

2014 – 2020 RURAL DEVELOPMENT PROGRAMME – CONSULTATION RESPONSES

LOCAL AUTHORITIES

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136. Antrim Borough Council

Council has agreed to submit the following response focussing on Priorities 2, 4 and 5 and also on issues surrounding the programme Delivery Framework.

Priority 2: Enhancing the competitiveness of all types of agriculture and enhancing farm viability.

The proposal to include a specific farm business development programme for young farmers¹ is to be welcomed under this Priority. There has been a significant increase in the enrolment of young people from farming backgrounds in the full range of CAFRE programmes over recent years, including those offered from the Greenmount Campus. Targeted measures should be prioritised that enable young people to develop business and management skills in a way that may help them to take over the family farm or start their own farm businesses.

The current generation of young farmers have attained much higher levels of education than that enjoyed by older family members and there is now a greater reliance on modern technology, use of renewable energies and environmentally friendly materials/techniques to successfully manage farm businesses and to comply with statutory regulations. The consultation document indicates that overall farm income in Northern Ireland is some 19.5% lower than the Northern Ireland average income which may be explained by the relatively poor performance of the arable farming sector compared to livestock farming. Food production and processing represents a crucial growth area for the NI economy and the new RDP needs to reflect this potential and the training needs of the industry.

The Business Investment Scheme (BIS) is to replace the current Farm Modernisation Scheme. At a recent consultation event, DARD indicated that the average level of financial assistance for farmers under the new RDP to develop their businesses would be in the region of 40%; this is to be welcomed however, for new entrants, or for farm businesses in need of significant capital investment, grant aid subventions should reflect the greater levels of need subject to preparation of viable business plans.

Priority 4: Preserving and enhancing ecosystems dependent on agriculture and forestry

Councils have a statutory duty to further biodiversity in their areas and are soon to take on responsibility for community planning. Councils therefore have an important role to play in ensuring that there is effective communication with farming communities on biodiversity issues and DARD is encouraged to fully engage with Councils through the new RDP and through relevant collaborative initiatives. Council recognises the value of ecosystem services and the vital role that agriculture, food and forestry can play in provisioning, regulating, cultural and supporting ecosystems functions. For example, working locally on a water catchment scale, the restoration, preservation and enhancement of ecosystems can benefit water storage and flood alleviation, improve water quality, improve recreation and tourism resources.

The new RDP programme should incorporate the UK Ecosystem Assessment, Northern Ireland (2011) key recommendations that will ensure the following:

- Fully integrated cross-departmental and inter-sectoral approach to ensure that ecosystems services are maintained and optimised in the long term

¹ Defined by the EU as those new entrants who are under 40 years of age

- Natural habitats are crucial for providing the resilience necessary for meeting global and local challenges including climate and food security and how to manage ecosystems to deliver multiple services
- The financial value of ecosystem services are recognised
- Effective delivery of ecosystem services requires informed and integrated management across a range of habitats that support high levels of biodiversity and ensures long-term resilience to changing circumstances. Resilient, biodiverse ecosystems underpin a wide range of valuable services
- The role of ecosystems services in mitigating the effects of human impacts, including climate change and biodiversity loss, should be considered in all decisions about land use
- Carbon management needs to be seen as an important part of management for multiple services delivery. Carbon storage and sequestration are vital ecosystem services and are cost effective ways to mitigate and adapt to climate change. Key aspects include soils, peatlands, permanent pasture and woodlands
- Planning and management policies need to be aligned with natural processes to maintain the capacity for multiple service delivery
- A network of ecological coherent sites should form a core for integrated management within the wider environment, delivering ecosystem services and minimising environmental impact.

Priority 5: Promoting resource efficiency and supporting the shift towards a low-carbon and climate resilient economy in the agriculture, food and forestry sectors

It is vital that DARD ensures that its policies on facilitating renewable energies (for example, wind, solar and anaerobic digestion) are both consistent with other government interventions and provide proper incentives that the farming community will find attractive. Under the current RDP for example, farms that receive grant aid for renewables are required to sell all of the power generated to the Grid and are not permitted to use any to help reduce the running costs of their farm businesses; this is an EU regulation and the new programme offers the opportunity to change it.

It is important that the farming sector is not exposed to the effects of 'silos' within government in relation to renewable energy development. A strategic approach must be taken, particularly on wind and anaerobic digestion plant, and attention should be paid to the emerging Single Planning Policy Statement. The new planning responsibilities that are coming to councils will directly impact on farms in relation to their renewable energy development, and a more integrated approach at local level will be needed on what can be extremely contentious developments.

Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

Priority 6 is to be the main focus for Councils and the new LAGs in terms of social, economic and community development. The new RDP proposals offer assistance with business start-up and growth by providing information on the formulation of business plans and signposting training and mentoring to increase competitiveness. DARD takes the view that training is better delivered by other agencies but the LAGs

are unanimous that training and mentoring for rural start-up and existing small businesses should be a key component of the assistance provided through the new programme. Delivery could be in partnership with, for example, the further education and training colleges and local enterprise agencies. In addition, there may be opportunities to lever in resources from the European Social Fund (ESF) in conjunction with the Department for Employment & Learning (DEL) for these training interventions. Consideration should be given to sustaining retail businesses in small rural communities and these contribute to sustaining the rural population.

The **Rural Business Investment Scheme** is to be welcomed as it proposes to offer direct funding to small businesses in rural areas similar to that available under the current programme that can be used for capital equipment and expansion projects, subject to a viable business plan. It is not clear however what the level of grant will be other than a reference to it being linked to the growth potential of the firm applying. It is crucial that the LEADER approach is fully utilised to implement this measure given how successful the LAGs have been to date in supporting businesses under the current programme.

In terms of **Farm Diversification**, the consultation document proposes that projects to be considered for funding under the new programme must first have benefitted from programmes specifically tailored for rural enterprise and that diversification proposals must have already gone through the CAFRE Diversification Challenge Programme as a prior condition of receiving support. This is too inflexible and that may discourage farming communities from applying. The LAGs would prefer that it should not be compulsory for farm diversification applicants to have to go through a CAFRE programme if the project business plan is robust and the business has a good track record of performance.

The **Rural Tourism Scheme** is expected to become a key theme under the new programme for Councils especially in view of tourism not being written into the Local Economic Development measure of the new Jobs and Growth Programme. Northern Ireland has had a very good year in terms of tourism with specific events such as the City of Culture, the World Police and Fire Games, and activities centred around the Titanic and Giant's Causeway all of which have helped in raising the profile of the regional tourism product and increasing visitor numbers. These events have had a positive spin-off on some rural areas as visitors took advantage of these events to extend their stay and visit less accessible areas. However, rural areas need to build their own offer in terms of tourism products and the new programme offer the potential to exploit these.

Under the Local Government Reform Programme, Councils will see local tourism functions transferred to them with the opportunity to manage the development of small scale tourism accommodation, the provision of business support including start-up advice and development of customer care schemes. The Rural Tourism Scheme should form part of the Community Plan led approach that Councils are expected to undertake; it should be developed and delivered accordingly with public and private partners along with clear community support. Tourism is likely to be fully integrated in the new councils' strategies and the type of activities proposed under the new RDP must converge with the aims and strategies of the new council arrangements.

To help address **poverty and social isolation** the Councils' Community Planning functions should help in clearly identifying the level and nature of local need in rural areas to inform the types of activities that the new RDP should provide. For example, rural transport, village renewal schemes (such as those falling out of the village plans that have been produced during the current programme), access to superfast broadband, innovative health solutions and childcare are all vital to sustain rural

communities. These types of activities will be able to integrate with and complement interventions that the Councils will be able to develop through the next Peace Programme as well as Good Relations. Community capacity remains weak in some rural areas of Northern Ireland and Antrim Borough is no exception; the new RDP needs to be designed to ensure that capacity building measures can be used to bridge the gaps that exist led by Councils in partnership with other agencies.

Delivery Framework

The new Programme proposes to deliver a minimum of 5% of the programme through the LEADER approach which has worked so well in delivering the current and previous RDPs; 19% of the current RDP is delivered through the LEADER model with LAGs at the centre of the implementation accountable to the Councils. The current delivery method has been overly complex however and needs streamlining to ensure that the funding can be allocated and spent where it is most needed without the delays that have been such a feature of the current programme. Good governance and robust accountability can still be achieved without the layers of administration and multiple auditing processes that are currently in place which have held up spend and resulted in some project applications being withdrawn to the detriment of rural communities.

The cost of administering the LAGs has come for some criticism especially from the farming sector however the success of the LAGs is due in no small part in having dedicated staff employed to promote the programme, work with applicants and ensure that funding is properly disbursed to comply with the stringent regulations imposed by DARD and the European Commission. DARD has indicated in the consultation document that it is not planning to transferring any of its functions to Councils through RPA other than through the new rural development programme so both policy responsibility and paying agency functions for the programme will remain with the Department. There is a good case to enable the Councils to take responsibility for direct grant payments using the robust accounting and governance systems that are now in place to ensure that funding goes to project promoters in a timely manner.

Antrim Borough Council
21 October 2013

137. Armagh City and District Council

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Increased vocational training in a broad range of appropriate skills will help improve efficiency whilst ensuring there is lesser adverse environmental impact of farming and forestry. Adding value to products substantially increases farm profitability so training in possible methods/ ways to add value (as individual farmers or collectively) could be beneficial. Farms in NI have huge areas of hedgerows and it is vital that these areas are protected, maintained and increased.

Possible focus targets for training:

- Modernisation and Innovation including more use of Technology
- Best practice and benchmarking
- Value adding to produce
- Marketing and co-operative marketing
- Value of hedgerows and ways to protect them
- Renewable energy production

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

The role of the Innovation Broker may present opportunity for the following:
To co-ordinate and liaise with partner organisations e.g. farmers/farmer groups and Universities/Colleges, statutory agencies and relevant agencies etc

Innovation Broker required skills could include:

A third level qualification in a relevant discipline (e.g. Rural Development, Business, Economic Development, Community Development European Structures) with two year's experience in the last five of project/programme management and delivery

or

A minimum of three years experience of project monitoring and delivery in the area of rural development or other relevant business environment.

Have 5 GCSE / "O" Levels or equivalent, Grades A – C, including English and Maths

Significant experience of funded programme development and management

Experience of preparing and presenting reports.

Have the ability to work under pressure and to strict timescales

Access to transport for work purposes.

Proficient verbal and written communication skills in English

Desirable Criteria

- ◆ Experience of working with individuals, groups, statutory agencies and businesses within the rural community.

This can be aimed at the individual or the skills sets required for a independent body to facilitate

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Young farmers are more likely to consider change in agricultural practices, more likely to avail of training and more likely to become more efficient farmers. Young farmers with their own business ID could be supported with increased grant rates

Older farmers should be encouraged to hand over ownership to the next generation – this may require some consideration in terms of a severance payment to act as a catalyst .

Older farmers could be encouraged to initiate partnerships arrangements with younger farmers (equal partnership ownership of lands and herds), such arrangements qualifying for support eligible to young farmer schemes.

This will help to ensure that uptake of fresh ideas will increase and modernisation of farms will result

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

Minimum funding level should be £1500 in order to ease the administrative burden on funders. This would still permit necessary small scale development

Young farmers could get 60% capital grant-rate linked to 100% grant-aid support to develop business plans and avail of training

Other eligible farmers could get 50% capital grant-aid in line with similar business support available through other programmes

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

The criteria outlined for financial support under Tiers 1, 2 and 3 appear to be adequate and proportionate to the levels of funding sought

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Farmers considering diversification and development programmes would naturally look at potential ideas for both food and renewable energy production. Both such themes should be considered under LEADER as LEADER is often the first port of call for such developments. This would help to ensure that potential applicants are not moved around departments/Councils when seeking advice and support and it would also avoid any potential for duplication of funding.

100% support for farmer buying and selling groups could be considered as this would help to make farms more sustainable by decreasing farm input costs and maximising farm output returns.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

In order to ensure that best practice is engaged and that farm performance information is collated and disseminated as widely as possible, 100% of actual costs should be reimbursed to group members, as this is a voluntary role.

Question 8

How should participants in development groups be selected?

Comment

Potential participants in development groups should apply to be members and should be assessed by a panel made up of a DARD representative, a relevant discipline representative and a rural development representative.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Adding value to food is an obvious and often a first consideration for farmers thinking about farm diversification. Any initial proposed farm developments considering adding value to food should be the remit of LEADER funding. This would provide applicants with an opportunity to test the approach in securing funding and implementing small scale developments on farm.

Secondary or very large proposed developments in food processing could be considered by the Processing Investment Development Grant Scheme

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

Tier 1 could be better dealt with by LEADER as LEADER is more closely aligned with first stage farm diversification. Upper limit could be £50,000 grant-aid

Tier 2 could consider projects with total costs of over £50,000 - £2million

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Other groups /alliances that may be considered under this scheme could include:

Constituted buying/selling groups considering co-operative purchase of raw materials and selling of produce i.e. groups that only meet occasionally for such specific purposes
Groups and partnerships that co-operate to set up renewable energy installations to reduce farm input costs

European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

NI farms include vast areas of permanent grassland, hedgerows and walls. Existing regulation on farm practices in NI is sufficient to preserve and protect these features and other relevant environmental interests. While support for agricultural practices that are compatible with protecting and improving the environment is to be encouraged, this should not be at the expense of increased regulation and bureaucracy. Rather, the focus could be on increasing awareness of best practice with support for approved enhancement schemes.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Designated sites are of the utmost importance and should be prioritised for financial support for environmental improvements.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Environmental training should not be compulsory but participation in such training should be encouraged and rewarded as it is important that greater awareness is promoted and best practice implemented.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

The level of uptake for co-operation measures under this scheme is likely to be low but it may be appropriate for multiple owners of areas of bog land, upland heather etc. Such co-operation should attract significantly higher levels of funding as it targets areas that may not ever be improved without support for collective action.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

Uptake of organic farming has been low due to the fact that current prices for organic produce do not compensate such farmers for the decreased level in production and the significant but necessary changes in housing, waste management and in general farming practices to that in conventional farming. Support for introducing organic farming practices should be made available at a level that really encourages farmers to consider this option.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

Woodland planting is often perceived as a last ditch usage of land and generally only on lands where conventional farming is too difficult to manage. The time factor involved in maturation of woodland means a long wait for a limited financial return and that return may be somewhat uncertain. Letting out land in conacre ensures a regular agreed return with often only an annual commitment and it is therefore more attractive to owners. Support for woodland planting needs to be increased in order to make it more attractive to owners.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

If financial support for woodland planting was made much more attractive and an annual return for loss of income was guaranteed then many more owners would consider the option of woodland planting

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

Pillar II should be viewed as income support aligned with environmental considerations. ANC areas may be limited in the scope of agricultural production that can be carried out in them but a range of farm diversification activities can be undertaken and supported, tourism being an obvious activity for increasing farm income. Farmers in areas other than ANC areas do have greater scope for agricultural activity but such activities do not necessarily mean that farm income is any more easily obtained. It would seem unfair to divert additional monies to ANC areas if this penalises farmers in other areas.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Farmers in ANC areas need to be supported to remain on the land but income supplements could be better achieved through support under farm diversification measures in LEADER programmes. Perhaps prioritising applications to LEADER programmes from such areas and/or increasing the grant-aid available to farm diversification projects in ANC areas could be considered.

In addition, environmental schemes in ANC areas could attract higher grant-aid rates than in other areas and co-operation environmental schemes with a strategic impact could attract 100% funding.

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Comment

Renewable Energy production is an obvious choice for farm diversification and should therefore be dealt with under LEADER. However, farmers need to be able to use the electricity to reduce farm costs and detailed negotiations need to take place between DARD and NIE/PowerNI to ensure that grid capacity is available. If necessary, government needs to ensure that plans are implemented to upgrade the grid infrastructure so that such farm diversification can take place more easily and that government renewable targets are achieved.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

Each renewable energy technology should be supported on its own merits as assessed by a LEADER assessment panel. Economic return, viability and sustainability should be the key factors in assessment of applications.

Furthermore consideration should be given to strategic renewable energy projects which have the potential to create wider economic growth.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

Grant-aid support should be targeted at the most economically viable projects and these may factor in on-farm usage. An economic appraisal should examine all likely returns and benefits of the project and determine the potential value of the project.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Supporting larger scale woodlands with attractions of community benefit and access etc will be fraught with difficulties such as insurance and ownership issues. Any projects in woodlands that permit access and greater community benefit could be dealt with separately to timber production i.e. by local councils or by LEADER

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

Slurry processing equipment such as separators and the roofing over of manure pits are measures that will directly improve the environment and should be supported under METS. Uptake will be small unless the grant rate is at a higher level than that for other METS projects.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

Support for advanced slurry systems is most likely to be targeted at contractors and most of these have probably already availed of METS support. Demand is therefore likely to be small

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Feedback only needs to indicate that no extra production has resulted – carried out by site visit 12 months after project completion. Any more complex feedback will only serve to limit uptake.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

Time constraints for carrying out everyday farming activities are imposed on farmers by weather conditions and by EU and DARD regulation. This means that activities such as soil testing and drawing up nutrient plans are not prioritised and may be overlooked. Many farmers have good knowledge of the land requirements on a field by field basis and do not see drawing up a nutrient plan as being a major priority. The importance of such activities could be highlighted by best practice visits to focus farms and by linking training on such matters to DARD environmental schemes

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Discussion by peers on any farming matters would be a suitable mechanism for improving awareness and uptake

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

The Nutrient Efficiency Scheme could encourage movement away from slurry production to solid manure production. Uptake could be greatly

encouraged by participants being less subject to farm inspections.

Grants at a higher rate could be made available for straw handling equipment to encourage a move away from slurry production

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

Rural Business Development Scheme:

The concept of a business development scheme is welcomed however effectiveness will depend on the practicalities of the delivery structure used and how “user friendly” it can be made for participants. The aim must be on delivering maximum benefit to the businesses participating with minimal bureaucracy.

Armagh has a large number of micro businesses many of which are dispersed rurally. For many such business owners devoting the time and resources necessary for business planning activities is difficult. We strongly agree that there is a need to offer support to these businesses which will allow them to realise their growth potential. The nature of this support must however be tailored to the needs of each business and must be flexible enough to cater for the needs of businesses at different stages of development. Experience from the current programme would suggest that established businesses quite often know what they need for business expansion in terms of investment in machinery/equipment/infrastructure. Others not at this level will require more intensive support therefore this Scheme must be capable of catering for all.

Experience from the current programme shows clearly this area has suffered due to the introduction of Strategic Projects.

Rural Business Investment

Access to finance is critical for rural businesses wishing to grow particularly in the current lending climate therefore a business investment scheme is an essential element of the next RDP.

Delivery of this Scheme should be through the LEADER approach. The current LAG structure in place within this region will not be co-terminus with RPA therefore this should be realigned and the necessary agreements developed with the new Council structure. *To this end we would strongly recommend that the process of establishing the new LAG structure and*

development of the Local Action Strategy commences immediately.

We would urge that in relation to the operational management and roll out of this Scheme and others delivered through a LAG structure, consideration is given to the barriers identified in the delivery of the current RDP (Barriers Report) so that lessons can be learnt and previous pitfalls avoided.

Rural Tourism Scheme

The extended geography of the new Council area presents the opportunity to develop rural tourism in a more strategic manner. We believe the development of tourist product within this area should encompass attractions, activities and infrastructure should rest with the new Council structure.

We also believe that opportunities exist for private sector investment in new tourism businesses and therefore welcome the support available through the business development and investment schemes for this purpose. Experience from the delivery of the current RDP suggests that the number of private sector tourism businesses supported was low therefore every encouragement should be given to the development of this sector in order to complement future Council investment in building the tourist offering and increasing visitor number beyond current levels.

Basic Services Scheme

Access to services in rural areas is essential for tackling poverty and isolation. However basic service provision is wide ranging in scope and predicated on what constitutes a basic service. For example the availability of a community facility/hub will for some communities in itself constitute a basic service. Experience from the delivery of the access to service measure within the current RDP provides examples of how outreach services can be successfully delivered to rural areas in partnership by community sector and statutory agencies.

The opportunity exists to build on these examples going into the next RDP through the Community Planning process. We are committed to ensuring that a bottom up approach is taken which ensures that local communities are fully involved in determining local needs and supported by the relevant statutory agencies in identifying solutions.

Village Renewal

Village renewal in the current programme has delivered well and should be built upon in the next Programme with Councils playing a supporting role in assisting with the development of village plans and implementation of agreed actions. Again this process could form part of the community planning process. We would argue that a partnership approach to delivery of village renewal by the LAG and Council structure would represent an effective approach based on the experience and knowledge gained from the current RDP.

All Island Co-operation scheme

This needs to complement the Access to Services scheme and further information is needed on how the two can operate together otherwise this will lead to confusion for potential applicants.

Projects that are strategic in focus could feature here.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Before commenting on how the individual Schemes can be improved upon it is important to recognise that DARD as the managing agent and those responsible for delivery of the next RDP should learn from the failings of the current programme and build upon good practice in operational delivery in order to have more effective and efficient delivery on the ground next time round. This process should commence now and involve both those setting policy and those responsible for delivery on the ground.

The difficulties which have plagued the current programme as outlined within the Barriers Report need to be addressed. Promoters going through the application process have been left feeling as if they have to “clarify in different ways” which has created a negative perception of the current Programme.

Secondly we believe that the LEADER approach, facilitated through the LAG in partnership with the new Council structures, should play a major role in delivery of the next RDP. We are therefore disappointed with the findings and recommendations of the recently published Review of the LEADER methodology in Northern Ireland commissioned by DARD. While commissioned as an independent report we consider that the findings do not present a balanced view of the effectiveness of LEADER as a delivery model.

Suggested areas of improvement:

Rural Business Development Scheme:

There needs to be greater focus placed on ensuring that the application process used is fit for purpose and grant drawdown process is less onerous for project promoters across all Schemes.

Business plans, if developed to support applications for funding should be consistent with project assessment criteria to maximise the chances of approval.

Flexibility is needed on eligibility i.e. number of workers, businesses owned etc

Rural Business Investment

The aim of this scheme should be to provide assistance for investment leading to business growth and expansion, therefore while acknowledging that audit compliance must be adhered to, an overly complex administrative and grant drawdown process should not overshadow this aim.

We would argue that participation in the Business Investment Scheme by both farm diversification and non-farm diversification businesses should not necessarily be conditional on first progressing through the Business Development Scheme if a current robust business plan is available.

Animation support should be available for those businesses not participating in the business development scheme to assist in the application process.

Additional tailored mentoring support should be made available to participating businesses after investment to assist in achieving business objectives – especially job creation and increased profitability. More emphasis needs to be placed on achieving economic outputs as a result of investing grant aid and not just on achieving programme spend.

Investment support must be made available for rural businesses as early as possible in the next RDP. We therefore stress the importance of putting in place a clear transitional and time bound plan by January 2014 to include key milestones ensuring a state of readiness in time for commencing the new programme.

Consideration should be given for the inclusion of small scale food production businesses under the business development and business investment schemes. Experience from the current RDP has shown demand from such businesses but who were deemed ineligible for application.

Rural Tourism Scheme

While the consultation does not focus on grant aid ceilings we would argue a need for higher levels of grant aid above the current cap of £250,000 in order to progress larger scale tourist infrastructure projects within this area.

Combating poverty and social isolation – Basic Services Scheme

This Scheme will benefit from the Councils Community Planning process in identifying integrated services which will benefit local communities. A support structure should be made available to local communities to provide animation in the working up of project ideas aimed at improving basic service provision which should include guidance from statutory agencies to identify potential solutions to gaps in provision.

In terms of project delivery involving community sector applicants, the experience from the current RDP suggests that some groups have struggled in adhering to the complex audit requirements associated with EU funding. Cash flow management has been a particular difficulty due to the retrospective nature of grant drawdown and this should be addressed in the new programme.

Again an opportunity should be taken to bring together DARD staff responsible for developing the operating rules for the next programme and

those involved in delivery of the current programme for the purpose of ironing out the difficulties highlighted within the Barriers Report.

Village Renewal

The possibility of opening the village renewal scheme to private sector applicants/businesses should be considered regardless of the nature of the business – i.e. retail. There is a rationale for Councils to deliver this scheme.

All Island Co-operation Scheme

Focusing again on practical delivery, a support structure should be available for community sector applicants wishing to participate in the Scheme. This needs to work on two fronts: firstly in assisting with networking to identify partners and secondly in working up suitable projects which will fulfil eligibility criteria set for this scheme.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

The consultation document states that communities on both sides of the border are characterised with a range of economic and social problems that result from the existence of borders. We consider that the three key priority areas of access poverty, financial poverty and social isolation identified under the basic services scheme have relevance here albeit at more escalated levels. Added to this border villages have suffered from physical dereliction which exacerbate feelings of social isolation.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

Pockets of deprivation exist all over NI therefore this scheme should extend to all areas. This is also an opportunity for border communities to look at examples of best practice in addressing deprivation and disadvantage within areas not adjacent to the border therefore a wider scope for cooperation would be preferred.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

As a minimum 20% of the overall RDP budget should be allocated to local Councils and LEADER. Council should have the autonomy to establish the most appropriate delivery arrangements with the LAG for Priority 6 Schemes when budgets are allocated.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Either the LEADER approach working through a LAG or delivery by Council should be used to deliver all schemes in Priority 6. The delivery arrangements can be agreed as part of the discussion when grant allocations are agreed.

Outside of Priority 6 there are elements from across the other Priorities which could be delivered through a LEADER methodology for example:

- Priority 1
 - Farm exchange visits
 - Co-operation groups/networks
 - Family farm key skills
 - Link with priority 6 – business development scheme.
- Priority 2
 - Business development through knowledge transfer
 - Business investment scheme
 - Forestry competitiveness scheme – link with priority 6 business measures.
- Priority 3
 - Processing investment development grant
 - In particular small business - link with priority 6
- Priority 5

- Renewable energy – focus on community use not necessarily restricted to farm.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD has experience in the management and delivery of mainstream agri food/environment schemes from previous programmes therefore Priorities 1-4 should fall under DARD responsibility. However as stated above there are areas within these Priorities which have potential for delivery through the LEADER methodology which should be explored.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Councils through their local economic/community development function already work with local businesses and rural communities and with their enhanced responsibilities under RPA can continue to work with LAGs in delivery. LAGs with Council support have the right mix of representation with elected members and social partners working together for the benefit of their own communities. The only Measures best delivered by bodies other than LAGs and Councils are those relating directly to improving agricultural/horticultural production, forestry (but not recreational forestry) and on-farm environmental schemes

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

Available funds should be distributed in proportion across the schemes if the funds are not sufficient to fully support the programme. This is the fairest approach and should reflect the make up of rural communities both farming and non farming.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

LEADER programmes should have the highest priority as LEADER programmes alone offer the widest possible benefits to the entire rural community.
2nd priority should be direct support to farmers to modernise their businesses as this will offer visible and practical aid to a large number of farmers
3rd priority should be environmental schemes to enhance farm facilities and help to improve water quality

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

If necessary, funds should be transferred to maintain the 20% for Rural Development

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

We reiterate the importance of moving quickly through the transition from the current to the new programme in the interest of maintaining momentum and retaining the knowledge accumulated by delivery staff and LAG members alike.

Delivery of the next RDP needs to take account of past delivery experience. In particular, the significant barriers to Axis 3 delivery that have been identified by LAG members and staff (as outlined in the Barriers Report) and highlighted to RDD staff need to be addressed. For example, Axis 3 of the current RDP started 2 years too late and started without appropriate systems in place e.g. proper Operating Rules and an effective Database. In addition, no time or funding was made available for early animation with prospective applicants and there was inconsistency and lack of clarity regarding eligibility of applicants, projects and items within projects.

Monitoring targets need to better reflect the real benefits of the programme to farmers, members of farm families and the wider rural community. Current monitoring is so restrictive that many real benefits, including job creation, are missed

Procurement has been an on-going issue in current RDP delivery with a large number of applicants failing to properly adhere to audit requirements.

LAGs and other delivery agencies should have the flexibility to engage outside agencies to assist project promoters with procurement.

We reiterate that the operational difficulties, such as those outlined above can and should be avoided in the next RDP through better discussion between those involved in setting policy and audit requirements and those responsible for on the ground delivery.

138. Banbridge District Council



APPENDIX A

Draft Response to the Department of Agriculture and Rural Development's Consultation on the Rural Development Programme 2014-20

25 September 2013

This response has been drafted by the Northern Ireland Local Government Association (NILGA), in partnership with its 26 member councils, and SOLACE, in response to the Department of Agriculture and Rural Development's Consultation on the Rural Development Programme 2014-20.

The NILGA Executive Committee will finalise a corporately approved response at its meeting of 7th October 2013. The closing date for this consultation is 21st October 2013.

To follow up on any of the issues highlighted, please contact Karine McGuckin at the NILGA Offices: Email: k.mcguckin@nilga.org

Tel: 028 9079 8972

Derek McCallan

Chief Executive

25th September 2013

1.0 INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of local authorities and is supported by all the main political parties in Northern Ireland. **Local economic development, including rural development, should be a primary responsibility of councils** – like Planning. Therefore this response is predicated upon a strategic imperative of gaining greater devolution to Councils.

NILGA will provide clear and unequivocal evidence as a separate initiative, to DARD, at Ministerial level, during this financial year.

Rural Development within the context of local economic development is a key issue for local government and local communities, given the leading role of councils in developing local economic growth and prosperity. Councils take their responsibility for economic well-being, regeneration, and job creation very seriously, and are keen to ensure that the wider economic policy frameworks can be translated into council services that are required on the ground.

NILGA welcomes the opportunity to respond to this consultation. All of our member councils are extremely keen to move forward with properly designed and governed Rural Development Programme, in partnership with their local rural businesses and communities.

2.0 BACKGROUND

NILGA would highlight the local authority's role (*as part of the statutory community planning model now in legislation*) as a strategic leader in place-shaping, responding to residents' ambitions and aspirations and working with partners to deliver necessary services – and planning future economic growth - at the local level. The Association would also point to efforts that have been ongoing through three rounds of European funding to develop the capacity of the local government sector to fulfill a strategic role in the delivery of rural development as part of **Local Economic Development (LED) strategies**, as well as the on-going preparatory work undertaken with the Department of Finance and Personnel and the other Government Departments to develop a suite of new European programmes for Northern Ireland as part of the 2014-20 Structural Funds.

