Policy Proposals
for a
Rural Proofing Bill

Summary of Responses
to Public Consultation

June 2015

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Annexes

1. Executive Summary

Introduction

1.1. A public consultation on the proposal to introduce primary legislation to strengthen rural proofing across government commenced on 3 February 2015 and concluded on 16 March 2015. During this six-week period, the Department of Agriculture and Rural Development (DARD) held a series of public meetings and received written responses from consultees.

Public Meetings

1.2 Nine public meetings were held across the North during the consultation period to obtain the views of interested groups and individuals. A total of 47 people attended these events. Details of the dates, times and locations of the meetings, and the number of attendees at each, are provided in Annex A. Details of DARD representation at the meetings are provided at Annex B.

Written Responses

1.3 A total of 32 written responses to the consultation were received. A list of respondents is provided at Annex C. Details of the consultation questions that were addressed by each respondent are provided at Annex D.

Summary of Main Issues Raised

Enhancing rural proofing

1.4 Twenty-eight written responses referred to the need for change to current rural proofing arrangements. All but one of these respondents welcomed the proposal to put rural proofing on a statutory footing. This proposal was viewed as a means of ensuring the effective and consistent implementation of rural proofing across government departments and other public bodies and of encouraging policy makers to give greater priority to ensuring that rural proofing was undertaken effectively, thereby delivering better outcomes for those living in rural areas.

1.5 A number of respondents commented positively on DARD's aspiration that rural issues should be embedded in the development and delivery of all government strategies and policies. Others welcomed the aim of providing

transparency and ensuring the availability of information on rural proofing. The objective of establishing and maintaining a joined-up and collaborative approach to rural proofing was also welcomed.

1.6 One respondent, although in agreement with DARD's aspirations for enhanced rural proofing, was of the view that the case for changing the current process had not been made.

Duty to consider the needs of people living in rural areas

1.7 Views expressed at the public meetings included that a statutory duty to consider the needs of people living in rural areas when developing policies and delivering services was essential in order to effect significant change in the current rural proofing process; that the proposed Rural Proofing Bill should make clear that such a duty applied to operational matters as well as to high level policy decisions; that the Bill should place a statutory duty on government departments and councils to consult on polices that will impact on rural dwellers; and that the Bill should make provision for sanctions to be imposed in cases of non-compliance.

1.8 The majority of the twenty-eight respondents who addressed the proposed statutory duty on government departments and local councils in their written response agreed that such a duty would help ensure that the needs of rural dwellers were appropriately considered when policies were being developed and services were being delivered. Some commented that the duty would help ensure that rural issues and needs were embedded within decision-making across government. A number of respondents highlighted that the proposed duty *"to consider"* the needs of people living in rural areas did not compel duty holders to mitigate adverse impacts of their policies on rural dwellers. Others expressed the view that there should be provision in the proposed Bill for sanction in cases of non-compliance with the statutory duty.

1.9 Two respondents were unsure as to whether the proposed statutory duty on government departments and local councils would achieve the aim of ensuring that policy makers consider the needs of rural dwellers. One considered that further detail of the duty, and how it would be monitored, was

required. The other said that the placing of a statutory duty may be effective, provided that the wording of the legislation was clear; that its implementation was sufficiently resourced; and that there were appropriate arrangements for monitoring and reporting on compliance.

1.10 A further two respondents indicated they did not believe this proposal would be effective. One was of the view that a duty *"to consider"* the needs of rural dwellers, without having to mitigate any adverse impacts of the policy being developed or reviewed, would not ensure the robust application of rural proofing. The other respondent considered that the proposed statutory duty should not be implemented prior to undertaking a process of education and encouragement to rural proof.

1.11 Twenty- six respondents commented on the proposal that the statutory duty to consider the needs of rural dwellers should extend to non–departmental public bodies (NDPBs). All were in support of this proposal, although there were differing views as to which NDPBs should have this statutory obligation.

Promoting and encouraging rural proofing

1.12 There was a view at several of the public meetings that DARD should be the voice of rural development, leading a change in culture that would ensure rural issues were embedded across government and that the perception that rural issues were a matter only for DARD was addressed.

1.13 Twenty-four respondents indicated in their written response that they were in support of DARD having a statutory role in promoting and encouraging rural proofing. Some respondents saw this as a means of ensuring a more consistent approach to rural proofing and of providing centralised expertise for guidance and advice. Views were also expressed on the implementation of this role for DARD and there were suggestions as to what the role should involve.

1.14 No respondents disagreed with this proposed statutory role for DARD, although two indicated they were unsure about it. One of these, while agreeing with the need for a body to take the lead in promoting and

encouraging rural proofing, considered that role could be undertaken by an independent monitoring body rather than by DARD.

Monitoring and Reporting

1.15 Several views were expressed at the public meetings about the proposal that that DARD would be required to produce and publish regular reports on rural proofing to be laid before the Assembly. The need for independent scrutiny by representatives from the rural community and for departments to be accountable to their respective Assembly committee was suggested at two of the public meetings. It was considered that this would increase the credibility of the monitoring process. There was also a view that the proposed reports on rural proofing should include information on the impacts of policies and how these had been mitigated.

1.16 Twenty-eight respondents to the consultation provided written comments on the proposed monitoring and reporting arrangements. A total of 22 respondents indicated that they agreed that the proposal that DARD would be required to produce and publish regular reports on rural proofing to be laid before the Assembly would help to improve the availability and transparency of information about rural proofing. Some respondents called for Assembly committees to be involved in monitoring the performance of government departments and their NDPBs. A number of respondents proposed that rural stakeholders should be engaged in the monitoring arrangements, while several suggested there was a need for each duty holder to nominate a rural champion at senior level who would take a lead role in ensuring that policy and service delivery plans within their organisation were rural proofed. Several suggestions were made as to what information should be included in the proposed reports on rural proofing.

1.17 Two respondents indicated that they were unsure of whether the proposed monitoring and reporting arrangements would improve the availability and transparency of rural proofing information. One of these suggested that the proposed report needed to scrutinise rural proofing across government and highlight where needs had not been adequately considered. The other

respondent suggested there was a need for a mechanism for overseeing or enforcing the rural proofing arrangements.

1.18 Four respondents did not agree with the proposed monitoring and reporting arrangements. Three of these considered that independence in those arrangements was required. The other was of the view that it was unnecessary to produce reports to be laid before the Assembly.

Co-operation and collaboration

1.19 It was noted at several of the public meetings that co-operation and collaboration between DARD, other government departments and public bodies was vital to making the proposed Bill and the rural proofing process effective.

