

RURAL PROOFING IN ENGLAND 2020 REPORT

COMMENTS FROM THE RURAL COALITION

In March 2021 the Department for Environment, Food & Rural Affairs (Defra) published its first annual rural proofing report, *Rural Proofing in England 2020*¹. In doing so, it invited contributions or comments from rural stakeholders and residents. This note is the comments from the Rural Coalition, whose members are the thirteen organisations listed at the end.

The context for Defra's report is a commitment made by the Government in July 2019 in its response to a report from the House of Lords Select Committee on the Rural Economy. In that response² the Government rejected a key Select Committee recommendation, that it should develop a Rural Strategy. Instead, it said that "over the coming months, the government will expand on its strategic vision [for rural areas]". It also reaffirmed its "clear commitment that all policies be 'rural proofed'" and stated that "Defra will therefore publish each year an evidence-based report on rural proofing". No expanded strategic vision for rural areas has yet been published.

The following comments represent the joint views of the Rural Coalition. Individual members may have also commented separately.

Comments on the 2020 rural proofing report

- **Publication:** the Rural Coalition welcomes publication of this first annual *Rural Proofing in England* report. We acknowledge that Defra has made progress with certain processes intended to assist rural proofing, by identifying lead rural proofing officers in other Whitehall departments, by further developing its rural evidence base, by supporting rural academic research and by engaging regularly with rural stakeholders like ourselves.
- **Timeframe:** we would have expected an annual report for 2020 to focus on policies which were developed, launched or implemented during that year. We do not think it should be citing policies from earlier periods, such as the Early Years National Funding Formula from 2017 and the rural affairs strategy of the National Police Chiefs' Council from 2018. Similarly, we do not think it should be citing policies commenced only in 2021, such as the call for evidence on digital connectivity in hard-to-reach areas issued in March 2021 and the launch of the Community Ownership Fund in March 2021. It is important these annual reports adopt a consistent timeframe and, as the process evolves, they should examine the real impacts for rural communities of rural proofing which was cited in previous years.
- **Generic policies:** many policies cited in the report are national policies, where it is hard to point to anything about their design or implementation that adjusts for rural needs or mitigates for rural circumstances or even capitalises on rural opportunities. Describing the benefits of these generic policies the report falls back on phrases such as, "including in rural

¹ *Rural Proofing in England 2020 – Delivering policy in a rural context*, Defra (2021)

² *Government Response to the House of Lords Select Committee on the Rural Economy: "Time for a strategy for the rural economy"* (2019)

and remote areas”. Examples include references to international trade support and social care recruitment. A nationally applicable policy is not necessarily a rural proofed policy and there is no evidence provided that rural proofing took place.

- **Transparency:** more generally, we found it hard, from the material in the report, to understand how, or even whether, rural proofing influenced policy making by departments. The rural proofing process has been outlined in Defra guidance³ written for other departments, but it is not clear whether this guidance has been applied. We would expect an evidence-based report to show the rural thinking behind policies and the rural outcomes that resulted.
- **Scope:** we acknowledge the fairly broad scope of this report, in terms of the policies that it cites. However, since the Government’s rural proofing commitment applies to all (domestic) departments and their policies for England, we had expected to see more about the work of certain key departments. Four whose policies are only briefly referred to are HM Treasury, Home Office, Department of Work and Pensions and Ministry of Justice, all of whom have a significant impact on the lives of rural people and the operation of rural businesses.
- **Natural environment:** rural communities and many rural businesses benefit substantively from the quality of the natural environment in their localities. Having a section in the report on the natural environment is therefore justified. However, Defra for this reason also needs to rural proof its own policy making, for its likely impact on rural communities. It is unclear whether this has happened with the natural environment policies cited. In our view, the fact that rural communities live close to open countryside is not in itself evidence that those policies demonstrate rural proofing.
- **Outcomes:** we consider some of the rural proofing outcomes claimed in the report to be over-stated or over-simplified. We would be concerned if these were seen as good practice examples of rural proofing. For example, the flexibility given to local planning authorities to require an affordable housing contribution from small development sites applies only to ‘designated rural areas’ which comprise just 30% of small rural settlements. Similarly, the policy aim, to deliver gigabit-capable broadband to at least 85% of premises by 2025, could be met without provision reaching most rural premises.

Looking ahead

Despite our reservations about the *Rural Proofing in England 2020* report, we recognise it offers a starting point for an annual reporting process. In future years, we would expect to see the reports:

- Relating more obviously to rural proofing that has happened during the reporting year;
- Offering a more transparent picture of rural proofing, how it has been applied and its outcomes; and
- Providing more tangible evidence of rural proofing across all departments.

We recognise that these reports must not become over-long. One option would be to pepper the text with some more detailed examples illustrating how rural proofing was applied and its results.

Equally, we recognise that policies made in one year can lead to tangible outcomes in the following or future years. Where appropriate, it would be helpful to report back on the delivery results of rural proofing policy decisions that were cited in previous years’ reports.

³ *Rural Proofing: Practical guidance to assess impacts of policies on rural areas*, Defra (2017)

Future reports should, as a matter of course, include evidence about the rural proofing of all Government legislation and all White Papers.

In addition, we would expect to see sufficient evidence of rural proofing on key Government agendas, especially levelling up those places and communities which have been left behind and enabling the nation to follow its trajectory towards the 2050 net zero target.

Defra has shared with the Rural Coalition its list of five priority areas for its future rural proofing support activity. We appreciate the principle that the core of Defra's support effort on rural proofing, provided to other departments, needs focussing if it is to be manageable, but we were disappointed that neither health nor transport policies were on that list. At the same time, we still expect all departments to undertake rural proofing across their policy work and to demonstrate that they have done so.

The following are likely to be some of the most significant policy developments for rural communities in the coming year and, therefore, should feature in the 2021 report:

- The Comprehensive Spending Review
- UK Shared Prosperity Fund (in England)
- Planning reform following the Planning White Paper
- Further NHS restructuring and policy reforms
- Government public procurement policy (post-EU)
- The implementation of Project Gigabit
- The implementation of the National Bus Strategy and Future of Transport programme
- The Heat and Buildings Strategy
- The Devolution White Paper
- The Tourism Strategy

In applying rural proofing, we look to all Government departments (and not just Defra) to engage with stakeholder organisations with expertise on the rural affairs agenda, in order to benefit from their perspectives. This will help departments to meet the aims described in Defra's rural proofing guidance:

“Rural proofing aims to understand the impacts of government policy intervention and to ensure fair and equitable policy outcomes for rural areas. Rural proofing is about finding the best ways to deliver policies in rural areas.”

Finally – importantly – during 2021 we urge the Government to develop and publish its expanded vision for rural areas in England and to include within this a commitment to fair funding for rural areas and equitable access to public services for rural people. Without clarification of its policy priorities and objectives the Government's commitment to rural proofing is weakened. An expanded vision will provide the framework for engaging with rural stakeholders and partners, whilst the policy actions that ought to flow from it will help rural areas contribute fully towards national recovery and wellbeing.

Members of the Rural Coalition: Action with Communities in Rural England, CPRE – The Countryside Charity, Country Land and Business Association, The Arthur Rank Centre, National Association of Local Councils, National Centre for Rural Health and Care, National Farmers Union, National Housing Federation, Plunkett Foundation, Royal Institution of Chartered Surveyors, Royal Town Planning Institute, Rural Services Network, Town and Country Planning Association.

President: Rt Revd Dr Alan Smith, Bishop of St Albans

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Rural Coalition May 2021