New Community Planning powers coming under Local Government Reform will give Local Councils a real opportunity to shape services in their area. By leading on this process Councils and the communities which they serve will be key players in influencing the policy of statutory organisations, helping to ensure joint up solutions to local issues. Economic and rural development will be a central theme in this and critical to helping create vibrant and sustainable towns, villages and communities.

New architecture must bring new ambition too - within the context of the Local Government Reform Programme which will see 11 new Councils formed and 11 new community plans implemented from 2015. Councils have a strong track record and a dynamic, responsive, contemporary approach to determining local interventions, driven by data and knowledge, in the delivery of economic development interventions.

NILGA strongly asserts the growing recognition of the role of local authorities as bodies capable of making a unique and driving contribution to the social and economic prosperity of Northern Ireland.

Local government is keen to work in partnership with the NI Assembly, Departments and Committees to ensure that we can jointly plan and prioritise activity, optimising resources available to grow our economy.

NILGA welcomes the recognition of the need for an integrated and coherent approach to economic development within the region and the role of partners in delivering a shared economic agenda.

3.0 Overarching Comments:

For the purpose of this consultation, NILGA will respond specifically to the questions which have relevance to the current and future work and functions of local authorities.

In doing so, it is felt that three main priorities should be commented upon:

Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability.

Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

Priority 7: The Delivery Framework.

3.1 Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability.

NILGA asserts that there is a case for a specific support scheme for young farmers. It has clearly been identified that there was an increase in the number of student/farmers participating in CAFRE programmes. Some of these students may take over the family farm and others may want to start their own farm businesses. It is extremely difficult to start a farm business for young farmers, be they over or below 40 years of age. Farm outbuildings are often in need of repair in order to provide viable and modern crop storage or animal shelter and that is a necessary investment in order to avoid any future losses for the business. As this new generation of farmers have now reached a higher level of education and higher reliance on modern technology to farm their business, investment is also needed in that area, and this goes in tandem with a necessity to address farm waste in the most productive and climate-friendly manner. The investment associated with the setting up of a new business with modern practices is definitely higher for today's generation than it was for the previous one.

The farming sector, especially small farms, still struggle to make ends meet. The consultation document stipulated that farm income in Northern Ireland is 19.5 % lower than the Northern Ireland average income. This portrays a certain level of poverty and resource depletion suffered by some categories of farmers, especially crop farmers.

Support through a series of funding programmes would assist the farming community to acquire, modernise, compete, re-skill and manage farms like a business. The level of funding offered (determined at high level by relevant policy / criteria) should reflect the personal circumstances of the applicant in that new entrants should be considered for enhanced levels of funding as long as their business plan is sound and that they are fully committed to the business. At a recent consultation event, DARD stated that the average level of assistance would be in the region of 40%, however, for new entrants or for businesses in need of major investment to reach sustainability, that level should be raised and consideration should be given for the construction of NEW buildings, not just refurbishing or repair. It is felt by the rural community that a level of 60% is more appropriate than the 40% proposed by DARD.

NILGA has a particular interest in the Business Investment Scheme (BIS), as it is felt that its aims are fully in line with the Local Government Reform Programme's transfer of function. It has now been confirmed that functions such as local economic development activities currently being delivered by Invest NI – The start a Business Programme – will be the Councils' responsibility. Other similar programmes with a different target audience such as the Youth Entrepreneurship Programme, Social Entrepreneurship and Investing for Women will also be managed and delivered by Councils as part of their Plan led approach to the delivery of services at local level.

NILGA asserts that the BIS should be wholly delivered as part of the local community plans, as Councils will be tasked with providing pre-enterprise capacity building to small businesses. Not to do this shows an absence of foresight, integration and subsidiarity. This should therefore include new entrants in the farming business and small farm diversification training. Most councils in Northern Ireland are predominantly rural and that their experience of the farming industry as well as their knowledge of and closeness to the rural community represents a significant advantage in ensuring take up of the programme and implementation of the skills acquired during the training programme.

It seems that the programmes for young farmers is only open to those who have gone through college but excludes those who have not got a formal qualification. Experience as opposed to formal qualification/training should have the same weight in eligibility terms.

3.2 Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

The Rural Business Development Scheme is aimed to assist business start-up and growth by providing information on the formulation of business plans and signposting training and mentoring to increase competitiveness, efficiency, environmental performance and sustainability of rural businesses both new and existing.

NILGA fully endorses the aims of the Scheme but **would go further** by stating that appropriate training opportunities should be **provided** (directly and in partnership, with enterprise bodies and colleges, subject to tender), not just signposted, as part of an individually tailored plan developed in cooperation with relevant stakeholders, which would identify training needs and develop appropriate training for the rural community. Additional **European Social Fund investment** should be sought in order to realise this goal and suggested as part of the current ESF consultation exercise led by the Department of Employment and Learning – **again, showing cross cutting thinking and integrated planning.**

In terms of diversification, the consultation document states that projects within this Scheme must have benefitted from programmes specifically tailored for rural enterprise before receiving funding and that diversification proposals must have already gone through the CAFRE Diversification Challenge Programme before being presented for funding.

NILGA asserts that this process is too inflexible and that it may discourage people from applying. It is fully understood that all businesses should have at least gone through the basic Start a Business Programme and possess a viable, up-to-date business plan before proceeding to any diversification project, however, it should not be compulsory for applicants to have to go through the CAFRE Diversification Challenge if their business plan is robust and their business well established. Each individual application should be assessed on the ability, experience and business skills of the applicant.

The Rural Business Investment Scheme is mainly concerned with investing in localised projects that complement the areas local development strategy and which focused on a specific need. This Scheme would provide grants to local projects with growth potential and it is felt that this type of initiative would be best administered under the Leader model.

The Rural Tourism Scheme is a very important component of the rural fabric and is key to maintain income levels in local communities. Northern Ireland has had a very good year in terms of tourism with specific events such as the City of Culture, the World Police and Fire Games, and recent activity centred around the Titanic. It must be noted that these events have had a positive spin-off on rural areas as visitors took advantage of these events to extend their stay and visit less accessible areas.

However, in order to retain that level of visitors, rural areas must also build their own reputation in terms of tourism and they cannot do this without having essential/basic services available to tourists and to their own community.

Under the Local Government Reform Programme, Councils will see local tourism functions transferred to them with the opportunity to manage the development of small scale tourism accommodation, the provision of business support including start-up advice along with training of customer care schemes, the provision of advice to developers on tourism policies and related issues. Economic opportunities need to be channeled to the entire NI region, and this is one mechanism to achieve this.

NILGA asserts that the Rural Tourism Scheme should form part of the Community Plan led approach; it should be developed and delivered accordingly with public and private partners along with clear community support. Tourism will be fully integrated in the new councils' strategies and the type of activities proposed under the new RDP must converge with the aims and strategies of the existing and future councils.

As far as combating poverty and social isolation -(basic services schemes)- is concerned, this type of activities is very welcome and fits well within the Councils' Community Planning model which will provide a wide range of integrated services at local level and support the rural community. In the current programme, there are many examples of Council intervention which have prevented essential services from being withdrawn from the rural community. For instance, the Library in Gilford closed May 2012. Gilford Community Centre opened in April 2012. All services provided in the old Library were transferred to the Community Centre and continue to this day thanks to the work of the Rural Cluster.

Areas such as transport, access to broadband, innovative health solutions and childcare are vital as they ensure that rural communities can survive and prosper. These types of activities will be provided as part of the work which the Councils are involved in with the Peace Programme, the Good Relations initiatives and the underpinning Equal Opportunities policies and practices. **NILGA asserts that the delivery of these activities should therefore be carried out by the new Councils as part of their Community Plans.**

NILGA asserts that capacity building will be essential to build the ability of rural communities to sustain themselves and to avoid further erosion of the rural community. From recent discussion with rural stakeholders, the above mentioned Community Plans are central to maintaining and improving our rural community – therefore, the work already undertaken by the current clusters should be further developed in order to improve the quality of life in rural communities.

As far as the All-Island Cooperation scheme is concerned, it should be highlighted that the transnational element in the current programme has not been fully exploited and that only some outputs have been achieved. Under the Leader+ programme, a cross border speciality food sectoral development programme was delivered by Banbridge and Carlow Councils. The programme focused on small-scale rural artisan food producers and enabled the participants to strengthen their position in niche markets. Training was provided on new product development, marketing, sales, food safety and financial management. In addition, each business received one-to-one business support and advice and cross border trading took place at the National Ploughing Championships and Balmoral Show. This is a prime example of what could be achieved under this scheme. NILGA asserts that this should be a key, performance driven, element of the new Programme, as there are many opportunities for cooperation between SMEs and enterprise bodies in areas such as tourism, food, broadband, renewable energy. It is recognised that these opportunities could be harnessed under the new Interreg V programme or the Peace IV Programme, however, as the opportunity exists under the new RDP, NILGA would assert that these are exploited to the full. It is felt that Councils could play a central role in promoting cooperation on rural issues to help address rural poverty and social isolation.

3.3: Section 7: Delivery Framework.

The new Programme proposes to deliver a minimum of 5% of the programme through the Leader approach.

At present, 19% is delivered through that model. The current delivery method has been overly complex and needs rationalising for the ordinary person – the customer, as well as for the contracted bodies. NILGA recognises the need for authority and accountability, but the new Programme must not be so tightly controlled by DARD - the lack of flexibility has resulted in delays in processing applications and in spending the money wisely. Strategic projects, additionally, should be determined in partnership under the new Council model, not imposed centrally.

The cost of administering the existing clusters has been criticised as some clusters have spent up to 36% of their allocation in administration alone, and administrative collaboration can be deployed by councils, subject to agreement.

NILGA does not support point 14 page 86 of the document which states that DARD is NOT transferring any functions to Councils as a result of RPA (although consideration has been given to local government involvement in delivering some aspect of a future rural development programme) and that policy responsibility and managing authority and paying agency functions for the programme will remain with the department.

As above mentioned, NILGA asserts that **local economic development, including rural development, should be a primary responsibility of councils** – like Planning. Therefore this response is predicated upon a strategic imperative of gaining greater devolution to Councils. NILGA will provide clear and unequivocal evidence as a separate initiative, to DARD, at Ministerial level, during this financial year, and seeks clarification from DARD in this regard, as the Department has altered its stance markedly from earlier policy.

As the Leader approach is part of the new regulations, it is felt that any future local action groups (LAGs) should only deliver programmes, or part of programmes which do not fall under the transfer of functions to Councils. Any local action group should be tightly linked to the Council's Community plan and work seamlessly with other stakeholders to benefit the rural community. It should also have more autonomy and more flexibility than the current clusters.

There are currently seven Rural Development Clusters covering the 26 district Council areas. Although it is suggested in the document that the new clusters should be co-terminus with the boundaries of the new 11 councils, NILGA asserts that the Local Action Groups should cover a larger area (at least 2 new council areas) as it would not make economic or administrative sense to increase the number of LAGs. Hence NILGA's previous points about administrative collaboration. As with all contractual arrangements subject to wider strategic change, there is a need for transitional mechanisms and investment to avoid knowledge being lost – therefore NILGA seeks bridge funding on a cluster by cluster basis, negotiated with the Department.

The Rural Development Programme is something that the rural community will have to live with and deliver. Therefore, it has to meet its needs without the over-administrative approach adopted under the 2007-13 programme. There are arguments supporting the removal for example of the JCC and spending and monitoring targets must be applied to both the Clusters AND DARD itself.

Additional comments:

Priority 4: Preserving and enhancing ecosystems dependent on agriculture and forestry

Councils have a statutory duty for enhancement of biodiversity in relation to their duties. As councils are soon to take on responsibility for area planning and development management, it is vital that farmers understand the impact that the combination of duty and new functions will have on their activities.

The Department is therefore encouraged to ensure that engagement between councils and the farming community is supported, particularly in relation to biodiversity and prevention of water pollution.

Priority 5: Promoting resource efficiency and supporting the shift towards a low-carbon and climate resilient economy in the agriculture, food and forestry sectors

It is vital that DARD ensures that its policies on renewable energy do not conflict with planning policy, energy policy and waste management policy and strategy. It is important that the farming sector is not exposed to the effects of 'silos' within government in relation to renewable energy development. A strategic approach must be taken, particularly on wind and anaerobic digestion plant, and attention should be paid to the emerging Single Planning Policy Statement. The new planning responsibilities that are coming to councils will directly impact on farms in relation to their renewable energy development, and a more integrated approach at local level will be needed on what can be extremely contentious developments.

Conclusion

An overwhelming opportunity exists as part of a wider strategic reform process for DARD and local authorities to combine investment with ambition and work seamlessly with each other and sister government departments to ensure that optimal investment is designed and accounted for locally and accounted for in an integrated, not silo, fashion. The Association invites the Department to work with it and other Departments to achieve this common aim, through the right mechanisms, governance and monitoring, for the RDP 2014 -2020.

Disclaimer

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139. Belfast City Council

Background

Only certain elements of the programme are relevant to Belfast City Council, and the Council would like to make responses to the specific questions within the consultation document outlined below.

The key targets for the 2014-2020 Rural Development Programme includes measures to improve the competitiveness of our agri-food industry as well as the natural environment alongside measures to develop and improve rural areas. There are 6 priority measures: the one of most relevance to Belfast City Council is Priority 6: Rural Development.

The consultation document features a series of questions related to priority 6. Proposed answers to the key questions in this section of the consultation are detailed below.

The consultation document makes some reference to the potential for the “Leader” model of delivery which has happened under previous rounds of the programme. Leader is a bottom-up approach to rural development activity. It involves devolving funding to local level to allow the delivery of agreed programme of work against a set of objectives. At present, the EU requires at least 5% of the funding to be distributed in this way. Under the current programme, Belfast is part of a cluster with Lisburn and Castlereagh. There are seven of these clusters at present: they were established in 2006 in anticipation of aligning with the proposed 7 council area model that at that time. However the lack of progress in RPA meant that this did not happen.

While the current consultation does not define the geographies to be associated with the Leader approach, it suggests that there are a number of principles for service delivery that need to be considered, namely:

- Effectiveness
- Equality focused

- Capable
- Accountable
- Local.

It is proposed that the Leader model going forward is based on the 11 council structure and that, therefore, there is a Leader element of the programme for the new Belfast City Council area.

Question 31 - How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

The above-mentioned activities are aligned to the EU priorities for smart and inclusive growth. The document sets out well the rationale for measures envisaged within this priority: the need to support and maintain rural SMEs, dependence on rural tourism (both as a main and supplementary income), reducing isolation through the provision of adequate basic services and the renewal of villages as community hubs.

Whilst Belfast City Council agrees with the focus of the proposed schemes, the operational delivery of these initiatives should take into consideration the challenges experienced by project promoters in terms of accessing match funding finance, securing planning permission and the timescales of this activity.

The proposed Rural Business Development and Rural Business Investment Schemes are both welcome additions to support business start up and growth in eligible areas. However both schemes appear to have prerequisites which impact on a company's ability to access support under the scheme. We have some concerns about placing potential barriers such as this which may prevent access to vital support services for rural businesses and would recommend that this issue is looked at again. If this does not happen, we consider that it could impact negatively on the ability to realise grant spend targets under this measure.

Question 32 – How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Belfast City Council's Integrated Tourism Development Framework, which was developed in partnership with the Northern Ireland Tourist Board (NITB) has identified 10 Tourism Destinations for the city – two of which are directly located in or link into rural areas. These are Belfast Hills and Lagan Canal.

Tourism in Belfast was worth £416million in 2012 in direct visitor spending, and the industry supports 10,000 FTE jobs in the city. Belfast City Council's tourism strategy is focussed on spreading this benefit across the city. However, with particular regard to Belfast Hills and the Lagan Canal, there are a number of factors which impact on their ability to gain proportionate access to the economic benefits generated.

With regard to the Belfast Hills, baseline research has been undertaken by various groups in the hills and at the fringes of the hills. Current efforts have allowed pockets of sustainable development to take place but wider development has been hampered by limited access into the hills and within the wider hills network. Belfast City Council, with partner organisations, will continue to consult with private landowners and the National Trust to enable the maximum potential of the hills to be achieved and facilitate enjoyment of the natural assets by the public. These actions will greatly increase the potential of the Belfast Hills to realise its share of the overall Belfast tourism dividend. We would therefore encourage the Department to delineate the eligible hills boundary and increase the funding threshold for tourism projects to enable strategic, sustainable and inclusive projects to be delivered.

With regard to the Lagan Canal, Belfast City Council is working with several partners including the Lagan Canal Trust and landowners. However progress has been limited due to the need for large-scale investment. The funding limits in place in the current programme have supported only piecemeal investment in the site. If any strategic tourism development schemes are to take place, we would recommend that the Department considers removing the current funding cap to allow a number of these "flagship" projects to progress.

It is also important to consider the impact of Local Government Reform which will affect local government boundaries, bringing in and transferring areas across Council boundaries. How this transfer is managed without disruption to the scheme and any live projects needs to be taken into account.

Belfast City Council proposes that the Leader elements of the programme should be managed on a council area basis. We consider that this would have a number of benefits:

- Support the development of the community led local development approach: we are currently working with DFP, DETI and DEL to look at opportunities for providing ring-fenced funding to address identified socio-economic challenges in the locality. Inclusion of Leader funding into this model would allow a holistic yet targeted approach to addressing these challenges and would reduce duplication of funding, allowing Belfast to maximise the impact of the EU resources
- Belfast City Council has many years of experience in drawing down EU funding for use in social and economic regeneration projects, including some significant schemes under the current Rural Development Programme. We have a track record of delivering results and ensuring funding drawdown, in line with programme commitments
- The council's governance processes ensure that there is compliance with all relevant equality legislation. This would provide appropriate assurances for the Department in this regard
- The council has significant profile at a local level as a key delivery body. Through our elected members, we are able to reflect the issues addressing local communities and deliver tangible projects to make a difference at local level.

To support business growth, we would further suggest reconsidering the eligibility requirements for this programme to include small businesses with up to 20 employees. The majority of businesses in Northern Ireland are micro-businesses and will fall into this category. This would align with the requirements of other

programmes being run by the council and would therefore make it easier for companies to understand the nature of the offer.

Question 33 – On which issues should the proposed All Island Cooperation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

We consider that this measure should focus on shared learning, networking and exchange of best practice. Given that the council boundary is at a distance from the border, there are challenges in developing collaborative activities. While the opportunity for collaboration exists within the current programme, this has been difficult to realise in practical terms.

Question 34 – Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

We recommend that it could operate on the same principle as the INTERREG Programme; namely those areas not contiguous to the border are eligible for 20% of the total priority budget.

Question 35 – How much of the programme budget should be allocated to the Leader approach, and why?

The Lagan Rural Partnership has fully allocated its available budget through the current NIRD. This demonstrates the potential of the Leader approach to achieve spend targets. We would therefore suggest that the Department considers going beyond the minimum 5% allocation to Leader projects and allocates a budget that is closer to the current programme (19% of programme budget).

In addition, it should be noted that Councils were able to design and deliver strategic projects only at a very late stage in the current Programme's lifespan. This demonstrates councils' flexibility and ability to design projects which meet localised

needs and which contribute to the overall programme aims and objectives. We would encourage the Department to maintain this element of the Programme as we consider that there is additional potential for significant projects of this nature which can make a positive impact on the rural economy. Any reduction in budget to this element of the programme would have a significant impact on the ability to deliver projects of strategic impact and scale.

Should this approach be adopted for the 2014 programme, we would recommend that strategic projects with a value in excess of £250,000 of grant funding should be eligible for funding earlier in the programme in order to allow for time to build the potential landmark projects and facilitate early acceleration of grant spend.

Given the change of boundary as a result of Local Government Reform, Belfast City Council will have a more significant footprint in the designated rural boundary. We have seen the benefits of engagement under the current programme, albeit that our rural population is limited in size. Under the future programme, we would be a willing partner in a Leader-type approach and would be keen to look at how we could work with the Department to develop rural regeneration schemes which will impact positively on the quality of life for rural residents within our boundary.

Question 36 - Which measures/schemes should be delivered through the Leader approach, and why?

We believe that the draft Operational Programme is accurate in terms of what is envisaged to be delivered through Leader. There is however potential for Local Action Groups to also deliver activity related to knowledge transfer and innovation (priority 1) and we would support a revision of the programme to take account of this. This is in line with our proposals under the ERDF consultation.

Question 37 – Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Belfast City Council believes that it has a key role to play in the delivery of the outlined measures in Priority 6. In particular, we consider that local authorities, in partnership with the Local Action Groups, have a key role in delivering:

- Village renewal activity: notably where the rural community lacks the community infrastructure to develop plans and then map out and develop the delivery of initiatives contained therein
- Strategic flagship initiatives which deliver a lasting legacy and sustainable outputs for an area, including tourism infrastructure schemes.

As previously mentioned, cognisance should be given to the likely transfer of functions to Councils through the Reform of Local Government e.g. business development and enterprise support initiatives. Belfast City Council would encourage the Department to work closely with councils in the development and implementation of any related measures, in order to minimise any negative impact on the end user.

We consider that, while the focus of the programme is on development of the physical space and its communities, it is also important to consider linkages with the adjacent urban areas. Many of the communities who use and “own” rural parts come from outside the designated area.

Additional comments

Whilst Belfast is principally an urban area, we welcome the opportunity to engage in the NIRDP and provide support to its rural visitors and population. Cities across the EU are recognising the importance of linking urban-rural and actions to support this should be welcomed within the functions of the Programme.

From our experience in the current programme, we would also make the following comments:

- Village Renewal Scheme (p80): one of the key lessons from the current programme is that the success of this measure is dependent on the social fabric existing in the village. Where a community infrastructure does not exist the Programme should facilitate community development and accommodate the time needed for this work within the profile of the Programme’s lifespan.

- The Department should recognise that, if it is envisaged that communities themselves are responsible for the development of these plans, the communities may not be able to access match funding. In the current Programme, local authorities undertook this responsibility. However, in line with the principles of community regeneration and in order to ensure that the community has ownership of the Programme, we would encourage communities to take the lead in this process. This however raises a number of issues including availability of funding and variances in capacity levels across local communities. The programme should consider how these issues can be addressed.
- We consider that there is a significant opportunity in the new programme to focus on support for the social economy in rural areas – both in terms of raising the awareness of its potential amongst rural communities and in providing resources to develop the sector
- We would encourage the department to look at how the administration and bureaucracy associated with Programme delivery can be reduced. A possible consideration for this may be the creation of a one tier robust corporate body, rather than the two tier (Strategic Joint Committee/Local Action Group) management system in the current programme
- We consider that the Leader structures should be co-terminous with the new council boundaries. This will ensure alignment with the proposed integrated programme approach that has been discussed with DFP as part of the new EU funding programming period 2014-2020.

140. Craigavon Borough Council

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

The priority proposals are relevant to sector as there is a need to continue to support small businesses and to combat poverty and social isolation in rural areas. The new schemes reflect the current programme measures being delivered from 2007 – 2013.

From the profile of businesses supported to date, it is apparent that rural businesses tend to be smaller and require more tailored support. To date, Southern Organisation for Actins in Rural Areas has committed support to 168 businesses worth £4,056,840 of grant aid, which has a potential volume of investment of £8,113,680. Through this investment business have agreed to 261 new jobs across a range of business sectors. This represents excellent value of money in terms of job creation, as the average cost of each job is £15,543. The issue of safeguarding jobs is also a real issue that whilst it is not monitored, is important to the growth potential of the NI economy.

This is reflective of the level of interest in farm diversification and local business development in the Council areas of Craigavon, Armagh and Newry & Mourne. This is a growing area and SOAR has witnessed an increased interest in this area through the latter stages of the programme, which it was not able to meet the needs of due to restrictive budgets.

Business Start up and development is one of the most important aspects of the current rural development programme and offers a real opportunity to grow the NI economy by creating jobs and wealth. Also by supporting job creation helps the rural development programme meet the European 2020 objectives of creating a smart and innovative economy.

Tourism is another area which offers growth potential for the NI economy. Through the SOAR area, we were able to support 25 tourism related projects with a total project being committed of £2,167,892 to tourism related projects, both to the project and public sector. These projects increase the number and variety of tourism offerings in rural areas and will act as a potential catalyst for more investment and increase the number of visitors to the local area and locality.

Finally, it is well documented that there are major gaps in service provision in remote rural areas which has been highlighted in completed village plans undertaken as part of the past programme. There is the need to provide support to improve services and access to these services in future scheme. There is a need for a more partnership approach across government department, local councils and communities in order to combine services to create a more effective delivery model.

SOAR has seen major success through increasing services to rural areas and is proud to report that 49 projects has been supported to date, with an investment of grant of £6,869,481.

The number of important of services being delivered in rural areas has grown tremendously through provision of childcare and young people services, services for the elderly and women. We should built on this success and develop connected rural communities were services are delivered locally for all rural dwellers.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Rural Business Development, Rural Business Investment,

A huge number of lessons have been learnt in terms of Business Creation and Development. SOAR have had a 35% drop out rate after letter of offer. SOAR undertook research into what affected this dropout rate and learnt that the level of bureaucracy and lack of match funding were two of the biggest contributing factors to drops out.

In order to be more effective in the delivery of support, a less bureaucratic, less onerous approach would be welcomed for smaller schemes/ start up business worth £10,000 / £15,000 or less of grant aid. DARD should consider offering a small grants programme with a more streamlined assessment process. Is it value for money to carry out a full economic appraisal for some grants. As a delivery agent we saw comparable assessment time for small grants a large grants, as the need still had to justified to independent assessors.

Consideration should also be given to increasing grant aid for small business to encourage take up of full utilisation of further grants, in line with other European countries, due to the potential to create real jobs in rural areas.

SOAR however welcomes that animation and business support /mentoring will from part of the new delivery model. As supporting a business creates better long term results in terms of completing projects and making better informed decisions for the business owner in their investments.

Accredited courses that can demonstrate a direct benefit to a project should be eligible for support. Training should be support so that it can be offered in rural locations.

Combating Poverty Social Isolation – Basic Services, Village Renewal

The Basic Service measure has been delivered successfully through the current programme and this success should be built upon.

The process of drawing done grants and cash flow has been a particularly difficult process for community groups, this should be given consideration for future programmes that advance payments can be offered more easily to avoid thee issues.

This measure should offer the opportunity for targeted calls to meet the strategic needs of local areas. This would enable a better quality of projects which offer the ability to support more rural dwellers and deliver more sevices.

Community Capital projects should be encouraged to integrate renewable energy technologies as part of any capital build/refurbishment.

Access to capacity building and training for community groups should be further developed through the new programme, to enable community groups to deal with legal and financial issues more readily.

Thought should be given to offering grants for rural community development posts fro fixed term contracts to help revitalise services in rural areas and develop actions plans for a cluster of community groups/areas. These resources should be shared amongst groups to maximise economies of scales

It should be noted that DSD functions will be transferring to Council under RPA and these monies will be able to be utilised in rural villages as well as for urban regeneration. Therefore a joined up approach is essential maximise the potential that this measure offers for rural communities

We welcome that areas such as transport, access to broadband, innovative health solutions and childcare are included under current proposals as these are vital to ensuring that rural communities can survive and prosper.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

Co-operation should indeed be part of the new programme, both on a North South and East West basis. It should be delivered across all of Northern Ireland not restricted to the border areas. Co-operation should also include

a transnational element, enabling applicants to engage with European counterparts on a range of areas.

There is a potential if it is focused on border areas, there will be duplication of funds under Interreg and Peace IVA.

It should be highlighted that the transnational element in the current programme has not been fully exploited and that only some outputs have been achieved due to a number of constraints in the delivery model outlined in the operating rules.

However, it is important that DARD consult with SEUPB before deciding on this scheme and its scope.

There should be an open call process for co-operation related projects and applications should be invited from a wide range of stakeholders.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

The scheme should include all rural areas and not just counties adjacent to North / South boarder.

These issues of deprivation and disadvantage effect rural settlements within all rural areas which can be evidenced by the MDM indicates.

Border regions can access funding through Interreg funds and there is a potential to create a duplication.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

SOAR supports the Leader approach and recommends that that it should be a significant part of the delivery process.

It is a well developed Europe methodology, successfully utilised from 1991 to address rural issues. In the present programme 19% of RDP is delivered by LAGs and this level of funding should be continued or increased to the maximum 25% in order to build on previous programmes.

To date, SOAR has received over 1000 applications since first opening a call in 2009 and grant aided 255 projects to date and committed its entire budget of £13,943,198.

Leader also has the ability to be funded at EU levels to a higher percentage than other RDP funds thus there are financial incentives for an area to use the leader approach.

These figures demonstrate that there is a need for support in rural areas. However, sufficient changes to the programme are required to reduce the number rejected and withdrawn applications.

There are opportunities outside of priority 6 which should be considered for delivery in a Leader methodology in particular priorities where there is a business or farm family development focus.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

All of priority 6 should be delivered through LAGs using the Leader model. It is noted that there are other specialised expertise required to deliver aspects of the other priorities. There is a need for a practical approach using and building on previous programmes so that the delivery is not impacted.

The current delivery method has been overly complex and needs rationalising for the ordinary person.

Whilst we understand and agree there is a need for authority and accountability, but the new Programme must not be so tightly controlled by DARD - the lack of flexibility has resulted in delays in processing applications.

There are currently seven Rural Development Clusters covering the 26 district Council areas. Although it is suggested in the document that the new clusters should be co-terminus with the boundaries of the new 11 councils through a Service Level Agreement. Should the Local Action Groups cover a larger area (at least 2 new council areas) as this would enable economies of scale to be maximised.

There is a need for transitional mechanisms and investment to avoid knowledge being lost from LAGs and Admin services and impact on service at an early stage in the programme.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD should have responsibility for the all the priorities which require farming and renewable energy expertise.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

All agencies bodies, Councils and LAGs should work together on all measures with a linked Partnership approach in order to combine services and create the greatest impact.

Councils can and should be a major delivery option as they have a direct mandate in their area for Economic Development, Tourism Development, Community Services and Village Renewal and have established delivery mechanisms. They should work in partnership across all the priority 6 measures with LAGs.

Councils are receiving more powers through RPA, which will support their importance as strategic stakeholders' to support the communities that they represent. It is hoped that RPA will create a better a more joined up government for local communities at a local level and more effective services will be delivered.