1.20 All 27 written responses that addressed this aspect of the consultation indicated support for greater co-operation and collaboration. Many respondents commented that increased co-operation and collaboration was essential to ensure meaningful and effective rural proofing that would achieve real outcomes for rural dwellers. Some respondents highlighted the importance of greater co-operation and collaboration in view of the introduction of the new duty of community planning and the increased accountability of all community planning stakeholders at local level.

Provision of support, advice, guidance and information

1.21 Each of the 27 respondents who commented on this policy proposal agreed that the Rural Proofing Bill should give DARD powers to offer support for rural proofing through the provision of training, advice, guidance and information. Several saw support for policy makers as being essential to ensuring that rural proofing was undertaken effectively. A number of respondents considered that training and education should be a key component of DARD's support for rural proofing. Several respondents made suggestions for the content of the proposed rural proofing support programmes to be provided by DARD.

Other aspects of the policy proposals

1.22 Some respondents took the opportunity to raise further issues concerning the policy proposals, or to reiterate some points already made in their response to other aspects of the consultation. Issues highlighted by those respondents included:

- the need for a clear and appropriate definition of “rural”;
- the need for the proposed Rural Proofing Bill to focus on securing better outcomes for rural dwellers;
- the lack of provision in the policy proposals for sanctions to be imposed in cases of non-compliance;
- concern that the proposal to have the Bill complete the legislative process within the current Assembly mandate may not allow for sufficient scrutiny;
- the need for independent monitoring of rural proofing;
- a proposal that the Bill should take account of the extent to which the rural community depends on the private sector for some services; and
- a suggestion that the concept of “reasonable accommodation”, which already applies in equality and anti-discrimination law, should also apply to rural proofing.

Impact Assessments

1.23 The majority of respondents who addressed this aspect of the consultation either noted or indicated their agreement with DARD’s decision that further assessments of the impacts of a Rural Proofing Bill were not required. One respondent, however, queried the evidence base for DARD’s conclusion that, in relation to equality of opportunity, the Bill was neutral for all Section 75 categories and that an EQIA was therefore not necessary. Another commented that in relation to all impact assessments, the single solution was to tackle the inequality that rural dwellers face on a daily basis.

2. Background

2.1 On 3 February 2015, DARD launched a public consultation on a proposal to introduce primary legislation to strengthen rural proofing across government.

2.2 Rural proofing is the process that policy makers use to assess whether proposed policy is likely to have a different impact in rural areas compared with elsewhere, and to identify ways to address these impacts appropriately. The Executive has been committed to undertaking rural proofing since 2002 and all government departments have been required to rural proof since that time.

2.3 DARD has lead responsibility in the North for rural proofing policy. In 2014, the Minister of Agriculture and Rural Development made a commitment to strengthen rural proofing across government. The Minister has decided that introducing primary legislation, subject to the agreement of the Executive, is the most effective way of achieving this aim.

2.4 The public consultation on the proposed Rural Proofing Bill took place during the six-week period 3 February to 16 March 2015. As part of the consultation exercise, DARD hosted a series of nine public meetings at various venues to hear the views of interested groups and individuals.

2.5 A consultation pack was prepared consisting of a Consultation Document, '*Policy Proposals for a Rural Proofing Bill*'[1]; an Equality and Human Rights Screening Template[2]; a Partial Regulatory Impact Assessment[3]; a Rural Issues Statement[4]; and a Consultation Response Template[5].

2.6 This report is an account of the consultation process and a record of:

- the views of the 32 respondents who provided written responses to the consultation; and
- the comments of those who attended and participated in the nine public meetings.

[1] http://www.dardni.gov.uk/policy_proposals_for_a_rural_proofing_bill
[2] http://www.dardni.gov.uk/equality-and-human-rights-screening-proposals-for-a-rural-proofing-bill.pdf
[3] http://www.dardni.gov.uk/partial-regulatory-impact-assessment-proposals-for-a-rural-proofing-bill.pdf
[4] http://www.dardni.gov.uk/rural-issues-statement-proposals-for-a-rural-proofing-bill.pdf
[5] http://www.dardni.gov.uk/consultation-response-template-proposals-for-a-rural-proofing-bill.docx

3. Enhancing Rural Proofing – Policy Proposals for a Rural Proofing Bill

3.1 The Executive has been committed to undertaking rural proofing since 2002, and reaffirmed this commitment in 2009. It is recognised that there is scope to improve the effectiveness of rural proofing within government to ensure that it can help deliver better outcomes for rural dwellers.

3.2 In the Consultation Document *'Policy Proposals for a Rural Proofing Bill',* DARD set out the following aspirations for an enhanced rural proofing process:

- rural issues would be embedded in the development and delivery of all government strategies and policies, including spending plans;
- rural needs and impacts would be identified and addressed appropriately as a matter of course across government;
- there would be transparency and availability of information on rural proofing; and
- government would establish and maintain a joined-up and collaborative approach to considering and taking account of rural needs when designing all services.

3.3 In addition, the document set out the following policy objectives for the Bill:

- to require the effective implementation of rural proofing across government;
- to establish DARD's role in promoting and encouraging rural proofing across government and providing advice and guidance;
- to require information and data on rural proofing to be made available in a transparent way in a report to be laid before the Assembly; and
- to put in place effective arrangements are in place for co-operation between public authorities and sharing best practice.

3.4 The document also set out the policy proposals for a Rural Proofing Bill and sought views from consultees on each of the specific proposals as set out below:

- the introduction of a statutory duty on government departments and district councils to consider the needs of people living in rural areas when developing new policies, strategies and plans, or revising existing ones, and when designing and delivering public services or making changes to the way in which they are delivered;

- a statutory role for DARD to promote and encourage departments and district councils to consider the needs of people living in rural areas;

- a requirement for DARD to produce regular monitoring reports to be laid before the Assembly. DARD would seek and collate information from all departments on how they have considered the social and economic needs of people living in rural areas;

- a provision for departments and councils to make arrangements for cooperation and collaboration to help ensure a more consistent and cohesive approach to addressing the needs of rural dwellers;

- the power for DARD to support rural proofing and the implementation of the Bill through the provision of training, advice and guidance; and

- the power to make regulations to extend the Bill to non-departmental public bodies as may be specified in such regulations.

3.5 Consultees were asked to respond to the following questions about the policy proposals:

Question 1: Do you support the need for change in line with DARD's aspirations [as outlined at paragraph 3.2 above]?

Question 2: Do you think that placing a statutory duty on all government departments and local councils would help to ensure that the

needs of rural dwellers are appropriately considered when policies and public services are being developed and delivered?

