



Department
for Environment
Food & Rural Affairs

Independent Rural Proofing Implementation Review

Lord Cameron of Dillington
January 2015



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Foreword from the Secretary of State for Environment, Food and Rural Affairs, Elizabeth Truss



This Government has strong rural credentials and is committed, from the Prime Minister down, to ensuring the interests of rural communities and businesses are accounted for within our policies and programmes.

For central government, rural proofing means assessing policy options to ensure that evidence is adequately considered and that the fairest solutions are delivered. Rural communities and businesses rightly expect that all Government policies and programmes should be sufficiently flexible so that they deliver quality services to meet their everyday needs.

I am proud of our record in raising the profile of rural issues across national and local government. The Government is supporting rural communities in every aspect of life. For example, in 2010 superfast broadband was accessible to 45% of the UK; today the figure stands at 78% and government and local authorities are investing £1.7 billion to get it to 95% by 2017. We have frozen fuel duty saving motorists £9 every time they fill their tanks, while our fairer schools funding has seen an additional £390m for the least fairly funded areas of England. However, I am also keen to learn of any improvements or additional factors that can strengthen our efforts to remove unintended consequences and integrate the rural dimension into our policy interventions.

As part of this Government's more open and transparent policy making, Defra asked Lord Cameron of Dillington, in line with our commitment in the 2012 Rural Statement, to undertake an independent review of rural proofing.

Lord Cameron has provided a rigorous assessment of the extent to which Defra and Government Departments are implementing rural proofing, since Defra published refreshed guidance in Autumn 2013. There are many examples of where we are making good progress and where, within a number of key departments, rural issues are being mainstreamed in policy making.

The ministerial meetings, in particular, have highlighted some important areas where we can make some straightforward changes to strengthen departments' rural proofing efforts. I am particularly pleased to see that where departments have been working with Defra's Rural Communities Policy Unit this has resulted in positive adjustments that deliver fair and equitable outcomes in rural locations.

Lord Cameron's report makes a clear statement. For rural proofing to work effectively, it is for all government departments to make rural issues a routine policy consideration. I am keen to capitalise on the level of enthusiasm and engagement demonstrated by all Government departments to engage fully with their rural proofing responsibilities. This presents an excellent foundation upon which Lord Cameron's review findings and recommendations are placed.

It is evident from the review that with sensible and practical changes we can create a real game changer; moving from rural proofing to mainstreaming rural issues within policy making. I will give Lord Cameron's recommendations my full and considered attention.

Foreword from Lord Ewen Cameron of Dillington



I was asked to take forward this review primarily because of my well known interest in rural policy. In my capacity as past Chair of the Countryside Agency and a Rural Advocate for England I have witnessed first-hand the issues faced by rural communities and the impacts that a lack of the rural perspective can have on individuals and businesses. As well as being intimately connected with a small rural village, I am also a businessman operating out of a rural area. I represent many people like me who want to see England's rural social and economic potential unlocked.

Mainstreaming rural issues into policy making and decision taking is fundamental to enabling all stratas of the rural community to access services that allow them to engage fully with our increasingly diverse and dynamic lifestyles, and to ensuring that rural businesses can thrive even in the most remote parts of England. And of course, sound rural proofing is the mechanism by which this can be achieved.

My focus was to explore the current systems, processes and activity on rural proofing across government. Of course the policies of the day are an important context within which to examine how well those systems are working. But my interest was not to challenge policy – it was simply to explore whether those policies extended their reach equitably and fairly to rural areas in the same way as they do in towns and cities.

Rural proofing – in my view – is a non-political issue. It is a constant. It applies equally to the policies of tomorrow as it does to the policies of today. My interest is in how we make rural proofing work effectively and fairly. How do we ensure we are removing unintended consequences before they happen and making decisions that provide flexible deployment in differing geographic, social and economic settings?

The recommendations I have set out within the report are designed to stand the test of time, irrespective of government or governance arrangements. They apply equally to all departments and provide a framework to move rural proofing into the mainstream policy agenda. Most importantly, however, the changes I am proposing are light touch and entirely achievable with little or minimal disruption to parliamentary business.

I look forward to seeing how Government will respond to my review findings.

Independent Review Team

The Rural Proofing Review led by Lord Cameron and supported by an independent review team appointed from across government.



Lord Cameron A crossbench peer, manager of the Dillington Estate in Somerset, National president of the Country Land and Business Association from 1995 to 1997 and a member of the UK Government's Round Table for Sustainable Development from 1997 until 2000. He was Chair of the Countryside Agency from 1999 to 2004 and was the UK Government's rural advocate for England from 2000 to 2004.



Lord Dear A crossbench peer, retired British police officer and a former Chief Constable of West Midlands Police. Currently DL and past Vice Lord Lieutenant of Worcestershire. Currently non-executive chairman of Blaythorne Group Ltd, and takes an active and regular part in the business of the House of Lords, speaking from the cross benches on home affairs, criminal justice, and rural affairs.



