Community First Yorkshire – written evidence (NER0017)

Rural advocacy and the Commission for Rural Communities
Q1. Since the closure of the Commission for Rural Communities (CRC), and subsequent winding up of the Defra Rural Communities Policy Unit, how – if at all - are the CRC’s original functions of being fulfilled?

1. Advocate, adviser and watchdog functions are not being fulfilled consistently or constantly across Government in the absence of a cross cutting policy unit or commission. Rural advocacy is not seen as a priority for a particular departmental or Government agency.

2. Local advocacy is happening through networks such as ACRE Network of Rural Community Councils and RSN (Rural Services Network). Local members of these networks actively engage with national agendas to seek to influence and shape plans. Locally members are well embedded in economic, health and community structures to feed in and facilitate conversations regarding all aspects of rural needs and opportunities. Close and regular contact is made with local authorities, LEPs, CCGs, national parks, AONBs, voluntary and community groups, etc.

3. Officials often point to Food, Farming and Rural Networks as being a rural influencer – in fact these are not funded and generally led by the farming lobby. This is fine if it is clear that the views are from a narrow representative group, and that the intention is not for a broad spread of views to be gathered. But without a clear indication and planning for a wider range of views it should not be assumed that ‘food and farming’ networks effectively represent rural views.

4. There are pockets of advice within both DEFRA and DCLG and their agencies, which seek to support rural interests but that is limited to the scope of their departmental remit. The focus on rurality and the issues raised, tend to come from the service delivery perspective of departments such as Health and Education, as they seek to identify ways of ensuring equality of access and take-up of services by people living in rural areas compared to people living in more urban and populated areas. There are concerns that Brexit can unduly distract Defra from other on-going priorities for rural communities.

5. Advice is being provided by organisations within the voluntary and community sector (VCS), or other agencies such as National Parks, LEADER Groups, AONB, NFU, waterways authorities etc. For VCS organisations their funding is not secure for the long term and often annually from multiple sources, putting at risk retaining people with the right level of knowledge, skills and experience to provide good quality advice.

6. Nationally and through formal structures there does not appear to be a strong emphasis on 'watchdog'. Locally local authority planning processes through various levels of planning consideration seeks to draw in views on development and also local communities have a route to raise issues of concern and be part of the local watchdog function. Rural interest groups provide an informal watchdog function and through networks and contacts are able to raise concerns with public bodies and Government departments.
7. There is not a consistency of approach or common cross-cutting priorities to provide a collective structure within which policies and plans to be shaped.

Q2. Are sufficient measures being taken to ensure that policies are rural-proofed at national and local levels? Who is taking the lead on policy for rural areas – and who should be taking the lead on such matters?

8. Rural proofing is not part of common practice among planners and funders, nationally and locally. If it is done it is at the end of a planning process as a headline check. Rural proofing does not shape planning from the start. For example one or two paragraphs is often all that is asked for in tender documents to show how hard to reach communities will be engaged with, this does not go far enough in terms of detail; costings in funding does not reflect it has been proofed from a financial basis.

9. Part of the role of ACRE Network of Rural Community Councils members locally is to provide the rural proofing check and challenge to strategies and plans for an area or nationally. A recent example is feedback on the consultation on the UK Industrial Strategy, and the response from Community First Yorkshire highlighted rurality amongst other issues which the strategy did not address:

‘Rurality and sparsity of people, businesses and opportunities – the Industrial Strategy should have the scope to ensure investment to create economic and business growth in rural areas of the country. To do this it is essential to recognise that there will not be the same critical mass of numbers in rural areas as other parts of the country and value for money, output and other measures need to be flexible enough to accommodate investment in areas of sparsity. Investment priorities for rural areas should be opened up by the strategy, to enable local residents to have access to training, apprenticeships, career and entrepreneurial opportunities. This should be routed in Government cross-departmental working, linking education and the work of DWP more closely with BIS. The Industrial Strategy should set out a new basis for planning and investment, linking with the National Parks, Environment Agency and cross-government departments such as DEFRA, Department for Education and its agencies and investment arms.’

10. More importantly rural proofing is not central to commissioning, and as more and more cross-region and national providers are successful in their tendering, the reach into rural areas is not as effective as it could and should be, rural communities are not where providers first go to get some early wins on a contract and local working does not to build on the strong networks which exist is rural areas. A stronger rural proofing model feeding into the planning and tender assessment stages of procurement would ensure a great focus is given to delivery and reach of services into rural areas.

