

## Consultation Response Template

Please use this template for submitting your responses and comments. The template should be read in conjunction with the proposals which can be viewed at [www.dardni.gov.uk/consultations](http://www.dardni.gov.uk/consultations).

To request a hard copy of the consultation papers please write, or email, as detailed below or telephone 028 9052 4106. The deadline for responses to this consultation is 16 March 2015. All responses should be received by then to ensure they can be fully considered.

DARD welcomes any comments you wish to make on all of the proposals or just on those issues that are of particular interest to you in the consultation.

If you are completing an electronic version of this form, it should be emailed to: [rural.proofing@dardni.gov.uk](mailto:rural.proofing@dardni.gov.uk).

Alternatively you can post a hard copy of the completed form to:

Rural Proofing Bill Team  
Department of Agriculture and Rural Development  
Room 654 Dundonald House  
Ballymiscaw  
Belfast BT4 3SB

All responses should be received by 16 March 2015 to ensure they can be fully considered.

## Freedom of Information

In line with the Department's policy of openness at the end of the consultation period, copies of the responses we receive may be made publicly available. The information they contain may also be published in a summary of responses, which will be placed on the internet at <http://www.dardni.gov.uk/index/consultations/current-consultations.htm>.

This summary will include a list of names of organisations or sectors that responded but not personal names, addresses or other contact details.

If you do not consent to this, you must explicitly request that your response be treated confidentially. Any confidentiality disclaimer generated by your IT system in e-mail responses will not be treated as such a request.

You should also be aware that there might be circumstances in which we will be required to communicate information to third parties on request, in order to comply with our obligations under Freedom of Information Act 2000 and the Environmental Information Regulations 2004. For further information about confidentiality of responses, please contact the Information Commissioner's Office, or visit their website at [www.ico.org.uk](http://www.ico.org.uk).

## RESPONDENT INFORMATION

**Please Note** this form **must** be returned with your response to ensure that we handle your response appropriately.

### 1. Name / Organisation

**Organisation Name (If applicable).**

Ulster Farmers' Union

**Title** Mr  Ms  Mrs  Miss  Dr  **Please tick as appropriate**

**Surname**

Bell

**Forename**

Barclay

### 2. Postal Address

475 Antrim Road

Belfast

**Postcode** BT15 3DA

**Phone** 02890370222

**Email**  
davidmcconaghy@ufuhq.com

## Consultation Questions

1) Do you support the need for change in line with DARD's aspirations (as outlined at paragraph 4.8):

- 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.

