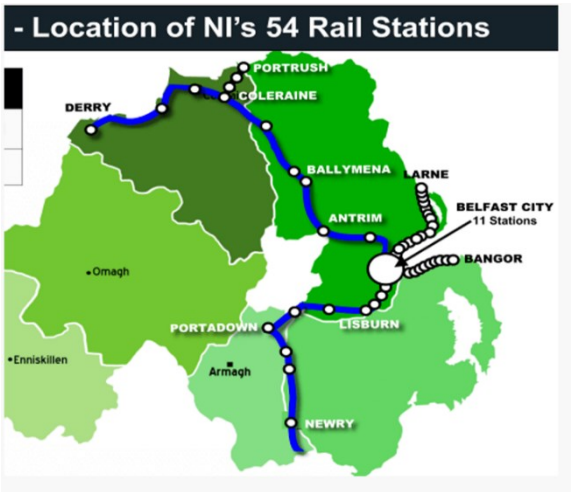
Map showing locations of NI Universities



You will note that it is not just the sheer distance required to travel to access higher

education, you also have to consider the additional cost this incurs as well as the poor infrastructure in place to allow for access.





- We suggest utilising the regional colleges map below[vi] in order to allow equity of access to education. The south west region for example has no access to rail, limited access to buses and no motorways and yet they are required to travel up to, and sometimes over, 100 miles each way to access education at universities. Maps are above for ease of reference.

In terms of rural needs impact assessment there is no equity of access to services for those living rurally. This leads to poverty of opportunity. The RNIA might consider for example the Regional Colleges as a solution to this issue. These colleges could offer tailor made courses, apprenticeships for local people thus encouraging them to stay in the area and invest into the area long term. Better regional infrastructure is also required however to sustain that. In addition to this, apprenticeships for our young people need to be spread out across the Regional Colleges to allow equity of access.

- Tourism Investment. Whilst this is welcome, we need to ensure an even and equitable spread of investment right across NI and into the west. Northern Ireland and its rural areas have so much to offer in terms of beauty, wildlife, fishing and tranquility. However, accessing those rural areas is difficult for tourists who do not rent a vehicle.

  In addition, people who work in the tourism sector need to be better supported. Tourism work tends to be seasonal in nature. Therefore, at certain times of the year these workers will not receive an income to live on and will require to either look for alternative work or claim Universal Credit. It will be important that any sub-regional economic plan take account of this and take account, in turn, how Universal Credit may not be in a position to assist with any gap. Parts of UC that struggle to keep pace with seasonal work include: the 5 week wait, 2 child limit as rural areas tend to have larger families (based on census data per council region[vii]) and Local Housing Allowance on UC wherein LHA is not reflective of private rental rates and in rural areas this has been driven up by remote workers with city based salaries, sheer demand for housing as rural areas tend to have less NIHE availability and second/holiday homes[viii].

- Sub-Regional Economic Action Plan- We recommend a local approach to this. Involve the community in shaping the future of their areas. Rural Areas often present with unique issues but community development approaches have indicated that the answers can also be found within the community. In addition to this, Invest NI need to engage more in rural communities and rural proof how they invest and support entrepreneurs

- It is disappointing to note your comment within the RNIA assessment on the industries you feel are rural, namely agriculture, fishing, horticulture, food and drink. Our RSNs commented that they feel this comment alone is made by someone who is making assumptions, as opposed to relying on facts. Whilst of course those industries are prevalent in rural areas, agriculture of example only equates to 7% of employment rurally as at 2016.[ix] NISRA data by council area, highlights that in rural areas there are huge numbers of self-employed entrepreneurs and research by Rural Community Network also ascertained an increase in remote or hybrid working since COVID.[x] If you do not understand economically what is happening in our rural communities, you cannot seek to improve or utilize it. We, therefore, encourage you to directly engage.