Lord Teverson Chair of the Rural Coalition was a member of the European Parliament for Cornwall and West Plymouth 1994 to 1999, Chief Whip of the European Liberal Democrat Group 1997 to 1999. Currently non-executive director of KCS Tradeprint, Wessex Investors Limited and Wessex Projects Limited where he is Chairman, and Devon & Cornwall Business Council.



Lord Inglewood Barrister and chartered surveyor member Lake District Planning Board 1983-1989, MEP 1989-1994, 1999-2004, Member House of Lords 1989-, PUSS DNH 1995-1997, chairman Carrs Milling Industries 2005-2013, CN 2002-, Chairman HofL Communications Committee 2011-2014, Extradition Law 2014.



Baroness Byford A life peer and president of LEAF, Leicestershire Clubs for Young People. She is a Patron of Women Food and Farming Union and former Patron of the National Farm Attractions Network and the Institute of the Agricultural Secretaries and Administrators. Former President of the Royal Association of British Dairy Farmers from 2007 to 2009 and is a Fellow of the Royal Agricultural Society and an Honorary Canon of Leicester Cathedral.



Dr Wollaston MP Conservative Member of Parliament for Totnes since 2010. Elected Chair of the House of Commons Health Committee in 2014. Formerly a rural GP practising on Dartmoor, GP trainer and clinical tutor.



Lord Curry A British farmer and businessman, currently chair of NFU Mutual and non-executive chair of the Better Regulation Executive. Created a Crossbench (independent) life peer on 13 October 2011 and introduced in the House of Lords on 24 October 2011.



Lord Boswell An English Conservative Party politician and Member of Parliament (MP) for Daventry from 1987 until he retired at the 2010 general election. He was raised to the House of Lords in 2010. In May 2012, he was made Principal Deputy Chairman of Committees in the House, and Chairman of the European Union Committee.

1.0 Introduction

Rural Proofing was introduced by Government in the Rural White Paper (2000). Since its introduction, successive administrations have sought to apply rural proofing practices and principles within the policy making process. The Countryside Agency (1999 – 2005) and then the Commission for Rural Communities (CRC) (2006 – 2013), both independent non-departmental public bodies, had responsibility for advising government departments on their rural proofing activity.

Under the Coalition Government, the decision was taken to bring rural proofing responsibilities inside the Department for Food and Rural Affairs (Defra). In 2011, Defra set up the Rural Communities Policy Unit (RCPU) to lead rural proofing and act as a centre for rural expertise. The Defra Ministerial team also act as rural champions within Government, supported by the RCPU.

The RCPU's influence extends to providing advice and guidance to other government departments on their rural proofing activities at national level. Its evidence also supports the Governments localism and decentralisation agenda. A primary aim is to build capacity for all national policy makers to mainstream rural issues as part of their decision taking.

The Rural Statement published in 2012¹ reaffirmed Government plans to put rural interests at the heart of decision making. The statement set out the imperative for government policies to consider the impact on rural people, businesses and the countryside. It recognised that rural needs are occasionally overlooked and the development of some policies did not take into account their impact on rural areas. The consequences of which can result in adverse impacts occurring to the detriment of those in rural England.

In 2012 the RCPU, in collaboration with the Action with Communities in Rural England (ACRE), the National Association of Local Councils, the CRC, County Councils Network and Rural Services Network (RSN) published local level rural proofing guidance². Shortly after this, Defra's RCPU, in line with a commitment made in the Rural Statement, published national level rural proofing guidance in September 2013.

The statement also included a commitment to independently review national rural proofing efforts, one year on from the launch of refreshed rural proofing guidance.

From the outset, my interest in undertaking this review has been in exploring how departments use the national rural proofing guidance and to what extent rural proofing is systematically embedded within departmental policy cycles.

1 See: <https://www.gov.uk/government/publications/rural-statement-2012>

2 <http://randd.defra.gov.uk/Default.aspx?Module=More&Location=None&ProjectID=18130>

2.0 Rural/Urban England

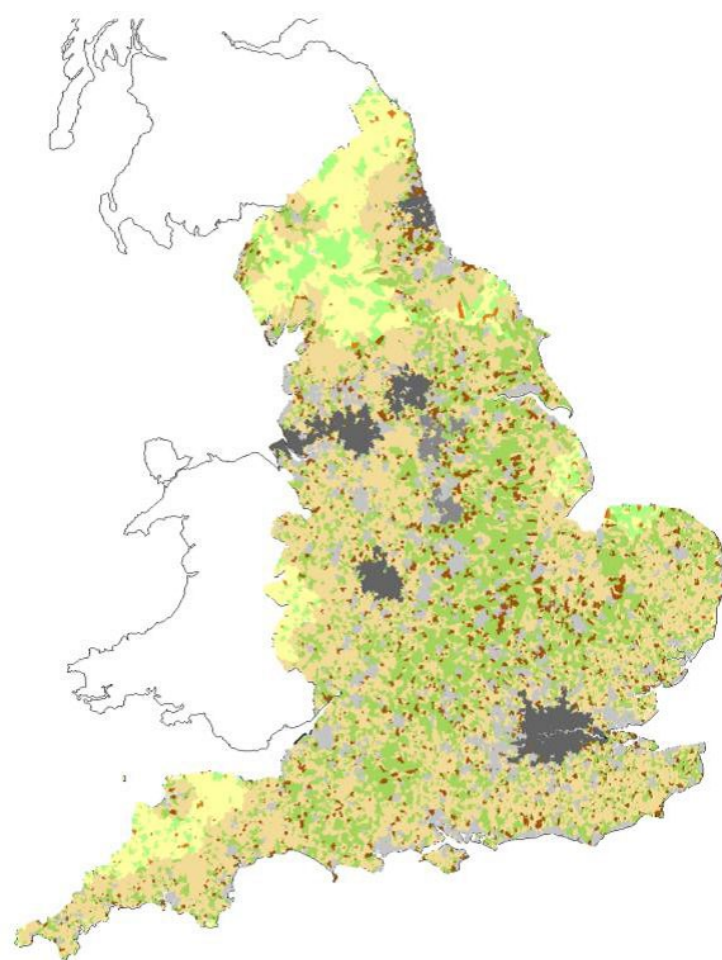
Rural England is made up of thousands of different communities located in widely varying parts of the country. Distance to services, population sparsity, aging, social isolation and market structure can create differing social and economic circumstances.