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

There is a need for more funds across all measures.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

The overall aim of priority 6 is to improve the quality of life for people living in rural areas. Therefore, the individual schemes will impact on the entire rural community, thus it is those schemes that should be a priority. The most popular schemes in part schemes have been Farm Diversification, Business, Tourism, Basic Services and Village Renewal.

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

Yes, at least 15% up to 25%. This will help support farm diversification businesses and small businesses across NI. Pillar 2 measures are much more focused and have the ability to have a significant impact on the rural economy and the NI economy in general

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

- Knowledge gained over the previous programme should be utilised.
- Remuneration for assessment panel members to knowledge their time and expertise should be considered.
- Create a different approach to deal with audit requirements.
- The match funding levels need to be reduced and funding thresholds raised i.e. more than £50k per private applicant. Perhaps projects creating more jobs should receive more investment?
- Redefine the definition of a rural area. Will settlements currently eligible under the programme change with the new census figures?
- The documentation and consultation presentations refers that there is no cost to DARD to the programme if DARD manage the administration in house. This is a misleading comment as there is an indirect cost from Central Government which is tax payers money. Why not account for all administration even to third party organisations from Central Government?
- There needs to a move towards an output based programme, rather than the present process and audit driven programme.

The Barriers paper, which was developed by NI clusters provided to DARD through the current the Rural development Programme should be fully implemented as previously agreed by DARD and Clusters.

141. Coleraine Borough Council

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Yes Coleraine Borough Council agree there is a need for broader vocational training and the five schemes, i.e. *European Innovation Partnership (EIP) Operational Groups, Other Network/Clusters, Innovation and Technology Evaluation and Demonstration, Farm Family Key Skills and Farm Exchange Visits* offer a wide range for potential vocational training. Skills development to assist people run successful and profitable businesses with an emphasis on environmental and sustainable to agriculture

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

Coleraine Borough Council see the innovation broker as a Facilitator Role - good skills in facilitation with proven business experience, experience of fostering positive relationships; effective communicator; researcher, investigator and have experience in problem-solving and have a broad industry awareness with knowledge of planning, decision-making, etc.; The role will be one for visioning, creating, and inspiring others with ideas; developing solutions and establishing agreements.

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

There is a rationale for providing targeted support to new entrants on existing holdings. This support could be accommodated under the proposed Business Development Groups through the creation of a grouping of young farmers who have become or are about to become heads of holdings and could include new entrants as well as those taking over existing businesses. The age of young farmers as suggested (40) seems reasonable.

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

A minimum level of £5,000.00 and a maximum of £150,000.00 would be reasonable. An intervention rate of 50% would be suggested as our economic climate remains difficult and challenging to access the required match funding.

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

Clarification is required that the minimum entry requirement for all tiers is a 'Registered Farm Business'.

It is also suggested that there should be an additional criteria in relation to updating buildings and equipment. - Applicants should be required to illustrate that they are not merely replacing the current item but that there is demonstrable additionally in terms of the introduction of innovation, technology, or diversification.

There should also be a clearly demonstrated need for the intervention and any farms supported should be able to support 1 full time person.

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Renewable energy support should be part of any support under a farm business development grant scheme.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

It is important to reimburse development group members as this will get buy in ensure such information is collated and disseminated illustrating farm performance to promote knowledge transfer from farmer to farmer and farmer to advisor.

Question 8

How should participants in development groups be selected?

Comment

This should be open to all with particular emphasis on the participation of people 40 or under. They should also be fully informed that they need to be prepared to commit to active participation in the group and for the duration of the programme.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Coleraine Borough Council agree a new fresh approach is required to improve the competitiveness and development of food processing businesses.

The need to work in tandem with the requirements set out in the Agri-Food Strategy Report is important and that such be funded with additional monies to the Rural Development fund.

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

Coleraine Borough Council agree that the levels are adequate however small business should be funded at a higher level than the larger processors as these companies in general are highly profitable and do not need the same intervention as small rural food businesses.

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Coleraine Borough Council propose that there should be a strong emphasis on networking and marketing. There should be a closer linkage between the primary producer and the end consumer. It is therefore suggested that rather than focusing on an all-inclusive grouping, links should be established firstly at the supply end of the value chain, i.e. between primary producers, livestock markets and processors, and then another at the demand end, i.e. retailers (including farmers markets and farm shops) and the food service sector. Once these links have been established then the link between the supply and demand side could be developed through various events, seminars, etc.

European Union - Priority 4**Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors****Question 12**

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

It is agreed that options for support for specific habitat/species management on designated areas should be administered separately from support for general biodiversity enhancement, water quality management, and woodland enhancement initiatives. The proposed structure is unclear - should this not be simplified and could it then possibly be addressed under the current Single farm Payment system.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Coleraine Borough Council understand there is agreement in principle that supporting the management of designated sites is a priority. However, whether funding should be prioritised towards these designated sites, which only make up 8% of the land in Northern Ireland, is a different matter.

There are other priorities that require funding across the remaining 92% of land across Northern Ireland, e.g. increasing the level of tree cover should also be a priority, as NI has the lowest % tree coverage in Europe. It is suggested that care be taken to ensure that funding creates the most 'added value' and therefore greatest impact in relation to EU targets.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Coleraine Borough Council understand that there is agreement that training should be a compulsory element of the entire programme so we agree it is an essential.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

Yes Coleraine Borough Council agree that higher levels of funding should be allocated to farmers who participate and actively support these schemes.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

It is a good idea to plant woodland on farms but these areas should be carefully chosen to integrate with the landscape. This would not mean that only poor land should be allocated to planting as this means poorer production and therefore not the same financial return and good pasture.

Good ground is therefore a premium for the farming community, whether for own use or in conacre, as the farm is dependent on it for income generation either directly or indirectly. To give over this land to planting woodland would therefore be difficult to rationalise to the farming community unless it were larger scale and under the Forestry Plantation Scheme (Priority 5). Where it could be encouraged on a smaller scale is on land that has limited potential for crop production or grazing, or on areas that are difficult to harvest, e.g. corners of fields.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

Coleraine Borough Council understand that farmers will use their land for food production as opposed to woodland - food production is the more profitable venture. However, reimbursement for income foregone would provide a rationale to farmers for making land available for new planting, albeit any income foregone support would have to be for the long-term.

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

Coleraine Borough Council agree as is suggested in the consultation document, it is appropriate that ANC (Areas of Natural Constraint) scheme is retained within Pillar 1 as a form of income support. Other schemes to promote environmentally protective and enhancing agricultural production methods should be retained within the agri-environment based schemes.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

See question 19

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Yes. The new renewable energy technology scheme should be simpler and more customer friendly and easier to avail of so that the farmer can participate.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

Coleraine Borough Council agree that the renewable energy technologies that should be supported are:

- Wind
- Hydro
- Solar
- Biomass

Albeit care should be taken in relation to impact on the countryside in relation to the carbon footprint of an installation, its longevity/maintenance requirements, its

suitability and its impact on other sectors, e.g. the aesthetics of a large, highly visible installation will impact on tourism and potentially the attractiveness of Northern Ireland as a film location (both of which impact on the rural economy), height and turbulence generated (in the case of wind turbines) can affect the air transport industry.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

No, this should be decided through a more flexible approach.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Yes

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

Yes – however it may be a smaller scheme that should be considered.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

With the increasing demand for improved efficiencies and the need to meet energy efficiency and waste reduction targets, it is anticipated that legislative requirements will be increased, which in turn will increase demand for advanced slurry spreading systems.

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc. to help track behavioural change?

Comment

Yes – to gather information for future schemes.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

- Time constraints,
- Financial constraints,
- lack of knowledge of how to develop and what to include in the NMPs (Nutrient Management Plans),
- Lack of knowledge and experience negating the rationale for developing NMPs.

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Yes - It would enable farming peers to learn together - It would provide peer support in relation to difficulties encountered, development of solutions, etc.

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

There should also be support for the implementation, as well as the development, of Nutrient Management Plans. This would include assistance with the collation and analyses of findings.

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

Coleraine Borough Council fully endorse the proposed Priority 6 Measures and advocate improved synergy between the measures for example Rural business development and rural business investment should have a direct impact in the Village renewal theme by promoting rural business hubs in villages. There also needs to be a more integrated approach across all priorities to help promote and stimulate new ideas for farm diversification and small rural businesses. Rural businesses have issues with isolation and access to labour and markets compared to urban areas. They also tend to be smaller and require more tailored support. Tourism, particularly in the NE is a growth market and resources should be targeted at this sector.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Such efforts must ensure Villages are vibrant encouraging a living and growth focused culture among its residents - not simply improving the image thereby addressing the Leader principles of what is seeking to be achieved overall in our villages.

Basic Services need greater clarity as to what this should be deemed as eligible – it should be based primarily on what local people say is needed in their local villages. Providing a basic service for transport, addressing poverty and social isolation or such other clearly recognised local needs based on community hubs, community groups and local village plans.

Training was not adequately covered in the past programme and this needs to be factored into the roll out of such priorities particularly in relation to Rural Business Development, Rural Business Investment, Rural Tourism and combating poverty.

There should be greater potential to link across the priorities taking into consideration the project and or the applicant eg. Linking priority 5 Resource Efficiency with priority 6 Social Inclusion, economic development and poverty reduction.

Coleraine Borough Council would state that Business Support, Tourism infrastructure and support and Village Renewal should be aligned with council given that regeneration is seen as an integral part of the new RPA and community planning proposals.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

Coleraine Borough Council would suggest that all the themes within Priority 6 should all be included as an open and eligible offer allowing an All Island approach which address deprivation and disadvantage in remote rural areas allowing for progressive thinking potential models of good practice on an all island basis to come forward.

Co-operation should indeed be part of any programme, both on a North/South and East/West basis. In the North East the Scottish connection has tremendous potential, but has been very much undeveloped.

Minimise any restrictions to allow for greater flexibility. The lead in time has proved heavily bureaucratic in the recent past and this needs addressing to allow for a more effective streamlined customer friendly programme that gains momentum from day one.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

No – It should cover all of Northern Ireland as there are areas of deprivation and disadvantage across all rural areas of NI therefore North/South Co-operation focus should not just be focused on the border areas.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

The Leader Approach is a tried and tested model and Coleraine Borough Council believe that at least 10-15% should be allocated to allow for the local bottom up approach which directly impacts the people and community it serves which was clearly demonstrated in the previous Leader II and Leader Plus programmes. This approach involves the community in every aspect of the theme selection, delivery of the projects and ownership of the projects is truly centred in a community planning approach.

Coleraine Borough Council recognises that Leader should be a significant part of the delivery process. However it should be aligned with the new council structures and work very closely with them. There should be a partnership as at present, but with a 1 (one) tier delivery structure. Staff and administration should continue to lie with councils.

Leader is and remains one the main tools for addressing the issues in rural areas. It has been basically missing from the last round of funding and needs to be reinstated. In the present programme 19% of RDP is delivered by LAGs-this should be evaluated but the 2 main delivery organisations should be LAGs and Councils.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Coleraine Borough Council believe all measures/schemes should be delivered by the Leader approach as there has been acknowledged excellence in the management and delivery of such measures in the recent past through the participation and voluntary input done by the expertise and experience of the members of the Local Action Groups. Village Renewal and Basic Services should be delivered through the Leader approach as these measures involve communities co-operating for the benefit of their rural areas. The main emphasis of this measure is addressed directly in the Leader approach

.The main delivery areas for Leader could be

- Networking and Co-operation elements, including Priority 1 measures
- Networking and cross cutting themes with other EU programmes – Interreg and Peace
- Business support

- Small grants scheme
- Combating poverty and isolation scheme.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

Priority 6 should be delivered by local authorities and LAG;s DARD should be responsible for the regulation and policy of this priority rather than be directly involved in delivery of the priority. DARD should also have responsibility for environmental issues and those where there are needs for enforcement activities. The main areas would be

- Some of Priority 1
- Priority 2
- Priority 3 , but with small scale food included in business measures ie Priority 6
- Priority 4
- Priority 5

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Coleraine Borough Council believe that Councils and external bodies such as the existing rural support networks, COLLAGE etc serve the effective delivery of the programme therefore we do not advocate that any other bodies should be involved in the roll out of the programme. Councils should work in partnership across all the Priority 6 measures with LAGs. They are obviously receiving more powers as part of RPA and thus will be able to create more delivery synergy in a range of programmes. Councils already work with small businesses through the DETI/INI programmes and also in the provision of community services and Village Renewal and have an obvious role in these areas.

The main areas of delivery should be

- Business support
- Tourism marketing and infrastructure
- Village Renewal and Regeneration

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

All measures have merit in going forward however if faced with this situation, the only measure we might suggest being reduced or eliminated could be the all island approach. The reason for saying such is that past experience clearly demonstrated the slowness of this type of measure with other measures bringing about greater and faster returns on investment thereby having a greater impact on addressing the objectives of the

programme – such as creating and sustaining jobs, regenerating community facilities and villages and addressing poverty and social isolation directly in the communities affected most by such issues.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

Community Measures (Combating Poverty and Social Isolation) should be given priority due to the probability of the required match funding for these measures being provided by Local Authorities and these measures are clearly addressing recognised and acknowledged needs highlighted by the community. That said Rural Business Development, Rural Business Investment and Rural Tourism should be treated in the order as listed in terms of prioritising the measures.

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

Yes – given the strength of debate on this issue in the current round of funding it is imperative that this be allowed for in the future – the proposed amount of 15% as is being argued now should continue to be the same rate and even consider increasing to 20% as this programme measures are seeking to enhance rural communities, rural businesses and directly address social isolation through farm diversification and small business support. The core of any RDP should be addressing the basic needs of the rural community in a Leader approach. Pillar 2 measures can directly benefit and are much more focussed and have the ability to have a significant impact on rural economies and areas.

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

It is vital that in the planning for the next round of RDP funds that delivery is considered at the same time as the priority or measure content. The current RDP was launched late and although the strategies were detailed and thorough, the lateness of the launch had an adverse effect on the LAGs ability to promote and develop projects with communities and private participants, resulting in some poorly thought out projects and a lot of participants withdrawing from the programme due to lack of time to deliver and the issue about match funding in the current poor financial climate.

Food – funding for Food is currently antiquated and misses out on helping small businesses source funding to help them become more efficient and ready to service local communities or indeed help feed the ever increasing world population – the measures require a huge increase in monies to

address these issues and Coleraine Borough Council believes funds need to be targeted at the recommendations highlighted in the Agri-Food Strategy Report.

The new programme needs to be a more output/outcome based programme as opposed to a process and audit driven programme.

142. Cookstown District Council



Cookstown DISTRICT COUNCIL

A. McCreesh, MSc, Dip IoD, MCIM
Chief Executive (Acting)
chief.executive@cookstown.gov.uk

COMHAIRLE CHEANTAR NA COIRRE CRÍOCHAÍ
DISTRICK COONCIL O COOKESTOUN

16 October 2013

RDP Management Branch
Department of Agriculture and Rural Development
Room 407
Dundonald House
Upper Newtownards Road
Belfast
BT4 3SB

Dear Sir

Rural Development Programme Consultation 2014 - 2020

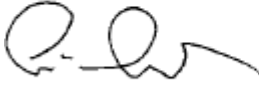
Cookstown District Council welcomes the opportunity to submit this response to the consultation paper on the Rural Development Programme 2014 – 2020. Cookstown District Council is committed to continuous improvement in service delivery throughout the District and therefore looks upon the Rural Development Programme 2014-2020 as an opportunity for improving the economic, social and environmental conditions within the District's rural areas.

The extended statutory responsibilities of the new Council structure in community planning coupled with an economic and community development remit will work to deliver improved economic and social prosperity throughout the Local Authority area. Council looks forward to taking the lead role in the delivery of the next Rural Development Programme as part of the new Council structure to achieve this in partnership with a Local Action Group.

The Rural Development Programme exists for betterment of all sections of the rural communities and must strive to ensure that all who benefit from it do so positively. An overly complex and audit heavy application and grant drawdown process has created a negative perception among applicants participating in the current programme. The barriers which hindered delivery within the current programme must be addressed but this can only be achieved through a meeting of minds between those responsible for setting policy and audit requirements within DARD and those who will be responsible for delivering on the ground. To this end we would urge DARD as Managing Authority to engage with Council and LAG members in order to plan for a more effective and user friendly delivery process.

The current programme has delivered many successful projects across both private and community sectors and it is important that we build on the good work. It is vital that work commences immediately on the transition to the new programme. Council staff and LAG members have accumulated significant experience in the operational delivery of the current programme which would be lost if there are delays in commencing the next programme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Adrian McCreesh', with a long horizontal flourish extending to the right.

Adrian McCreesh
Chief Executive (Acting)

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Increased vocational training in a broad range of appropriate skills will help to improve efficiency and at the same time lessen any adverse environmental impact of farming and forestry. More effective use of farm produced nitrates could reduce fertiliser input costs thereby reducing potentially harmful emissions. Adding value to raw products substantially increases farm profitability so training in possible methods/ ways to add value (as individual farmers or collectively) could be beneficial. Farms in NI have huge areas of hedgerows and it is vital that these areas are protected, maintained and increased.

Possible focus targets for training:
More modern techniques in production
Best practice and benchmarking
ICT use
Value adding to produce
Marketing and co-operative marketing
Value of hedgerows and ways to protect them
Renewable energy production

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

The role of the Innovation Broker could be:
To co-ordinate and liaise with partner organisations (farmers/farmer groups and Universities/Colleges, statutory agencies and relevant agencies etc)

Innovation Broker required skills could include:

A third level qualification in a relevant discipline (e.g. Rural Development, Business, Economic Development, Community Development European Structures) with two year's experience in the last five of project/programme management and delivery

or

A minimum of three years experience of project monitoring and delivery in the area of rural development or other relevant business environment.
Have 5 GCSE / "O" Levels or equivalent, Grades A – C, including English and Maths

Significant experience of funded programme development and management

Experience of preparing and presenting reports.

Have the ability to work under pressure and to strict timescales

Access to transport for work purposes.

Proficient verbal and written communication skills in English

Desirable Criteria

- ◆ Experience of working with individuals, groups, statutory agencies and businesses within the rural community.

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Young farmers are more likely to consider change in agricultural practices, more likely to avail of training and more likely to become better and more efficient farmers. Young farmers with their own business ID could be supported with increased grant rates

Older farmers should be encouraged through a one off or annual payment to hand over ownership to the next generation – that payment being proportionally increased the younger the owner signs the farm over to the next generation.

Older farmers could be encouraged to initiate partnerships arrangements with younger farmers (equal partnership ownership of lands and herds), such arrangements qualifying for support eligible to young farmer schemes.

This will help to ensure that uptake of fresh ideas will increase and modernisation of farms will result

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

Minimum funding level should be £1500 in order to ease the administrative burden on funders. This would still permit necessary small scale development

Young farmers could get 60% capital grant-rate linked to 100% grant-aid support to develop business plans and avail of training

Other eligible farmers could get 50% capital grant-aid in line with similar business support available through other programmes

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

The criteria outlined for financial support under Tiers 1, 2 and 3 appear to be adequate and proportionate to the levels of funding sought

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Farmers considering diversification and development programmes would naturally look at potential ideas for both food and renewable energy production. Both such themes should be considered under LEADER as LEADER is often the first port of call for such developments. This would help to ensure that potential applicants are not sent from pillar to post when seeking advice and support and it would also avoid any potential for duplication of funding.

100% support for farmer buying and selling groups could be considered as this would help to make farms more sustainable by decreasing farm input costs and maximising farm output returns.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

In order to ensure that best practice is engaged and that farm performance information is collated and disseminated as widely as possible, 100% of actual costs should be reimbursed to group members

Question 8

How should participants in development groups be selected?

Comment

Potential participants in development groups should apply to be members and should be assessed by a panel made up of a DARD representative, a relevant discipline representative and a rural development representative.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Adding value to food is an obvious and often a first consideration for farmers thinking about farm diversification. As such, any initial proposed farm developments in adding value to food should be the remit of LEADER funding. This would provide applicants with a 'testing of the water' approach in securing funding and implementing small scale developments on farm.

Secondary or very large proposed developments in food processing could be considered by the Processing Investment Development Grant Scheme

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

Tier 1 could be better dealt with by LEADER as LEADER is more closely aligned with first stage farm diversification. Upper limit could be £50,000 grant-aid

Tier 2 could consider projects with total costs of £100,000 - £2million

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Other groups /alliances that may be considered under this scheme could include:

Loosely constituted buying/selling groups considering co-operative purchase of raw materials and selling of produce i.e. groups that only meet occasionally for such specific purposes

Groups and partnerships that co-operate to set up renewable energy installations to reduce farm input costs

European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

NI farms include vast areas of permanent grassland, hedgerows and walls. Existing regulation on farm practices in NI is sufficient to preserve and protect these features and other relevant environmental interests. While support for agricultural practices that are compatible with protecting and improving the environment is to be encouraged, this should not be at the expense of increased regulation and bureaucracy. Rather, the focus could be on increasing awareness of best practice with support for approved enhancement schemes.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Designated sites are of the utmost importance and should be prioritised for financial support for environmental improvements.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Environmental training should not be compulsory but participation in such training should be encouraged and rewarded as it is important that greater awareness is promoted and best practice implemented.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

The level of uptake for co-operation measures under this scheme is likely to be low but it may be appropriate for multiple owners of areas of bog land, upland heather etc. Such co-operation should attract significantly higher levels of funding as it targets areas that may not ever be improved without support for collective action.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

Uptake of organic farming has been low due to the fact that current prices for organic produce do not compensate such farmers for the decreased level in production and the significant but necessary changes in housing, waste management and in general farming practices to that in conventional farming. Support for introducing organic farming practices should be made available at a level that really encourages farmers to consider this option.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

Woodland planting is often perceived as a last ditch usage of land and generally only on lands where conventional farming is too difficult to manage. The time factor involved in maturation of woodland means a long wait for a limited financial return and that return may be somewhat uncertain. Letting out land in conacre ensures a regular agreed return with often only an annual commitment and it is therefore more attractive to owners. Support for woodland planting needs to be increased in order to make it more attractive to owners.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

If financial support for woodland planting was made much more attractive and an annual return for loss of income was guaranteed then many more owners would consider the option of woodland planting

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

Pillar II should be viewed as income support aligned with environmental considerations. ANC areas may be limited in the scope of agricultural production that can be carried out in them but a range of farm diversification activities can be undertaken and supported, tourism being an obvious activity for increasing farm income. Farmers in areas other than ANC areas do have greater scope for agricultural activity but such activities do not necessarily mean that farm income is any more easily obtained. It would seem unfair to divert additional monies to ANC areas if this penalises farmers in other areas.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Farmers in ANC areas need to be supported to remain on the land but income supplements could be better achieved through support under farm diversification measures in LEADER programmes. Perhaps prioritising applications to LEADER programmes from such areas and/or increasing the grant-aid available to farm diversification projects in ANC areas could be considered.

In addition, environmental schemes in ANC areas could attract higher grant-aid rates than in other areas and co-operation environmental schemes with a strategic impact could attract 100% funding.

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Comment

Renewable Energy production is an obvious choice for farm diversification and should therefore be dealt with under LEADER. However, farmers need to be able to use the electricity to reduce farm costs and detailed negotiations need to take place between DARD and NIE/PowerNI to ensure that grid capacity is available. If necessary, government needs to ensure that plans are implemented to upgrade the grid infrastructure so that such farm diversification can take place more easily and that government renewable targets are achieved.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

Each renewable energy technology should be supported on its own merits as assessed by a LEADER assessment panel. Economic return, viability and sustainability should be the key factors in assessment of applications.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

Grant-aid support should be targeted at the most economically viable projects and these may factor in on-farm usage. An economic appraisal should examine all likely returns and benefits of the project and determine the potential value of the project.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Supporting larger scale woodlands with attractions of community benefit and access etc will be fraught with difficulties such as insurance and ownership issues. Any projects in woodlands that permit access and greater community benefit could be dealt with separately to timber production i.e. by local councils or by LEADER

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

Slurry processing equipment such as separators and the roofing over of manure pits are measures that will directly improve the environment and should be supported under METS. Uptake will be small unless the grant rate is at a higher level than that for other METS projects.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

Support for advanced slurry systems is most likely to be targeted at contractors and most of these have probably already availed of METS support. Demand is therefore likely to be small

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Feedback only needs to indicate that no extra production has resulted – carried out by site visit 12 months after project completion. Any more complex feedback will only serve to limit uptake.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

Time constraints for carrying out everyday farming activities are imposed on farmers by weather conditions and by EU and DARD regulation. This means that activities such as soil testing and drawing up nutrient plans are not prioritised and may be overlooked. Many farmers have good knowledge of the land requirements on a field by field basis and do not see drawing up a nutrient plan as being essential or beneficial. The importance of such activities could be highlighted by best practice visits to focus farms and by linking training on such matters to DARD environmental schemes

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Discussion by peers on any farming matters would be a suitable mechanism for improving awareness and uptake

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

The Nutrient Efficiency Scheme could encourage movement away from slurry production to solid manure production. Uptake could be greatly encouraged by participants being less subject to farm inspections.

Grants at a higher rate could be made available for straw handling equipment to encourage a move away from slurry production

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

Rural Business Development Scheme:

The concept of a business development scheme is welcomed however effectiveness will depend on the practicalities of the delivery structure used and how "user friendly" it can be made for participants. The aim must be on delivering maximum benefit to the businesses participating with minimal bureaucracy.

Mid Ulster has in the region of 900-950 micro businesses many of which are dispersed rurally. For many such business owners devoting the time and resources necessary for business planning activities is difficult. We strongly agree that there is a need to offer support to these businesses which will allow them to realise their growth potential. The nature of this support must however be tailored to the needs of each business and must be flexible enough to cater for the needs of businesses at different stages of development. Experience from the current programme would suggest that established businesses quite often know what they need for business

expansion in terms of investment in machinery/equipment/infrastructure. Others not at this level will require more intensive support therefore this Scheme must be capable of catering for all.

Rural Business Investment

Access to finance is critical for rural businesses wishing to grow particularly in the current lending climate therefore a business investment scheme is an essential element of the next RDP.

Delivery of this Scheme should be through the LEADER approach. The current LAG structure in place within the Mid Ulster region should be maintained for this purpose with administrative support provided via a service level agreement from the new Council structure. This will ensure that the expertise and knowledge in project assessment and audit compliance accumulated in the roll out of the current RPD is easily transferred to the new Programme. *To this end we would strongly recommend that the process of establishing the new LAG structure and development of the Local Action Strategy commences immediately.*

We would urge that in relation to the operational management and roll out of this Scheme and others delivered through a LAG structure, consideration is given to the barriers identified in the delivery of the current RDP (Barriers Report) so that lessons can be learnt and previous pitfalls avoided.

Rural Tourism Scheme

The extended geography of the new Council area presents the opportunity to develop rural tourism in a more strategic manner. We believe the development of tourist product within the Mid Ulster area encompassing attractions, activities and infrastructure should rest with the new Council structure.

We also believe that opportunities exist for private sector investment in new tourism businesses and therefore welcome the support available through the business development and investment schemes for this purpose. Experience from the delivery of the current RDP in Mid Ulster suggests that the number of private sector tourism businesses supported was low therefore every encouragement should be given to the development of this sector in order to complement future Council investment in building the tourist offering and increasing visitor number beyond current levels.

Basic Services Scheme

Access to services in rural areas is essential for tackling poverty and isolation. However basic service provision is wide ranging in scope and predicated on what constitutes a basis service. For example the availability of a community facility/hub will for some communities in itself constitute a

basic service. Experience from the delivery of the access to service measure within the current RDP provides examples of how outreach services can be successfully delivered to rural areas in partnership by community sector and statutory agencies.

The opportunity exists to build on these examples going into the next RDP through the Community Planning process. We are committed to ensuring that a bottom up approach is taken which ensures that local communities are fully involved in determining local needs and supported by the relevant statutory agencies in identifying solutions.

Village Renewal

Village renewal in the current programme has delivered well and should be built upon in the next Programme with Councils playing a supporting role in assisting with the development of village plans and implementation of agreed actions. Again this process could form part of the community planning process. We would argue that a partnership approach to delivery of village renewal by the LAG and Council structure would represent an effective approach based on the experience and knowledge gained from the current RDP.

All Island Co-operation scheme

This needs to complement the Access to Services scheme and further information is needed on how the two can operate together otherwise this will lead to confusion for potential applicants.

Projects that are strategic in focus could feature here.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Before commenting on how the individual Schemes can be improved upon it is important to recognise that DARD as the managing agent and those responsible for delivery of the next RDP should learn from the failings of the current programme and build upon good practice in operational delivery in order to have more effective and efficient delivery on the ground next time round. This process should commence now and involve both those setting

policy and those responsible for delivery on the ground.

The difficulties which have plagued the current programme as outlined within the Barriers Report need to be addressed. Promoters going through the application process have been left feeling as if they have to "jump through hoops" which has created a negative perception of the current Programme.

Secondly we believe that the LEADER approach, facilitated through the LAG in partnership with the new Council structures, should play a major role in delivery of the next RDP. We are therefore disappointed with the findings and recommendations of the recently published Review of the LEADER methodology in Northern Ireland commissioned by DARD. While commissioned as an independent report we consider that the findings do not present a balanced view of the effectiveness of LEADER as a delivery model.

Suggested areas of improvement:

Rural Business Development Scheme:

Entry by participants should not necessarily be via the EU grant application process but rather through expression of interest.

There needs to be greater focus placed on ensuring that the application process used is fit for purpose and grant drawdown process is less onerous for project promoters across all Schemes.

Business plans, if developed to support applications for funding should be consistent with project assessment criteria to maximise the chances of approval.

Flexibility is needed on eligibility i.e. number of workers, businesses owned etc

Rural Business Investment

The aim of this scheme should be to provide assistance for investment leading to business growth and expansion, therefore while acknowledging that audit compliance must be adhered to, an overly complex administrative and grant drawdown process should not overshadow this aim.

We would argue that participation in the Business Investment Scheme by both farm diversification and non-farm diversification businesses should not necessarily be conditional on first progressing through the Business Development Scheme if a current robust business plan is available.

Animation support should be available for those businesses not participating in the business development scheme to assist in the application process.