- Our RSNs also added that the role of the Agri-Food Sector is not discussed within the draft PfG above a simple acknowledgement. They stated that this was disappointing considering farmers are the food source for most of the UK and with the recent UK inheritance tax changes, farmers are feeling continuously let down by policy makers. Running alongside that, the Government now has a net zero emissions target, this will require discussion with farming families, support and education on the sustainability of farming. Our RSNs advise that these communities need support, they need to know they are not alone and that they have an important role to play going forward. In addition to the foregoing, another consideration not covered within the draft PfG or the RNIA was the ongoing questions around the movement of goods and services following Brexit[xi]. It is disappointing that the border generally, the agri-food sector and

the sustainability of farming/agri-food are not covered in the draft PfG or in the draft RNIA given the rurality of those border counties.

Deliver More Affordable Childcare

- RCN welcome the 15% increase for Registered Providers, however, we would ask you to note the difficulties rural families have in accessing registered child care. [xii] it is not simply that there are less numbers of childminders or childcare facilities rurally, it is also the issue of travel time required to access child care and the knock on impact this has on our working families including children. It causes longer days for our children in childcare, longer working days for parents and the additional costs associated with fuel, additional hours in care and maintenance, wear and tear of their vehicles.
- The most recent survey on Grandparents providing child care in NI published October 2020 based on the pre-COVID year of 2019 showed 2/3 of NI parents rely on Grandparents for some or all of their childcare needs. This is particularly true in rural areas for school-age children due to the additional required travel and lack of access to afterschool clubs, breakfast clubs and summer schemes. [xiii]
- UC for self employed people is not working in rural communities due to seasonal nature of work and RTI nature of UC[xiv]- to have child care so intrinsically linked is more dangerous in rural communities. Education and awareness of entitlement to assistance with child care costs rurally and along the border region is also required. Community Advice Fermanagh at the All-Island Social Security provided an example of DFC refusing to pay cross border childcare due to reading the legislation incorrectly. If our government departments are not trained to a sufficient standard on related border/rural legislation, we run the risk of people living in that region being isolated due to lack of knowledge.
- Pre-School Educational Programmes are welcome but this requires a rural lens. In rural areas, there is a heavy reliance on community lead settings, run by a board of volunteers. Despite the fact that all education settings for children aged 3-4 require the same level of scrutiny across all Trust Areas with Social Services for example, some rural settings are run by non-professional volunteer boards- some are even required to fundraise to stay open in their community. The risk is, it creates a postcode lottery for the education of our young and vulnerable children
- Skills Academy needs a rural lens with real life examples to frame it to ensure relevance and equity of access

Cutting Health Waiting Lists

- As discussed in our first response, RCN noted your focus on elective care with a view to bringing down waiting lists. We support this endeavour despite your own admission that you do not have the budget to tend to it. However, our concern rurally is that two

thirds of the health budget is spent on non-elective or emergency medicine annually as published by Nuffield Trust[xv]. It is not clear for example if you intend to reduce the non-elective or emergency budget to address the elective issues and if so, have you rural proofed this?

- Acute needs are medically defined as active, short-term treatment for a condition which includes emergency scenarios eg severe injury, period of illness or urgent medical condition. In the NHS, it often includes services such as accident and emergency (A&E) departments, inpatient and outpatient medicine and surgery [xvi] As such, time is of the essence and there are various medical reports around how much time one has- but the generally accepted time frame appears to be the "golden hour" [xvii] and yet our groups rurally are reporting issues with safe access to emergency care due to decisions to remove emergency general surgery from rural and isolated geographical areas. Our groups are not saying they require every service in every area, but, safe and reliable care pathways are required to enable equity of access to these vital services.

- Access to emergency services is different to access to services generally, however both cause more issues in rural communities than urban. For there to be true and safe reform, it needs to occur alongside similar transformation in infrastructure to address rural access issues such as travel time, cost of travel, assistance required, ambulance issues, state of infrastructure, poor public transport. We encourage you to consider our Rural health Toolkit[xviii]

- Our rural community groups have also identified that your draft RNIA did not cover mental health in rural areas where the support, or access to same, is more limited and often supplied by C&V sector instead of statutory bodies. Our groups advise that the work they do on the ground is heavily related to mental health support and also to preventive health measures. Rural Support for example are significantly concerned about the mental health pressures within farming communities and research has indicated that they are a significant group at risk of ill mental health and suicide[xix] . This shows the significant risk to health by not correctly and safely rural proofing.