Defra develop and publish rural evidence to inform and support Ministers' rural objectives in relation to Rural Fairness.

Rural Fairness is a way of expressing a long-standing function, and involves ensuring that policy makers at all levels of Government give reasonable and proportionate consideration to the needs and interests of rural people, places and businesses when policies are considered, developed, delivered and reviewed.

Just over eighty percent of England's population live in non-rural areas and their issues and needs are in general better understood by policy-makers, more visible because they are more concentrated, and often more easily mapped because existing measuring tools, e.g. the Index of Multiple Deprivation are attuned to them.

The 18% of the population who live in rural areas inhabit a number of different typographies (remote and sparsely populated areas, peripheral-urban, coastal etc): measuring and understanding where these make a difference enables social and economic policies to be delivered more effectively and fairly. These are the areas often adversely affected by government policy that has not considered the impact on rural businesses and communities.



	Resident population	%
Urban major conurbation	18,783,700	35.4
Urban minor conurbation	1,906,100	3.6
Urban city and town	22,889,800	43.2
Urban city & town in a sparse setting	88,900	0.2
Total Urban	43,668,600	82.4
Rural town and fringe	4,470,700	8.4
Rural village	2,772,700	5.2
Rural hamlet & isolated dwellings	1,619,000	3.1
Rural town & fringe in a sparse setting	186,300	0.4
Rural village in a sparse setting	157,700	0.3
Rural hamlet & isolated dwellings in a sparse setting	137,400	0.3
Total Rural	9,343,900	17.6
Total England	53,012,500	100.0

Source: 2011 Census, Rural-Urban Classification

3.0 The policy instruments supporting rural proofing

My focus was to explore the systems and procedures Government has put in place to routinely rural proof their policies and programmes. To this end, the Government has committed to embedding rural proofing within key policy instruments and reporting in more open and transparent ways.

For example:

- **HM Treasury's Green Book**³ refers to rural proofing as an issue that needs to be considered when Government Departments appraise and evaluate their policies, rural proofing is required when Departments prepare their policy Impact Assessments. Rural proofing is not optional, but it is also not complicated or a significant burden. It is not about special pleading for rural communities. Rural proofing is about making sure that evidence and policy impacts are considered fully.
- **Impact Assessments** need to provide a brief description of the policy rationale and commentary as to whether it is likely to have rural impacts, i.e. what the effect and costs and benefits might be and how it will be delivered.
- **All Departmental Annual Reports and Accounts** must report on departmental rural proofing activity.

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/220541/green_book_complete.pdf

4.0 Methodology

My review began in January 2014 with an initial meeting, hosted by Dan Rogerson, Parliamentary Under Secretary Department for Environment, Food and Rural Affairs.

Ministers from the Department for Communities and Local Government (DCLG) and the Department for Culture, Media and Sport (DCMS) and a range of senior government officials from other Government departments were in attendance. As part of my approach I stated my intention to meet with Ministers in a range of government departments.

At these meetings, my lines of enquiry avoided questioning or challenging the policy rationale. These are the policies of the day and my brief was not to try and change them. This review is about the policy outcomes, questioning whether the policy has fully considered rural delivery and rural impacts, and that unintended consequences have been recognised and mitigating actions taken.

To give these meetings some structure, I agreed a topic guide with the RCPU to provide key lines of enquiry to explore with Ministers in their respective departments. As context to this, I asked the RCPU to highlight just some of their sixty or so policies where, in collaboration with other government departments, rural proofing activity is being undertaken. I have included the document that Defra provided me in Annex 2.

4.1 Engagement with key independent rural experts

To ensure that the ‘independent’ element of this review was upheld, I was keen to explore wider questions about stakeholder perceptions on departmental performance rural proofing. I also wanted to examine their engagement with non-governmental rural representatives, who are often vital in being able to describe the ‘real term’ impacts of unintended policy consequences on local communities and businesses. Therefore, I sought out the views from a prominent and expert group of key rural stakeholders.