Additional tailored mentoring support should be made available to participating businesses after investment to assist in achieving business objectives – especially job creation and increased profitability. More emphasis needs to be placed on achieving economic outputs as a result of investing grant aid and not just on achieving programme spend.

Investment support must be made available for rural businesses as early as possible in the next RDP. We therefore stress the importance of putting in place a clear transitional and time bound plan by January 2014 to include key milestones ensuring a state of readiness in time for commencing the new programme.

Consideration should be given for the inclusion of small scale food production businesses under the business development and business investment schemes. Experience from the current RDP has shown demand from such businesses but who were deemed ineligible for application.

Rural Tourism Scheme

While the consultation does not focus on grant aid ceilings we would argue a need for higher levels of grant aid above the current cap of £250,000 in order to progress larger scale tourist infrastructure projects within the Mid Ulster area. We wish to build upon the success of tourist projects implemented in the current RDP such as for example Davagh Forest recreational trails which while still in their infancy are proving their value evidenced through visitor numbers achieved to date.

Combating poverty and social isolation – Basic Services Scheme

This Scheme will benefit from the Councils Community Planning process in identifying integrated services which will benefit local communities. A support structure should be made available to local communities to provide animation in the working up of project ideas aimed at improving basic service provision which should include guidance from statutory agencies to identify potential solutions to gaps in provision.

In terms of project delivery involving community sector applicants, the experience from the current RDP suggests that some groups have struggled in adhering to the complex audit requirements associated with EU funding. Cash flow management has been a particular difficulty due to the retrospective nature of grant drawdown and this should be addressed in the new programme.

Again an opportunity should be taken to bring together DARD staff responsible for developing the operating rules for the next programme and those involved in delivery of the current programme for the purpose of

ironing out the difficulties highlighted within the Barriers Report.

Village Renewal

The possibility of opening the village renewal scheme to private sector applicants/businesses should be considered regardless of the nature of the business – i.e. retail. There is a rationale for Councils to deliver this scheme.

All Island Co-operation Scheme

Focusing again on practical delivery, a support structure should be available for community sector applicants wishing to participate in the Scheme. This needs to work on two fronts: firstly in assisting with networking to identify partners and secondly in working up suitable projects which will fulfil eligibility criteria set for this scheme.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

The consultation document states that communities on both sides of the border are characterised with a range of economic and social problems that result from the existence of borders. We consider that the three key priority areas of access poverty, financial poverty and social isolation identified under the basic services scheme have relevance here albeit at more escalated levels. Added to this border villages have suffered from physical dereliction which exacerbate feelings of social isolation.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

Pockets of deprivation exist all over NI therefore this scheme should extend to all areas. This is also an opportunity for border communities to look at examples of best practice in addressing deprivation and

disadvantage within areas not adjacent to the border therefore a wider scope for cooperation would be preferred.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

As a minimum 20% of the overall RDP budget should be allocated to local Councils and LEADER. Council should have the autonomy to establish the most appropriate delivery arrangements with the LAG for Priority 6 Schemes when budgets are allocated.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Either the LEADER approach working through a LAG or delivery by Council should be used to deliver all schemes in Priority 6. The delivery arrangements can be agreed as part of the discussion when grant allocations are agreed.

Outside of Priority 6 there are elements from across the other Priorities which could be delivered through a LEADER methodology for example:

- Priority 1
 - Farm exchange visits
 - Co-operation groups/networks
 - Family farm key skills
 - Link with priority 6 – business development scheme.
- Priority 2
 - Business development through knowledge transfer
 - Business investment scheme
- Forestry competitiveness scheme – link with priority 6 business measures.
- Priority 3
 - Processing investment development grant
 - In particular small business - link with priority 6
- Priority 5
 - Renewable energy – focus on community use not necessarily restricted to farm.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD has experience in the management and delivery of mainstream agri food/environment schemes from previous programmes therefore Priorities 1-4 should fall under DARD responsibility. However as stated above there are areas within these Priorities which have potential for delivery through the LEADER methodology which should be explored.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Councils through their local economic/community development function already work with local businesses and rural communities and with their enhanced responsibilities under RPA can continue to work with LAGs in delivery. LAGs with Council support have the right mix of representation with elected members and social partners working together for the benefit of their own communities. The only Measures best delivered by bodies other than LAGs and Councils are those relating directly to improving agricultural/horticultural production, forestry (but not recreational forestry) and on-farm environmental schemes

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

Available funds should be distributed in proportion across the schemes if the funds are not sufficient to fully support the programme. This is the fairest approach and should reflect the make up of rural communities both farming and non farming.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

LEADER programmes should have the highest priority as LEADER programmes alone offer the widest possible benefits to the entire rural community.
2nd priority should be direct support to farmers to modernise their businesses as this will offer visible and practical aid to a large number of farmers
3rd priority should be environmental schemes to enhance farm facilities and help to improve water quality

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

If necessary, funds should be transferred to maintain the 20% for Rural Development

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

We reiterate the importance of moving quickly through the transition from the current to the new programme in the interest of maintaining momentum and retaining the knowledge accumulated by delivery staff and LAG members alike.

Delivery of the next RDP needs to take account of past delivery experience. In particular, the significant barriers to Axis 3 delivery that have been identified by LAG members and staff (as outlined in the Barriers Report) and highlighted to RDD staff need to be addressed. For example, Axis 3 of the current RDP started 2 years too late and started without appropriate systems in place e.g. proper Operating Rules and an effective Database. In addition, no time or funding was made available for early animation with prospective applicants and there was inconsistency and lack of clarity regarding eligibility of applicants, projects and items within projects.

Monitoring targets need to better reflect the real benefits of the programme to farmers, members of farm families and the wider rural community. Current monitoring is so restrictive that many real benefits, including job creation, are missed

Procurement has been an on-going issue in current RDP delivery with a large number of applicants failing to properly adhere to audit requirements.

LAGs and other delivery agencies should have the flexibility to engage outside agencies to assist project promoters with procurement.

We reiterate that the operational difficulties, such as those outlined above can and should be avoided in the next RDP through better discussion between those involved in setting policy and audit requirements and those responsible for on the ground delivery.

143. Derry City Council

Derry City Council Response to RDP Consultation

Derry City Councils' response to the consultation is informed by comments made by members of the public at Consultation seminars hosted by DARD in August/September 2013 as well as local consultation events hosted by RAPID Ltd and Derry City Council during September 2013.

This consultation response has been written and agreed in partnership with the Rural Area Partnership in Derry (RAPID LTD)

Derry City Council welcomes the opportunity to respond to the consultation. The feedback from the local consultation with Farming Groups, Private and Social Economy Businesses and Community Groups in the area demonstrated the wide interest in the Programme.

The Rural Development Programme provides very valuable resources to the Rural Community and it is imperative that this funding is maximised in order to meet the needs of the farming community and also the wider rural community as well as safeguarding and enhancing our rural environment.

The Review of Public Administration places the local authorities in a strategic role as part of the Statutory Community Planning Model, working with partners to deliver essential local services and in the planning and delivery of economic development at a local level.

Local Government Reform will see the 11 new Councils formed and 11 new community plans implemented from March 2015. It is within this context that Derry City Council welcomes the recognition of the need for an integrated and coherent approach to economic development within the region and the role of a partnership approach in delivering on this ambition.

Derry City Council welcomes the commitment by DARD in the Regulation Framework to work in partnership with the Department of Enterprise, Trade and Investment (DETI), and the Department for Employment and Learning (DEL) to ensure that the activities funded under each of their programmes will complement the activities proposed for funding under the Rural Development Programme for Northern Ireland, 2014 – 2020. The further commitment to aim for complementarity within the proposed measures under the INTERREG V and Peace 1V programmes.

Background

Derry City Councils' response is set in the following context:

Farming income in Northern Ireland is **19.5%** lower than the Northern Ireland average income.

Agriculture is a key driver in the Northern Ireland Economy with a labour force of 46,948 directly involved in agriculture. Agriculture contributes £378 million gross value added to the local economy (1.3% overall), more than double the UK average.

Currently the Common Agriculture Policy accounts for around **42% of the entire EU budget** organised under 2 Pillars

Pillar 2 (Rural Development Programme) provides essential income to farmers in the Derry City Council area given the small scale hill farming, primarily sheep and cattle with **66% of the land classified as Less Favoured Area**. Habitat enhancement/ environmental and conservation payments and the Less favoured areas Compensatory allowance are essential.

Within Northern Ireland 24% (16,285) of all VAT registered/PAYE businesses operate in the agriculture, forestry and fishing sectors compared to 6.7% for the UK as a whole. In relation to the Strabane/ Derry City Council area this figure rises to 33%.

The average gross weekly earnings of people in rural areas in Northern Ireland from 2001 – 2006 was consistently below those living in urban areas, with the lowest rate of growth occurring in “less accessible rural” areas where, according to the local government based definition of rural, 32% of the Northern Ireland population live.

Work carried out by the New Policy Institute and published by the Joseph Rowntree Foundationⁱ found that poverty is higher in the west of Northern Ireland than in the east. For example, in the **Rural West 24% of people are in poverty** as are 23% in the urban west compared with 17% in poverty in both the rural and urban east of Northern Ireland.

In 2008 – 09 in Northern Ireland, of those who earned 50% below the United Kingdom (UK) mean income before housing costs half (50% of individuals) lived in rural areas, over a quarter in the Belfast Metropolitan Urban Area (27%) and the rest in urban areas (22%).ⁱⁱ

¹Joseph Rowntree Foundation (2012) Monitoring poverty and social exclusion in Northern Ireland 2012 Mac Innes T et.al.
²Source Family Resources Survey Urban Report Northern Ireland 2008-2009 (DSDNI)

General Comments

Feedback from our consultation exercises highlighted a number of general concerns from a range of experiences of the previous programme:

- The need for a reduction in bureaucracy across the programme was a general theme throughout the consultation process. The audit procedures for relatively small amounts of money was seen as a barrier by many applicants. The length of time taken to process applications was also raised as an issue at all of the consultation events. Many of the previous applicants to the programme felt that the programme presented the most bureaucratic process they had ever been through, despite the fact that many were community organisations and council officers who had a wide experience of a range of funding bodies.
- It is imperative that an Animation Programme is built into the next programme in order to develop applications to an appropriate level which will reduce the amount of administrative time spent on applications which are ultimately rejected.

- A major issue for those wishing to Diversify and the Micro Business Sector was both the level of funding and the intervention levels offered. Many applicants were forced to abandon their projects due to the inability to raise the required match funding. The higher levels of funding and intervention levels in the Republic of Ireland were raised and it was suggested that DARD should look at the experience of both programmes to see if lessons can be learned.
- A further issue was the length of time taken to process payments which resulted in cashflow difficulties for Micro Businesses.
- Given that Derry City Council is a border area many applicants pointed to the fact that businesses just a few miles away in the republic of Ireland were at a competitive advantage given the difference in grant rates and support levels. (50% up to £50k in Northern Ireland and 75% up to 150k euros in the Republic of Ireland).

While it is recognised by Derry City Council that an increase in the intervention level in the North is more difficult due to the “De Lorean” rule we would recommend that DARD look for solutions to this issue as the ability to raise match funding was a major contributory factor in money having to be transferred from micro businesses to Strategic projects in the last programme and will continue to be a problem at least in the medium term.

- The inability of Farm Diversification projects to use “in kind “ contributions was also seen as a barrier and it is suggested that this avenue should be investigated as a way to assist in relation to match funding for the new programme.
- There was a general concern at all of the consultation meetings that the emphasis throughout the **Priority 6 theme** (combating poverty and social isolation – basic services scheme) seems to be on grant aid towards “Capital with the partner department/agency providing the additional resources.” While there was agreement on the need to maximise the grant aid available and the benefits of partnership with other agencies there is a grave concern that if the revenue resource is not available many of the “**innovative solutions**” suggested may not materialise.
- There are a range of good practice examples of projects funded under the current programme including work with those affected by suicide in rural areas and innovative programmes for adults with learning disabilities. There is a real concern that this type of support which provided a much needed resource in rural isolated areas may not fit within the parameters of what is being proposed.
- In the absence of detailed discussion and **agreement** with the **partner/department agencies** to provide the revenue resource there is a risk that the funding will be not be deliverable.

- It is important that “innovative” projects are not deterred from applying to the programme due to restrictions which are applied at the time of programme development which ultimately result in simply becoming a barrier to delivery.

Consultation response

For the purposes of this consultation, Derry City Council will specifically respond to the questions which have relevance to the current and future work and functions of the local authority – Priority 6.

We also recognise the contribution of Agriculture and Rural Development to the local economy, the statutory responsibility of council in relation to the enhancement of Biodiversity, and the contribution a thriving rural area, with a well managed land base has for tourism potential. We will therefore also respond, following consultation with the farming community locally to those elements which specifically affect the Agricultural community in the Council area and across the North West.

NILGA/SOLACE Project Pipeline Exercise

DCC fully supports the project pipeline exercise currently being carried out between Councils and the Consultative Partnership and has been actively engaging with the Departments and the process. However, DCC would like the Departments to take note that the sector is currently a state of flux with a high degree of change and uncertainty not least as a result of RPA and the merger of Derry City Council (DCC) and Strabane District Council (SDC). Furthermore, DCC has been implementing an internal re-organisation process which is only now embedding.

Moreover, the development of two key pieces of strategic work are only now underway that will significantly impact on how the 2014-2020 NI EU Structural Funds will be utilised and invested in the NW. These are the development of a new Integrated Economic Development Strategy and the development of a NW Cross-border Action Plan. Both of these plans and the subsequent investment priorities and project activity that these plans will prioritise are subject to the final approval of both DCC and SDC as well as the Statutory Transition Committee.

Therefore, any proposals submitted to the Departments as part of this process are indicative only of the likely areas of project activity and are subject to change and further detailed design and development work over the next few months.

To achieve this DCC envisages working very closely with the Departments in particular DETI, Invest NI, DEL, DARD and DSD on the design of these plans and the development of the specific interventions and projects to be delivered to ensure an agreed and integrated strategic approach to take full advantage of and maximise the vital investment of the 2014-2020 EU funds in the NW. In the coming weeks we will be engaging with the Departments to request a nominated liaison from each department to work with us on these plans.

CONTENT OF THE PROPOSALS

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Derry City Council agree that the range of training outlined in Priority 1 Fostering Knowledge Transfer and Innovation is comprehensive.

Training for farmers on how to lay fibre-optic cables on their farmland in order substantially decrease the cost of connecting to High Speed Broadband networks – such training schemes have been and are planned for rural areas in other Member States, including Gavleburg (Sweden) and Lower Saxony (Germany)

Today, fibre is the only medium which can deliver High Speed Broadband in rural areas. Fibre-to-the-Cabinet (FTTC), available in many rural areas, is not a solution:

- *Speed decreases once the distance between the cabinet and farm premises is greater than one kilometre.*
- *Many farms and rural businesses are located more than one kilometre from the cabinet*

80% of the cost of building fibre is related to the cost of digging and laying the cable. This cost of providing High Speed Broadband could be substantially decreased if farming communities were in a position to lay the fibre themselves across lands or along rural roads and driveways.

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

Derry City Council agree with the role of the innovation broker as outlined in the document.

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Derry City Council agree that in the absence of securing an amendment to the definition of a young farmer in the EU proposals, support should be directed towards developing farms under the Business Investment Scheme and the Business Development Knowledge Transfer Scheme.

It is important, given the current age profile of farmers in Northern Ireland that some specific support is provided for young farmers in order to encourage participation in the industry.

Derry City Council support the use of the following mechanisms:

- Using the scoring mechanism of the proposed support scheme to give additional points for applications from young farmers or businesses with succession opportunities.
- Giving a different rate of support to applications from young farmers.

The average level of assistance is in the region of 40%. Derry City Council would propose that in relation to young farmers this level of grant aid should be increased given the major capital investment required for new entrants.

The document also states that investment support would be provided in relation to refurbishing or repair of buildings – it is important that support is also provided in relation to new buildings. This has particular relevance to young farmers who may wish to build from new or move existing farm buildings.

Derry City Council also support the 25% top up support currently being suggested under Pillar 1 for young farmers.

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

During consultation carried out by Derry City Council with farming representatives it was agreed that there should be a minimum expenditure limit of £1k in order to allow small farmers to make basic but important

improvements for example to improve health and safety.

It is also agreed that given the pressure on funds across the programme Tier 3 should be removed. The maximum level of grant assistance at Tier 3 is £250k which would require an investment of £625k. It is suggested that there would therefore be very few farms availing of this level of assistance and the farming community in the Derry City Council area felt that it is important that as many farms as possible are able to avail of resources particularly in relation to Upgrading/replacement of buildings/equipment through farm modernisation, **evidenced by risk assessments**.

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

Derry City Council would propose that Tier 1 should be increase to £50k in relation to Total Project Costs with the entry requirement being a Registered Farm Business.

The entry requirement above £50k Total Project Costs should, as outlined require a proportionate business plan (5 year) and commitment to monitor business performance.

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Derry City Council agree with the proposed areas of expenditure. However the document seems to concentrate on Upgrade or Replacement of farm buildings. Derry City Council would suggest that it is important to also include New Buildings in order to facilitate the need to either move buildings or to facilitate young farmers entering the industry.

It is not clear as to whether internal fit out of farm buildings/concrete yards/farm drainage/re-seeding and fencing costs are included.

These are areas which have been highlighted throughout the consultation period as important areas for inclusion as part of the capital grants scheme.

In light of the strong focus on Renewable Energy in emerging council plans Derry City Council would support the inclusion of support for Renewable Energy Technologies within the Farm Business Development Scheme.

Renewable energies should be included but also support for installing Fibre-to-the-Farm (FTTF), ie, the *Business Investment Scheme* (BIS) should, under its grants to *introduce new technologies or acquisition or development*

of information technology / equipment to assist development / restructuring, include support for installing fibre across farmland and along rural roads to connect farmhouse and outbuildings to nearest fibre enabled roadside telecommunications cabinet. This could include a number of farms cooperating within a small area to optimise route of fibre across farmland.

This could also be considered under the Forestry Competitiveness Scheme (FCS)

The main reason for this is that fibre is the only medium which can deliver High Speed Broadband in rural areas. Fibre-to-the-Cabinet (FTTC), available in many rural areas, is not a solution:

- *Speed decreases once the distance between the cabinet and farm premises is greater than one kilometre.*
- *Many farms and rural businesses are located more than one kilometre from the cabinet*

80% of the cost of building fibre is related to the cost of digging and laying the cable. A support towards this cost would enable farmers, rural businesses, etc. to connect to High Speed Broadband, perhaps across lands or along rural roads and driveways.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

Derry City Council would assert that group members should be reimbursed for collating and disseminating their farm performance. Considerable time will need to be invested in benchmarking.

It is suggested that Farm members should be reimbursed through Farm Relief Vouchers which are provided for attendance at each event. This type of reimbursement allows for Farmers to bring in a Relief Worker while the Farmer is away from the business. This type of scheme was provided through the INTERREG programme to farmers who participated in the Social Farming Across Borders project. Each farmer was provided with a voucher for 90 euro for each full day event attended.

Derry City Council would suggest this type of approach is adopted in the programme.

Question 8

How should participants in development groups be selected?

Comment

A criteria for the selection of participants should be developed in conjunction with the Local Farm Advisors/farm groups in the area.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Derry City Council agree with the sectors which are outlined in the Consultation document.

In particular Derry City Council welcome the inclusion of support for small operators to organise joint work processes and to share facilities and resources in order to help them to be more profitable despite their small scale.

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

The proposals in the document outline a two Tier approach to funding levels.

Tier 1 – Investment levels of up to £125k

Tier 2 – Investment levels up to £1.25m

Derry City Council would propose that Tier 1 should be split with two elements ie Investment up to £50k and £50k and above to a maximum of £125k with the level of entry criteria reduced for those projects below £50k.

In the previous programme small food producers found it difficult to secure resources as they were ineligible under Axis 3 and although eligible under Axis 1 felt that they were unable to compete at application stage with the large food producers across Northern Ireland.

There is an increased demand for locally produced food and Derry City Council believe there are opportunities for small food producers to develop their products/ markets and support for small operators to organise joint work processes or to share facilities and resources would indeed help to make them more profitable despite their small scale.

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Derry City Council agree with the areas of expenditure outlined, in particular the inclusion of capital expenditure associated with specific projects eg food hub/farmers market etc.

Processing Investment Development Grant Scheme (PIDGS)

The support for new technologies or software, whether for small or large scale food processors, should include support for connection of the processing premises to nearest fibre enabled roadside telecommunications cabinet.

As outlined above, the main reason for this is that fibre is the only medium which can deliver High Speed Broadband in rural areas. Fibre-to-the-Cabinet (FTTC), available in many rural areas, is not a solution:

- *Speed decreases once the distance between the cabinet and farm premises is greater than one kilometre.*
- *Many farms and rural businesses are located more than one kilometre from the cabinet*

80% of the cost of building fibre is related to the cost of digging and laying the cable. A support towards this cost would enable farmers, rural businesses, etc. to connect to High Speed Broadband, perhaps across lands or along rural roads and driveways.

Agri-Food Producer Cooperation Scheme (AFPCS)

Support under this measure could include a measure to establish the feasibility of developing fibre networks in particular areas to support clusters of SMEs - including between primary producers, food processors, retailers and the food service sector – to facilitate innovative cooperative methods including open innovation.

European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

Councils have a statutory duty for enhancement of biodiversity and we would encourage the Department to support co operation and engagement between Councils and the farming community, particularly in relation to Biodiversity and the prevention of water pollution. Derry City Council would suggest that this type of co operation could be facilitated through the training as outlined in the document.

The proposed structure of the Agri-Environment Scheme in principal is

accepted.

However there is a concern that the new scheme may not be whole farm agreements and that training may be compulsory.

More detail is required on the reasons for the new schemes not providing for whole farm agreements.

Derry City Council would agree on the need for mandatory training to improve skills and knowledge in order to maximise the outputs from the programme. However this will need to be flexible, accessible and relevant. There is a need to cover any expenses related to the training such as Farm Relief Vouchers. This will also provide an incentive for attendance.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

It is not possible to make an informed decision on this given the limited information available in the document at this time.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Derry City Council agree that the training element of the scheme is important in order to raise awareness of environmental protection and enhancement requirements.

During our consultation exercise the farming community were open to the idea of a compulsory element. However this is qualified by the fact that the training needs to be relevant, flexible and accessible and that any member of the farm family should be eligible to attend.

Derry City Council would also agree that there needs to be an element of expenses provided through a Farm Relief Voucher Scheme.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

Derry City Council agree that higher levels of funding should be provided to farmers who take collective action through the agri-environment scheme. This will provide an incentive for co-operation which is necessary in order to

ensure the best environmental benefits particularly in river catchment areas.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

The evidence provided in the document regarding the contraction of the local organic sector is accepted.

However it is important that DARD continue to provide technical and supply chain advice to the Sector through its advisors.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

Below are the main barriers that farmers and landowners face in regards establishing an area of woodland on their farms;

- (i) Unknown Market- Farmers and landowners interested in planting an area of woodland generally do so as an alternative means to traditional farming practices, such as livestock and arable crop production. It is the transition into a somewhat 'unknown' market that persists in preventing farmers, in particular, from planting an area of trees. Limited case studies are readily available to farmers highlighting annual income received from tree production and income to be achieved from the sale of timber is consistently potential as opposed to reality. For farmers establishing woodland through DARD administered grant aid, namely the Woodland Grant Scheme and/or the Farm Woodland Premium Scheme the main barrier is the uncertainty of the viability of the wood market fifteen years after initial planting (when the grant supplement ceases). For those establishing woodland under the grant system without the view to harvesting their tree crop within the 30 year period, it is perceived that no income will be gained between years 15-30 and the land is unable to be turned back into traditional farming practices until the thirty year stipulation for the retention of the woodland has passed.
- (ii) Grant Competitiveness- For those farmers who have an interest in establishing an area of woodland and are currently letting potential forestry land in conacre or whose land has agricultural limitations, the barrier to planting is whether or not grant aid and subsequent income from woodland planting is more viable than

income received from letting in conacre or from other environmental schemes, such as the NI Countryside Management Scheme. In the abundance of instances whereby farmers are letting their ground in conacre, annual income to be gained from the FWPS is less than that received in conacre.

(iii) Longevity- Another barrier to woodland establishment is the period of time in which the trees are required to remain in the ground under the current WGS system, that of 20-30 years, dependent on tree species planted. This timeframe means that a landowner/farmer may not change the agricultural use of the land within the designated timeframe and taking into consideration the average age of a farmer in NI is 58 years they may not be able to realise the full income potential of the timber.

(iv) Land Use- Utilising grant aid from DARD to establish woodland requires the woodland to be maintained for 20-30 years and after that time the landowner is permitted to utilise the land for other agricultural practices. However, in reality after the stipulated period has ended it can be extremely difficult to eradicate trees from the land and subsequently turn into an arable field or for livestock grazing and may not be done without considerable investment from the landowner.

(v) FWPS Rate Variation- The top rate of annual income to be availed of through the Farm Woodland Premium Scheme varies between land designations i.e. for land within a Severely Disadvantaged Area the top rate of annual income is £200, for Disadvantaged Areas this rises to £240 and outside Less Favoured Areas the top rate of annual payment is £290. The variation in these rates of annual income reduce the overall financial competitiveness of establishing woodland as generally it is within the LFA's where the most marginal land may be found and it is the land where tree planting offers a more viable alternative to traditional practices.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

It is perceived that this regulation will have a serious negative impact on land availability for new planting. It should be recognised that it will take between 10-15 years for trees to become established to the extent that they will be suitable for felling and selling for a viable income means. To not provide income foregone payments will mean that the possibility of farmers and landowners establishing a new area of woodland as an alternative farm crop will be greatly lessened, as farmers will perceive traditional methods as more economically viable, (as they will receive regular annual income) and

will not take the perceived risk of changing to timber production for income.

In addition, the current programme offers the opportunity to landowners and farmers to avail of the Farm Woodland Premium Scheme as a means of income foregone payments, which in some instances landowners/farmers perceive as not competitive enough to establish an area of woodland, as opposed to maintaining traditional farming methods. Therefore, offering no income foregone payment will negatively impact on land availability for new planting.

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

The Areas of Natural Constraint replaces the LFA designation. It is well documented that valuable habitats are located primarily in the Severely Disadvantaged Areas and these habitats are sustained by agricultural activity. As outlined in the document there is a growing risk of under-grazing and neglect and an increasing risk of limited land management or even land abandonment (ie an environmental challenge). The evidence suggests a need for a continuing intervention mechanism which has a clear focus on contributing, through active management of agricultural land, to delivering positive environmental outcomes and, in particular avoiding environmental degradation and land abandonment.

Derry City Council would propose therefore that there is a need to continue to link this support to a stocking rate in order to ensure agricultural management of valuable habitats.

For the same reasons Derry City Council would propose that the support should be targeted at active farmers and a move to Pillar 1 may result in these valuable resources being diverted to the tenant and not the farmer.

The consultation document seems to emphasise SDA areas. It is important that this support is provided both to those farmers in SDA and DA areas.

Derry City Council does not agree that this support is primarily an income support measure but has a very important role to play in ensuring that our valuable habitats are maintained through active management of agricultural land.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

It is important that the Agri-environment programme delivers a suite of

general options designed to provide financial support for habitat/species and water management to deliver benefits across the wider countryside.

Agri environment schemes should be targeted at “active farmers” and a stocking rate should be applied to ensure agricultural management of valuable habitats.

Agri environment schemes should last for at least 5 years and measures should be put in place to ensure that work carried out during this period is not lost through the inability to extend schemes where clear environmental outcomes can be evidenced.

Currently Agri-Environment schemes are included within the Single Farm Payment claim form. The consultation feedback outlined the need for the Agri Environment Scheme to be separate from the Single Farm Payment claim as this has caused much confusion in the past.

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

In light of the strong focus on renewable energy in emerging council plans Derry City Council would support the inclusion of support for Renewable Energy technologies within the farm business development scheme.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

Investment in anaerobic digestion, wind energy, biomass, solar and hydro should all be supported.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

There is insufficient information available at present in order to provide a comprehensive answer. The issue of State Aid may have an impact here and will require further discussion.

Support should also be given for creation of micro Smart Grids to facilitate

selling by farmers of excess energy production to the wider area.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Yes, the scope should be expanded to provide support for biodiversity enhancement and community benefits, such as public access. It is recognised that this type of support is of particular benefit to local community groups and organisations wishing to provide an area of recreation and biodiversity significance for the local community. This support is also beneficial for organisations who may wish to establish an area of recreational woodland. These types of projects have the potential to maximise areas of waste/unproductive ground, in both urban and rural areas. Often, commercial forests are at the detriment to public enjoyment of woodlands and provision of support to develop woodlands with provision of access to the public are a means of interacting with and engaging the community with a diverse range of wildlife that a woodland habitat provides.

The creation of woodlands for public access and woodlands which provide enhancement of biodiversity, are also a good means for interacting school children with the wildlife on their doorstep and for environmental interpretation and learning and it is often the case that local schools gain the most from such woodland based initiatives.

Support for commercial woodland is supported as an alternative means of income for the individual farmer and landowner, but support must also be provided for community based woodlands for interaction with wildlife and for overall interpretation and learning.

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

During our consultation exercise the farming representatives did not foresee a large uptake by farmers on this scheme.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

As above Question 25

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Feedback from the farming community during the consultation indicated that this type of information should be collated.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

The current barriers which prevent farmers from soil testing and drawing up nutrient management plans is both expertise and cost.

Derry City Council welcomes the proposal to contribute to the cost of chemical analysis and other information which will be used by the farmers to draw up their nutrient management plans. Derry City Council would propose that grant aid should be provided for Satellite Soil Sampling which can be cost prohibitive.

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Farmer discussion groups could be a very effective mechanism in raising awareness of the Scheme and therefore contribute effectively to the delivery of the Nutrient Management Scheme.

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

Derry City Council feel the document outlines a comprehensive list of measures under the Nutrient Efficiency Scheme.

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

The Rural Business Development Scheme is designed to assist businesses to start up and grow by providing information on for example how to develop effective business plans and by signposting training and mentoring. The document states “training and mentoring may sit better with other agencies”.