Question 3: Do you think that such a duty should extend to non-departmental public bodies in addition to government departments and councils? If so, which bodies?

Question 4: Do you think that DARD should have a statutory role to promote and encourage other bodies to undertake rural proofing?

Question 5: Do you think that the proposed monitoring and reporting arrangements will help to improve the availability and transparency of information available about rural proofing?

Question 6: Do you think that increased co-operation and collaboration between DARD, other government departments and public bodies is desirable?

Question 7: Do you agree with the strengthening of DARD's role in providing support for rural proofing?

Question 8: Is there any other aspect of the proposals you wish to comment on?

Question 9: Do you have any views on the conclusions reached by DARD to screen out from further assessment the impacts of a Rural Proofing Bill in respect of:

(a) Equality Impact Assessment;

(b) Regulatory Impact Assessment; and

(c) Rural Proofing?

4. Format and Structure of Public Meetings

4.1 Nine public meetings were held during the period 19 February to 6 March 2015. The meetings took place in Banbridge, Garvagh, Cookstown, Antrim, Enniskillen, Markethill, Belfast, Omagh and Dungiven between 19 February and 6 March 2015. A total of 47 people attended the meetings. (Details of the dates, times and locations of the meetings, and the number of attendees at each, are provided in Annex A).

4.2 The meetings were facilitated by DARD officials and representatives of the Rural Community Network (RCN) and the Rural Development Council (RDC).

4.3 At each event, DARD officials gave a presentation on the background to rural proofing and the proposals for a Rural Proofing Bill. Following a question and answer session, which provided members of the audience with the opportunity to comment on, or seek clarification of, any aspect of the policy proposals, further discussion of the proposals was facilitated by the RCN or the RDC.

4.4 The full agenda for the public meetings was as follows:

- Opening Address
- Proposals for a Rural Proofing Bill
- Question and Answer Session
- Facilitated Discussion
- Feedback from Discussion
- Close

5. Analysis of Responses to Consultation

5.1 Enhancing Rural Proofing

Written responses

Consultation Question 1

Do you support the need for change in line with DARD's aspirations that:

- *rural issues would be embedded in the development and delivery of all government strategies and policies, including spending plans;*
- *rural needs and impacts would be identified and addressed appropriately as a matter of course across government;*
- *there would be transparency and availability of information on rural proofing; and*
- *government would establish and maintain a joined-up and collaborative approach to considering and taking account of rural needs when designing all services.*

5.1.1 Of the 32 written responses received, 28 commented specifically on the need for change. Twenty-seven of these stated they were in support of enhancing rural proofing in line with DARD's stated aspirations.

5.1.2 The majority of the 27 respondents who indicated their support for the need for change welcomed the proposal to put rural proofing on a statutory basis. Some respondents saw this as a means of ensuring the effective and consistent implementation of rural proofing across government departments and other public bodies. Another commented that it would encourage policy makers to give greater priority to ensuring that rural proofing was undertaken effectively, thereby delivering better outcomes for those living in rural communities. One respondent said that legislation was necessary to ensure that government departments did not implement policies that would have an adverse impact on the rural population. Another respondent, while expressing support for DARD's aspirations, suggested it may be difficult to

implement a statutory duty in a way that ensures those aspirations are achieved.

5.1.3 A number of the respondents who were in support of a Rural Proofing Bill expressed the view that the current rural proofing process was not delivering consistently for rural communities, and it was suggested that past efforts at rural proofing had not had the desired effect of ensuring that rural areas were treated in a fair and equitable manner. Several reasons were suggested for this, including that rural proofing was not taken seriously by policy makers across all government departments, and that there was a lack of recognition that rural issues extended beyond the remit of DARD.

5.1.4 A further issue raised was the definition of "rural". One respondent suggested that there should be a more prescriptive definition that would be applied consistently across all government departments and which would reflect changing settlement patterns across Northern Ireland. Another respondent expressed the view that further clarity was needed of some of the terms used within DARD's stated aspirations, such as "rural issues", "rural needs", "embedded" and "appropriate". One respondent sought an explanation of DARD's definition of "equitable treatment".

5.1.5 A number of respondents referred to the specific aims of the proposed strengthening of rural proofing. Some commented positively on the aspiration that rural issues should be embedded in the development and delivery of all government strategies and policies. Others welcomed the aim of providing transparency and ensuring the availability of information on rural proofing, commenting on the importance of clarity on the evidence that had been taken into account in the process and how policy making had been influenced by it. One respondent highlighted the importance of ensuring the availability of information in an accessible format. Another respondent commented on the objective of establishing and maintaining a joined-up and collaborative approach to rural proofing, suggesting that this would enable the sharing of information across different government departments and other public bodies.

5.1.6 One respondent, while indicating agreement with DARD's stated aspirations, said it was unable to support the need for change. This respondent commented that DARD's stated aspirations did not make the case for changing the current rural proofing process. It also commented that the absence of detail in the consultation document on how rural proofing was being undertaken at present, and how successful it has been, meant that there was no way of knowing that the proposed change would be effective in making a tangible difference for rural dwellers and rural businesses.

5.1.7 No respondents indicated that they were against the proposed enhancing of rural proofing.

5.2 Duty to Consider the Needs of People Living in Rural Areas

(i) Duty on government departments and local councils

Views expressed at public meetings

5.2.1 The view was expressed at one of the public meetings that a statutory duty to consider the needs of people living in rural areas when developing policies and delivering services should be the cornerstone of a Rural Proofing Bill. It was felt that this was essential in order to effect significant change in the current rural proofing process.

5.2.2 There were differing views on how effective putting rural proofing on a statutory footing would be. One view was that that it would be ineffective because the existing process did not make a significant impact when policies were being developed or reviewed. Another opinion, however, was that putting rural proofing on a statutory footing should ensure that central and local government took the process more seriously. It was also noted that such a move would be welcomed by those organisations that were already committed to rural proofing, since this would strengthen their position going forward.

5.2.3 It was felt that a Rural Proofing Bill should be clear that the statutory duty to consider the needs of people living in rural areas related not only to high level policy decisions but also to operational matters. In addition, there was a view

that there should also be a statutory duty on departments and local councils to consult on policies when it was apparent that they had a clear impact on rural communities.

5.2.4 It was suggested at one meeting that if the proposed Bill placed a statutory duty on departments and local councils to consider the needs of rural dwellers, it should also make provision for sanctions to be imposed in cases where this duty was not met. There was also a view that if it were not feasible for the Bill to make such a provision, then consideration should be given to a system of awarding a charter mark for those that do comply in order to highlight their compliance with their statutory duty. It was felt that this would also aid positive re-enforcement of the Bill.