<u>Ending Violence Against Women & Girls</u>

- Our Rural Groups welcome the strategy and all were delighted that it was recognised that women and girls can be more vulnerable in rural settings and why that might be. The reason this strategy includes this acknowledgement is because it was heavily rural proofed by NIRWN, and as such is a good, healthy example of rural proofing.

- Rural Women's Aid Groups alongside our local RSNs all indicated a concern about the Rural proofing required as this strategy roles out, for example it will take sufficient funding to ensure relevant groups are educated and supported. This has to be based on need and complexity, not just per head of population alone, as is so often the case. The cost of travel to access vulnerable women, the cost of removing them safely might

require more significant travel or more significant protection. There has to be recognition of rural complexities eg smaller communities, more traditional communities and complex rural legal issues eg land, residence and access to services

- In terms of rural proofing, it also needs to be considered that the Rape Unit is in Belfast. This can be really traumatic for people being asked to travel two hours to access it and the obvious impact this has on victims.

Better Support For Children and Young People with SEN

- To understand what you mean by "Right place" you require to understand rurality and from the RNIA it is not clear to RCN that you do. For example, how will this work in rural communities? Will you consider distance to access to services, the length of a school day and the impact this has on the child
- C&V sector already addresses so much need in this area and they are not mentioned in the draft PfG or RNIA. Rurally, it is often accepted that those people volunteer and their counterparts in urban areas are paid. This needs to be addressed under your remit of regional balance.
- Our rural communities highlighted to us that this is urgent as there are children without placement this year due to work on school estates being delayed

Provide more affordable, social, sustainable housing

- Rural Community Network have worked with NIHE regarding latent demand testing to identify hidden demand for housing in rural areas. We encourage you to review this and we can be of assistance if required.[xx]
- Housing issues can be addressed with fuel poverty and green agenda in mind, but we are in a housing crisis and there has to be balance between the two- one cannot proceed more quickly than the other.
- DAERA recently admitted in plenary sessions they are aware water and sewage connections are an issue and we cannot address the housing issues without inter-departmental engagement
- Quality of housing – RCN run a Rural Residents Forum and it has come to light from our members that there is a backlog for repairs and maintenance which tends to take longer to resolve in rural communities. This potentially may be due to the distance required to travel between properties but when looking at housing need, the state of our current housing stock needs to be addressed. There has to be balance in building new housing against being in a position to afford maintaining the current housing stock. We would cite the houses in Armoy region where until recently, with much lobbying from us and others, they had experienced no repairs and renewals since the 1970s.

- Bedroom Tax Mitigation Payments have been a lifeline to many. The housing stock in terms of smaller bedroom numbers tends to be limited rurally and as such, people are more likely to be required to pay the Social Sector Size Criteria under the Universal Credit regulations. Whilst we welcome the decision this week to extend the mitigations, this decision was made post this draft RNIA and should have been addressed before. We point to the informed work of the Cliff Edge Coalition.[xxi]

- There have been significant increases in rent in the private sector. Using the most recent census data by council region, it shows larger numbers of private renters in most of the rural council areas and yet wages tend to be lower [xxii] We point to the work of the Cliff Edge Coalition on Local Housing Allowance Rates and how rurally, with less housing available, it has lead to a competitive market that is to the detriment of rural private paying tenants.[xxiii]

- Our rural groups, including community advice organisations, indicated concern over the limited scrutiny of the private rented sector. They advise us of increased complaints about private landlords and the poor state of properties including complaints about damp and mold.

- Rural Housing Groups, including First Housing, raised concerns about the equitable access to housing related services citing that homelessness support and supporting people services are very scare west of the ban[xxiv]

Safer communities

- You stated in your draft Programme for Government that violence is more likely to be suffered by people from deprived areas and yet there is no commitment to an Anti-Poverty Strategy or a target to address deprivation. Rural deprivation is an ongoing issue and one which DAERA has recognised for some time. Given the levels of poverty in rural areas, our groups were disappointed that this was not covered within the draft RNIA.