The programme states “Projects within this scheme must have benefitted from programmes specifically tailored for rural enterprise before receiving funding. In a similar vein diversification proposals must have already gone through the CAFRE Diversification Challenge Programme before being presented for funding.”

Derry City Council fully endorses the programme. However consultation responses from local businesses have outlined the need for flexibility. The programme should be based on individual business need and every effort should be made to ensure that the programme is designed to meet the individual needs of each business. There is a concern that this type of compulsory element may discourage applications.

Each application should be assessed on the basis of the experience, business skills, and viability of the business. It is of course essential that all applicants should be able to demonstrate their business competence through experience and competence gained from a variety of sources. However, it should not be compulsory for applicants to have gone through the CAFRE Diversification Challenge Programme or other Start a Business Programme if they can clearly demonstrate relevant management experience and a robust business plan.

The Rural Business Investment Scheme is targeted at those businesses who have potential for growth in the short to medium term.

Derry City Council fully endorses the aims of the scheme “to provide investment support on a localised basis to business projects that complement the areas local development strategy”

In terms of proposed support and intervention levels it is clear from the mid-term evaluation of the Leader programme and from a range of other sources of feedback that the 50% intervention level was insufficient given the difficulties micro businesses found in accessing match funding. As a result the Department were forced to introduce Strategic Projects, which resulted in much needed resources being allocated from budgets which were originally targeted at supporting the Micro Business Sector. DCC feel that given the current difficulties faced by the Sector it is absolutely essential that

this situation is not repeated. The Republic of Ireland provided intervention levels of 75% and support levels up to 150k euro in response to the problems experienced by the micro business sector and this proved to be very successful.

While DCC are aware of the difficulties in providing over 50% grant aid levels in Northern Ireland given the “De Lorean” rule we would urge the Department to work with DFP to find a solution in this regard. The consultation document outlines the level of grant aid for the Business Development Scheme ie 70k euro. However the support for Business Investment and growth has still to be decided. DCC would urge the department to increase the maximum level of support and the intervention level for growth businesses **which complement the areas local development strategy.**

Derry City Council welcome the commitment by DARD in the Regulation Framework to work in partnership with DETI (Department of Enterprise Trade and Investment) and DEL (Department of Education and Learning) to ensure that activities funded under each of their programmes will be complementary.

Tourism

Tourism is a key focus for economic development in the Derry City Council area. The UK City of Culture 2013 has been a major boost to the Tourism sector in the City and across the North West with an estimated 430,000 visitors attending the Fleadh Cheoil in August alone. Derry City Council fully supports the proposed investment in the tourism sector. In particular the Legacy of the City of Culture 2013 will be an important economic driver for the region. Derry City Council welcomes the Rural Tourism Scheme which are “in accordance with the principles of the Northern Ireland Tourism Priorities for Growth.”

Under Local Government Reform, local tourism functions will be transferred to Councils. Derry City Council welcomes the opportunities this presents for a Community Plan led approach, developed and delivered in partnership with public, private and community sector input.

The range of measures outlined in the Consultation document are welcomed particularly the emphasis on Strategic tourism product development including:

- Food Tourism
- Walking Routes
- Business Tourism
- Natural and Cultural heritage tourism

Combating poverty and Social Isolation

The type of activity outlined in the Consultation document is welcomed including investment in transport, broadband, childcare and innovative

health solutions and fits well within the Councils' Community Planning model.

However there is concern over the statement that "the scheme will provide the capital investment for the infrastructure and, depending on the project, the partner Department/Agency will provide **the additional resources.**" The document does not outline what consultation has been carried with other Departments in this regard. To confine the expenditure to Capital with no commitment from other Departments on resources for revenue may reduce the ability to fund "innovative solutions" which by their very nature may require both Capital and Revenue aid.

A further concern highlighted at the consultation was that all funding allocated within the measure should be additional and should not be utilised to subsidise any existing schemes for example rural broadband, transport and rural childcare. Any future investment in these important areas should be additional to that provided through mainstream funds. The consultation process also highlighted the need for investment in relation to revenue expenditure similar to that provided under Neighbourhood Renewal in the Urban area. Derry City Council would urge DARD in their role as Rural Champion to consider this and engage with DSD on this issue.

Village Renewal Scheme

Derry City Council asserts that the Village Renewal Scheme should form part of the Community Plan led approach, developed and delivered in partnership with public, private and community support.

Village Renewal should be fully integrated in the new Councils' Strategy and the activity proposed under the Programme must complement this approach.

Derry City Council recommends that the Department consider how other funding streams can complement the Village Renewal Schemes.

All Island Co-operation Scheme

Derry City Council welcomes the concept of an All Island Co-operation scheme and believe there are a range of opportunities for co-operation in areas such as health, tourism, food, broadband and renewable energy.

Unfortunately the Rural Development Programme 2000-2006 was unable to achieve results in relation to the Co operation element of the Scheme. This was largely as a result of the administrative issues on both sides of the border. It is felt that Councils could play a key part in the development of this Scheme. However it is essential that work is carried out to ensure that administration and bureaucracy does not hamper the development of initiatives in the next programme including ensuring that funding support and intervention levels across both jurisdictions are similar.

Due to the limited amount of funding which can be allocated to this scheme,

Derry City Council is of the view that the scheme should focus on those Council areas which adjoin the border.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

See comments above in question 31

It is important that the Schemes do not confine funding to Capital expenditure as this will restrict innovation and the number of quality projects which can be delivered.

Under the Combating Poverty and Social Isolation – Basic Services Scheme, access to broadband should be widened to allow rural communities to develop schemes to allow high speed broadband to be rolled out in their areas. This could include feasibility studies, negotiation with suppliers, cooperation to supply passive fibre networks

The arguments for this are set out in the section entitled “ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020” below

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

Derry City Council welcomes the concept of an All Island Co-operation scheme and believe there are a range of opportunities for co-operation in growth areas such as tourism, Agri - food, broadband and renewable energy and innovative health solutions.

The arguments for providing support for High Speed Broadband in rural areas has been made in answers to other questions. These arguments are especially true of rural areas in border regions, which tend to lay at the end of existing telecommunications networks and therefore can suffer from lack of investment and resilience

Cooperation on a crossborder basis, by enabling existing networks on both sides of the border to be considered, could provide a more cost effective solution for particular rural communities, e.g., it might be feasible to deliver High Speed Broadband to a particular farm from a fibre cable located on the other side of the border because it is closest.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

Due to the limited amount of funding which can be allocated to this scheme, Derry City Council is of the view that the scheme should focus on those Council areas which adjoin the border.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

Currently 19% of the total programme budget is allocated to the LEADER approach. The regulation requires at least 5% of the budget to be delivered using the Leader methodology.

There has been considerable criticism during the current Rural Development Programme of the LAGs, particularly in relation to delays in spend and the bureaucratic procedures. Derry City Council would suggest that these issues were beyond the control of the LAGs. The bureaucracy in the Operating Rules and in the 2 Teir Structure resulted in difficulties with delivery in a timely manner. The Economic conditions during the Programme period also had a major bearing on the ability to deliver, particularly in relation to the private sector measures given the inability to secure match funding.

While in the Republic of Ireland this obstacle was overcome by increasing the amount of grant aid and the level of intervention this proved to be impossible in the Northern Ireland Programme.

Derry City Council would recommend that a one Teir Leader structure per Council area is adopted to reduce the bureaucracy. Derry City Council further recommend that the Department increase the level of support and the intervention levels for private sector programmes and include the ability to use "in kind" contributions for Farm Diversification projects.

Local Action Groups should be closely linked to the Council's Community Planning process and should have increased autonomy and flexibility than the current clusters.

The Consultation document states "DARD is NOT transferring any functions to Councils as a result of RPA (although consideration has been given to local government involvement in delivering some aspect of a future rural development programme).

Derry City Council agree with NILGAs assertion that local economic development, including rural development should be a primary responsibility of councils and therefore this response is predicated upon a strategic imperative of gaining greater devolution to Councils.

In the absence of further information it is difficult to suggest a percentage of funding which should be delivered through the Leader methodology.

However Derry City Council would propose a combination of delivery through the Leader approach or directly through Councils for all elements of Priority 6.

Clusters should be co-terminus with new Council boundaries.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Derry City Council believe that optimal investment is achieved when programmes are designed, delivered and accounted for locally.

Derry City Council therefore suggest that all of the Priority 6 measures are delivered through a combination of Leader and Local Council direct delivery.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD should deliver directly those measures which are associated with direct agricultural production.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Local Action Groups should be co terminus with the new Council boundaries and development plans should be closely linked to the Councils Community Plan.

All of the Priority 6 measures should be delivered either directly through Councils or through the Leader methodology.

There may be an opportunity for other measures including training elements in the other priorities to be delivered through a Leader approach. However,

at this stage there is insufficient information to make an informed decision.

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

There is sufficient evidence within the document which outlines the need for all of the proposed schemes. However see Question 40 which outlines priority schemes.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

The following schemes are identified as essential elements:

Priority 2 - Farm Competitiveness

Business Investment Scheme – Teir 1 and 2.

Priority 4 - Preserving and enhancing ecosystems dependent on agriculture and forestry

Areas of Natural Constraint (ANC)

Agri-Environment Scheme (AES)

Priority 5 – Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in the agriculture, food and forestry sectors.

Nutrient Efficiency Scheme (NES)

Capital Support for Renewable Energy Technologies

Priority 6

Promoting social inclusion poverty reduction and economic development in rural areas.

Rural Business

Rural Tourism

Basic Services/Combating Poverty and Social Inclusion

All Island Co Operation

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

It is clear from consultations with the farming community that there is considerable difficulty in gaining support for a transfer from Pillar 1 to Pillar 2.

However it is recognised that a considerable proportion of the population are not involved in agriculture and there is a need to support the development and growth of the micro business sector and those who have diversified out of agriculture.

Rural transport, childcare, broadband and the delivery of key basic services are also essential in order to tackle the high levels of rural poverty across Northern Ireland.

Derry City Council would therefore support a measured transfer from Pillar 1 to Pillar 2 where leverage can be demonstrated.

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

As a founder member of the ERNACT network Derry City Council supports the view expressed by ERNACT including the importance of ensuring that farming and rural areas get the same level of High Speed Broadband (HSB) as urban areas.

Today, broadband speeds of 1,000 Mbits to the home are achievable in Europe's urban areas.

Relative to this, 4G mobile, often promoted as the High Speed Broadband (HSB) solution for Europe's rural areas, can in practice achieve maximum speeds of only 30 Mbits

Even Fibre-to-the-Cabinet, available in many rural areas, is not a solution:

- *Many farms and rural businesses are located more than one kilometre from the cabinet*
- *Speed decreases rapidly over one kilometre*

Consequently, many of Europe's rural areas will have broadband services that are of the order of 30 times slower than their urban neighbours

The magnitude of this disparity in speed, in a business (incl. agri-business) world driven by digital enabled business models, is having a direct negative impact on the potential of rural areas to innovate, create jobs and attract

investment.

In particular, it will probably act as a “drag” to achieving the full potential right across the Rural Development priorities:

- 1. Knowledge transfer and innovation in agriculture, forestry and rural areas*
- 2. Competitiveness of agriculture and farm viability*
- 3. Food chain organisation and risk management in agriculture*
- 4. Restoring, preserving and enhancing ecosystems dependent on agriculture and forestry*
- 5. Promoting resource efficiency and transition to a low carbon economy in agri- food and forestry sectors*
- 6. Social inclusion, poverty reduction and economic development in rural areas.*

HSB investment models, whilst they have worked for urban areas, are not delivering for rural areas.

Many rural communities, particularly in Sweden and Finland, have evolved alternative **Partnership HSB Investment Models** that are more suitable for rural areas that can deliver the very high speeds achievable in urban areas.

They are mainly based putting more fibre in rural areas and removing the burden of carrying the entire risk from telecom providers and sharing it between telecom providers, local communities and their local authorities. The essential features of the partnership models are:

- 1) Decreases the capital costs to the telecom provider of deploying fibre as a result of the community/local authority investment
- 2) Delivers additional HSB customers to telecom provider
- 3) Sustainable ROI based on the longer timescales and rates applicable to community investments
- 4) Better demand estimation and stimulation as a result of local cooperation and knowledge
- 5) Decreases the cost of delivering public services and improved revenues for public authorities

144. Dungannon and South Tyrone Borough Council

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Increased vocational training in a broad range of appropriate skills will help to improve efficiency and at the same time lessen any adverse environmental impact of farming and forestry.
More effective use of farm produced nitrates could reduce fertiliser input costs thereby reducing potentially harmful emissions.
Adding value to raw products substantially increases farm profitability so training in possible methods/ ways to add value (as individual farmers or collectively) could be beneficial. Farms in NI have huge areas of hedgerows and it is vital that these areas are protected, maintained and increased.

Possible focus targets for training:
More modern techniques in production
Best practice and benchmarking
Farm produce development
ICT use
Value adding to produce
Marketing and co-operative marketing
Value of hedgerows and ways to protect them
Renewable energy production

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

The role of the Innovation Broker could be:
To co-ordinate and liaise with partner organisations (farmers/farmer groups and Universities/Colleges, statutory agencies and relevant agencies etc)

Innovation Broker required skills could include:
Knowledge of key sectors of agriculture

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Young farmers are more likely to consider change in agricultural practices, more likely to avail of training and more likely to become better and more efficient farmers. Young farmers with their own business ID could be supported with increased grant rates

Older farmers should be encouraged through a one off or annual payment to hand over ownership to the next generation – that payment being proportionally increased the younger the owner signs the farm over to the next generation.

Older farmers could be encouraged to initiate partnerships arrangements with younger farmers (equal partnership ownership of lands and herds), such arrangements qualifying for support eligible to young farmer schemes.

This will help to ensure that uptake of fresh ideas will increase and modernisation of farms will result

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

Minimum funding level should be £1500 in order to ease the administrative burden on funders. This would still permit necessary small scale development

Young farmers could get 60% capital grant-rate linked to 100% grant-aid support to develop business plans and avail of training

Other eligible farmers could get 50% capital grant-aid in line with similar business support available through other programmes

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

With a limited budget priority should be given to tier 1 & 2 with tier 3 only used if there is a low uptake in tier's 1 & 2.

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Farmers considering diversification and development programmes would naturally look at potential ideas for both food and renewable energy production.

Both themes should be considered under LEADER as LEADER is often the first port of call for such developments. This would help to ensure that potential applicants are not sent from pillar to post when seeking advice and support and it would also avoid any potential for duplication of funding.

100% support for farmer buying and selling groups could be considered as this would help to make farms more sustainable by decreasing farm input costs and maximising farm output returns.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

In order to ensure that best practice is engaged and that farm performance information is collated and disseminated as widely as possible, 100% of actual costs should be reimbursed to group members

Question 8

How should participants in development groups be selected?

Comment

Potential participants in development groups should apply to be members and should be assessed by a group made comprising a strong agri food and rural development competency base.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

Adding value to food is an obvious and often a first consideration for farmers thinking about farm diversification. As such, any initial proposed farm development in adding value to food should be the remit of LEADER funding. This would provide applicants with a 'testing of the water' approach in securing funding and implementing small scale developments on farm.

Secondary or very large proposed developments in food processing could be considered by the Processing Investment Development Grant Scheme

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

Tier 1 could be better dealt with by LEADER as LEADER is more closely aligned with first stage farm diversification. Upper limit could be £50,000 grant-aid

Tier 2 could consider projects with total costs of £100,000 - £2million

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Other groups /alliances that may be considered under this scheme could include:

Loosely constituted buying/selling groups considering co-operative purchase of raw materials and selling of produce i.e. groups that only meet occasionally for such specific purposes

Groups and partnerships that co-operate to set up renewable energy installations to reduce farm input costs

Partnership collaboration on financing

Partnership working on maintaining land

European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

NI farms include vast areas of permanent grassland, hedgerows and walls. Existing regulation on farm practices in NI is sufficient to preserve and protect these features and other relevant environmental interests. While

support for agricultural practices that are compatible with protecting and improving the environment is to be encouraged, this should not be at the expense of increased regulation and bureaucracy. Rather, the focus could be on increasing awareness of best practice with support for approved enhancement schemes.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Designated sites are of the utmost importance and should be prioritised for financial support for environmental improvements.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Environmental training should not be compulsory but participation in such training should be encouraged and rewarded as it is important that greater awareness is promoted and best practice implemented.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

The level of uptake for co-operation measures under this scheme is likely to be low but it may be appropriate for multiple owners of areas of bog land, upland heather etc. Such co-operation should attract significantly higher levels of funding as it targets areas that may not ever be improved without support for collective action e.g. cross border areas and areas directly impacting upon international river basins.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

Uptake of organic farming has been low due to the fact that current prices for organic produce do not compensate such farmers for the decreased level in production and the significant but necessary changes in housing, waste management and in general farming practices to that in conventional farming. If the market price for organic produce reflected a more realistic price for a niche produce this would negate the need for ongoing payment.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

Woodland planting is often perceived as a last ditch usage of land and generally only on lands where conventional farming is too difficult to manage. The time factor involved in maturation of woodland means a long wait for a limited financial return and that return may be somewhat uncertain. Letting out land in conacre ensures a regular agreed return with often only an annual commitment and it is therefore more attractive to owners. Support for woodland planting needs to be increased in order to make it more attractive to owners.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

If financial support for woodland planting was made much more attractive and an annual return for loss of income was guaranteed then many more owners would consider the option of woodland planting

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

Pillar II should be viewed as income support aligned with environmental considerations. ANC areas may be limited in the scope of agricultural production that can be carried out in them but a range of farm diversification activities can be undertaken and supported, tourism being an obvious activity for increasing farm income. Farmers in areas other than ANC areas do have greater scope for agricultural activity but such activities do not necessarily mean that farm income is any more easily obtained. It would seem unfair to divert additional monies to ANC areas if this penalises farmers in other areas.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

Farmers in ANC areas need to be supported to remain on the land but

income supplements could be better achieved through support under farm diversification measures in LEADER programmes. Perhaps prioritising applications to LEADER programmes from such areas and/or increasing the grant-aid available to farm diversification projects in ANC areas could be considered.

In addition, environmental schemes in ANC areas could attract higher grant-aid rates than in other areas and co-operation environmental schemes with a strategic impact could attract 100% funding.

European Union - Priority 5

Promoting Resource Efficiency and Supporting the Shift towards a low Carbon and Climate Resilient Economy in Agriculture, Food and Forestry Sectors

Question 21

Comment

Renewable Energy production is an obvious choice for farm diversification and should therefore be dealt with under LEADER. However, farmers need to be able to use the electricity to reduce farm costs and detailed negotiations need to take place between DARD and NIE/PowerNI to ensure that grid capacity is available. If necessary, government needs to ensure that plans are implemented to upgrade the grid infrastructure so that such farm diversification can take place more easily and that government renewable targets are achieved.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

Each renewable energy technology should be supported on its own merits as assessed by a LEADER assessment panel. Economic return, viability, environmental sustainability and community impact should be the key factors in assessment of applications.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

Grant-aid support should be targeted at the most economically viable projects and these may factor in on-farm usage. An economic appraisal should examine all likely returns and benefits of the project and determine the potential value of the project both quantitative and qualitative impact.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope

should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Supporting larger scale woodlands with attractions of community benefit and access etc will be fraught with difficulties such as insurance and ownership issues. Any projects in woodlands that permit access and greater community benefit could be dealt with separately to timber production i.e. by local councils or by LEADER

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

Slurry processing equipment such as separators and the roofing over of manure pits are measures that will directly improve the environment and should be supported under METS. Uptake will be small unless the grant rate is at a higher level than that for other METS projects.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

Support for advanced slurry systems is most likely to be targeted at contractors and most of these have probably already availed of METS support. Demand is therefore likely to be small

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Feedback only needs to indicate that no extra production has resulted – carried out by site visit 12 months after project completion. Any more complex feedback will only serve to limit uptake.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

Time constraints for carrying out everyday farming activities are imposed on farmers by weather and EU and DARD regulation. This means that activities such as soil testing and drawing up nutrient plans are not prioritised. Many farmers have good knowledge of the land requirements on a field by field basis and do not see drawing up a nutrient plan as being essential or beneficial. The importance of such activities could be highlighted by best practice, training, evidence of impact and outcome and simple procedures.

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Discussion by peers on any farming matters would be a suitable mechanism for improving awareness and uptake

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

The Nutrient Efficiency Scheme could encourage movement away from slurry production to solid manure production with funding made available for slurry separators and solid manure spreaders. Uptake could be greatly encouraged by participants being less subject to farm inspections.

Grants at a higher rate could be made available for straw handling equipment to encourage a move away from slurry production.

Best practice to encourage and view benefits would support this.

Grant or administrative support also important as a substantial amount of paper work and monitoring.

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

Rural Business Development Scheme:

The concept of a business development scheme is welcomed however effectiveness will depend on the practicalities of the delivery structure used and how “user friendly” it can be made for participants. The aim must be on delivering maximum benefit to the businesses participating with minimal bureaucracy.

Mid Ulster has in the region of 900-950 micro businesses many of which are dispersed rurally. For many such business owners devoting the time and resources necessary for business planning activities is difficult. We strongly agree that there is a need to offer support to these businesses which will allow them to realise their growth potential. The nature of this support must however be tailored to the needs of each business and must be flexible enough to cater for the needs of businesses at different stages of development. Experience from the current programme would suggest that established businesses quite often know what they need for business expansion in terms of investment in machinery/equipment/infrastructure. Others not at this level will require more intensive support therefore this Scheme must be capable of catering for all.

Rural Business Investment

Access to finance is critical for rural businesses wishing to grow particularly in the current lending climate therefore a business investment scheme is an essential element of the next RDP.

Delivery of this Scheme should be through the LEADER approach. The current LAG structure in place within the Mid Ulster region should be maintained for this purpose with administrative support provided via a service level agreement from the new Council structure. This will ensure that the expertise and knowledge in project assessment and audit compliance accumulated in the roll out of the current RPD is easily transferred to the new Programme. *To this end we would strongly recommend that the process of establishing the new LAG structure and development of the Local Action Strategy commences immediately.*

We would urge that in relation to the operational management and roll out of this Scheme and others delivered through a LAG structure, consideration is given to the barriers identified in the delivery of the current RDP (Barriers Report) so that lessons can be learnt and previous pitfalls avoided.

Key issues including; match funding, planning, completing applications, decision timescales, procurement and logistics of the programme.

Rural Tourism Scheme

The extended geography of the new Council area presents the opportunity to develop rural tourism in a more strategic manner. We believe the development of tourist product within the Mid Ulster area encompassing attractions, activities and infrastructure should rest with the new Council structure.

We also believe that opportunities exist for private sector investment in new tourism businesses and therefore welcome the support available through the business development and investment schemes for this purpose.

Experience from the delivery of the current RDP in Mid Ulster suggests that the number of private sector tourism businesses supported was low therefore every encouragement should be given to the development of this sector in order to complement future Council investment in building the tourist offering and increasing visitor number beyond current levels. Again planning is a serious consideration in tourism development and flexibility to support this economic sector.

Basic Services Scheme

Access to services in rural areas is essential for tackling poverty and isolation. However basic service provision is wide ranging in scope and predicated on what constitutes a basic service. For example the availability of a community facility/hub will for some communities in itself constitute a basic service. Experience from the delivery of the access to service measure within the current RDP provides examples of how outreach services can be successfully delivered to rural areas in partnership by community sector and statutory agencies.

The opportunity exists to build on these examples going into the next RDP through the Community Planning process. We are committed to ensuring that a bottom up approach is taken which ensures that local communities are fully involved in determining local needs and supported by the relevant statutory agencies in identifying solutions.

Further discussion is needed on how other Government departments with a remit for tackling poverty and isolation can contribute to addressing rural issues in order to complement RDP funding. This discussion should extend to exploring the opportunity of LAG's utilising funding available from other Departments to meet local need through the LEADER approach.

Village Renewal

Village renewal in the current programme has delivered well and should be built upon in the next Programme with Councils playing a lead role in the development of village plans and implementation of agreed actions. All villages should be eligible for funding not just those designated as disadvantaged. Again this process could form part of the community planning process. We would argue that a partnership approach to delivery of village renewal by the LAG, Council structure and community would represent an effective approach based on the experience and knowledge gained from the current RDP.

Strategic projects played a key role in seeking to provide for rural communities that could be delivered at a level for wide community benefit, again Councils do play a key role in this area.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Before commenting on how the individual Schemes can be improved upon it is important to recognise that DARD as the managing agent and those responsible for delivery of the next RDP should learn from the failings of the current programme and build upon good practice in operational delivery in order to have more effective and efficient delivery on the ground next time round. This process should commence now and involve both those setting policy and those responsible for delivery on the ground.

The difficulties which have plagued the current programme as outlined within the Barriers Report need to be addressed. Promoters going through the application process have been left feeling as if they have to “jump through hoops” which has created a negative perception of the current Programme.

Secondly we believe that the LEADER approach should play a major role in delivery of the next RDP. We are therefore disappointed with the findings and recommendations of the recently published Review of the LEADER methodology in Northern Ireland commissioned by DARD. While commissioned as an independent report we consider that the findings do not present a balanced view of the effectiveness of LEADER as a delivery model.

Suggested areas of improvement:

Rural Business Development Scheme:

Entry by participants should not necessarily be via the EU grant application process but rather through expression of interest.

There needs to be greater focus placed on ensuring that the application process used is fit for purpose and grant drawdown process is less onerous for project promoters across all Schemes.

Business plans, if developed to support applications for funding should be consistent with project assessment criteria to maximise the chances of approval.

Flexibility is needed on eligibility i.e. number of workers, businesses owned etc

Rural Business Investment

The aim of this scheme should be to provide assistance for investment leading to business growth and expansion, therefore while acknowledging that audit compliance must be adhered to, an overly complex administrative and grant drawdown process should not overshadow this aim.

We would argue that participation in the Business Investment Scheme by both farm diversification and non-farm diversification businesses should not necessarily be conditional on first progressing through the Business Development Scheme if a current robust business plan is available.

Animation support should be available for those businesses not participating

in the business development scheme to assist in the application process.

Additional tailored mentoring support should be made available to participating businesses after investment to assist in achieving business objectives – especially job creation and increased profitability. More emphasis needs to be placed on achieving economic outputs as a result of investing grant aid and not just on achieving programme spend.

Investment support must be made available for rural businesses as early as possible in the next RDP. We therefore stress the importance of putting in place a clear transitional and time bound plan by January 2014 to include key milestones ensuring a state of readiness in time for commencing the new programme.

Consideration should be given for the inclusion of small scale food production businesses under the business development and business investment schemes. Experience from the current RDP has shown demand from such businesses but who were deemed ineligible for application.

Rural Tourism Scheme

While the consultation does not focus on grant aid ceilings we would argue a need for higher levels of grant aid above the current cap of £250,000 in order to progress larger scale tourist infrastructure projects within the Mid Ulster area. We wish to build upon the success of tourist projects implemented in the current RDP for example recreational trails, new tourism activities, heritage, waterway tourism and infrastructure.

Combating poverty and social isolation – Basic Services Scheme

This Scheme will benefit from the Councils Community Planning process in identifying integrated services which will benefit local communities. A support structure should be made available to local communities to provide animation in the working up of project ideas aimed at improving basic service provision which should include guidance from statutory agencies to identify potential solutions to gaps in provision.

In terms of project delivery involving community sector applicants, the experience from the current RDP suggests that some groups have struggled in adhering to the complex audit requirements associated with EU funding.

Cash flow management has been a particular difficulty due to the retrospective nature of grant drawdown and this should be addressed in the new programme.

It is important that the basic services and Department led tackling of rural poverty and co aligned with one another in a future programme.

Village Renewal

The possibility of inclusion of the private sector as key partners in the village scheme could be explored however sitting alongside the community sector and as part of benefit to a wider village plan

All Island Co-operation Scheme

Focusing again on practical delivery, a support structure should be available for community sector applicants wishing to participate in the Scheme. This needs to work on two fronts: firstly in assisting with networking to identify

partners and secondly in working up suitable projects which will fulfil eligibility criteria set for this scheme.

It is important that there is a key lead in any scheme development and opportunity for phased development in different cooperation areas as a delay with one partner can impact on another.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

The consultation document states that communities on both sides of the border are characterised with a range of economic and social problems that result from the existence of borders. We consider that the three key priority areas of access poverty, financial poverty and social isolation identified under the basic services scheme have relevance here albeit at more escalated levels. Added to this border villages have suffered from physical dereliction which exacerbate feelings of social isolation.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

Pockets of deprivation exist all over NI therefore this scheme should extend to all areas. This is also an opportunity for border communities to look at examples of best practice in addressing deprivation and disadvantage within areas not adjacent to the border therefore a wider scope for cooperation would be preferred.

Areas along the border however that have been most impacted by rural disadvantage should be given a level of priority.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

As a minimum 20% of the overall RDP budget should be allocated to local Councils and LEADER. The local LAG made up of social and Council reps should have autonomy to establish the most appropriate delivery arrangements for Priority 6 Schemes when budgets are allocated.

Any LAG should have a clear process of accountability in relation to representation of the wider community and clear communication of how this is delivered upon.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Either the LEADER approach working through a LAG or delivery by Council should be used to deliver all schemes in Priority 6. The delivery arrangements can be agreed as part of the discussion when grant allocations are agreed.

Outside of Priority 6 there are elements from across the other Priorities which could be delivered through a LEADER methodology for example:

- Priority 1
 - Farm exchange visits
 - Co-operation groups/networks
 - Family farm key skills
 - Link with priority 6 – business development scheme.
- Priority 2
 - Business development through knowledge transfer
 - Business investment scheme
 - Forestry competitiveness scheme – link with priority 6 business measures.
- Priority 3
 - Processing investment development grant
 - In particular small business - link with priority 6
- Priority 5
 - Renewable energy – focus on community use not necessarily restricted to farm.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD has experience in the management and delivery of mainstream agri food/environment schemes from previous programmes therefore some priorities are best placed centrally however within all priorities were there is potential for local delivery this would be important and the LEADER approach should be explored.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Councils through their regeneration teams, local economic development, community development, leisure and environmental units already work with local businesses and rural communities and with their enhanced responsibilities under RPA and community planning role can continue to work with LAGs in delivery.

LAGs will have a good mix of representation with elected members and social partners working together for the benefit of their own communities and it is important that representation is embedded with regular communication of each partner back to representative community.