5.2.5 The view was expressed at two meetings that consideration should be given to requiring the new local councils to rural proof as soon as they become fully operational in April 2015, with the duty to consider the needs of rural dwellers then becoming statutory once the proposed Bill became law. In addition, it was noted that there was a need to allow sufficient time for a statutory process to 'bed-in' for those public authorities not previously required to rural proof.

Written responses

Consultation Question 2

Do you think that placing a statutory duty on all government departments and local councils would help to ensure that the needs of rural dwellers are appropriately considered when policies and public services are being developed and delivered?

5.2.6 Twenty-eight of those who provided written responses commented specifically on the proposal to place a statutory duty on government departments and local councils to consider the needs of people living in rural areas when developing policies and delivering services. Twenty-four of these respondents agreed that a statutory duty would help ensure policy makers in government departments and local councils would consider the needs of people living in rural communities. Two respondents were unsure

about the proposed statutory duty, while a further two indicated that they did not agree that this proposal would be effective in helping to ensure policy makers considered the needs of rural dwellers.

5.2.7 Respondents in favour of the proposed statutory duty commented that it would help ensure that rural issues and needs were embedded within decision-making across government and that there was a consistent approach across government departments and local councils. One of these respondents made the point that the needs of people living in rural areas ought to be considered without the necessity for a statutory duty but was nevertheless in support of such a proposal, if this was viewed as the most effective way of ensuring the needs of those people were given the same consideration as those of non-rural dwellers.

5.2.8 A number of respondents commented that the commitment of all Executive Ministers and their Departments was necessary, if the placing of a statutory duty was to have meaningful impact.

5.2.9 Some respondents suggested that local councils, particularly those in rural areas, were already aware of, and committed to, the needs of rural communities and that it was essential that policy makers in central government also consider the needs of rural dwellers. Others welcomed the proposal that the statutory duty would extend to local government, particularly in view of the new duty on councils to make arrangements for community planning.

5.2.10 A number of respondents, while in agreement with the proposal for a statutory duty, suggested that in order for it to be effective, such a duty had to have “teeth”, requiring meaningful action by duty holders and providing for them to be called to account. The need for effective monitoring and reporting arrangements was also highlighted. In addition, a number of respondents considered there should be provision for sanction in cases of non-compliance with the duty to consider the needs of rural dwellers.

5.2.11 Other respondents who were in favour of a statutory duty expressed concern about the nature of the specific duty proposed in paragraph 5.2 of the

consultation document. They were of the view that the proposed statutory duty, *"to consider"* the needs of people living in rural areas did not compel duty holders to mitigate any adverse impacts of their policies on rural dwellers. These respondents suggested that a requirement to mitigate adverse impacts should be made clear in the legislation.

5.2.12 One respondent suggested that there was a need to ensure that clear, unambiguous guidance to be drawn up in parallel with the legislation. This respondent cautioned against such guidance not being available in a timely manner.

5.2.13 Another respondent, while welcoming the proposal for a statutory duty, suggested that unless there was a review of the current rural proofing system and a "baseline" established, it would be unclear as to whether such an obligation would achieve the aim of ensuring that the needs of rural dwellers were considered. This respondent also suggested there was a need for DARD's role in the rural proofing process, and arrangements for co-ordination between duty holders, to be clarified.

5.2.14 One respondent highlighted a need for adequate resourcing for DARD to undertake its proposed statutory duties and for the provision of independent scrutiny.

5.2.15 A number of respondents, in agreeing that a statutory duty would help ensure the needs of rural dwellers were considered by policy makers, commented on the aim of the proposed Rural Proofing Bill, which, as stated in paragraph 4.6 of the consultation document, is *"to secure the fair and equitable treatment of rural dwellers by requiring their needs to be considered when developing policies and strategies*, *including those which govern how public services are delivered ...".* These respondents considered that the phrase *"fair and equitable treatment"* may be difficult to define and therefore problematic to implement in practice. They suggested that consideration be given to changing the wording of the aim of the Bill to: *"to secure the equality of opportunity for rural dwellers by requiring duty holders to have due regard to their needs when developing policies and strategies, including those which govern how public services are delivered"*.

5.2.16 One of the two respondents to this question in the consultation who had indicated that they were uncertain of whether the proposed statutory duty would achieve the stated aim said that it required further detail of what the duty would be and how it would be monitored for compliance, as well as clarity on the meaning of terms such as *"rural dwellers"* and *"appropriately considered"*, before it could comment on how effective a statutory duty might be. The other respondent commented that a statutory duty may be effective, provided that the proposed Bill was appropriately worded; that there was sufficient resourcing for the implementation of its provisions; and that there was a clear plan on monitoring and reporting on compliance.

5.2.17 One of the two respondents who did not agree that the proposed statutory duty would help ensure the needs of rural dwellers were appropriately considered in policy development and service delivery was of the view that such a duty should not be imposed without first undertaking a process of education and encouragement to introduce rural proofing across the sector. The other respondent expressed the view that a duty *"to consider"* the needs of rural dwellers did not fully encompass, or ensure, the robust application of rural proofing. The same respondent also felt that a statutory duty of this nature may result in public authorities considering evidence without the need to take action to mitigate adverse impacts of strategies and policies on people living in rural areas.

(ii) Duty on non-departmental public bodies

Written responses

Consultation Question 3

Do you think that such a duty should extend to non-departmental public bodies in addition to government departments and councils? If so, which bodies?

5.2.18 Of the 32 written responses received, 26 commented on the proposal to extend the proposed statutory duty to non-departmental public bodies (NDPBs). All of these agreed with the proposal that there should be a statutory duty on (at least some) NDPBs to consider the needs of rural

dwellers in developing and delivering policies. There were differing views, however, on which NDPBs should have this statutory obligation.

5.2.19 Some respondents considered the duty should apply to any statutory body that makes policies or provides services which impact or which are likely to impact on the lives of rural dwellers. Another considered that the duty should also apply to agents undertaking significant tendered work or activity for government departments or NDPBs. One respondent stated that it was essential to include those Executive NDPBs that undertook functions within a government framework under statutory powers, including, for example, the Health and Social Care Board and Invest Northern Ireland. Another respondent was of the view that rural proofing obligations should be restricted to high-level strategic policy development in government departments and local councils and those NDPBs with a policy role, such as the Strategic Investment Board and the Northern Ireland Housing Executive. This respondent also suggested that it was necessary to develop clear criteria to determine which NDPBs should be included.