- Our groups have also insisted that we add a point herein that not all crime in rural areas is farming related. They advise us that this appears to be a common misconception. Our Advice Organisations point to high levels of older people, living rurally, being targeted by scams. Given that rural banks are being removed at pace, older people have no one to turn to for help locally and are therefore more at risk.
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Protecting Lough Neagh

- Our Rural Support Networks, particularly those who live and work along the region linked to Lough Neagh recognise the importance of addressing the pollution in Lough Neagh and offer their support and local knowledge by way of assistance. RNIA need not only be about looking at additional rural complexities but also about scoping out what might be available rurally to help address need.

- From a rural perspective, this item from your 9 key focus areas, appears to be the main DEARA agenda item. This is disappointing as, whilst it is important, the way it is written has alienated the west of the province. An area that includes the Sperrins, Rivers and Lakelands as well as a cross border Geo-Park, the Fermanagh, Omagh and Derry/Londonderry areas expressed disappointment that Lough Erne and rivers were not included considering there is heavy pollution of our waters generally. [xxv]

Reform and Transform Services

- We suggest that you have a specific rural lens within your "Reform and Transformation Unit" given that 38% of the population now live rurally
- We suggest a "whole of government approach" to ensure regional balance is achieved when reforming and transforming rural public services. Intersecting issues arise when you try to make changes to services that run rurally for example if we centralise a service, we should improve roads and rail to allow for more timely, safer access. Without a whole of government approach, this cannot be achieved.
- To be able to "reform and transform" that suggests there are services existing in the first place- in some rural areas that is not the case.

By way of additional rural needs from within your mission areas, we would also like to add:

Building New Foundations

- All Island Strategic Rail Review- the review itself states Fermanagh will be the only County in Ireland the Island with no rail network[xxvi]. The reason stated was that there was not enough people to avail of the service. This goes against Rural Proofing by definition. By investing in rail to Fermanagh, it could help encourage people to live there, businesses to invest there as well as allowing better access to tourism, farmers markets. Job markets will widen and in turn more people will feel able to live there. Rural groups advise they are losing their young people to cities for better paid work, but by rural proofing this decision and looking at rail and other working options such as work hubs, this would open the rural economic market, as can be seen by RCN research into remote working.[xxvii]

Shaping A Better Tomorrow

- Our groups consider this section to be important and said it was worded in a very visionary manner: "you deserve to have access to the best possible opportunities, so you can live, work and enjoy a happy, healthy life, in a safe community where you have the full confidence to reach your full potential" . the concern is what this might look like

rurally, as there is no guarantee, you are simply acknowledging that the public deserve it. There is a poverty of opportunity rurally and this is something RCN have spoken with numerous departments about over the years eg the longer school day, the significant distance to our universities, the road infrastructure to access services including health services. We need a commitment to address equity of access.

- You make reference to people struggling with the cost of living crisis and suggest to address this, you will introduce "social inclusion strategies" but we are not advised what they will be and what approach they will take to enable people to access it. Access rurally might look different and to that end, we ask you to consult with rural stakeholders and take learnings from the C&V response during the COVID 19 pandemic documented in the Rural Policy Framework.[xxviii]

- We note commitment to the reconfiguration of health services generally within the PfG and note with disappointment that this has in no way been rural proofed. Despite us only being at consultation stage in the draft PfG, you have already proceeded with a Consultation on "Hospitals are Better Together". We confirm that we intend to respond separately and in detail to this consultation but add frustration that we are responding to this consultation whilst you are already moving ahead with another.

- Heritage and culture are not mentioned in your draft PfG and draft RNIA. Our rural groups see this as a real lack of understanding of the needs of their communities. They cite fear and worry that their young are being educated to leave Northern Ireland. They could train and use their skills locally but there is nothing to keep them in the area. In turn, it has left an aging population living rurally who often feel isolated and lonely. Arts, culture and heritage aid that feeling of community, that link to place or home for all ages and can also provide sustainable employment. RCN have identified that productivity seems to be the key trend running through this draft PfG and if that is the case, it would be important to give consideration to these areas by way of rural proofing. Rurally there are groups who struggle to find their place in the community and we note that LGBTQ+ are not considered in draft PfG other than to note they are more at risk rurally within the draft RNIA. They are more at risk and yet you have not considered a mitigation, prevention or protection of rights within the draft RNIA.