I am hugely grateful to the Rural Coalition, the Rural Services Network (RSN), Local Enterprise Partnerships (LEPs), and Action with Communities in Rural England (ACRE) who outlined their concerns and aspirations on key rural topics. The topics they were keen for me to explore with departments included; Department for Work and Pensions (DWP) Spare room subsidy, Departments for Transport (DfT) policies addressing rural transport provision, Department of Health (DoH) minimum income practice guarantee, and Department for Communities and Local Government (DCLGs) assessment of the costs of delivering rural services, sparsity factors and funding formulas. Their concerns were cogently argued and informed the questions and lines of enquiry I put to Ministers in those departments.

My programme with Ministers took place from March through to November. My schedule of meetings can be reviewed in Annex 1.

4.2 A review of Impact Assessments

As my review sought to focus on the systems used by Government officials, I was keen to examine how routinely rural issues are described in key policy making instruments. An important line of my enquiries, which underpinned my discussions with Ministers, was a review of a sample of departmental Impact Assessments. I commissioned a short review to examine the extent to which rural issues have been considered in these documents. These results were presented to departments during my meetings with Ministers, including a breakdown of their own department's performance. I include a copy of this review in Annex 3.

5.0 Findings

In setting out my findings, it is pertinent to note that as a direct consequence of my undertaking this review, two positive outcomes materialised early on.

The first was a renewed emphasis on rural proofing at very senior levels in Government. Tackling Ministers, head on, on their record of rural proofing tends to be a bit of a wake-up call for the department. This led to helpful and open discussions about the methods departments apply, or not, to their rural proofing work.

The second aspect related to the role of Defra's RCPU which provides a service across government to support rural proofing activity. In many of my meetings, I enquired as to whether the department in question was in contact with Defra. Encouragingly, the majority were. But I was keen to press them further to ensure that, if they hadn't done so already, they undertake a rural proofing workshop with Defra. This would – at the very least – confirm that their rural proofing efforts were as thorough as they could be, and enable officials at all levels to understand how rural proofing works in practice and achieve the best results.

It is also pertinent to note the approach that Defra and RCPU take in regard to strengthening national efforts to rural proof. While it is never too late to apply rural proofing measures to the policy making process, the greatest benefits are delivered when rural issues are considered from the outset by the Department that holds the policy lead. This is mainstreaming.

Mainstreaming Rural Broadband and Mobile Services

Commercial rollout of superfast broadband has largely been completed and has resulted in coverage of 73% of premises at the end of 2013. Most of the remaining premises in the UK, mainly but not exclusively in rural areas, will not get coverage without public intervention.

To address this market failure, the Government's £780m superfast broadband programme, matched by Local Authorities with private sector contributions, will provide 95% of the UK with superfast broadband coverage by 2017, and universal coverage of standard broadband of at least 2 Mbps. Local Authorities have been placed at the forefront of delivery and are managing delivery arrangements locally.

This is a challenging infrastructure programme and needs time to deliver. However, good progress is being made. Superfast broadband is now available to 78% of UK premises – up from 45% in 2010. In August, the milestone of providing superfast broadband to 1.5 million UK premises was passed, of which 600,000 are rural, so far. Solutions are being explored to meet near universal superfast broadband coverage, including a £10m investment to market test pilots to explore delivery options for the final 5% hard to reach premises. A further £150 million is also being invested in new mobile infrastructure so that rural communities with no mobile signal will receive a mobile service for the first time.

There is a greater win to be achieved here by departments. With many of their services now moving to digital formats, there could be new gains to be made by rural communities and businesses needing to rely less on public transport and physical access.

The RCPU exists to build capacity across government. It is seeking to help departments to deliver their rural proofing responsibilities and with it, bring about a much bigger goal. A fundamental shift from rural proofing to mainstreaming rural issues. Their approach is one I agree with. Much of my focus, therefore, in this review and during discussions with Ministers has focussed on how this might be achieved.

5.1 The Review of Departmental Impact Assessments

Impact Assessments (IAs) are an important element of the policy process. They are designed to add rigour to the development of legislation and policy. Of course, not all policies will require adjustments to be made if their intended purpose has little or negligible differential impact in rural areas. However, as the name suggests, they are a fundamental first step in appraising the options and choices policy makers take in early decision making.

My review identified some good examples of rural proofing in action. However, for some departments the level of rural proofing analysis in IAs was much weaker. There were many that only included brief comment on rural proofing with little in the way of robust evidence or analysis to support their commentaries. Somewhat more concerning was that the majority of IAs failed to consider the rural dimension at all.

A sample of IAs from across government departments was chosen limited to those that had been published by departments between 2010 and 2014 and that appeared to be relevant for rural groups or locations. In total 93 IAs were selected from 12 departments. The key findings of the analysis were that:

- Around half (51%) showed no consideration of rural proofing or rural issues, even though the policy would impact rural areas;
- Just over a third (38%) described rural issues but did not analyse the policy impact;
- Only 11% provided robust evidence on rural proofing and indicated how the evidence had been used to inform policy design.