5.2.20 Several respondents said that it was important that provision was made in the Rural Proofing Bill for the statutory duty to be extended to all NDPBs; a decision on whether or not this was practicable or desirable could be taken at a later date.

5.2.21 It was also suggested that any duty on NDPBs to consider the needs of rural dwellers needed to be taken into account by departments when setting out spending plans in order that NPDBs had capacity to mitigate any adverse impacts. In addition, the need to ensure a statutory duty on NDPBs did not create additional bureaucracy and resource cost to them (thereby detracting from the resources available to deliver front-line services) was highlighted.

5.2.22 A number of respondents who addressed this question in the consultation provided details of NDPBs that they believed should have a statutory obligation to consider the needs of rural dwellers. The following NDPBs were suggested:

- Education and Library Boards/Education Authority

- Health and Social Care Trusts, including the NI Ambulance HSCT
- Public Health Agency
- Health and Social Care Board
- Police Service of Northern Ireland
- Northern Ireland Housing Executive
- Northern Ireland Fire and Rescue Service
- Invest Northern Ireland
- Arts Council of Northern Ireland
- Tourism Northern Ireland
- Sport Northern Ireland
- Commissioner for Older People for Northern Ireland

5.2.23 One respondent suggested that the statutory duty should also extend to UK government departments with responsibilities in Northern Ireland (such as the Ministry of Defence); government owned companies (such as Northern Ireland Water and Translink); cross-border bodies (such as Loughs Agency, Tourism Ireland, Intertrade Ireland and Waterways Ireland); and the Crown Estate.

5.2.24 Another respondent supported the extension of the legislation to NDPBs on a case-by-case basis.

5.2.25 One respondent suggested that in moving forward on the proposal on extending the statutory duty to NDPBs, DARD should consider, for comparative purposes, the recent consultation on the draft Local Government (Community Planning Partners) Order (Northern Ireland) 2015[6].

5.3 Promoting and Encouraging Rural Proofing

Views expressed at public meetings

5.3.1 It was proposed at four of the nine meetings that DARD should be the voice of rural development, leading a change in culture, which would ensure that

[6] http://www.doeni.gov.uk/consultation_document_-the_draft_local_government__community_planning_partners__order__ni__2015.pdf

rural issues were considered right across government and that the current perception, that such issues were only a matter for DARD, was addressed.

5.3.2 At two meetings, the view was expressed that DARD should ensure that there was clarity on what was meant by “rural proofing” because policy makers had to be sure of what was required of them in order that the rural proofing process could be effective. It was suggested that this would require DARD to ensure the availability of training and guidance for policy makers.

5.3.3 A further view was that DARD’s role should also include articulating the positive aspects of the Bill and the rural proofing process.

Written responses

Consultation Question 4

Do you think that DARD should have a statutory role to promote and encourage other bodies to undertake rural proofing?

5.3.4 Twenty-six respondents addressed this specific question in the consultation. Of those, 24 indicated that were in support of DARD having a statutory role in promoting and encouraging rural proofing. The remaining two respondents indicated that they were unsure of this proposal.

5.3.5 Some of the respondents who agreed with the proposal commented that such a statutory role for DARD should help ensure a more consistent approach to rural proofing and provide centralised expertise for guidance and advice on rural proofing. Another suggested that a statutory basis for DARD’s role would require it to allocate resources to training and promotion, which should ensure more effective delivery of rural proofing.

5.3.6 A number of respondents expressed a view on how DARD should undertake it statutory role. One suggested that the role should be delivered in partnership with the Rural Development Council and/or the Rural Community Network and other regional organisations better placed to deliver regional events. Another respondent proposed that DARD should undertake its role working through existing mechanisms such as the Inter-departmental Committee on Rural Policy.

5.3.7 Many of the respondents in favour of DARD having a statutory role, expressed a view on what that role should involve. The following functions were suggested:

- acting as the first point of contact for policy makers seeking advice in relation to rural proofing;
- developing training and providing resources to support policy makers;
- brokering of contacts with rural stakeholders who can inform the evidence gathering process;
- compiling statistical information to enable departments to evidence policy impacts in a more transparent way;
- identifying and promoting examples of good practice where policy makers have identified adverse rural impacts and mitigated these in an effective and creative way;
- producing a report to be laid before the Assembly detailing how government departments and NDPBs are implementing rural proofing;
- helping to establish a rural champion role within government departments so that rural proofing is seen as a process that will lead to better policy and public service delivery;
- providing an education and awareness programme to ensure expectations around the discharge of rural proofing statutory duties are understood by duty holders and their relevant staff;
- sharing practice and promoting good communications, including support for the development of tailored solutions;
- piloting and testing rural solutions demonstrating approaches for improved and supported rural development and delivery outcomes; and
- building the capacity of rural communities to scrutinise policy and service delivery to assess whether effective rural proofing has been undertaken.

5.3.8 A further issue raised by some respondents was the provision of appropriate resources to support rural proofing duties. One respondent expressed the view that DARD needed to ensure that policy makers were provided with the resources, including the development of training programmes, which were

required to implement rural proofing. Another suggested the production of a "rural proofing toolkit" to support both policy development and service delivery.

5.3.9 Of the two respondents who indicated they were unsure of whether DARD should have a statutory role in promoting and encouraging rural proofing, one, while recognising the need for a lead, co-ordinating body to promote and encourage other bodies to undertake rural proofing, did not see any requirement for this role to be fulfilled by DARD (although it did also acknowledge that there may be some benefits in DARD having that role). This respondent suggested that the role could be undertaken by an independent monitoring body. The other respondent who was unsure about the proposed statutory role for DARD, commented that there was a lack of evidence on which to assess this proposal or to determine whether there were alternative ways of achieving the aim of promoting and encouraging the need for rural proofing.

5.4 Monitoring and Reporting

Views expressed at public meetings

5.4.1 Several comments were made about the proposed monitoring and reporting arrangements. It was suggested at two meetings that as well as departments being accountable to their respective Assembly committees, there should be independent scrutiny by representatives from the rural community. (The Northern Ireland Housing Executive Central Housing Forum was highlighted as a good example of such an arrangement.) It was also suggested at two meetings that independent scrutiny arrangements would increase the credibility of the monitoring process.

5.4.2 It was proposed that the monitoring process itself should focus on setting definitive goals and targets and that it should identify, and highlight, areas of good practice. In addition, the importance of building an evidence base to show the extent to which rural proofing was being undertaken was noted.