11. Community First Yorkshire has asked if plans have been rural proofed, and responses tend to be no or that there is no recognition of the proofing guidance. If this is happening in North Yorkshire and it is not doing this as a matter of course, the same if very likely elsewhere.
12. Rural proofing of superfast broadband installation policies and procurement specifically permit agreements such as BT leaving 1% unfinished to avoid Universal Offer, this is not acceptable and would not meet rural proofing criteria. Also the concept that 10MG is acceptable for rural areas is creating a two tier economy. Rural proofing has failed spectacularly in this regard and should be an area for further review to understand why and who is accountable for allowing this two tier commitment to be deemed acceptable. This failing is being felt in economic, education and will be increasingly impacting the roll-out of new ICT-led methods of health, wellbeing and social interaction and delivery of services. It might be said that an increased investment should be made to secure better broadband speed in rural areas to overcome the discrimination which is inherent in the location of businesses and residents and distance to services and facilities.

13. Policy for rural areas does not have a single lead, which is to be expected. Lead roles are cross department, cross local authorities and national, regional and local. Like economic and health strategies it is needed at all these levels. A national strategy is needed to set the overarching framework for planning and investment. This is then amplified by Government departments, local authorities and other planners, as they bring into the framework their respective areas of responsibility, with their particular focus and associated plans and investments. Overall lead could sit within or outside government, the benefits of the options needs to be explored.

Q3. What role should Defra – or other Government departments – play in co-ordinating policy for rural areas? How effectively are the interests – including social and economic interests - of rural communities being represented within the current structures of Government, and how could representation and co-ordination be improved?

14. DEFRA and DCLG have key roles in coordinating policy for rural areas. The interests of rural communities are represented but it is currently unstructured and uncoordinated. Where it is effective is effective because the parties providing and listening to representation are keen to be open and responsive. It could be more effective and efficient if it were done via one structure which operates both nationally and locally. The organisations involved in that structure need to be positioned and given a remit to influence the plans of and be seen as a cross departmental resource. The structure is in place via rural networks which could work collaboratively on representation and producing the framework as outlined in the response to Q2.

15. The ACRE Network of Rural Community Councils receive Defra grant funding which is absolutely essential for a strong rural voice and for ACRE members to have the capacity to rural proof when requested eg the Health Weight Strategy was rural proofed last year which takes time and is done as part of the Defra grant work, but it does not have the full impact without the follow up needed to ensure it is implemented.

Natural England
Q4. How well has Natural England fulfilled the mandate that it currently has? How well do its wide-ranging functions fit together, and does it have the appropriate powers and resources to perform these functions?
16. The fit between its wide ranging functions is timely to be reviewed in the context of the changing roles of local government, national Government departments and agencies, and the socio-economic context of the countryside.

Q5. Are any changes to the remit and responsibilities of Natural England required, either as a result of Brexit or of other significant developments in the period since 2006?

17. Changing responsibilities will come with Brexit, in particular shaping and embedding national Government legislation as the Great Repeal Bill and the second the Bill which converts all EU law into United Kingdom law are implemented. This will include laws and directives to be turned into UK law before Brexit is completed in mid-2019. These laws will need the necessary checks and balances in place to ensure they are enforced and there is a route for challenge, which may open up gaps in responsibilities and roles that Natural England and other parts of local and national Government will be required to fill.

18. Of concern are the resources being diverted to Brexit, and pre and post DEFRA planning, which will limit the attention given by all agencies to the interests of rural communities.

19. Changes to local Government roles and resources also has an influence on the remit of Natural England, such as less resources going into building inspectors and pathways management.

Q6. Do the arrangements and provisions for enabling and managing access to the countryside remain appropriate? How effective have Natural England – and other partners – been in promoting better access?

**Sustainability and biodiversity**

Q7. Is the duty to ‘have regard’ to biodiversity, which is contained within the Act, well understood by those bodies to whom it applies? Is any further work required to raise awareness of the duty?

Q8. What has been the practical impact of the 2006 duty? Is any modification to the duty required as a result of developments in our understanding of the value of ecosystems and biodiversity since 2006?

Q9. How does the English duty to ‘have regard’ to biodiversity compare to the Scottish duty to ‘further’ biodiversity and the enhanced biodiversity duty introduced in Wales in 2016?

**The changing context since 2006**

Q10. Will the structures established by the Act be sufficient to ensure appropriate protection for nature and environmental standards following Brexit? Are any modifications or changes to the structures established by the Act required to address the implications of Brexit?

20. Close attention needs to be given to check that clauses and legislation from EU law are covered by the Act and Government departments continue to cover the necessary responsibilities to ensure appropriate protection for nature and environmental standards following Brexit. Any gaps in standards will need to be put in place through legislation.
Q11. Are there any further parts of the Act which are currently in force that need to be re-considered as a result of developments since 2006?

21. Parts of the Act will need reviewing in the light of other legislation and plans for post-Brexit. In particular the UK Industrial Strategy will have opportunities and challenges which the legislation and Natural England, will need to respond to, to ensure rural communities are protected and best placed to benefit from the new vision.

Response on behalf of: the voluntary and community sector North Yorkshire and Rural Community Council for North Yorkshire, one of 38 Rural Community Councils which make up the Network of Rural Community Councils (Action with Communities in Rural England).

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