Whilst it was clear that the IA process was being followed, the emphasis on rural proofing was lacking in a lot of areas. It was clear that in some departments a 'Tick Box' mentality was evident and guidance was being ignored. Crucially solutions are easily within reach to improve departments' knowledge and skills in relation to rural issues. Defra offers facilitated workshops on rural proofing to improve policy knowledge, use of rural data sets, and better understanding of rural challenges. They provide a bespoke service for departments on designing and implementing new policies.

Some rural commentators will, understandably, express concern at the absence of rural considerations. However, it should not necessarily be concluded that this meant departments were avoiding rural issues. Generally, I found that there was a good awareness of rural issues at Ministerial and senior official level. Departments seemed, however, genuinely unaware of the value of describing and commenting on the rural dimensions to their policy interventions. Departments need to recognise that they will be judged by rural stakeholders on their IAs since they are public documents.

An important factor to consider here is that while this is a consistent problem for some departments, it is not an irredeemable one. The tools and broad structures are in place to enable all departments to do rural proofing and to do it well⁴. With a few minor adjustments and

⁴ See: <https://www.gov.uk/government/publications/guide-to-rural-proofing-national-guidelines>

strong leadership all departments can examine rural issues and implement interventions, where necessary, in national policy.

As disparities became evident, Ministers were open to suggestions on how they could better ensure their policies and programmes are more systematically rural proofed. I am keen to build on this enthusiasm to achieve clear leadership from Ministers and senior civil servants so that improvements are made.

I was particularly struck by the MoJ who have a specific group of staff within their Sustainable Development team who have key roles and responsibilities on rural proofing. This team ensure that Impact Assessments are developed alongside the design and development of their policy proposals. This approach has been used to good effect in, for example, court closure proposals which included detailed analysis of travel times between courts and homes. The wider impact assessment of the proposed changes factored in travel times, the percentage of users impacted and identified where journeys will be over an hour. The outcome of using this analysis has been very positive – the use of 'actual' times used for calculations and not 'as the crow flies' means that real term impacts can be evaluated as part of the policy reforms.

I would like all departments to consider how their policy cycle enables systematic and routine analyses of rural evidence as part of the policy making process. If they are in any doubt as to how sound their rural evidence base may be, they should contact Defra for guidance on how to strengthen this element of their departmental working.

Recommendation 1: Defra Ministers should work with Cabinet Office to strengthen and improve rural proofing guidance when the impact of policies is being assessed, to ensure that rural policy impacts are given clear and robust attention. Rural proofing must be applied more systematically in Departments and described more openly and transparently.

Rural proofing workshops have been offered to all departments since 2012. Several departments have taken up the opportunity to train staff and take part in workshops with Defra's RCPU colleagues. They spoke highly of the experience and the higher levels of awareness that resulted from these sessions. However, take up of these workshops has been patchy. So it was agreed at each of my meetings with Ministers that their departments undertake rural proofing workshops where they have not already done so.

A key supplementary action to support recommendation 1 therefore, is for all departments to routinely invite Defra's RCPU to run a rural proofing workshop to improve awareness, highlight the available data and evidence available that can be examined on an urban/rural basis and bring policy teams together with their analysts to explore the policy problems and appropriate interventions.

5.2 Collaboration with key rural stakeholders

It was apparent during my review that there is good engagement with key rural organisations and that stronger engagement between some government departments and rural stakeholders would be beneficial. Defra's RCPU has made good efforts to develop links with its rural stakeholder base. This is hugely important to ensure that policy is not made in isolation of the communities which are intended to benefit from it. When I pressed senior officials and Ministers on these points, I generally found them to be receptive and open to greater collaboration with both the RCPU and their key rural stakeholders.

I would like to see all Government departments working with the RCPU to ensure that their stakeholder plans include key rural stakeholders to consult with and involve, where appropriate, in their policy design and implementation.

DCLG Business Rates Retention Scheme

The Business Rates Retention scheme, part of the Local Government Resource Review (LGRR), was initiated by DCLG in 2011, to explore how to recast the distribution of business rates to deliver a more effective income stream for councils. RCPU recognised that opportunities to maximise income from business rates would be challenging in rural areas, where 70% of business are small and medium sized enterprises which would generate less income.

Analysis of the provisional settlement indicated that rural authorities would suffer a disproportionate impact as a result of the proposed changes with business being smaller in rural areas, and some businesses, especially large ones, more likely to be in urban areas, revenues for smaller more rural authorities are likely to be more limited. Bigger businesses are deterred from rural areas by historically weaker transport links and workforce planning issues. Defra suggested that DCLG revisit the working of the Settlement for rural authorities and sought a commitment from them to review this approach in 2014-15 and beyond.

DCLG and RCPU have worked closely on Local Government funding issues following their review of Business Rates Retention and subsequent open criticism from rural stakeholders of the impact of 2012/13 funding settlement on rural local authorities.

A research project was undertaken to establish the additional costs of providing services in rural areas in 2014. Defra and DCLG involve the Rural Services Network and the LGA on the Advisory Board.