5.4.3 Views were also expressed on the content and structure of the proposed reports on rural proofing to be laid before the Assembly. It was suggested that reports should include input from rural communities and/or their representative organisations on qualitative data and the impact of various policies. In addition, it was considered that reports should be outcome focused and that they should include information on the impacts of policies and how these were mitigated. It was also suggested that reports should allow comparisons to be made between the performance of the public authorities being reported on.

5.4.4 There were differing views on how frequently monitoring reports should be produced: some felt that it was necessary to produce an annual report to ensure effective monitoring while others were of the view that reporting 'regularly', rather than annually, would give DARD more scope to identify areas where rural proofing was not being undertaken.

Written responses

Consultation Question 5

Do you think that the proposed monitoring and reporting arrangements will help to improve the availability and transparency of information available through rural proofing?

5.4.5 Twenty-eight of those who provided written responses to the consultation referred specifically to the proposed monitoring and reporting arrangements. Of these, 20 respondents stated they were in agreement with the proposals. A further two, by way of their written comments, indicated their support for the proposed arrangements. Four respondents were opposed to the proposed arrangements. The two remaining respondents indicated they were unsure of whether those arrangements would help to improve the availability and transparency of information.

5.4.6 A number of those in favour of the proposed arrangements welcomed that these provided for regular reports on rural proofing to be laid before the Assembly, which would allow for scrutiny by MLAs. Some respondents called for Assembly committees to be involved in monitoring performance of

government departments and their NDPBs. One respondent suggested that department-specific reports should be provided to the relevant committee for examination. This respondent also stated that clarity was needed on how frequently *"regular"* reports would be produced and queried whether it was proposed that the performance of councils and other public bodies would be included in a report be laid before the Assembly, or whether a separate report would be published for them.

5.4.7 A number of respondents suggested that consideration be given to how rural stakeholder groups and rural citizens could be engaged in the monitoring arrangements. There was a suggestion that a mechanism for this should be built into existing structures and could, for example, take the form of an inquiry or other public event organised on a bi-annual basis by the Assembly's Agriculture and Rural Development Committee, which would seek evidence from the public on the implementation of rural proofing across government.

5.4.8 Another view on monitoring arrangements, which was expressed by several respondents, was that each government department, local council and NDPB should nominate a rural champion at senior level who would take the lead role in ensuring policy and service delivery plans within their organisation were rural proofed.

5.4.9 Some respondents expressed a view on the content of the proposed reports on rural proofing. They suggested that examples of good practice should be identified, as should instances where rural proofing had not been carried out. It was also proposed that the reports provide information on barriers to rural proofing and make suggestions for further improvements. There was also a view that a record of all activity by duty holders within the designated timeframe would provide an evidence base for use in future policy making.

5.4.10 Other comments in response to this aspect of the consultation included: that although the proposed monitoring and reported arrangements were important, they should not create bureaucracy; that while there are benefits in having readily available data, this should be available in a user-friendly format; that the proposed reports on rural proofing would increase awareness

of rural needs; and that it would be helpful to have guidance to assist duty holders develop their monitoring and reporting systems.

5.4.11 Of the two respondents who indicated they were unsure of whether the proposed monitoring and reporting arrangements would help improve the availability and transparency of information, one suggested that to ensure effective rural proofing, the proposed report should seek to scrutinise rural proofing across government as well as improving the availability and transparency of information, and that it should also outline areas of best practice and highlight where needs had not been adequately considered. This respondent also referred to a need for DARD to review its own role. It was suggested that consideration be given to an independent review, similar to that undertaken by the Department for Environment, Food and Rural Affairs[7].

5.4.12 The other respondent unsure about the proposed arrangements commented that there was no clearly defined mechanism to oversee or enforce the rural proofing arrangements. This respondent highlighted a need for an independent watchdog to which duty holders would be accountable in cases of non-compliance, and suggested that if the rural process was to be truly transparent, a clear route of redress was necessary for anyone who considered that their needs had not been properly considered and that they had been adversely affected as a result.

5.4.13 Three of the four respondents who were not in support of the proposed monitoring and reporting arrangements were of the view that independence was required. Two of these considered that an independent organisation should be required to produce and publish regular reports on rural proofing to be laid before the Assembly. They proposed that these reports should give a factual, evidence-based account of what departments and other public bodies had done in furtherance of their duty to consider the needs of rural dwellers and also demonstrate what DARD had done to meet its duty to promote and encourage rural proofing.

[7] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/400695/rural-proofing-imp-review-2015.pdf

5.4.14 Another of the four respondents not in favour of the proposed arrangements expressed the view that DARD could not be subject to the rural proofing legislation and undertake the monitoring and reporting role without there being a conflict of interest. A potential for conflict of interest in relation to the proposed role for the Inter-departmental Committee on Rural Policy (as referred to in paragraph 7.10 of the consultation document) was also highlighted. This respondent suggested that a properly resourced independent body should discharge the monitoring and reporting role, which would include reporting on examples of good practice, demonstrating the benefits of undertaking effective rural proofing and making suggestions for improvements where needed.

5.4.15 The remaining respondent opposed to the proposed monitoring and reporting arrangements expressed the view that it was not necessary to produce regular reports to be laid before the Assembly. This respondent, a local council, stated that it would focus on outcomes for its rural communities, and would review, monitor and be accountable, in an open and transparent manner, to its constituents for delivery of those outcomes.

5.5 Co-operation and Collaboration

Views expressed at public meetings

5.5.1 It was noted at several meetings that co-operation and collaboration was key to making the proposed Bill and the rural proofing process effective. In addition, participants at two meetings considered that linking the Bill to the Community Plan would be useful in relation to exchanging information with local councils. It was felt that this link should exist as soon as the Bill became law so that the process would be embedded within councils' thinking as soon as possible.

Written responses

Consultation Question 6

Do you think that increased co-operation and collaboration between DARD, other government departments and public bodies is desirable?

5.5.2 Of the 32 written responses received, 27 commented on the proposal that the Bill would provide for increased co-operation and collaboration between DARD, other government departments and public bodies. All of these respondents were in support of this proposal.

5.5.3 Many respondents commented that greater co-operation and collaboration was essential to ensure meaningful and effective rural proofing that would achieve real outcomes for rural dwellers. Some also noted that co-operation and collaboration was vital in order to ensure the sharing of information, evidence-based research and good practice at an early stage of the policy development process. There was also a suggestion that a collaborative approach to rural proofing would enable gaps in service provision to be identified and resources focused where most needed. One respondent suggested that increased co-operation and collaboration would encourage more effective communication across government regarding delivery plans for key services within budget constraints.