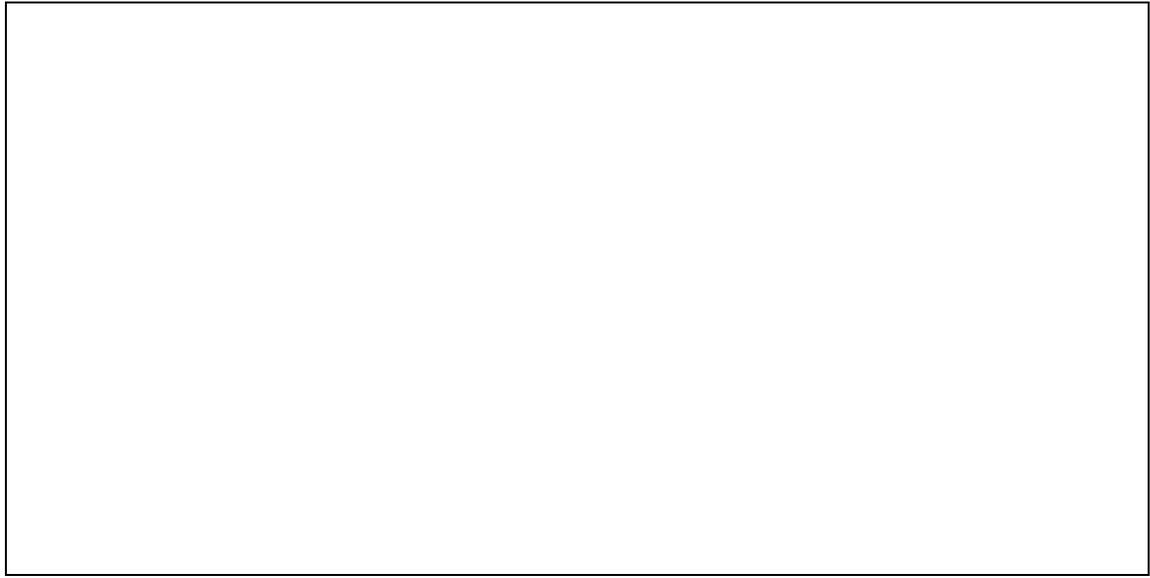
- Yes
- No
- Don't Know

The aspirations listed above are good, in so far as they go, but they do not, however, make the case for change. They effectively skip this step and jump straight to what they would like to achieve. The aspirations listed could be used to support any policy whatsoever and there is nothing tying them specifically to the policies explored in the consultation document.

It is impossible to support a "need for change" when the case has no substantive detail or evidence for us to make a decision on. We have been given no detail on the current situation and the extent to which rural proofing has been carried out and how successful it has been. If you do not know what you are changing from there is no way to tell if the change will bring a benefit: particularly a change as radical as what is being proposed.

The words used in these aspirations are require much more clarity and expansion: what are "rural issues" and "rural needs"? How will these be identified? What does "embedded" mean? What will be classed as "appropriate"? By framing the aspirations in such a vague way they could literally mean anything and in reality mean very little at all.

DARD need to give us some concrete goals of what we can expect to see that will make a real and tangible difference to rural dwellers and rural businesses.



**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?**

- Yes**
- No**
- Don't Know**

Again, we are unclear about what such a statutory duty would consist of: we would need to see some proposed wordings before we could comment- worded in one way it could and if worded in another it may not result in any benefit.

As well as this, a duty needs to be enforced. There is no clarity in this document about how a duty would be monitored for compliance, a duty on its own may or may not be followed, and without robust and transparent accountability there is no way to ensure that correct procedures are followed, with a clear route of redress for anyone left aggrieved.

Finally, we return to the questions of what “rural dwellers” and “appropriately considered” mean. Until these issues are clarified it is impossible to comment.



**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?**

**Yes**

**No**

**Don't Know**

In the absence of detail on what the duty would consist of it is very difficult to comment, but we do believe that any policy made by a public body which could have implications for rural areas should be included.

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

Yes

No

Don't Know

Again, there is no evidence being presented which allows us to assess the current and there are no alternative proposals for how DARD could achieve their aims in different ways outlining the positive and negative connotations of each option so that we could make an educated choice.

**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?**

- Yes**
- No**
- Don't Know**

To return to our previous points, there is no clearly defined mechanism for overseeing and enforcing the arrangements that are in place. In order for a process to be truly transparent there needs to be a clearly set out route of redress for anyone who feels that their needs have not been considered adequately and that they have suffered harm as a result. The current proposals seem to keep the entire process “in-house” which does not inspire confidence.

We have raised the issue repeatedly of the need for an independent watchdog or ombudsman to whom the bodies on whom a duty rests would be answerable in the case of a failure on their part. Again, we would need to see various options for pursuing this route so as to be able to comment on the most suitable course of action.



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

- Yes**
- No**
- Don't Know**

This question is so generic as to be impossible to respond to in any other way. No-one could possibly object to such a bland statement as there can never be too much co-operation between government bodies- and stakeholders – in these matters, however in the absence of any clearly defined and presented framework or forum for this co-operation, such as was laid out in Lord Cameron’s review, it is impossible to say what benefits rural dwellers can expect.



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

**Yes**

**No**

**Don't Know**

We agree with the principle of this, but there is no clarity on how this strengthening would take place. We believe that the best way to strengthen DARD's position in this matter is to provide them with the information on the extent and effectiveness of the rural proofing process so far so that it can be assessed in a realistic way.

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

We have written a follow-up letter to this document which outlines our concerns and arguments in more detail: the documents should not be read in isolation from one another.

**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:**

- (i) Equality Impact Assessment;**
- (ii) Regulatory Impact Assessment; and**
- (iii) Rural Proofing?**