As a result of Defra and DCLG's joint research the LGA Funding Settlement is being increased from £11.5m to £15.5m. The rural element was £9.5m for 2014-15, so the proposed £15.5m for 2015-16 represents an annual increase of £6m, or just over 63%.

5.3 Collaboration across government

It makes sense that where one department's policies are reliant upon other departments' policies, coherent alignment is needed. Defra already has several cross departmental strategic relationships with, for example, the Department for Communities and Local Government, the Department for Transport and the Department of Health. Meetings occur at Director level on a quarterly basis and are attended by policy teams. They are designed to ensure alignment of government wide objectives and to foster closer and coordinated working.

However, I believe there is more to be gained from these good working relationships by bringing departments around the table to discuss the inter-dependence of their policies and agree actions to better join these up.

Several examples provided during the review were related to transport and more specifically non-emergency patient transport, a policy with cross-departmental responsibility. It was highlighted that in some rural areas as a result of either poor transport links or distances from healthcare provision, some patients are unable to attend a hospital appointment involving travel in one day. This results in higher levels of missed appointments, higher costs to patients and often stressful situations. Bringing together senior officials from the principal Departments whose policies may have implications for people living in rural areas would provide a forum for (high-level) peer-reviews of approaches to rural issues, sharing best practice, and identifying where Departments need to enhance rural-proofing. Examples such as this could be debated, solutions identified and implemented quickly across departments.

Recommendation 2: Defra Ministers should establish an Inter-Departmental Rural Oversight group, it would bring together all the main Departments, at a senior level, to discuss particular/topical rural issues and identify where policies or delivery could be adjusted.

5.4 Communication

This is an area where I felt that several departments could improve their narrative and reputation for rural proofing. As I have indicated above, quite often, it isn't that rural proofing isn't being undertaken, it is more often the case that it is not being clearly described in key policy documents. This led to discussions around Open Policy Making which is a relatively new initiative that involves stakeholders and others in the policy lifecycle. It is to be welcomed that Government is setting out to be more open and transparent. I commend the reporting of rural proofing in key policy instruments and reporting mechanisms such as departmental annual reports and accounts. However, what I believe rural stakeholders really want is a more interactive forum to discuss rural proofing; a place to share evidence, best practice and discuss rural proofing issues and ideas.

Many rural stakeholders have enthusiastically embraced and regularly use social media. Defra should therefore provide an online forum for routine discussion on rural issues, creating a place to describe best practice (at a local to national scale) and a means to test policy options during their design and implementation. Not only would this provide a core narrative on what Government departments are undertaking on rural issues, but it would also be a platform to exchange ideas, promote discussion, and offer relevant areas for discussion at the Inter-Departmental Rural Oversight Group above.

Recommendation 3: Defra, with support and input from other government departments, to develop a Rural Proofing Forum. Working closely with the inter-Departmental Rural Oversight Group to share best practice, information and key messages across government.

5.5 Use of the rural proofing guidance and urban/rural definitions

Defra quite rightly take the attitude that rural proofing is best carried out at the beginning of the policy making process. But it is never too late to consider rural impacts if you identify an issue during policy development that is likely to have adverse or unintended consequences. On occasions, a lack of awareness can lead to rural proofing being considered late within the policy implementation process. However, as the case study below shows, positive rural proofing interventions can still be achieved.

DWP Spare Room Subsidy

DWP sought rural proofing advice regarding the removal of the spare room subsidy implemented for the social rented sector on 1st April as a result of the Welfare Reform Act, 2009.

The policy received considerable negative press and Ministers raised concerns, the original Impact Assessment indicated no rural impact and the evidence quoted had not been analysed at the relevant rural/ urban definition level. A clear definition that could be applied to England, Scotland and Wales had not been used, due to the devolved nature of the subject, which is why they took the approach of using population density in the UK.

DWP worked with RCPU and attended a workshop on Working Age Benefits Strategy in June 2013 which highlighted the rural impacts of the removal of the spare room subsidy policy. RCPU provided more in depth support to outline more fully the impacts of the policy, provided a presentation on key rural issues and statistics, a discussion on impacts and a review of a sample of DWP evidence with a rural-urban definition applied.

As a result of this joint work additional funding for the Discretionary Housing Fund for the most sparsely populated local authorities was introduced and an English rural case study for DWP's guidance to Local Authorities was produced. DWP subsequently announced an additional £20m for all authorities with £5m specifically for the 21 least densely populated areas, six of which are in England. DWP is currently evaluating the impacts and realisation of benefits. Lessons learnt are being gathered to show other Local Authorities what mitigating measures can be undertaken.

This joint work ensured those living in the sparsest areas were not unfairly disadvantaged as a result of the new policy and have been treated fairly.

It is apparent that some departments and policy teams are regularly referring to the rural proofing guidance to inform their policy making processes. Indeed, a key feature of the rural proofing workshops facilitated by the RCPU has been to outline how socio-economic trends can differ when the rural-urban definitions are applied.