5.5.4 Two respondents made the point that co-operation and collaboration was particularly important within the context of current economic constraints in order to avoid duplication of work and wasting of resources. Another respondent noted that key issues facing rural communities, such as sustainable development and environmental protection, were cross-cutting and therefore required collaborative thinking across government.

5.5.5 Attention was drawn to the importance of greater co-operation and collaboration in view of the introduction of the duty of community planning and the increased accountability of all community planning stakeholders at local level. In addition, one respondent suggested that the proposed co-operation and collaboration arrangements should be extended to include North South collaboration, particularly in respect to informing cross-border rural solutions.

5.5.6 A number of respondents highlighted a link between the proposal for greater co-operation and collaboration and the proposal for DARD to have a statutory duty to promote and encourage rural proofing. They were of the view that in

furtherance of such a duty, DARD would have to work to ensure co-operation and partnership between government departments, councils and NDPBs.

5.5.7 One respondent suggested that further co-operation and collaboration between departments could be used to maximise the drawdown of EU funding for the benefit of the rural community.

5.5.8 Some respondents made suggestions on how DARD might wish to move forward on this policy proposal. One encouraged DARD to scope arrangements for community planning and to consider the Children's Services Co-operation Bill for potential precedent in relation to the Rural Proofing Bill. Another highlighted the existing partnership between DARD and Libraries NI, as a model of good practice.

5.6 Provision of Support, Advice, Guidance and Information

Written responses

Consultation Question 7

Do you agree with the strengthening of DARD's role in providing support for rural proofing?

5.6.1 Twenty-seven respondents expressed a view on the proposed strengthening of DARD's role in providing support for rural proofing. All of these respondents indicated that they agreed with this proposal.

5.6.2 Several respondents suggested that DARD, as the body responsible for rural development, was best placed to provide that support. Some expressed the view that this role for DARD should include being a champion for rural proofing.

5.6.3 A number of respondents commented that support for policy makers was essential to ensuring that rural proofing was undertaken effectively. Several respondents expressed the view that training and education should be a key component of DARD's support for rural proofing. It was necessary, they said, that policy makers and decision makers in government departments, councils

and NDPBs received appropriate training and education in order to ensure that policy and service delivery was considered from a rural perspective.

5.6.4 Some views were expressed on the resource implications of the Rural Proofing Bill providing for DARD to have a statutory role in the provision of support. One respondent reiterated a point made in their response to consultation question 4, which was that a statutory duty on DARD to provide support for rural proofing would require it to dedicate resources to training and promotion, which should ensure more effective delivery of rural proofing. Another respondent commented that the successful implementation of the Bill would be dependent on adequate resources being made available for advice, training and monitoring. There was also a view that the strengthening of DARD's role should not entail additional administrative cost.

5.6.5 Several respondents expressed views on the content of the proposed rural proofing support programme to be provided by DARD. The following areas were suggested:

- developing an external facilitated stakeholder forum;
- providing a rural proofing support service;
- establishing a rural evidence hub;
- piloting and testing rural solutions;
- sharing best practice and communications;
- building the capacity of policy makers to engage effectively with rural stakeholders;
- building the capacity of rural communities to scrutinise policies and service delivery to assess whether or not effective rural proofing has been undertaken; and
- training in equality legislation, including Section 75 obligations, UN Convention on the Rights of Persons with Disabilities and UN Convention on the rights of the Child

5.7 Other Aspects of the Proposals

Views expressed at public meetings

5.7.1 There was some discussion at the meetings of rural proofing more generally. It was felt that the rural proofing process should not only consider the rural aspects of policies but also provide clear evidence of how the impact of polices could be mitigated. Some participants made the point that grass roots engagement, before making or changing policies that affected rural communities, was vital in order to assess the real effect those policies would have within those communities. Another was of the view that the correct application of the rural proofing process should result in government officials considering alternative options to losing or removing services. The concept of a 'rural champion' in each department and across local councils was discussed at two meetings.

5.7.2 Further issues raised included a suggestion that the key purpose of a Rural Proofing Bill should be to provide better outcomes for rural communities. There was a view expressed at one meeting that aspects of government policy made life more difficult for rural communities and that the Bill should aim to address this. It was considered important, however, that the Bill was not regarded as just adding bureaucracy to the rural proofing process. At several meetings the point was made that careful consideration needed to be given to the wording of the Bill in order to ensure it had maximum effect.

Written responses

Consultation Question 8

Is there any other aspect of the proposals you wish to comment on?

5.7.3 A significant number of respondents commented on other aspects of the proposals.

Definition of "rural"

5.7.4 Some suggested there was a need for a clear and appropriate definition of "rural" in order for the proposed Rural Proofing Bill to deliver tangible benefits to rural dwellers. Respondents also noted the scope for policy makers to

depart from the default definition of rural (as referenced in paragraph 2.6 of the consultation document), if their policy objectives made it appropriate to do so. While these respondents accepted the rationale for such flexibility, they also suggested that the Bill should provide for rural proofing to consider how the impacts of policy development and service delivery differ between remote rural communities and those that are closer to urban centres.

Clarity of the purpose of the Bill

5.7.5 Several respondents emphasised the need for the proposed Rural Proofing Bill to focus on securing better policy outcomes for rural dwellers. They were of the view that the Bill should make clear the ethos and spirit of what the legislation was aiming to achieve. There was also a suggestion that aims of the Bill needed to be more specific, and that clarity was needed as to how achievement of those aims would be measured.

Non-compliance

5.7.6 Some respondents highlighted in their response to this consultation question that there was no provision in the proposals for sanctions to be imposed in cases of non-compliance. It was suggested that consideration be given to strengthening this aspect of the proposals to ensure that the rural proofing process was taken seriously and in order to reduce the possibility of judicial review being seen as the only means of addressing perceived non-compliance.

Timing of the Bill

5.7.7 One respondent noted concern about the timing of the Bill, suggesting that the proposal to have it complete the legislative process within the current Assembly mandate may not allow for sufficient scrutiny. This respondent suggested that DARD should commission a review of current rural proofing arrangements and make recommendations for debate by the Assembly before deciding how to proceed.

Supporting framework

5.7.8 The view was expressed by one respondent that a Rural Proofing Bill would be ineffective unless there was a framework to support rural proofing policy. This respondent commented that independent monitoring of rural proofing by departments and district councils was essential. In recognising the cost of creating an independent oversight office, the respondent suggested that consideration be given to whether this role could be undertaken by an existing body.