The only Measures best delivered by bodies other than LAGs and Councils are those relating directly to improving agricultural/horticultural production, forestry (but not recreational forestry) and on-farm environmental schemes

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

Available funds should be distributed in proportion across the schemes if the funds are not sufficient to fully support the programme. This is the fairest approach and should reflect the make up of rural communities both farming and non farming.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

LEADER programmes should have the highest priority as LEADER programmes alone offer the widest possible benefits to the entire rural community.

2nd priority should be direct support to farmers to modernise their businesses as this will offer visible and practical aid to a large number of farmers

3rd priority should be environmental schemes to enhance farm facilities and help to improve water quality

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

If necessary, funds should be transferred to maintain the 20% for Rural Development

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

We reiterate the importance of moving quickly through the transition from the current to the new programme in the interest of maintaining momentum and retaining the knowledge accumulated by delivery staff and LAG members alike.

Delivery of the next RDP needs to take account of past delivery experience. In particular, the significant barriers to Axis 3 delivery that have been identified by LAG members and staff (as outlined in the Barriers Report) and highlighted to RDD staff need to be addressed. For example, Axis 3 of the current RDP started 2 years too late and started without appropriate systems in place e.g. proper Operating Rules and an effective Database. In addition, no time or funding was made available for early animation with prospective applicants and there was inconsistency and lack of clarity regarding eligibility of applicants, projects and items within projects.

Monitoring targets need to better reflect the real benefits of the programme to farmers, members of farm families and the wider rural community. Current monitoring is so restrictive that many real benefits, including job creation, are missed

Procurement has been an on-going issue in current RDP delivery with a large number of applicants failing to properly adhere to audit requirements. LAGs and other delivery agencies should have the flexibility to engage outside agencies to assist project promoters with procurement.

We reiterate that the operational difficulties, such as those outlined above can and should be avoided in the next RDP through better discussion between those involved in setting policy and audit requirements and those responsible for on the ground delivery.

145. Fermanagh District Council

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

There is no doubt the list of schemes listed for Priority 6 will be effective in meeting the needs of rural dwellers. The population of the Fermanagh District Council is much dispersed and there is currently a very real threat to rural life in terms of the stripping away of basic services such as education, health, rural shops etc. The support for the development of new and existing rural businesses and rural tourism will be crucial to the long term sustainability of rural areas. Fermanagh District Council received funding through the current Rural Development Programme to complete village plans in 12 settlements. This resulted in applications being submitted to the RDP for work to be completed in these villages. However, only a minimal amount of work was completed through the current RDP and many villages did not receive any support; village renewal is still very much a priority for this district council area. The funding for basic services is also a real priority for rural areas such as Fermanagh. Many rural dwellers have to travel long distances to access services such as health, education and employment. Access to reliable broadband is a genuine concern in many parts of Fermanagh; people need broadband to complete online forms on day to day basis, therefore the rural dwellers of Fermanagh are facing real disadvantage with the current poor level of service. However a multi-agency approach is needed to address many of the problems rural dwellers are facing. The funding for cross border schemes is very relevant for the local area given its close proximity to the border. Fermanagh District Council is a member of the Icban cross border group of Councils, five from Northern Ireland and five from the Republic of Ireland. Icban has recently completed extensive research on the issues affecting dwellers in the cross border area. Working relationships between the Councils in the two jurisdictions are already well developed; joint applications have been submitted and rolled out through the current Interreg IVa programme. One of the reports completed by Icban was a scoping exercise on Telecommunications. There is no doubt there are difficulties in terms of accessing broadband and mobile phone coverage on both sides of the border. Both of these issues could be addressed on a cross border basis.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

Most of the of the schemes listed in for the priority are included in the current Rural Development Programme. There were a number of problems with the roll-out of the current programme, The programme took a long time to roll-out initially and this caused major frustration for applicants; awards of funding need be made quickly in order to meet the needs of the businesses. At the beginning of the current programme there were delays of over a year between the time of application and the award of the Letter of Offer. As the programme progressed the length of time taken to progress applications decreased but it was a major problem initially and this resulted in negative publicity for clusters. There are also genuine issues in terms of the match funding requirement for businesses. The economic climate changed dramatically during the lifetime of the programme and this had major implications in terms of applicants' ability to take up their Letter of Offer. A number of applicants had to withdraw their application because of they were unable to obtain match funding from the banks. The new programme needs to take this into account in terms of the match funding requirements.

There are also issues regarding the challenging bureaucracy of the programme. Many applicants struggled with the application process, the procurement process and the claims process. More support needs to be provided to applicants and this needs to be included in the overall funding of the programme.

In terms of Village Renewal more funding needs to be allocated to this scheme in the overall priority. Each cluster had the freedom to determine the amount of funding it set aside for village renewal. In the SWARD cluster the amount set aside per village was £66,666. Whilst all the villages welcomed this investment it wasn't enough to have a major impact on the settlements. Having vibrant villages is imperative for the long term sustainability of rural life, therefore more funding needs to be allocated to this measure, perhaps in the form of the strategic projects used towards the end of the current programme. This is particularly true for some of the larger villages in the Council area. The Department of Social Development has provided extensive funding for Enniskillen in recent months and the positive impact is very visible. No such funding is available for rural areas and many villages are really struggling with dereliction and run down properties. Rural villages are the responsibility of the Department of Agriculture and Rural Development and budgets need to be set aside for improvements in their infrastructure.

In terms of rural tourism this measure in the current round of funding was very popular in County Fermanagh. However there is much more investment needed to develop the infrastructure and this is particularly needed in rural areas where tourism plays such a major role in the local economy, creating employment, which in turns contributes to the sustainability of rural areas. The funding for promotion and marketing activities is also to be welcomed, there is no point developing facilities and

infrastructure if there is no funding provided to create awareness of them. In addition to the items included under Strategic tourism product, funding for cycling routes/off road cycling should be included. There is a deficit of such facilities in the County and the provision of cycling facilities would complement the provision already in the County.

In terms of combating poverty, the need for multi-agency work to address the issues affecting rural areas is to be welcomed; perhaps this could happen through the community planning process to be introduced through the Review of Public Administration. There is also a need to provide support for community groups to manage projects; many groups need to develop their capacity, particularly with the ever increasing demands placed on them by funders. In many cases only certain groups have the ability to apply for funding while others with less capacity continue to struggle to survive. The amount of support groups need to apply and manage projects from funders should not be under-estimated. The introduction of a Local Community Fund is also to be very much welcomed.

The need for multi-agency work is essential to ensure, not only the smooth roll-out of funding, but also to ensure funding is maximised. Communication with agencies such as the Planning Service is imperative in order to ensure applications are dealt with a matter of urgency in order to ensure quick spend on projects. It is also important to communicate with other funders such as Invest NI and SEUBP (InterregV) to ensure there is no duplication of funding, for example, for business support, or, for example, on cross border projects.

Community planning may not be in place for the start of this programme but it would be a very useful tool in ensuring not only good value for money but also cross-agency working.

Clarity in terms of policy is needed from DARD from the beginning of the programme in order to address the needs of the applicants quickly and ensure spend on the programme.

The new programme needs to have increased resources to manage the programme. There have been a huge number of applications over the lifetime of the current programme. It takes a huge amount of time to assess applications, the unsuccessful as well as the successful. This time was not factored into the administration costs allocated for the programme. The Councils have put a significant amount of funding into the current Rural Development Programme and if this funding hadn't been available the cluster would have experienced difficult financial decisions.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

The main issues are broadband, issues with isolation, access to affordable services, including health, education and employment, the provision of rural shops and other infrastructure that will allow local residents to be able to remain living and working in border areas. There is a low population density in the border region so innovative approaches need to be developed to

ensure local service provision, There is also an ageing population and services need to be provided to allow them to remain in these areas. There is a very real issue with emigration of many young people; opportunities need to be provided to allow young people to gain employment in rural areas. The provision of workspace would allow local people to develop businesses in border areas which would contribute immensely to the sustainability of life in rural areas. Also support is required for rural businesses to grow, more competitive, and look at new markets in order to ensure the long term sustainability of life in rural areas. If businesses in border areas grow this will provide employment opportunities for young people to remain in the areas they come from.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

The scheme should cover the areas close to the border because there is clear deprivation and disadvantage in the border areas, certainly in County Fermanagh. The disadvantages include distance from services such as health, education and employment. Many people work in the other jurisdiction and this causes problems in terms of benefits if they lose their jobs and pensions when they retire. There can be issues in terms of educational provision; this is a very real issue in Fermanagh currently. Many residents are very isolated and the problems accessing broadband is particularly acute in rural areas. There are issues with accessing childcare because many people do not live close to centres of population.

Some of the issues affecting the tourism sector can be addressed on a cross-border basis. Cross border tourism partnerships are already established; examples of this are the Clones Erne East Partnership which is a partnership between Fermanagh and Monaghan, and the Marble Arch Global Geopark, which straddles the Fermanagh/Cavan border. There are real opportunities for the local villages on both sides of the border to take advantage of these facilities developed through these projects but support needs to be provided to allow them to do so.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

The new programme states that a minimum of 5% of the programme should be delivered through the Leader approach, In the current programme 19% of the programme is delivered through Leader, Whilst it is accepted many clusters had difficulty spending their allocations in the current programme there were many factors contributing to this. The primary reason was the

economic downturn and the affect this had on businesses/farm diversification projects and community groups. Some were too afraid to proceed with their initial business ideas while others were unable to obtain match funding from the banks. The application process is very bureaucratic and complex and many people lacked the knowledge to complete all the paperwork required. There was a lack of flexibility in the programme which frustrated both applicants and the clusters rolling out the projects. Cluster areas are currently very large and this contributed to the length of time taken to deal with applications in the early stages of the programme. However the Council argues the majority of these factors were outside the control of the clusters and the new programme should have at least 20% of the total funding allocated towards the Leader approach. This is based on the new programme being delivered on the new Council area groupings. In the case of Fermanagh the area would only involve two Council areas instead of the four that exist in the SWARD cluster. SWARD was allocated the largest amount of funding in the current round of funding and whilst it has achieved very high spend it has been a very difficult process; part of the problem was the size of the cluster. Each time a call for funding was issued a large number of applications was received and it took a long time to process these. Having a smaller area will quicken up the process. Under RPA powers of Community Planning are being issued to new Council areas. This should also improve the ability of Leader groups to roll-out the new programme. Community planning will mean other government departments will be involved in the roll-out of projects locally and this programme will be seen as one way of funding identified needs in the area. The Leader approach allows local people to identify what is needed in their local area in order to make it more sustainable in the longer term and, as such, at least 20 per cent of the total budget should be allocated to the new programme. The Council is strongly supportive of the Leader approach and recommends at least 20% of the total budget is allocated to this method of delivery.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

All the schemes identified in Priority 6 should be delivered through the Leader approach, mirroring the current programme delivery model. All the schemes are relevant to the ensuring the sustainability of rural areas and the priorities for addressing rural issues such as poverty reduction and economic development should be identified by rural dwellers using the Leader approach.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

The other priorities should be delivered by DARD in association with other

relevant government departments because this is their area of expertise.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Priority six should be delivered through the Leader method which involves local Councils.

In terms of the other priorities DARD should take the lead but it needs to work with other relevant agencies when appropriate. For example Invest NI needs to be involved in the delivery of Priority 3, Promoting food chain and risk management in agriculture. The Agri-food sector is one of the fastest growing industries in Northern Ireland and Invest NI has expertise in helping businesses grow, become more competitive and look at export markets.

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

All of the areas have been identified as priorities for the new Rural Development Programme and as such should receive adequate funding. If there are problems with funding lobbying may be needed to ensure support is provided for this very important programme for all rural dwellers.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

All the priorities are important for the sustainability of rural life. From a Council perspective Priority 6 is very important because rural life is under such threat and for rural life to survive services need to be provided locally and villages need have thriving shops, health centres and schools and businesses. However farming is also an integral part of life in Northern Ireland and, in particular, in County Fermanagh. Efforts to make it more efficient and competitive must be encouraged, and the development of businesses in areas such as Agri-food sector are imperative, given it is a growing industry, and an area where Fermanagh has had some success in recent years.

146. Lisburn City Council

LISBURN CITY COUNCIL CONSULTATION RESPONSE

Consultation on the NI Rural Development Programme 2014 - 2020

Thank you for the opportunity to provide comment on the aforementioned consultation proposal.

Lisburn City Council is the lead Administrative Council for Lagan Rural Partnership, the delivery agent of Axis 3 of the NI Rural Development Programme (NIRDP) 2007 - 2013 in the rural areas of Lisburn City Council, Castlereagh Borough Council and Belfast City Council. The Partnership comprises of a Local Action Group representative of 11 social partners and 11 elected representatives and a Joint Council Committee representative of a further 11 elected representatives from all three Council areas.

Overarching EU Funding Context

The Council would like to make DARD aware that after a substantial period of consultation and collaboration an outline paper was submitted to the Department of Finance & Personnel (DFP) in late March 2013 by NILGA requesting that Local Councils are given the opportunity to have a greater role in the design and administration of the new round of EU Structural Funds for Northern Ireland 2014-2020.

It is proposed that this is delivered by the emerging 11 Councils, through a community plan led approach, accompanied by sub delegated authority from existing managing authorities such as DETI, DARD and DEL, therefore optimising spend, meeting local needs, whilst ensuring accountability. This funding includes:

- The Northern Ireland ERDF Investment for Growth & Jobs Programme 2014-2020.
- The European Social Fund
- The Northern Ireland Rural Development Programme 2014-2020
- PEACE IV

Lisburn City Council has been part of this process working through COMET, the Northern Ireland Local Economic Development Forum (LED Forum), NILGA and SOLACE. The Council is currently identifying "pipeline" projects that can be delivered early on by the new Cluster Council during the new EU Structural Funds funding period 2014-2020 as part of an integrated economic development plan which will be prepared for the new Council area.

The aim of this Plan Led approach is to ensure that EU funds are allocated at a local level based on identified needs and avoiding duplication, whilst maximising spend and impact, and reducing the overall administrative burden. The integrated Economic Development Plan will comprise a key component of the Community planning function of the new Council post RPA.

Consultation Response to Priority Six – Promoting Social Inclusion, Poverty Reduction and Economic Development in Rural Areas

The Councils response to this consultation primarily relates to the proposals outlined under priority 6 as this priority best reflects the objectives of the current Axis 3 NIRDP programme being delivered by the Council.

(i) Effectiveness of Proposed Schemes

The Council supports the new NIRDP programme objective to develop the following six schemes:

- a) Rural Business Development Scheme
- b) Rural Business Investment Scheme
- c) Rural Tourism Scheme
- d) Combating Poverty and Social Isolation Scheme – Basic Services Scheme
- e) Village Renewal Scheme
- f) All Island Co – operation Scheme

The Council approves the aims of the **Rural Business Development Scheme** to assist business start-up and growth by providing information on how to develop business plans and signposting regarding training and mentoring opportunities available.

The Council further recommends that DARD encourages more active partnership working with a range of business training providers and schemes to include enterprise bodies, further education colleges, private enterprises and other government departments with a view to further mapping appropriate training needs to the potential business ideas that may come forward but ensuring there is no overlap or duplication in activity with the aforementioned Plan Led approach.

The Council recommends that such grant investment should also be provided to local training providers focused on training provision to the farming industry to help complement other schemes tasked with building the skills base and sustainability of our farming sector.

The Council would caution that the prerequisite for every applicant to complete the CAFRE Diversification Challenge Programme before being presented for funding may inhibit the number of applicants participating in this scheme, and as standard in the current Axis 3 NIRDP, each individual application should be assessed on the ability, experience and business skills of the applicant.

The Council supports the aims of the **Rural Business Investment Scheme** to provide investment support on a localised basis similar to the farm diversification and business creation grant schemes being delivered under the current Axis 3 NIRDP, but would also like to see greater opportunity for rural businesses to avail of funding for food processing and marketing schemes which is not available to potential applicants under the current programme.

The Council further suggests that DARD request that the European Commission reconsider the funding threshold for small/medium enterprises with 10 or less employees to 20 or less employees in recognition of the evidenced demand for

investment in rural businesses within the Lagan Rural Partnership area.

The Council would again caution the prerequisite for every applicant to provide a business plan before being presented for funding as this again may inhibit applications to the programme and will duplicate the requirement of an economic appraisal that is already a standard prerequisite for assessment purposes.

The Council endorses the aims of the **Rural Tourism Scheme** to provide support for projects which are in accordance with the principles of the Northern Ireland Tourism Priorities for Growth. The Council would like to inform that under Local Government Reform local tourism functions will be transferred to the new Council structures and therefore it is important that any potential proposals developed should converge with the aims and strategies of the existing and new Council structures.

The Council supports the aims of the **Basic Services Scheme** to provide support for measures aimed at tackling rural poverty and isolation. The Council would like to commend the decision to provide more investment on community development and capacity building but would caution against capping the local community grant fund to £10,000. It has been evidenced from the current Axis 3 NIRDP that large scale capital investment in community facilities and community meeting spaces has made a significant difference to the quality of life of rural communities in the Lagan Rural Partnership area.

The Council supports the proposal to develop strategic basic services provision through partnership working with other Departments and Agencies to improve service delivery in areas such as rural transport, access to broadband, innovative health solutions and childcare and would encourage DARD to explore how such proposals could fit with the new Council's Community Planning models and associated initiatives.

One of the most successful measures of the current Axis 3 NIRDP has been the Village Renewal and Development scheme. The Council is therefore encouraged to note that the proposed **Village Renewal** measure is to follow the successful implementation model adopted by the current programme.

The Council endorses the aims of the **All Island Co-operation Scheme** to support schemes that could be developed on a North/South basis and complement shared cross border social and economic need. The Council would however like to highlight that the transnational element of the current Axis 3 NIRDP has not been fully achieved, albeit that there were and remains significant opportunities for co-operation between SMEs and enterprise bodies in areas such as tourism, food, broadband, renewable energy.

(ii) Reducing Barriers to Project Promoter Participation

The Council is aware of the significant barriers to project promoter participation under the current NIRDP due to onerous procurement regulations and conservative grant rates for private promoters (50%) during a period of acute economic recession.

The Council would therefore recommend that these two fundamental barriers to participation are reviewed with an objective to introduce significant easements to procurement regulations and to consider increased grant rates for private promoters

up to at minimum 75% of total eligible project costs.

(iii) Suggested Delivery Framework

The Council is aware the new NIRDP programme proposes to deliver a minimum of 5% of the programme through the LEADER approach ('bottom up' delivery). Under the current Axis 3 NIRDP 20% is delivered through this model.

If the LEADER approach adopted by the new NIRDP programme is delivered using the minimum allocation of 5% it is envisaged that only £19 million will be available to 11 Cluster groups (based on new Council structures) out of a projected NI fund allocation of £380 million, compared to £100 million being available to 7 Cluster groups out of a NI fund allocation of £500 million under the current NIRDP.

It is therefore recommended by the Council that at least 20% of the new programme is once again allocated to local government centred delivery arrangements, including the new LEADER driven Local Action Groups, taking into consideration that the current delivery model has proven to be successful.

The Council would also encourage that in keeping with the ethos of previous NIRDP's, the majority of the allocated funds are directed to farm diversification and other private sector rural business creation and development schemes.

Further to the above it is recommended that local Councils in association with the new Local Action Group structures are provided the opportunity to work collaboratively to roll out large investment strategic projects at the beginning of the new programme to optimise the potential of agreed schemes and to help accelerate grant spend earlier within the new NIRDP timeframe.

The Council notes that the consultation document states that DARD is not transferring any functions to Councils as a result of the Review of Public Administration and that key functions in terms of policy responsibility, managing authority and paying agency functions of the new programme will remain within the Department.

The Council is disappointed in this proposal given the move to transfer significant functions to new Council structures such as planning and are therefore concerned that the operating and decision making powers of local elected representatives and social partners nominated on new Local Action Group structures will once again be limited and predicated on departmental rules and regulations.

(iv) Confirmed Programme Start Date

The Council is extremely disappointed that the eventual shape and size of the programme remains unclear due to uncertainty regarding the funding package to be provided by the European Commission and an inability by DARD to seek a definitive programme start date.

The absence of a start date inhibits any preparation by local Councils to begin any process of strategy development or to consider any resource implications regarding the delivery of the new programme.

The Council also recommends that every effort should be made to maintain current staff tasked with programme delivery in the interests of continuity and considering the Council's investment in staff skills and capacity training within the last 5 years.

The Council view that it was unacceptable that the current programme profiled to begin in January 2008 did not legally proceed until July 2009 and encourage DARD to ensure that such a time lag does not occur again to ensure that investment can be delivered soon to our rural businesses and rural dwellers within our area of interest.

Alderman Allan Ewart

Chairman, Lisburn City Council Economic Development Committee

LAGAN RURAL PARTNERSHIP CONSULTATION RESPONSE

Consultation on the NI Rural Development Programme 2014 - 2020

Thank you for the opportunity to provide comment on the aforementioned consultation proposal.

Lagan Rural Partnership is the delivery agent of Axis 3 of the NI Rural Development Programme (NIRDP) 2007 - 2013 in the rural areas of Lisburn City Council, Castlereagh Borough Council and Belfast City Council. The Partnership comprises of a Local Action Group representative of 11 social partners and 11 elected representatives and a Joint Council Committee representative of a further 11 elected representatives from all three Council areas. Lisburn City Council is the lead Administrative Council for the Partnership.

Overarching EU Funding Context

The Partnership would like to make DARD aware that after a substantial period of consultation and collaboration an outline paper was submitted to the Department of Finance & Personnel (DFP) in late March 2013 by NILGA requesting that Local Councils are given the opportunity to have a greater role in the design and administration of the new round of EU Structural Funds for Northern Ireland 2014 – 2020.

It is proposed that this greater role would involve the emerging 11 Councils, through a community plan led approach, accompanied by sub delegated authority from existing managing authorities such as DETI, DARD and DEL, therefore optimising spend, meeting local needs, whilst ensuring accountability. This proposed new delivery mechanism would include delivery of the new NIRDP 2014 – 2012 and also the following new proposed programmes:

- The Northern Ireland ERDF Investment for Growth & Jobs Programme 2014-2020
- The European Social Fund
- PEACE IV

The aforementioned partner Councils of Lisburn City Council, Belfast City Council and Castlereagh Borough Council have been part of this process working through COMET, the Northern Ireland Local Economic Development Forum (LED Forum), NILGA and SOLACE. The aforementioned Councils are also currently identifying “pipeline” projects that can be delivered early on by the new Cluster Councils during the new EU Structural Funds funding period 2014-2020 as part of integrated economic development plans which will be prepared for the new Council areas.

The aim of this Plan Led approach is to ensure that EU funds are allocated at a local level based on identified needs and avoiding duplication, whilst maximising spend and impact, and reducing the overall administrative burden. The integrated Economic Development Plan will comprise a key component of the Community planning function of the new Councils post RPA.

Consultation Response to Priority Six – Promoting Social Inclusion, Poverty Reduction and Economic Development in Rural Areas

The Partnerships response to this consultation primarily relates to the proposals outlined under priority 6 as this priority best reflects the objectives of the current Axis 3 NIRDP programme being delivered by the Partnership

(i) Effectiveness of Proposed Schemes

The Partnership supports the new NIRDP programme objective to develop the following six schemes:

- a) Rural Business Development Scheme
- b) Rural Business Investment Scheme
- c) Rural Tourism Scheme
- d) Combating Poverty and Social Isolation Scheme – Basic Services Scheme
- e) Village Renewal Scheme
- f) All Island Co – operation Scheme

The Partnership approves the aims of the **Rural Business Development Scheme** to assist business start-up and growth by providing information on how to develop business plans and signposting regarding training and mentoring opportunities available.

The Partnership further recommends that DARD encourages more active partnership working with a range of business training providers and schemes to include enterprise bodies, further education colleges, private enterprises and other government departments with a view to further mapping appropriate training needs to the potential business ideas that may come forward but ensuring there is no overlap or duplication in activity with the aforementioned Plan Led approach being promoted by the COMET partnership.

The Partnership recommends that such grant investment should also be provided to local training providers focused on training provision to the farming industry to help complement other schemes tasked with building the skills base and sustainability of our farming sector.

The Partnership would caution that the prerequisite for every applicant to complete the CAFRE Diversification Challenge Programme before being presented for funding may inhibit the number of applicants participating in this scheme, and as standard in the current Axis 3 NIRDP, each individual application should be assessed on the ability, experience and business skills of the applicant.

The Partnership supports the aims of the **Rural Business Investment Scheme** to provide investment support on a localised basis similar to the farm diversification and business creation grant schemes being delivered under the current Axis 3 NIRDP, but would also like to see greater opportunity for rural businesses to avail of funding for food processing and marketing schemes which is not available to potential applicants under the current programme.

The Partnership further suggests that DARD request that the European Commission reconsider the funding threshold for small/medium enterprises with 10 or less employees to 20 or less employees in recognition of the evidenced demand for investment in rural businesses within the Lagan Rural Partnership area.

The Partnership would again caution the prerequisite for every applicant to provide a business plan before being presented for funding as this again may inhibit applications to the programme and will duplicate the requirement of an economic appraisal that is already a standard prerequisite for assessment purposes.

The Partnership endorses the aims of the **Rural Tourism Scheme** to provide support for projects which are in accordance with the principles of the Northern Ireland Tourism Priorities for Growth. The Partnership would like to inform that under Local Government Reform local tourism functions will be transferred to the new Council structures and therefore it is important that any potential proposals developed should converge with the aims and strategies of the existing and new Council structures.

The Partnership supports the aims of the **Basic Services Scheme** to provide support for measures aimed at tackling rural poverty and isolation. The Partnership would like to commend the decision to provide more investment on community development and capacity building but would caution against capping the local community grant fund to £10,000. It has been evidenced from the current Axis 3 NIRDP that large scale capital investment in community facilities and community meeting spaces has made a significant difference to the quality of life of rural communities in the Lagan Rural Partnership area.

The Partnership supports the proposal to develop strategic basic services provision through partnership working with other Departments and Agencies to improve service delivery in areas such as rural transport, access to broadband, innovative health solutions and childcare and would encourage DARD to explore how such proposals could fit with the new Council's Community Planning models and associated initiatives.

One of the most successful measures of the current Axis 3 NIRDP has been the Village Renewal and Development scheme. The Partnership is therefore encouraged to note that the proposed **Village Renewal** measure is to follow the successful implementation model adopted by the current programme.

The Partnership endorses the aims of the **All Island Co-operation Scheme** to support schemes that could be developed on a North/South basis and complement shared cross border social and economic need. The Partnership would however like to highlight that the transnational element of the current Axis 3 NIRDP has not been fully achieved, albeit that there were and remains significant opportunities for co-operation between SMEs and enterprise bodies in areas such as tourism, food, broadband, renewable energy.

(ii) Reducing Barriers to Project Promoter Participation

The Partnership is aware of the significant barriers to project promoter participation under the current NIRDP due to onerous procurement regulations and conservative grant rates for private promoters (50%) during a period of acute economic recession.

The Partnership would therefore recommend that these two fundamental barriers to participation are reviewed with an objective to introduce significant easements to procurement regulations and to consider increased grant rates for private promoters

up to at minimum 75% of total eligible project costs.

The Partnership would also encourage DARD to explore the option of an enterprise loan facility similar to that provided by the Ulster Community Investment Trust or Charity Bank NI.

(iii) Suggested Delivery Framework

The Partnership is aware the new NIRDP programme proposes to deliver a minimum of 5% of the programme through the LEADER approach ('bottom up' delivery). Under the current Axis 3, NIRDP 20% is delivered through this model.

If the LEADER approach adopted by the new NIRDP programme is delivered using the minimum allocation of 5% it is envisaged that only £19 million will be available to 11 Cluster groups (based on new Council structures) out of a projected NI fund allocation of £380 million, compared to £100 million being available to 7 Cluster groups out of a NI fund allocation of £500 million under the current NIRDP.

It is therefore recommended by the Partnership that at least 20% of the new programme is once again allocated to local government centred delivery arrangements, including the new LEADER driven Local Action Groups, taking into consideration that the current delivery model has proven to be successful.

The Partnership would also encourage that in keeping with the ethos of previous NIRDP's, the majority of the allocated funds are directed to farm diversification and other private sector rural business creation and development schemes.

Further to the above it is recommended that local Councils in association with the new Local Action Group structures are provided the opportunity to work collaboratively to roll out large investment strategic projects at the beginning of the new programme to optimise the potential of agreed schemes and to help accelerate grant spend earlier within the new NIRDP timeframe.

The Partnership notes that the consultation document states that DARD is not transferring any functions to Councils as a result of the Review of Public Administration and that key functions in terms of policy responsibility, managing authority and paying agency functions of the new programme will remain within the Department.

The Partnership is disappointed in this proposal given the move to transfer significant functions to new Council structures such as planning and are therefore concerned that the operating and decision making powers of local elected representatives and social partners nominated on new Local Action Group structures will once again be limited and predicated on departmental rules and regulations.

(iv) Confirmed Programme Start Date

The Partnership is extremely disappointed that the eventual shape and size of the programme remains unclear due to uncertainty regarding the funding package to be provided by the European Commission and an inability by DARD to seek a definitive programme start date.

The absence of a start date inhibits any preparation by local Councils to begin any process of strategy development or to consider any resource implications regarding the delivery of the new programme.

The Partnership also recommends that every effort should be made to maintain current staff tasked with programme delivery in the interests of continuity and considering the Partnerships investment in staff skills and capacity training within the last 5 years.

The Partnership view that it was unacceptable that the current programme profiled to begin in January 2008 did not legally proceed until July 2009 and encourage DARD to ensure that such a time lag does not occur again to ensure that investment can be delivered soon to our rural businesses and rural dwellers within our area of interest.

Cllr Ann Marie Beattie

Chairman, Lagan Rural Partnership Joint Council Committee

Alderman Allan Ewart

Chairman, Lagan Rural Partnership Local Action Group

147. Newry & Mourne District Council

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

The consultation document does not provide much guidance on the eligible projects and expenditure items that could be supported under each of the themes. Therefore in board terms (bearing this in mind), all proposed schemes are a welcomed inclusion in the programme. The need for each of these priorities has been well documented in the consultation document, and the benefits that can be accumulated from these themes is visible from the impact on our communities and economy through delivery of the 2007-2014 RDP programme, Axis 3.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

- Rural Business Development Scheme

The consultation document sets out that this scheme will provide resource funding for training, mentoring and information provision. As the focus of the scheme is on efficiency, sustainability, and performance of new and existing business, capital investment should also be included. Capital investment is often the vehicle which businesses require for increasing productivity, becoming more efficient, branching out into new avenues, thereby becoming more sustainable and efficient. This is evident through the previous RDP programme, and should be carried forward to the 2014-2020 programme.