DfE School Funding

DfE started a process in 2012 to reform the school funding system. In 2013-14, local authorities allocated almost 90% of funding based on the needs of pupils, compared with 71% in 2012-13. RCPU worked closely with DfE to ensure that rural schools, which are typically smaller and have lower pupil numbers, were not disadvantaged by the reforms.

Having met their commitment to fund all local authorities at the same cash level per pupil in 2014-15, DfE will now add a further £350m for the most under-funded authorities. No local authority and no school will receive less funding as a result of the proposal.

DfE will set a minimum funding level for two school characteristics currently used by local authorities to allocate money to schools:

- a minimum funding level for each school on top of its per-pupil funding ('lump sum'); and
- a minimum funding level for small schools that are essential to serving rural areas ('sparsity sum').

RCPU worked closely with DfE officials on changes to the funding formula, ensuring that the move to 'per pupil' funding did not disproportionately disadvantage rural schools, which are typically smaller and have on average fewer pupils per class.

Work with DfE is on-going to assess how the new funding formula has been applied and its impact upon rural schools. DfE have agreed to continue to work with RCPU to review the sparsity factor as well as review how they measure disadvantage for the purposes of applying the formula to rural schools. DfE and Defra are working to ensure that no rural authority will receive less funding per pupil in 2015-16 than in the previous year. DfE will continue to review the introduction of the sparsity factor and how useful local authorities had found this change. It will be a key factor in the consultation document to the settlement.

It is not universally the case however, that rural evidence and circumstances are being considered. Worryingly, some government departments do not routinely apply the urban-rural definitions to their policy analyses. The consequence of this patchy approach means that urban and rural issues are not being disaggregated and rural dimensions are likely to be missed. Given the variable use, I believe it is now time for all government departments to apply urban-rural analyses to their policy considerations. To not do so is missing a fundamental and critical first step in appraising policy options.

Recommendation 4: All government departments should adopt the use of Office of National Statistics and government wide urban/rural classifications in their analyses of data and evidence. With support from Defra on statistical analyses as required.

See: <https://www.gov.uk/government/collections/rural-urban-definition>

5.6 Systematic Weaknesses need to be addressed by strengthening current policy instruments

During the review it became apparent that the government's ambitions to bring rural issues in to the mainstream were being frustrated by a number of factors. As I note above, Impact Assessments have regularly failed to report on key rural proofing adjustments or activity. I believe that to enable policy makers, economists and analysts to examine rural issues more thoroughly, existing policy processes, guidance and documentation need strengthening and in some cases additional policy instruments added.

It was also the case that where departments had limited engagement with Defra the result has been a distinct lack of rural proofing activity. Part of this can be attributed to a lack of knowledge on where to find advice and little in the way of scrutiny, from within departments at least, to ensure rural issues are being adequately accounted for. Some of it stems from a fear that rural proofing will lead to increased costs and delays in implementation. Most worrying of all, is the belief that rural equates simply to special pleading.

To some extent, I have some sympathy with government on these observations. In an age of austerity where we all have to do more with less, we become more risk averse and stringent in our resource prioritisation. In addition, with Government bringing rural proofing within the responsibilities of departments, there has been a need for a period for up scaling capacity – given that the CRC and the Countryside Agency led on this agenda under the previous administration.

However, we should not overlook the fact that this government has a clear commitment to ensure rural issues are mainstreamed in to the policy making cycle. While this isn't happening consistently yet, there are clear indications that as a result of my review, Government departments are committed to do more to embed rural proofing in their policy making processes.

I was particularly struck by my meeting with Oliver Letwin who shares my ambition to see rural proofing becoming a mainstream element of Coalition Government policy making. His views were well informed and refreshing to hear. He recognises the valued role that Defra's RCPU has played in raising the profile of rural proofing and strengthening government wide capacity to undertake it.

The real result is to see all departments consistently deliver on their rural proofing responsibilities. To do this, we need a fundamental shift in how we approach rural proofing. We need to move all government departments toward mainstreaming rural evidence into their policies and programmes.

I firmly believe, in conducting this review, that the means to move from rural proofing to mainstreaming is well within our reach. It is time to put this in to practice.

Recommendation 5: I would like to see a clear rural proofing stage built into the collective agreement processes so that departments will have to explain their rural proofing measures in their policy considerations.

Departments will have to take rural proofing seriously earlier in the policy process if they want to avoid delays in the clearance process. Working together with Recommendation 1, this additional consideration will incentivise Government officials to ensure they mainstream rural issues early on in the policy process.

Firstly, I believe it is for Defra, with support from the Cabinet Office, to drive this mainstreaming agenda. In making this recommendation two further steps need to be set in motion. I do not want to diminish the invaluable role Defra has played in offering advice, guidance and support to government departments and their agencies. However, with Defra taking the lead alone, rural issues are not thought of as an issue relevant across government. This thinking needs to be challenged. I therefore believe support from the centre of government is needed to endorse and drive home these changes – if the mainstreaming outcome is to be achieved.

Secondly, the expertise Defra has to offer is immensely valuable and should continue to be available. But, I believe the emphasis should now shift toward strengthened policy instruments, and scrutiny of the government's rural proofing record. Defra should continue with its advice through rural proofing workshops, but its broader policy objective should be to promote a mainstreaming approach. Defra's focus should also move toward supporting the scrutiny of policy to ensure the government's rural agenda is being monitored and addressed.