The private sector

5.7.9 One respondent, in noting that the proposed Rural Proofing Bill would apply only to the public sector, commented that the rural community was dependent on the private sector, and the community and voluntary sector, for services such as transport and advice. This respondent suggested that while it should be a longer-term goal to have a rural element included in regulators' assessments of fair trading and good commercial practice, a starting point would be provision in the proposed Rural Proofing Bill for any currently government-owned body to be required to continue to rural proof its policies in the event of it being privatised and still holding a monopoly in its field.

"Reasonable accommodation"

5.7.10 One respondent highlighted the reference in paragraph 4.6 of the consultation document to the proposed Bill's aim of securing *"fair and equitable treatment"* for rural dwellers, contending that the stated definition of *"equitable"* was unclear. This respondent raised the concept of "reasonable accommodation", stating that this places an obligation on a responsible party to take reasonable steps to eliminate or minimise a disadvantage, where such a disadvantage exists or would be created. The respondent commented that the concept of reasonable accommodation already applies in equality and anti-discrimination law and should also apply to rural proofing.

5.8 Impact Assessments

Written responses

Consultation Question 9

Do you have any views on the conclusions reached by DARD to screen out from further assessment the impacts of a Rural Proofing Bill in respect of:

a) Equality Impact Assessment;
b) Regulatory Impact Assessment; and
c) Rural Proofing?

5.8.1 Of the 32 written responses received, ten referred to DARD's decision that further assessments of the impacts of a Rural Proofing Bill were not required.

5.8.2 Of those, four stated they agreed with DARD's conclusion. A further four respondents indicated that they had noted the decision and had no further comment.

5.8.3 One respondent queried the evidence base for DARD's conclusion that, in relation to equality of opportunity, the Bill was neutral for all Section 75 categories and that an EQIA was therefore not necessary.

5.8.4 Another respondent indicated in relation to all of the assessments, that there was a single solution, which was to tackle the inequality that rural dwellers face on a daily basis.

ANNEX A:

Public Meetings Held During the Consultation Period

	Location	Venue	Date	Time	Number of Attendees
1	Banbridge	Old Town Hall	Thursday 19 February 2015	7.00pm – 9.00pm	4
2	Garvagh	Garvagh Community Building	Friday 20 February 2015	11.30am – 1.30pm	6
3	Cookstown	CAFRE Loughry College	Wednesday 25 February 2015	2.00pm – 4.00pm	9
4	Antrim	CAFRE Greenmount College	Thursday 26 February 2015	7.00pm – 9.00pm	1
5	Enniskillen	CAFRE Enniskillen Campus	Monday 2 March 2015	11.00am – 1.00pm	9
6	Markethill	Old Court House	Tuesday 3 March 2015	7.00pm – 9.00pm	2
7	Belfast	The Pavilion, Stormont Estate	Wednesday 4 March 2015	10.00am – 12.00 noon	5
8	Omagh	Omagh Community Forum	Thursday 5 March 2015	2.00pm to 4.00pm	4
9	Dungiven	Glenshane House	Friday 6 March 2015	2.00pm – 4.00pm	7

ANNEX B:

DARD Representation at Public Meetings

Name	Position in DARD	Meetings Attended
Louise Warde-Hunter	Head of Central Policy Group	1, 7
Colette McMaster	Director, Food Farm and Rural Policy Division	2, 3, 4
Astrid Stuart	Head of Rural Proofing Branch	1, 2, 3, 4, 5, 6, 7, 8, 9
Jim McIlduff	Rural Proofing Branch	1, 2, 3, 4, 5, 6, 7, 8, 9

Annex C:

List of Written Responses to Consultation

Response Number	Name	Organisation (where applicable)
1	Councillor Paul Maguire	
2	Mrs Marian Maguire	
3		Police Service of Northern Ireland
4	Ms Mags Lightbody	Northern Ireland Housing Executive
5	Mr Nicholas McCrickard	County Down Rural Community Network
6		Patient and Client Council
7	Mr Lauri McCusker	Fermanagh Trust
8	Ms Irene Knox	Libraries NI
9		Disability Action
10	Mr Bernard Clarke	Translink
11		Fermanagh and Omagh District Council
12	Mr Aidan Campbell	Rural Community Network
13	Dr Stephen McCabe	Northern Ireland Environment Link
14	Mr Paul Dinsmore	Volunteer Now
15	Mr Conor Corr	Cookstown and Western Shores Area Network
16	Mr Lyall Plant	Countryside Alliance Ireland
17	Mr Stephen Fisher	Rural Housing Association
18	Mr Derek McCallan	Northern Ireland Local Government Association
19	Mr Martin McTaggart	Centre for Cross Border Studies
20	Mrs Teresa Canavan	Rural Development Council
21	Mrs Claire Williamson	Royal Town Planning Institute (NI)
22	Mr Declan McAleer	Sinn Féin
23	Mrs Louise Coyle	Northern Ireland Rural Women's Network
24	Professor Seamus Kennedy	Agri-food and Biosciences Institute
25	Mr Barry Boyle	Fermanagh Rural Community Network
26	Mr Pat Cumiskey	Banbridge District Council
27		Community Relations Council
28	Mr John Kelpie	Derry City and Strabane District Council
29	Mr Barclay Bell	Ulster Farmers' Union
30		Mid and East Antrim Borough Council
31		Social Democratic and Labour Party
32		Armagh City, Banbridge and Craigavon Borough Council

Annex D:

Consultation Responses by Topic

Consultation Questions		Response Number
Q1	Enhanced rural proofing	1, 2, 4, 5, 7, 8, 9,10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 27, 28, 29, 31, 32
Q2	Duty on government departments and local councils to consider the needs of people living in rural areas	1, 2, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 30, 31, 32
Q3	Duty on non-departmental public bodies to consider the needs of people living in rural areas	1, 2, 4, 5, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 31, 32
Q4	Promoting and encouraging rural proofing	1, 2, 4, 5, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 31, 32
Q5	Monitoring and reporting	1, 2, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 30, 31, 32
Q6	Co-operation and collaboration	1, 2, 4, 5, 7, 8, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 30, 31, 32
Q7	Provision of support, advice, guidance and information	1, 2, 4, 5, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 23, 24, 25, 27, 28, 29, 31, 32
Q8	Other aspects of the proposals	1, 2, 4, 5, 9,11, 12, 13, 14, 15, 16, 18, 19, 20, 21, 22, 23, 24, 28, 29
Q9	Impact Assessments	1, 2, 4, 9, 11, 16, 18, 24, 28, 31