The inclusion of providing assistance in business planning is important, as is the training and mentoring. However what was lacking in the previous programme was the ability to fund training, other than 'bespoke training', therefore minimum impact was gained in up-skilling the rural business community. It would be recommended that the new programme takes a step further, and rather than just consider 'sign posting' to training and

mentoring, that training and mentoring opportunities are identified and provided for / supported.

It is agreed that many individuals intending to start a new business, will require appropriate expertise and assistance, this not being limited to just farmers and members of a farming family wishing to diversify. However, not all individuals will require this. It should therefore not be assumed that all new diversification entrepreneurs should have to complete a full business start up training course, if they themselves have appropriate 3rd level qualifications, training / previous employment which enables them to produce a viable and comprehensive business plan. It would be agreed however, that all new business start up proposals should have a comprehensive business plan in place.

For those that do require business start up support, if they wish, it is stated that “other agencies” can provide that help at an early business start up stage. It would not be recommended that the RDP 2014-2020 limits new diversification business to only seeking this support from CAFRE Diversification Challenge programme.

- Rural Business Investment Scheme

This would be a welcomed inclusion in the programme, providing investment support towards both new and existing businesses who complement the areas local development strategy. Further clarity would be required however on the types of activity that this scheme would support.

Consideration should also be given to increasing grant aid for small business to encourage take up of full utilisation of further grants, in line with other European countries, due to the potential to create real jobs in rural areas.

- Rural Tourism

This would be a welcomed inclusion in the programme, which should focus on the 'creation' and improvement of tourism facilities and infrastructure. (rather than just 'improvements' which is referenced in the consultation). In order to meet the NI Tourism priorities for growth there is a need for utilising existing assets and creating from these new tourism facilities and infrastructure, where demand exists. Together with improvements of existing tourism facilities, this will ensure growth within our tourism offering. The types of activities proposed under the new RDP must converge with the aims and strategies of the existing and future Councils.

- Basic Services

A welcomed inclusion in the programme. However, under the previous programme community groups wishing to avail of basic services grant of over £7,500 where required to register their status as Company Limited by Guarantee. This was viewed as a deterrent to the programme, and placed unnecessary bureaucracy and administration on community groups who were forced to change their status. Many community groups withdrew from the process rather than proceed with this. The threshold for this

requirement should be lifted, and applied to the delivery of only larger scale projects.

The process of drawing down grants and cash flow has been a particularly difficult process for community groups, this should be given consideration for future programmes that advance payments can be offered more easily to avoid these issues.

Also, under the previous programme, what was eligible under the Basic Service measure was very unclear based on the information provided under the operating guidelines. As ultimate decision making lay with DARD, eligible projects and assessment of same was a delayed and administrative process, which further added to slow spend under the programme. For the future programme, it should clearly outline the objective of the scheme, and activities which are to be considered eligible.

- Village Renewal

This would be a welcomed inclusion in the programme which would see the implementation and realisation of plans developed under the previous programme, and other streams

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

This would be a welcomed inclusion in the programme, which should focus on encouraging cooperation between SMEs and enterprise bodies on areas such as business growth, exporting, knowledge transfer, tourism, food, broadband, renewal energy etc.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

All areas should be considered. Those regions in the north that have been most disadvantaged by the border could receive higher priority under this measure.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

Currently 19% of the programme budget is delivered by Leader, and the proposal for the new programme is 5%, which is the minimum level set by EU proposals for rural development. The proposal for programming the Leader approach is through priority 6.

The Leader model under the previous programme was extremely difficult and inflexible to deliver due to the high level of bureaucracy, administration and tight management of the programme by DARD. This resulted in a programme that had a slow decision making process due to the various levels of administration from the LAG, through the JCC, and then through to DARD, creating a programme that was then slow to implement and slow to spend, which it was then criticised for.

As local economic development, which includes rural development, will be transferred to Councils under RPA, the economic & rural development priority under the new RDP programme should be transferred and become a primary responsibility of councils.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

As part of EU regulations, a minimum of 5% has to be delivered through the Leader model. It is stated that under the previous programme, 19% was delivered in this manner, however a number of issues affected the ability of the LAGs to deliver.

The issues that prevented easy delivery of the programme were generally created through the design and inflexibility of the programme, the over administration and control retained by DARD, cumbersome procurement regulations, (which were only relaxed mid 2012), and high levels of cash match funding requirements, all which prevented many good applicants and projects from proceeding.

As the Leader approach has to be part of the new regulations, it is felt that any future local action groups (LAGs) should only deliver programmes, or part of programmes which do not fall under the transfer of functions to Councils, as referred to above. Any local action group should be tightly linked to the Council's Community plan and work seamlessly with other stakeholders to benefit the rural community. It should also have more autonomy and more flexibility than the current clusters, a greater focus on animation and capacity building, and an increase in the budget for animation and running costs.

There should be a specific rule requiring a minimum share of participation of the public and non-public sector partners (as opposed to just non-public members as referenced in the consultation document).

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

DARD should have responsibility for the all the priorities which require farming and renewable energy expertise.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

As local economic development, which includes rural development, will be transferred to Councils under RPA, the economic & rural development priority under the new RDP programme should be transferred and become a primary responsibility of councils.

Councils have already in place and a proven track record of delivering on the key principles which DARD require for service delivery:

Effective / equality focused / capable / accountable / flexible / Local

FUNDING SCENARIOS AND PRIORITISATION OF INTERVENTIONS

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

There is a need for more funds across all measures.

The previous programme had an EU budget of £250m and was matched by £250m of EU funds. (Total programme value £500m)

Based on latest information, the EU funds available for the new programme is estimated to be £190m, with the national funds not yet known.

Under the previous programme the national contribution matched the EU contribution. If this rule was applied to the 2014-2020 programme, the national contribution would be £190m, creating a programme value of £380 m, which is a reduction of 24% from the previous programme. These levels would result in a significantly reduced programme, therefore it would not be considered positive for the programme for any national funding to be less than the proposed EU contribution.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

All priorities should feature in the new programme where possible; however savings could be made in the delivery / implementation of priorities by removing those mechanism which have created over administration in the previous programme, and by transferring economic development / rural development elements of the programme as a primary responsibility to Councils.

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

The overall aim of priority 6 is to improve the quality of life for people living in rural areas. Therefore, the individual schemes will impact on the entire rural community, thus it is those schemes that should be a priority. The most popular schemes in part schemes have been Farm Diversification, Business, Tourism, Basic Services and Village Renewal.

Transferring a limited amount of funds from Pillar 1 to Pillar 2 should be considered, as this was successfully used under the previous programme in order to increase the rural development budget available.

For every 1% transferred from Pillar 1, would increase the RDP budget by £19.5m, therefore minimum impact on Pillar 1 could have the potential to create maximum benefit to Pillar 2 (RDP budget).

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

Please find below information on elements from the previous programme that added to the high level of administration and micro management, resulting in poor programme delivery and spend on the ground. These issues should be avoided were possible, or eased in the design of the new 2014-2020 RDP programme:

Grant & intervention rates: Due to difficulties in obtaining cash match funding availability, a higher intervention rate could be considered for private sector applications. The match funding levels need to be reduced and funding thresholds raised

Application assessment process: The same assessment process has to be applied to all applications regardless of level of grant requested. It should be considered adopting a fast track assessment process that could be applied to small grant applications.

Audit Bureaucracy: Under Axis 3 there was a very high level of audit processes which was imposed on the JCC and LAGs. Higher levels of audit checks at the start of a programme could be expected until good practice is instilled, however this should be dramatically reduced as the programme becomes embedded, and no major risk findings are ongoing. The result of this has:

- Prevented developmental work, particular in under represented parts of the programme
- Created long assessment / turnaround time periods – resulting in drop outs
- Created lengthy decision times and prevented staff being pro active in addressing problems and quickly moving projects forward, i.e. with minor decisions on LoO extensions, phased payments, and minor procurement deviations, all which had to be considered through the JCC and / or DARD.

Procurement: In 2012 DARD relaxed the procurement regulations which significantly improved performance in moving projects forward, and increasing the rate of spend. The easing of procurement should be carried forward and included in the start of any new programme:

- Reduction in number of quotations required
- Acceptance of e-mail quotations
- Demonstrating an attempt to obtain the correct number of quotations
- Acceptance of internet banking statements

However, there still remains confusion of the definition of 2-stage procurement and what is allowed under the 2007-2014 which should be clearly explained in the new programme

Lack of flexibility in changes to Letter of Offer schedule line budgets: DARD audit requested a detail breakdown across schedule lines, with individual items referenced on different schedule lines. However, the Axis 3 programme only allows for a 10% variance across schedule lines, which is restrictive, and has resulted in the loss of grant aid against certain schedule lines, where it could easily have been transferred to another eligible item if the variance threshold was lifted, and resulted in higher spend achievements.

The Barriers paper, which was developed by NI clusters provided to DARD through the current the Rural development Programme should be fully implemented as previously agreed by DARD and Clusters

148. Newtownabbey Borough Council

Introduction

Newtownabbey Borough Council Officers have attended a number of consultation workshops on the new programme proposals and have been in discussions with GROW South Antrim and with other Councils through NILGA to prepare a draft response for Members to consider. Within the overall consultation there are sections that are more specifically relevant to local Councils given the increased role that Councils are expected to have in implementation and delivery therefore this response focuses on the following priorities and programme delivery arrangements:

- Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability.
- Priority 4: Preserving and maintaining eco-systems that are dependent on agriculture and forestry.
- Priority 5: Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in the agriculture, food and forestry sectors.
- Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability

The proposal to include a specific farm business development programme for young farmers is to be welcomed under this Priority. There has been a significant increase in the enrolment of young people from farming backgrounds in the full range of CAFRE programmes over recent years, including those offered from the Greenmount Campus close to the Borough of Newtownabbey. Targeted measures should be prioritised that enable young people to develop business and management skills in a way that may help them to take over the family farm or start their own farm businesses.

The current generation of young farmers have attained much higher levels of education than that enjoyed by older family members and there is now a greater reliance on modern technology, use of renewable energies and environmentally friendly materials/techniques to successfully manage farm businesses and to comply with statutory regulations. The consultation document indicates that overall farm income in Northern Ireland is some 19.5% lower than the Northern Ireland average income which may be explained by the relatively poor performance of the arable farming sector compared to livestock farming. Food production and processing represents a crucial growth area for the Northern Ireland economy and the new RDP needs to reflect this potential and the training needs of the industry.

It is proposed that the Business Investment Scheme (BIS) is to replace the current Farm Modernisation Scheme. At a recent consultation event, DARD indicated that the average level of financial assistance for farmers under the new RDP to develop their businesses would be in the region of 40%; this is to be welcomed however, for new entrants, or for farm businesses in need of significant capital investment, grant aid subventions should reflect the greater levels of need subject to preparation of viable business plans.

Priority 4: Preserving and maintaining eco-systems that are dependent on agriculture and forestry

Councils have a statutory duty to further biodiversity in their areas and are soon to take on responsibility for community planning. Councils therefore have an important role to play in ensuring that there is effective communication with farming communities on biodiversity issues and DARD is encouraged to fully engage with Councils through the new RDP and through relevant collaborative initiatives.

Council recognises the value of ecosystem services and the vital role that agriculture, food and forestry can play in promoting and protecting fragile ecosystems. For example, the restoration, preservation and enhancement of ecosystems can benefit water storage and flood alleviation, improve water quality, and enhance recreation and tourism resources.

The new RDP programme should incorporate the UK Ecosystem Assessment, Northern Ireland (2011) key recommendations that will ensure the following:

- Fully integrated cross-departmental and inter-sectoral approach to ensure that ecosystem services are maintained and optimised in the long term.
- Natural habitats are crucial for providing the resilience necessary for meeting global and local challenges including climate and food security and how to manage ecosystems to deliver multiple services.
- The financial value of ecosystem services is recognised.
- Effective delivery of ecosystem services requires informed and integrated management across a range of habitats that support high levels of biodiversity and ensures long-term resilience to changing circumstances. Resilient, bio diverse ecosystems underpin a wide range of valuable services.
- The role of ecosystem services in mitigating the effects of human impacts, including climate change and biodiversity loss, should be considered in all decisions about land use.
- Carbon management needs to be seen as an important part of management for multiple services delivery. Carbon storage and sequestration are vital ecosystem services and are cost effective ways to mitigate and adapt to climate change. Key aspects include soils, peatlands, permanent pasture and woodlands.
- Planning and management policies need to be aligned with natural processes to maintain the capacity for multiple service delivery.

- A network of ecological coherent sites should form a core for integrated management within the wider environment, delivering ecosystem services and minimising environmental impact.

Priority 5: Promoting resource efficiency and supporting the shift towards a low carbon and climate resilient economy in the agriculture, food and forestry sectors

It is vital that DARD ensures that its policies on facilitating renewable energies (for example, wind, solar and anaerobic digestion) are both consistent with other government interventions and provide proper incentives that the farming community will find attractive. Under the current RDP for example, farms that receive grant aid for renewable energy projects are required to sell all of the power generated to the National Grid and are not permitted to use any to help reduce the running costs of their farm businesses; this is an EU regulation and the new programme offers the opportunity to change it.

It is important that the farming sector is not exposed to the effects of 'silos' within government in relation to renewable energy development. A strategic approach must be taken, particularly on wind and anaerobic digestion plant, and attention should be paid to the emerging Single Planning Policy Statement. The new planning responsibilities that are coming to councils will directly impact on farms in relation to their renewable energy development, and a more integrated approach at local level will be needed on what can be extremely contentious developments.

Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas

Priority 6 is to be the main focus for Councils and the new LAGs in terms of social, economic and community development. The new RDP proposals offer assistance with business start-up and growth by providing information on the formulation of business plans and signposting training and mentoring to increase competitiveness. DARD takes the view that training is better delivered by other agencies but the LAGs are unanimous that training and mentoring for rural start-up and existing small businesses should be a key component of the assistance provided through the new programme. Delivery could be in partnership with, for example, the further education and training colleges and local enterprise agencies. In addition, there may be opportunities to lever in resources from the European Social Fund (ESF) in conjunction with the Department for Employment & Learning (DEL) for these training interventions. Consideration should be given to sustaining retail businesses in small rural communities and these contribute to sustaining the rural population.

Council particularly welcomes the Rural Business Investment Scheme as it proposes to offer direct funding to small businesses in rural areas similar to that available under the current programme that can be used for capital equipment and expansion projects, subject to a viable business plan. It is not clear however what the level of grant will be other than a reference to it being linked to the growth potential of the

firm applying. It is crucial that the LEADER approach is fully utilised to implement this measure given how successful the LAGs have been to date in supporting businesses under the current programme.

In terms of Farm Diversification, the consultation document proposes that projects to be considered for funding under the new programme must first have benefitted from programmes specifically tailored for rural enterprise and that diversification proposals must have already gone through the CAFRE Diversification Challenge Programme as a prior condition of receiving support. Council believes this is too inflexible and may discourage farming communities from applying. The LAGs would prefer that it should not be compulsory for farm diversification applicants to have to go through a CAFRE programme if the project business plan is robust and the business has a good performance record.

The Rural Tourism Scheme is expected to become a key theme under the new programme for Councils especially in view of tourism not being written into the Local Economic Development measure of the new Jobs and Growth Programme. Northern Ireland has had a very good year in terms of tourism with specific events such as the World Police and Fire Games benefitting the Borough of Newtownabbey, and activities centred around the Titanic and Giant's Causeway having positive spin off benefits for Newtownabbey, whilst raising the profile of the regional tourism product and increasing visitor numbers. However, Council acknowledges that rural areas of the borough need to build their own offer in terms of tourism products and the new programme offers the potential to exploit these.

Under the Local Government Reform Programme, Councils will see local tourism functions transferred to them with the opportunity to manage the development of small scale tourism accommodation, the provision of business support including start-up advice and development of customer care schemes. The Rural Tourism Scheme should form part of the Community Plan led approach that Councils are expected to undertake; it should be developed and delivered accordingly with public and private partners along with clear community support. Tourism is likely to be fully integrated in the new councils' strategies and the type of activities proposed under the new RDP must converge with the aims and strategies of the new council arrangements.

To help address poverty and social isolation the Councils' Community Planning functions should help in clearly identifying the level and nature of local need in rural areas to inform the types of activities that the new RDP should provide. For example, rural transport, village renewal schemes (such as those falling out of the village plans that have been produced during the current programme), access to superfast broadband, innovative health solutions and childcare are all vital to sustain rural communities. These types of activities will be able to integrate with and complement interventions that the Councils will be able to develop through the next Peace Programme as well as Good Relations activities. Community capacity remains weak in some rural areas of Northern Ireland and parts of Newtownabbey are no exception; the new RDP needs to be designed to ensure that capacity building measures can be used to bridge the gaps that exist led by Councils in partnership with other agencies.

Delivery Framework

The new Programme proposes to deliver a minimum of 5% of the programme through the LEADER approach which has worked so well in delivering the current and previous RDPs; 19% of the current RDP is delivered through the LEADER model with LAGs at the centre of the implementation accountable to the Councils. The current delivery method has been overly complex however and needs streamlining to ensure that the funding can be allocated and spent where it is most needed without the delays that have been such a feature of the current programme. Good governance and robust accountability can still be achieved without the layers of administration and multiple auditing processes that are currently in place which have held up spend and resulted in some project applications being withdrawn to the detriment of rural communities.

The cost of administering the LAGs has come in for some criticism especially from the farming sector however the success of the LAGs is due in no small part to having dedicated staff employed to promote the programme, work with applicants and ensure that funding is properly disbursed to comply with the stringent regulations imposed by DARD and the European Commission. DARD has indicated in the consultation document that it is not planning to transfer any of its functions to Councils through RPA other than through the new Rural Development Programme so both policy responsibility and paying agency functions for the programme will remain with the Department. There is a good case to enable the Councils to take responsibility for direct grant payments using the robust accounting and governance systems that are now in place to ensure that funding goes to project promoters in a timely manner.

Conclusion

In conclusion Council cautiously welcomes the proposals set out by the Department for Agriculture and Rural Development in its consultation document for the new Northern Ireland Rural Development Programme (2014-2020).

To enable the effective planning within Council regarding future funds, we welcome further clarity and detail around the proposed priorities for the Northern Ireland Rural Development Programme (2014-2020). Detail on how the funding will be managed and how the different funding streams will be co-ordinated will enhance future Council activities and the resulting impact on local communities and the economy.

The current work undertaken by NILGA on this issue is welcome and supported by Council.

149. NI Housing Executive

03/10/13



Chief Executive
Dr John McPeake

2 Adelaide Street
Belfast BT2 8PB

RDP Management Branch
Department of Agriculture and Rural Development
Room 407
Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast
BT4 3SB

2nd October 2013

Dear Sir/Madam

Re: Consultation Paper on the Rural Development Programme 2014-2020

The Northern Ireland Housing Executive welcomes the opportunity to provide comments in relation to the above consultation paper outlining DARD's proposals for the next Rural Development Programme which, based on the outcomes of the current programme to date, has the potential to significantly improve quality of life in rural Northern Ireland.

Our particular interest is with the 3 areas of focus which are included within Priority 6 and the range of schemes and activities which will stem from each. We were in the fortunate position of being able to provide match funding under two of the measures contained within Axis 3 (Quality of life in rural areas) in the current programme. This experience gave us a flavour of the range of worthwhile projects which can be achieved through engagement with DARD, Local Action Groups and active rural community groups of which there is no shortage throughout the province. Based on the successful uptake of our match funding over the past 3 years, we would be keen to explore further opportunities which may arise through the new programme especially in our own key areas of interest which include sustaining rural communities through rural regeneration, encouraging social enterprise, targeting rural poverty and social isolation and rural community development. These key areas have been addressed to varying degrees under this priority and we believe that there may be an opportunity for the new programme to support and complement the existing NIHE programme of work in rural areas and to contribute to the overarching vision of 'working in partnership to sustain vibrant communities and provide economic, social and environmental benefits in rural areas'.

We have based this consultation response on our own internal consultation with members of our Rural Policy Implementation Panel who monitor the delivery of our 'Rural Homes & People Strategy' and the associated Rural Action Plan and based on our involvement to date on the RDP Stakeholder Consultation Group.



Telephone 028 9031 8720 Fax 028 9043 9803
Typetalk no : 18001 03448 920 900 Email: john.mcpeake@nihe.gov.uk



Question 31: How effective do you think the proposed priority 6 schemes will be in meeting the needs of the sector?

If successfully implemented the range of schemes included under this priority could go a long way to addressing the target areas of social inclusion, poverty reduction and economic development.

The Rural Business Development Scheme will offer a valuable opportunity for new and existing businesses to receive funding in order to kick-start or improve the performance of an existing business. However access to this funding is heavily dependant on the initial provision of resources, training and support from other Departments and Agencies which may cause ambiguity for those interested in the scheme. It will be vital to provide user-friendly guidance in association with other relevant Departments on what is on offer and in which order it should be sought.

The Rural Business Investment Scheme has an important link to the local development strategy of the rural area. Many villages and small settlements have prepared village plans with the assistance of funding from the current RDP. These plans may be an important step towards realising the benefits of community planning and the opportunities which will arise for rural communities to identify their specific needs in the local development strategy for their area. By including this focus in the Business Investment Scheme, new and existing businesses will have to examine the specific business needs of their local community.

The Rural Tourism Scheme will present an opportunity to potentially expand a sector which still has much unrealised potential in rural NI. The link between the Business Investment & Development Schemes could provide an important incentive for existing small-scale tourism businesses to widen their focus and impact on the local economy.

Combating Poverty and Social Isolation – Basic Services Scheme. This scheme and the three sub measures contained within are of particular interest to NIHE. The scheme seeks to address a wide range of issues which impact on rural areas and which will rely heavily on successful inter-agency partnerships and coordination of services and support. This scheme also requires rural communities to use local area plans to address their specific needs which again is in line with broader proposals stemming from RPA and the emergence of community planning.

The Village Renewal Scheme is another area which is of particular interest to NIHE given our involvement in match funding under this measure in the current programme. The inclusion of this scheme is welcomed as it will allow for a continuation of work which had commenced under the current programme by presenting an opportunity for community groups to address those issues which had been highlighted in their village plans and to deliver associated meaningful projects which can help improve quality of life.

All Island Co-operation Scheme. We welcome the opportunity for complementary support schemes for border areas which could be delivered through the local development plan approach. We envisage that this may be one of the most difficult schemes to deliver under this priority but could potentially have the most considerable impact.

Again this scheme is dependant on inter-agency coordination of services but also the establishment of partnerships with cross border counterparts.

Question 32: How might these schemes be improved upon to meet the needs of your sector?

The Housing Executive would benefit from the inclusion of a housing focus in the following schemes:

Basic Services Scheme

Housing unfitness levels in rural areas have risen in recent years and the Housing Executive are not able to address these issues as effectively as in the past due to a major reduction in private sector grants funding. There may be opportunities for DARD to work with the DSD on their home improvement strategy to develop new mechanisms in rural areas for maintaining housing stock, e.g. subsidised handyman services at reduced rates for older or vulnerable people.

As fuel poverty is an issue which we recognise can be exacerbated in rural areas we would welcome the inclusion of funding for specific high impact initiatives such as a community heating or solid wall insulation or less costly initiatives such as oil buying cooperatives. The Housing Executive is the Home Energy Conservation Authority for NI and we have a dedicated Energy Conservation team who has experience with these issues and could certainly work alongside DARD to deliver such projects.

Under the first sub measure we would see a benefit in the inclusion of an energy advice programme which has been specifically tailored to the needs of rural dwellers. We would also welcome support in relation to community food projects where communities could be enabled to collectively grow their own produce which could impact on health and well-being, social isolation and poverty.

Village Renewal Scheme.

This scheme could be extended to include a focus on the refurbishment and re-use of the many vacant and derelict buildings and indeed empty housing stock which exists in villages and small settlements throughout the province. A programme of funding support could complement current Housing Executive and DSD work and could have a major impact on village renewal. An example of a similar existing programme would be the Mourne Heritage Project where an inter-agency partnership succeeded in bringing life back into empty rural homes.

Similarly, there could be an opportunity within this scheme to re-introduce the Living Over the Shop (LOTS) initiative which would be a mechanism of providing a business premises, additional central accommodation as well as contributing to village renewal and encouraging a vibrant rural community.

As it stands this scheme makes no reference to the issue of community relations in rural areas. The 'Beyond Belfast' Steering group comprises statutory, community and voluntary based organisations (including NIHE) who have been brought together to gather existing information on interfaces and contested spaces in rural areas and explore opportunities for

influencing Government policy and practice and supporting peace-building initiatives. The group have recognised that the draft programme is lacking in this area and could be enhanced if consideration was given to RCN's 'Beyond Belfast' report and the associated Practice to Policy Papers which were developed following the 'Rural Enabler' programme. We feel it would be beneficial to consider community cohesion activities by encouraging the use of traditionally non-inclusive buildings and clubhouses for broader community use e.g. for focus groups for elderly and young people.

All Island Co-operation Scheme.

The Housing Executive is keen to explore an area based approach to rural regeneration and are hopeful that community planning will present an opportunity to focus the services of statutory departments to tackle poverty and social isolation in those areas which are most in need. We would support a comprehensive analysis of all rural areas taking into account indicators of deprivation as well as other examples of similar analysis e.g. DSD Areas at Risk Programme or the English Neighbourhood Renewal Model. If joint North/South funding could be made available for border areas under this scheme then we would envisage that a range of more ambitious projects could be explored e.g. renewable energy, and this could encourage other rural communities to follow the lead.

Question 33: On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively?

In order to address issues of deprivation and disadvantage most effectively, any scheme should cover all key areas of regeneration including social renewal, economic renewal, physical renewal and community renewal. One element of community renewal which may be pertinent is that of peace building and the Housing Executive would welcome support for community cohesion and re-imagining projects as one initiative which may begin to address this.

Ideally, the profile of the specific area should be fully examined, the key issues identified and the proposed remedial actions set out in a local development strategy which has been developed and agreed by key stakeholders including statutory bodies and most importantly the community who hope to benefit from the scheme.

Question 34: Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north?

The Housing Executive would welcome a comprehensive analysis of all rural areas in the province in order to identify those regions which are most deprived and disadvantaged. This may highlight that these issues apply not only in border regions but in other villages such as Ballyhornan where rural dwellers on an ex-MOD site face major challenges with old and decaying infrastructure.

A transparent system of measuring disadvantage and deprivation such as a tailored version of the neighbourhood renewal approach should ideally be applied in order to ensure that any available funding is channelled to those rural areas which are most in need.

The Housing Executive would welcome the opportunity to be involved in this initiative in order to ensure that the appropriate housing services are also delivered in these areas.

Where border areas are identified through this scheme, any initiative should ideally be supported by a similar complementary scheme south of the border in order to maximise outcomes.

Questions 35-38 – Delivery mechanisms

The Housing Executive believe that it is important to continue to deliver an element of the programme via the LEADER approach with community groups driving and facilitating projects at a local level with the assistance of and funding through their Local Action Group. We believe that at least 19% of the budget should be allocated to the LEADER approach in order to facilitate high impact, worthwhile projects within this Priority. Particular attention should be paid to the new Community Plans in order that funding is used correctly in a way that will address local needs.

However, we believe that this should be complemented by funding of large-scale more strategic projects by DARD which may provide an opportunity for other statutory agencies to apply for funding e.g. the Housing Executive in its HECA role could draw down on funding for large scale and high-impact energy efficiency projects for renewable technologies. Utilising organisations that are placed to efficiently deliver large scale projects would ensure no funding is wasted and this approach could also allow projects such as MARA to continue and to be developed.

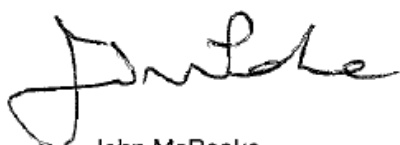
We believe that the programme should be monitored and evaluated after the first 3 years to ensure that resources are being allocated equitably and that there is consistency across all the areas. Ideally, funding should be held until section 75 forms are received so that a full and accurate evaluation of the Programme can take place.

Questions 39-41 – Finance & Resources.

We believe that should it transpire that there are insufficient funds to support the proposed Rural Development Programme, that the schemes contained under Priority 6 should be protected and a budget ring-fenced for their delivery. 94% of the rural population in the Province are not involved with farming and will see little to no benefit from Priorities 1-5 of the programme. The impacts of deprivation and disadvantage in non-farming rural communities are recognised and addressed in the Rural White Paper and in the NIHE Rural Action Plan and funding initiatives such as the Rural Development Programme are vital in supporting rural regeneration and community development.

Thank you for the opportunity to respond to this important consultation. We believe the linkages between rural housing and rural development are worth exploring further and we would be willing to engage directly to explore shared opportunities.

Yours faithfully,



John McPeake
Chief Executive

150. Northern Ireland Local Government Association (NILGA)



Draft Response to the Department of Agriculture and Rural Development's Consultation on the Rural Development Programme 2014-20

This response has been drafted by the Northern Ireland Local Government Association (NILGA), in partnership with its 26 member councils, and SOLACE, in response to the Department of Agriculture and Rural Development's Consultation on the Rural Development Programme 2014-20. It has been agreed - subject to minor but added value revisions - by SOLACE on 4th October 2013, by NILGA's Agriculture and Rural Development Working Group on 1st October 2013, and formed part of the above mentioned WGs evidence to the DARD Committee on 2nd October 2013, as delivered by Councillors Chittick and Clarke.