Recommendation 6: I would like to see the creation of a permanent forum for discussion of rural proofing, at Cabinet level, which could intervene consistently and at key decision points as policy is being developed and encourage interdepartmental cooperation to assist in the delivery of those policies.

This approach would overcome the 'tick box' culture in some departments which has led to a lack of understanding of rural proofing identified in the review. It would also encourage evidence on rural impacts to be mainstreamed into policy decisions and foster transparent discussion on rural proofing e.g. for the departmental annual reports, accounts and impact assessments, all of which require rural reporting. By taking this step, all Government departments will be able to better understand rural issues, use rural data more routinely and test their policies early on in their development.

Conclusion

In taking forward this review I have been able to see at first hand the commitment that all Ministers have to rural proofing.

I am reassured that each Minister I have spoken to wishes to strengthen their approaches to rural proofing. I am keen that the level of enthusiasm and engagement demonstrated by all Government departments to engage fully with their rural proofing responsibilities is not lost.

The recommendations I have set out within the report are designed to stand the test of time, irrespective of government or governance arrangements. They apply equally to all departments and provide a framework to move rural proofing into the mainstream policy agenda. Most importantly, however, the changes I am proposing are light touch and entirely achievable with little or minimal disruption to parliamentary business. I look forward to seeing how Government will respond.

Acknowledgments

I would like to offer my sincere thanks to the Ministers who provided their time and insights, their refreshing honesty and openness has given this review a clear imperative to make the changes I am advocating.

I am hugely grateful to my team of independently appointed Peers who accompanied me on a number of my Ministerial meetings. I also extend my thanks to my team of officials from Defra for their advice and support as I conducted my evidence gathering. And finally, my gratitude and warm thanks to The Rural Coalition, ACRE, the Rural Services Network and Barry Dodd, Chair of the York, North Yorkshire and East Riding LEP.



Annex 1 – Schedule of Rural Proofing Meetings with other Government Departments

Department	Date of meeting	Key Topics
The Department for Work and Pensions (DWP)	1st April 2014	<ul style="list-style-type: none"> • Universal Credit • Housing benefit – Spare room subsidy • Ageing Population – Access to services • Wheels to Work – Youth unemployment
The Department for Energy and Climate Change (DECC)	8th May 2014	<ul style="list-style-type: none"> • Rural Energy and Fuel Poverty Reference Group • Fuel Poverty Strategy • Energy Efficiency (Green Deal and ECO) • Rural Community Energy Fund (RCEF)
Department for Transport (DfT)	6th May 2014	<ul style="list-style-type: none"> • Working Group on Rural Transport for Young People • Rural Transport Reference Group: Non-Emergency Patient Transport (NEPT) and Wheels to Work (W2W) • Support for Wheels to Work Association (W2WA) • Community Transport Association (CTA) State of the Sector report • Bus Service Operators Grant (BSOG)
Department for Culture Media and Sport (DCMS)	13th May 2014	<ul style="list-style-type: none"> • Public Library Services • Cultural Policy – Rural Areas • Tourism • Broadband and Mobile
Department for Communities and Local Government (DCLG)	15th May 2014	<ul style="list-style-type: none"> • Local Government finance formula • Rural Affordable Housing Advisory Group • National Planning Policy Framework • Neighbourhood Planning and Community Rights
The Department for Business, Innovation and Skills (BIS)	19th June 2014	<ul style="list-style-type: none"> • Post Office Network Transformation Programme • Local/ Rural Growth • Business Support and Skills
The Department for Education (DfE)	24th June 2014	<ul style="list-style-type: none"> • Schools Funding Formula • Provision of school meals • Rural School Closures
The Home Office (HO)	24th June 2014	<ul style="list-style-type: none"> • Statistics/data/intelligence <ul style="list-style-type: none"> – Crime Survey – Data on Racism and Hate Crime – Stakeholder Relations – Rural Crime Network • Policy Initiatives <ul style="list-style-type: none"> – Firearms Licensing – Police Funding Formula – Police and Crime Commissioners
The Cabinet Office (CO)	1st July 2014	<ul style="list-style-type: none"> • The Independent Rural Proofing Review • Departmental Annual Reviews and IAs • Policy inter-Departmental Opportunities
The Department of Health (DoH)	2nd July 2014	<ul style="list-style-type: none"> • Minimum Practice Income Guarantee (MPIG) • Service Delivery Costs • Adult Social Care • Patient Transport • Rural Proofing for Health Toolkit
The Ministry of Justice (MOJ)	18th November 2014	<ul style="list-style-type: none"> • Rural Court Closures • Probation Service • Prison Services
In addition we spoke to the Arts Council for England.	17th December 2013	<ul style="list-style-type: none"> • Arts Council England Rural Proofing activity to date • Current drivers for Arts Council England's rural proofing activity • Strengthening community involvement • Small Grants in rural areas • Improve analysis of statistical data in rural areas