- Within the body of your RNIA you state: "Within rural communities there can be wider social determinants to health including the risks of isolation, loneliness and rural poverty'. The RNIA for The Engage III Programme, August 2022 noted approximately 26% of 93,000 pupils across all pre-primary settings, EOTAS, primary, post-primary and special schools in Northern Ireland were in rural settings. This comment is welcome and shows some insight. We now need to see action off the back of this comment. It cannot be enough that a box was ticked on a form.

- We welcome the use of your various indicators such as sex, age, marital status as well as geography to make sure inequalities that exist and trends that might appear are clear to see. However, you then state it will help you "understand if Programmes are working". This indicates you possibly would not be using it as a means to consider regional balance but more a tool to monitor your Programmes. This sounds reactionary when equally it could be used as a proactive tool to consider need, complexity, equity of access and equality of opportunity. RCN encourage taking a proactive approach.

Finally, RCN note your comment about a further RNIA being required on the PfG in the future. We suggest a further, more holistic assessment is required and you should consider rural stakeholders in this process to ensure it is representative and inclusive. RCN would be happy to assist you in any way we can. Thank you for taking the time to read this detailed response and we hope you have found it useful.

Yours sincerely

Samantha Gallagher

Policy & Public Affairs Officer

Rural Community Network

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[i] Rural Needs Act (Northern Ireland) 2016 (legislation.gov.uk)
[ii] Urban - Rural Classification | Northern Ireland Statistics and Research Agency
[iii] According to the Northern Ireland Statistics and Research Agency (NISRA), 22% of households in rural areas are living in poverty, compared to 18% in urban areas (NISRA, 2021).
[iv] Northern Ireland Audit Office, 2020
[v] https://estatic.universityguru.com/images/gmaps/6ce0b6a3faffd124d22da00a6af20ecb.png
[vi] https://www.qub.ac.uk/home/media/Media,1101735,smxx.png
[vii] https://explore.nisra.gov.uk/area-explorer-2021/N09000006/
[viii] Rise of the rental market in Fermanagh | Impartial Reporter and Second homes and holiday-lets in rural communities - House of Commons Library
[ix] NI agri-food sector - key statistics | Department of Agriculture, Environment and Rural Affairs
[x] The Policy Landscape for Remote Working - Rural Community Network
[xi] Brexit Questions and Answers | Northern Ireland Assembly
[xii] Search Results in Creche Category
[xiii] Do you rely on grandparents or other family members for help with childcare? - Employers For Childcare and After School Programmes | CommunityNI
[xiv] Speech All Island Social Secuirty Conference June 2024
[xv] nuffield-trust-future-funding-and-current-productivity-in-northern-ireland-web.pdf
[xvi] Acute care - The Health Foundation
[xvii] Golden Hour research | Midlands Air Ambulance Charity
[xviii] https://www.ruralcommunitynetwork.org/app/uploads/2022/10/NI-Rural-Health-and-Care-Toolkit-Final-version.pdf
[xix] committees.parliament.uk/writtenevidence/43055/pdf/

[xx] Community Led Housing in Northern Ireland - Rural Community Network
[xxi] Cliff Edge welcomes minister's commitment to extend welfare mitigations | Law Centre Northern Ireland
[xxii] Employee Earnings in Northern Ireland: October 2024 | Department for the Economy NI's best and worst paid areas identified in new statistics - Belfast Live
[xxiii] Cliff-Edge-Coalition-Briefing-June-2024.pdf
[xxiv] Supporting People Service Directory
[xxv] Blue-green algae found in Lough Erne near Castle Archdale - BBC News
[xxvi] https://www.infrastructure-ni.gov.uk/sites/default/files/publications/infrastructure/final-report-of-the-all-island-strategic-rail-review-31july2024.PDF
[xxvii] The Policy Landscape for Remote Working - Rural Community Network
[xxviii] ruralpolicyframeworkfornorthernirelandreportonpublicconsultation.pdf (nidirect.gov.uk)