The NILGA Executive Committee will finalise a corporately approved response at its meeting of 11th October 2013. **The closing date for this consultation is 21st October 2013.**

To follow up on any of the issues highlighted, please contact Karine McGuckin at the NILGA Offices: Email: k.mcguckin@nilga.org, Tel: 028 9079 8972

Derek McCallan
Chief Executive
25th September 2013

1.0 INTRODUCTION

NILGA, the Northern Ireland Local Government Association, is the representative body for district councils in Northern Ireland. NILGA represents and promotes the interests of local authorities and is supported by all the main political parties in Northern Ireland. **Local economic development, including rural development, should be a primary responsibility of councils** – like Planning. Therefore this response is predicated upon a strategic imperative of gaining greater devolution to Councils. NILGA will provide clear and unequivocal evidence as a separate initiative, to DARD, at Ministerial level, during this financial year.

Rural Development within the context of local economic development is a key issue for local government and local communities, given the leading role of councils in developing local economic growth and prosperity. Councils take their responsibility for economic well-being, regeneration, and job creation very seriously, and are keen to ensure that the wider economic policy frameworks can be translated into council services that are required on the ground.

NILGA welcomes the opportunity to respond to this consultation. All of our member councils are extremely keen to move forward with properly designed and governed Rural Development Programme, in partnership with their local rural businesses and communities.

2.0 BACKGROUND

NILGA would highlight the local authority's role (*as part of the statutory community planning model now in legislation*) as a strategic leader in place-shaping, responding to residents' ambitions and aspirations and working with partners to deliver necessary services – and planning future economic growth - at the local level. The Association would also point to efforts that have been ongoing through three rounds of European funding to develop the capacity of the local government sector to fulfil a strategic role in the delivery of **rural development as part of Local Economic Development (LED) strategies**, as well as the on-going preparatory work undertaken with the Department of Finance and Personnel and the other Government Departments to develop a suite of new European programmes for Northern Ireland as part of the 2014-20 Structural Funds.

New Community Planning powers coming under Local Government Reform will give Local Councils a real opportunity to shape services in their area. By leading on this process Councils and the communities which they serve will be key players in influencing the policy of statutory organisations, helping to ensure joint up solutions to local issues. Economic and rural development will be a central theme in this and critical to helping create vibrant and sustainable towns, villages and communities.

New architecture must bring new ambition too - within the context of the Local Government Reform Programme which will see 11 new Councils formed and 11 new community plans implemented from 2015. Councils have a strong track record and a dynamic, responsive, contemporary approach to determining local interventions, driven by data and knowledge, in the delivery of economic development interventions.

NILGA strongly asserts the growing recognition of the role of local authorities as bodies capable of making a unique and driving contribution to the social and economic prosperity of Northern Ireland.

Local government is keen to work in partnership with the NI Assembly, Departments and Committees to ensure that we can jointly plan and prioritise activity, optimising resources available to grow our economy.

NILGA welcomes the recognition of the need for an integrated and coherent approach to economic development within the region and the role of partners in delivering a shared economic agenda.

3.0 Overarching Comments:

For the purpose of this consultation, NILGA will respond specifically to the questions which have relevance to the current and future work and functions of local authorities.

In doing so, it is felt that three main priorities should be commented upon:

Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability.

Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

Priority 7: The Delivery Framework.

3.1 Priority 2: Enhancing competitiveness of all types of agriculture and enhancing farm viability.

NILGA asserts that there is a case for a specific support scheme for young farmers. It has clearly been identified that there was an increase in the number of student/farmers participating in CAFRE programmes. Some of these students may take over the family farm and others may want to start their own farm businesses. It is extremely difficult to start a farm business for young farmers, be they over or below 40 years of age. Farm outbuildings are often in need of repair in order to provide viable and modern crop storage or animal shelter and that is a necessary investment in order to avoid any future losses for the business. As this new generation of farmers have now reached a higher level of education and higher reliance on modern technology to farm their business, investment is also needed in that area, and this goes in tandem with a necessity to address farm waste in the most productive and climate-friendly manner. The investment associated with the setting up of a new business with modern practices is definitely higher for today's generation than it was for the previous one. The farming sector, especially small farms, still struggle to make ends meet. The consultation document stipulated that farm income in Northern Ireland is 19.5 % lower than the Northern Ireland average income. This portrays a certain level of poverty and resource depletion suffered by some categories of farmers, especially crop farmers.

Support through a series of funding programmes would assist the farming community to acquire, modernise, compete, re-skill and manage farms like a business. The level of funding offered (determined at high level by relevant policy / criteria) should reflect the personal circumstances of the applicant in that new entrants should be considered for enhanced levels of funding as long as their business plan is sound and that they are fully committed to the business. At a recent consultation event, DARD stated that the average level of assistance would be in the region of 40%, however, for new entrants or for businesses in need of major investment to reach sustainability, that level should be raised and consideration should be given for the construction of NEW buildings, not just refurbishing or repair. It is felt by the rural community that a level of 60% is more appropriate than the 40% proposed by DARD.

NILGA has a particular interest in the Business Investment Scheme (BIS), as it is felt that its aims are fully in line with the Local Government Reform Programme's transfer of function. It has now been confirmed that functions such as local economic development activities currently being delivered by Invest NI – The start a Business Programme – will be the Councils' responsibility. Other similar programmes with a different target audience such as the Youth

Entrepreneurship Programme, Social Entrepreneurship and Investing for Women will also be managed and delivered by Councils as part of their Plan led approach to the delivery of services at local level.

NILGA asserts that the BIS should be wholly delivered as part of the local community plans, as Councils will be tasked with providing pre-enterprise capacity building to small businesses. Not to do this shows an absence of foresight, integration and subsidiarity. This should therefore include new entrants in the farming business and small farm diversification training. Most councils in Northern Ireland are predominantly rural and that their experience of the farming industry as well as their knowledge of and closeness to the rural community represents a significant advantage in ensuring take up of the programme and implementation of the skills acquired during the training programme.

It seems that the programmes for young farmers is only open to those who have gone through college but excludes those who have not got a formal qualification. Experience as opposed to formal qualification/training should have the same weight in eligibility terms.

3.2 Priority 6: Promoting social inclusion, poverty reduction and economic development in rural areas.

The Rural Business Development Scheme is aimed to assist business start-up and growth by providing information on the formulation of business plans and signposting training and mentoring to increase competitiveness, efficiency, environmental performance and sustainability of rural businesses both new and existing.

NILGA fully endorses the aims of the Scheme but **would go further** by stating that appropriate training opportunities should be **provided** (directly and in partnership, with enterprise bodies and colleges, subject to tender), not just signposted, as part of an individually tailored plan developed in cooperation with relevant stakeholders, which would identify training needs and develop appropriate training for the rural community. Additional **European Social Fund investment** should be sought in order to realise this goal and suggested as part of the current ESF consultation exercise led by the Department of Employment and Learning – **again, showing cross cutting thinking and integrated planning.**

In terms of diversification, the consultation document states that projects within this Scheme must have benefitted from programmes specifically tailored for rural enterprise before receiving funding and that diversification proposals must have already gone through the CAFRE Diversification Challenge Programme before being presented for funding.

NILGA asserts that this process is too inflexible and that it may discourage people from applying. It is fully understood that all businesses should have at least gone through the basic Start a Business Programme and possess a viable, up-to-date business plan before proceeding to any diversification project, however, it should not be compulsory for applicants to have to go through the CAFRE Diversification Challenge if their business plan is robust and their business well established. Each individual application should be assessed on the ability, experience and business skills of the applicant.

The Rural Business Investment Scheme is mainly concerned with investing in localised projects that complement the areas local development strategy and which focused on a specific need. This Scheme would provide grants to local projects with growth potential and it is felt that this type of initiative would be best administered under the Leader model.

The Rural Tourism Scheme is a very important component of the rural fabric and is key to maintain income levels in local communities. Northern Ireland has had a very good year in terms of tourism with specific events such as the City of Culture, the World Police and Fire Games, and recent activity centred around the Titanic. It must be noted that these events have had a positive spin-off on rural areas as visitors took advantage of these events to extend their stay and visit less accessible areas. However, in order to retain that level of visitors, rural areas must also build their own reputation in terms of tourism and they cannot do this without having essential/basic services available to tourists and to their own community.

Under the Local Government Reform Programme, Councils will see local tourism functions transferred to them with the opportunity to manage the development of small scale tourism accommodation, the provision of business support including start-up advice along with training of customer cares schemes, the provision of advice to developers on tourism policies and related issues. Economic opportunities need to be channelled to the entire NI region, and this is one mechanism to achieve this.

NILGA asserts that the Rural Tourism Scheme should form part of the Community Plan led approach; it should be developed and delivered accordingly with public and private partners along with clear community support. Tourism will be fully integrated in the new councils' strategies and the type of activities proposed under the new RDP must converge with the aims and strategies of the existing and future councils.

As far as combating poverty and social isolation -(basic services schemes)- is concerned, this type of activities is very welcome and fits well within the Councils' Community Planning model which will provide a wide range of integrated services at local level and support the rural community. In the current programme, there are many examples of Council intervention which have prevented essential services from being withdrawn from the rural community. For instance, the Library in Gilford closed May 2012. Gilford Community Centre opened in April 2012. All services provided in the old Library were transferred to the Community Centre and continue to this day thanks to the work of the Rural Cluster.

Areas such as transport, access to broadband, innovative health solutions and childcare are vital as they ensure that rural communities can survive and prosper. These types of activities will be provided as part of the work which the Councils are involved in with the Peace Programme, the Good Relations initiatives and the underpinning Equal Opportunities policies and practices. **NILGA asserts that the delivery of these activities should therefore be carried out by the new Councils as part of their Community Plans.**

NILGA asserts that capacity building will be essential to build the ability of rural communities to sustain themselves and to avoid further erosion of the rural community. From recent

discussion with rural stakeholders, the above mentioned Community Plans are central to maintaining and improving our rural community – therefore, the work already undertaken by the current clusters should be further developed in order to improve the quality of life in rural communities.

As far as the All-Island Cooperation scheme is concerned, it should be highlighted that the transnational element in the current programme has not been fully exploited and that only some outputs have been achieved. Under the Leader+ programme, a cross border speciality food sectoral development programme was delivered by Banbridge and Carlow Councils. The programme focused on small-scale rural artisan food producers and enabled the participants to strengthen their position in niche markets. Training was provided on new product development, marketing, sales, food safety and financial management. In addition, each business received one-to-one business support and advice and cross border trading took place at the National Ploughing Championships and Balmoral Show. This is a prime example of what could be achieved under this scheme. NILGA asserts that this should be a key, performance driven, element of the new Programme, as there are many opportunities for cooperation between SMEs and enterprise bodies in areas such as tourism, food, broadband, renewable energy. It is recognised that these opportunities could be harnessed under the new Interreg V programme or the Peace IV Programme; however, as the opportunity exists under the new RDP, NILGA would assert that these are exploited to the full. It is felt that Councils could play a central role in promoting cooperation on rural issues to help address rural poverty and social isolation.

3.3: Section 7: Delivery Framework.

The new Programme proposes to deliver a minimum of 5% of the programme through the Leader approach.

At present, 19% is delivered through that model. The current delivery method has been overly complex and needs rationalising for the ordinary person – the customer, as well as for the contracted bodies. NILGA recognises the need for authority and accountability, but the new Programme must not be so tightly controlled by DARD - the lack of flexibility has resulted in delays in processing applications and in spending the money wisely. Strategic projects, additionally, should be determined in partnership under the new Council model, not imposed centrally.

The cost of administering the existing clusters has been criticised as some clusters have spent up to 36% of their allocation in administration alone, and administrative collaboration can be deployed by councils, subject to agreement.

NILGA does not support point 14 page 86 of the document which states that DARD is NOT transferring any functions to Councils as a result of RPA (although consideration has been given to local government involvement in delivering some aspect of a future rural development programme) and that policy responsibility and managing authority and paying agency functions for the programme will remain with the department.

As above mentioned, NILGA asserts that **local economic development, including rural development, should be a primary responsibility of councils** – like Planning. Therefore this response is predicated upon a strategic imperative of gaining greater devolution to Councils. NILGA will provide clear and unequivocal evidence as a separate initiative, to DARD, at Ministerial level, during this financial year, and seeks clarification from DARD in this regard, as the Department has altered its stance markedly from earlier policy.

As the Leader approach is part of the new regulations, it is felt that any future local action groups (LAGs) should only deliver programmes, or part of programmes which do not fall under the transfer of functions to Councils. Any local action group should be tightly linked to the Council's Community plan and work seamlessly with other stakeholders to benefit the rural community. It should also have more autonomy and more flexibility than the current clusters.

There are currently seven Rural Development Clusters covering the 26 district Council areas. Although it is suggested in the document that the new clusters should be co-terminus with the boundaries of the new 11 councils, NILGA asserts that the Local Action Groups should cover a larger area (at least 2 new council areas) as it would not make economic or administrative sense to increase the number of LAGs. Hence NILGA's previous points about administrative collaboration. As with all contractual arrangements subject to wider strategic change, there is a need for transitional mechanisms and investment to avoid knowledge being lost – therefore NILGA seeks bridge funding on a cluster by cluster basis, negotiated with the Department.

The Rural Development Programme is something that the rural community will have to live with and deliver. Therefore, it has to meet its needs without the over-administrative approach adopted under the 2007-13 programme. There are arguments supporting the removal for example of the JCC and spending and monitoring targets must be applied to both the Clusters AND DARD itself.

Additional comments:

Priority 4: Preserving and enhancing ecosystems dependent on agriculture and forestry

Councils have a statutory duty for enhancement of biodiversity in relation to their duties. As councils are soon to take on responsibility for area planning and development management, it is vital that farmers understand the impact that the combination of duty and new functions will have on their activities. The Department is therefore encouraged to ensure that engagement between councils and the farming community is supported, particularly in relation to biodiversity and prevention of water pollution.

Priority 5: Promoting resource efficiency and supporting the shift towards a low-carbon and climate resilient economy in the agriculture, food and forestry sectors

It is vital that DARD ensures that its policies on renewable energy do not conflict with planning policy, energy policy and waste management policy and strategy. It is important that the farming sector is not exposed to the effects of 'silos' within government in relation to renewable energy

development. A strategic approach must be taken, particularly on wind and anaerobic digestion plant, and attention should be paid to the emerging Single Planning Policy Statement. The new planning responsibilities that are coming to councils will directly impact on farms in relation to their renewable energy development, and a more integrated approach at local level will be needed on what can be extremely contentious developments.

Conclusion

An overwhelming opportunity exists as part of a wider strategic reform process for DARD and local authorities to combine investment with ambition and work seamlessly with each other and sister government departments to ensure that optimal investment is designed and accounted for locally and accounted for in an integrated, not silo, fashion. The Association invites the Department to work with it and other Departments to achieve this common aim, through the right mechanisms, governance and monitoring, for the RDP 2014 -2020.

Disclaimer

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151. Omagh District Council

European Union - Priority 1

Fostering Knowledge Transfer and Innovation in Agriculture, Forestry and Rural Areas

Question 1

Is there a need to provide broader vocational training in the agri-food and forestry sectors and what particular areas do you envisage being targeted?

Comment

Omagh District Council recognises the importance of ongoing vocational training within the agri-food and forestry sectors and would suggest that specific consideration is given to the needs of "new" farmers, that is, those who have commenced working in the sector, at a later stage than is the norm.

The Council would note that there have previously been occasions when the courses provided by educational institutions do not necessarily reflect industry needs. Given the long lead in times required for educational accredited courses to be developed, the Department should now be working with such institutions to ensure relevant courses are available.

The Council would wish to ensure that appropriate safeguards are in place to ensure the bulk of these funds are not allocated to third level institutions, but rather to facilitate the sector's participation in such courses.

Question 2

What do you think the role of the innovation broker should be and what skill sets should they have?

Comment

The innovation broker should be able to identify future needs and trends and apply innovative ways of working to enable everyday farms to benefit from industry practice.

The Council considers that in the past, there has been a tendency for such innovation to be targeted at a very small percentage of the sector, and this would be widened out significantly within the new programme.

European Union - Priority 2

Enhancing Competitiveness of all Types of Agriculture and Enhancing Farm Viability

Question 3

In light of the restrictions posed by the definition of 'young farmer' in the proposed European legislation, and the findings from previous research and experience, do you agree that there is no case for a specific support scheme for young farmers? If not, why? And what else should be taken into account?

Comment

Omagh District Council remains of the view that sufficient priority has not been in place to meet the needs of young farmers and new entrants into the sector generally.

As young farmers are the only hope for the future of this sector, all efforts should be made to support them and to make farming an attractive career prospect.

The Council considers that greater flexibility should be applied to the definition of the young farmer to be more reflective of the current state of the sector and that a specific support scheme should be put in place to support the needs of young farmers.

Grant levels for young farmers need particular consideration, as it is now apparent that the economic downturn is having a disproportionate impact on this sector.

Question 4

With regard to funding levels, should there be a minimum expenditure limit? Do you think the funding levels at each tier and the maximum limit is appropriate?

Comment

Omagh District Council is generally supportive of this measure, but of the view that the grant levels are too low. One of the difficulties of the current programme has been the inability for grant aid to be realigned over the course of the programme, and consideration should be given to having grant levels being kept under active review to meet the changing needs of the sector. A minimum wage for farmers, should also be considered.

A key consideration should be to ensure proportionality in relation to the level of administration/bureaucracy. For example, low level funding awards should not require the same level of paperwork as larger awards.

The Council would particularly welcome a programme to support the improvement of outbuildings which are often in need of repair and such investment could assist with the sustainability of these rural businesses. The new Programme sets out that the average level of assistance would be in the region of 40%, it is the Council's opinion that this rate should be raised and consideration should be given to including in kind costs and "sweat equity", as eligible for consideration in the wider funding package.

Omagh District Council recognises the importance of Business Investment Schemes (BIS), and it is felt that these aims are in line with the enhancement of the economic development of the region, and therefore could be facilitated through Councils.

Question 5

Are the entry criteria appropriate and in proportion with the level of funding or should there be additional requirements?

Comment

The Council considers that the entry criteria are generally appropriate – however, some flexibility regarding the level of funding may be required should general circumstances change.

Question 6

Are the proposed areas of expenditure the most appropriate to improve the competitiveness and development of farm businesses? Should renewable energy technologies be included in a farm business development grant scheme?

Comment

Yes; the proposed areas of expenditure are appropriate to improve competitiveness. The Council would wish to highlight the responsibility that DETI has regarding business competitiveness – some supports to the sector from DETI should also be considered.

With regard to renewable energy technology, there is an obvious link with farm business development grants.

The Council notes the inadequacy of the existing infrastructure to cope with even the current renewable linkages and would urge the Department to ensure private developers and promoters, as well as the respective Government Departments, are held to account for and work to address these deficiencies, so that these deficiencies do not delay the

implementation of projects under the new programme.

While there is some focus on H&S issues, the Council considers that this needs to be considerably enhanced.

Question 7

To what extent should development group members be reimbursed for collating and disseminating their farm performance?

Comment

Omagh District Council has no specific comment to make in relation to this query, but advises the general principle that where farmers are assisting in performance data, they should be reimbursed for so doing.

Question 8

How should participants in development groups be selected?

Comment

The Council would recommend a selection process which enables the breadth of the farming sector including young farmers, and the farming types for which they are responsible, to be considered.

European Union - Priority 3

Promoting Food Chain Organisation and Risk Management in Agriculture

Question 9

Are the proposed sectors and type of expenditure for the Processing Investment Development Grant Scheme the most appropriate to improve the competitiveness and development of food processing businesses?

Comment

The Council is generally supportive of the proposals in this priority, however, would note the absence of a regulator means the cost of production and the retail price obtained, makes it almost impossible for competitiveness to be achieved.

Question 10

What do you think of the funding levels at each tier and is the maximum limit appropriate?

Comment

The Council is generally supportive of the funding levels and limits as defined.

Question 11

What additional types of group or area of expenditure should be included in the scope of the cooperation scheme proposal?

Comment

Considerable scope exists for North/South and East/West cooperation, with particular opportunities where there are similarities in land types.

The Council is of the view that cooperation should not be "forced" and that more sustainable cooperative approaches will be developed if these are allowed to evolve naturally.

European Union - Priority 4

Restoring, Preserving and Enhancing Ecosystems dependent on Agriculture, Food and Forestry Sectors

Question 12

Do you think that the proposed structure of the next Agri-Environment Scheme is appropriate?

Comment

The Council is generally supportive of the proposals in this priority, and would note that there is potential for Councils to be more closely involved in this priority under the new programme, due to the complementarity between enhancing ecosystems and the area plan/development control functions.

Question 13

Do you agree that funding should be prioritised in the first instance to support the management of designated sites?

Comment

Yes; however, some consideration should be given to widening out the eligibility of sites when the first priorities have been addressed.

Question 14

Do you think that an element of training should be a compulsory part of the scheme?

Comment

Yes – however, training should be relevant and proportionate to the funding secured. Concise training sessions would be preferred.

Question 15

Do you think the co-operation measures should be used to provide higher levels of funding to farmers who take collective action through the agri-environment scheme: for example, in a river catchment area?

Comment

Yes – however, protections should be put in place to preserve the interests of “small” farmers and their ability to access such funds.

Question 16

Should the next agri-environment scheme include an Organic Management Option, providing an ongoing payment to organic farmers that continue to farm organically certified land? Please provide evidence/reasons to support your views.

Comment

The Council contends that such arrangements should only be put in place, where sustainability is proven. Considerable funds could be allocated to meeting the accreditation, rather than delivering actual farming benefits.

Question 17

There are opportunities to plant woodland on farms. What do you think are the barriers that farmers and landowners face, particularly those letting their land in conacre or whose land has agricultural limitations?

Comment

The Council’s general position is that farmers should have scope to manage their lands as they deem appropriate. While the potential for woodland planting is welcomed, it would be the Council’s view that this should only be on “poor” land and “good” agricultural land should be protected for food production. Planting guidelines should not be overly restrictive.

Question 18

The proposed EC regulation makes provision for establishment and maintenance payments but not income foregone payments. What are your views on the impact this would have on land availability for new planting?

Comment

This is likely to have an adverse impact.

Question 19

Do you agree that if Pillar II Areas of Natural Constraint support is primarily an income support measure, support from Pillar I to those areas is the more appropriate route? If not, why?

Comment

The Council has no specific comments on this question.

Question 20

Following on from this what changes may be necessary to the architecture of the new agri-environment programme to ensure that any environmental issues and concerns arising from this approach are adequately addressed?

Comment

The Council has no specific comments on this question.

Question 21

Should renewable energy technologies be included in a farm business development grant scheme?

Comment

With regard to renewable energy technology, there is an obvious link with farm business development grants.
The Council notes the inadequacy of the existing infrastructure to cope with even the current renewable linkages and would urge the Department to ensure private developers and promoters, as well as the respective Government Departments, are held to account for and work to address these deficiencies.

Question 22

Which renewable energy technologies, if any, should be supported?

Comment

On farm wind turbines (the potential for these sites to be "colonised" by larger developers needs to be managed); hydropower; tidal and anaerobic digestors (for farm waste generally, but not silage).

It is vital that DARD ensures that its policies on renewable energy do not conflict with wider planning and waste management strategies and policies. It is important that the farming sector is not exposed to the effects of 'silos' within government in relation to renewable energy development. A strategic approach must be taken, particularly on wind and anaerobic digestive plant, and attention should be paid to the emerging Single Planning Policy Statement. The new planning responsibilities that are coming to councils will directly impact on farms in relation to their renewable energy development, and a more integrated approach at local level will be needed on what can often be contentious schemes.

Question 23

Should support be restricted to renewable energy technologies where the majority of energy produced by the installation is being used on-farm in direct support of agricultural activities?

Comment

Yes; but there needs to be some greater flexibility than the current situation of "stand alone" technology.

Question 24

The proposed Forestry Plantation Scheme aims to support larger new planting projects with wood production as a major objective. Do you think that the scope should be expanded to provide support for larger new woodlands which provide enhancement of biodiversity and local community benefits of visual amenity and public access?

Comment

Yes – the Council is strongly supportive of this measure, and particularly the improvements for community and public access, in which local government can play an enhanced role.

Question 25

Do you think that slurry/manure processing equipment, such as slurry separators, should be funded under Manure Efficiency Technology Scheme? If so, what uptake would you forecast?

Comment

Yes – the Council would anticipate a high take up rate to the scheme.

Question 26

What level of demand do you see for advanced slurry spreading systems in future tranches of Manure Efficiency Technology Scheme?

Comment

The Council would anticipate a high take up rate to the scheme.

Question 27

Should farmers in the Manure Efficiency Technology Scheme be required to provide feedback on the amount of slurry spread, fertiliser use, etc to help track behavioural change?

Comment

Yes – any learning from such schemes would be advantageous.

Question 28

What are the current barriers that prevent farmers from soil testing and drawing up nutrient management plans?

Comment

The "technicalities" associated with the plans and the associated monitoring and compliance burden.

Question 29

Would farmer discussion groups be a suitable delivery mechanism for the Nutrient Management Scheme?

Comment

Possibly – however, such groups would have to be focussed and possibly facilitated.

Question 30

Are there any other measures which should be considered under the Nutrient Efficiency Scheme?

Comment

No – the Council considers the proposed measures to be adequate.

European Union - Priority 6

Promoting Social Inclusion Poverty Reduction and Economic Development in Rural Areas

Question 31

How effective do you think the proposed priority 6 schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty and Social Isolation – Basic Services, Village Renewal) will be in meeting the needs of the sector? Please provide reasons / evidence to support your views.

Comment

In the current RDP, Omagh District Council is the administrative council for ARC north west which covers the council areas of Derry City, Limavady, Omagh and Strabane. Our experience is that the proposed priority 6 schemes will be beneficial in meeting the needs of rural communities.

The Rural Business Development Scheme is aimed to assist business start up and growth by providing information on the preparation of business plans and signposting training and mentoring to increase competitiveness, efficiency, environmental performances and sustainability of rural businesses both new and existing. Omagh District Council endorses the aims of the initiative but would go further by stating that appropriate training opportunities should be provided, not just signposted, as part of an individually tailored plan developed in cooperation with relevant stakeholders, which would identify training needs and develop appropriate training for the rural community.

In terms of diversification, the consultation states that projects within this initiative must have benefited from a programme specifically tailored for rural enterprise before receiving funding and that diversification proposals must have already been through the CAFRE Diversification Challenge Programme before being presented for funding. The Council suggests that this process is too inflexible and that it may discourage people from applying. It should not be compulsory for applicants to have to go through the CAFRE Diversification Challenge, if their business plan is robust and their business is well established. Each individual application should be assessed on the ability, experience and business skills of the applicant.

The Rural Business Investment Scheme is concerned with investing in localised projects that complement the areas local development strategy and which focused on a specific need.

The Rural Tourism Scheme is an important component of the rural fabric and it is key to maintain income levels in local rural communities. A focus of this scheme should be on areas such as the Sperrins that remain less

competitive to other tourism areas across Northern Ireland. Rural areas must build their reputations in terms of tourism and they cannot do this without having essential/basic services available to tourists and to their own community.

Under the Local Government Reform Programme, Councils will see local tourism transferred to them, with the provision of business support to benefit this important sector.

Omagh District Council proposes that the Rural Tourism Scheme should form part of the Community led approach. It should be developed and delivered accordingly with public and private partners along with clear community support. Tourism will be fully integrated in the councils' strategies and the type of activities proposed under the new Programme should converge with the aims and strategies of the existing and future councils.

In response to combating poverty and social isolation (basic service initiatives), these activities are very welcome and will fit well with the Councils' Community Planning responsibilities which provides for a wide range of integrated services at local level and support the rural community. Topics such as transport, access to broadband, innovative health solutions and childcare are vital as they ensure that rural communities can survive and prosper. Such activities are best delivered through Councils.

The measure for Village Renewal Schemes, similarly to Strategic Projects could facilitate immediate impact/benefit and spend. Omagh District Council similar to many other councils have developed in partnership with their village communities, actions plans that would permit substantial projects to commence with the announcement of the new Programme, that would kick start village regeneration at this time of continued economic uncertainty.

Question 32

How might these schemes (Rural Business Development, Rural Business Investment, Rural Tourism, and Combating Poverty Social Isolation – Basic Services, Village Renewal) be improved upon to meet the needs of your sector? Please provide reasons / evidence to support your views.

Comment

The most effective way for the schemes to be enhanced is for them to be fully integrated within the Council's wider powers and suite of functions. By including them within a community planning led funding approach, will allow all strands to contribute to wider strategic interventions.

Question 33

On which issues should the proposed All Island Co-operation scheme focus in order to address deprivation and disadvantage in rural areas most effectively? Please provide reasons to support your views.

Comment

It should be highlighted that this element in the current programme has not been effective and very significant changes should be put in place for the new programme.

Omagh District Council would suggest that if Councils are able to take a more proactive role in this measure in future, will allow for more effective cooperation to take place.

Question 34

Should a scheme to address deprivation and disadvantage through North/South Co-operation focus only on those regions in the north adjacent to the border, or should it cover all rural areas in the north? Please provide reasons to support your views.

Comment

The Council considers that all rural areas should be able to avail of the funding, however, those areas nearest the border, should have access to greater funds. For example, a rural community on the West Tyrone/Donegal border, should have access to greater funds than a village on the north coast. Particular scope exists for linking with Interreg projects.

DELIVERY MECHANISMS

Question 35

How much of the programme budget should be allocated to the LEADER approach, and why?

Comment

Omagh District Council has significant experience of implementing the LEADER approach both in the current RDP as part of ARC north west and in the former programme, as part of West Tyrone Rural. The principle of the LEADER approach is positive, however, the inflexibility which the Department has adopted in relation to the current programme, has highlighted the shortcomings in the LEADER approach.

The Department's delays in getting the current programme operational, are already well documented. This has meant that since the beginning of the current programme, the focus has been on spend. The current approach of delivering everything under Axis 3 has been detrimental to the overall spend and progress of the programme, and was responsible for the Department's suggestion to allow for strategic projects.

In light of this, and in recognising the greater powers of the new Councils in respect of Economic Development generally, tourism, community planning, regeneration and place shaping, Omagh District Council would propose that a considerable lower percentage is allocated through a "pure" LEADER approach, possibly in the region of 5%-8%. Input to the remainder of the programme can be achieved through wider community planning and partnership structures.

The Council notes that the Department appears to be taking a particularly inflexible view of the LEADER approach – Councils themselves can be delivery vehicles through the LEADER approach, but to date, this has been dismissed by the Department.

Question 36

Which measures/schemes should be delivered through the LEADER approach, and why?

Comment

Based on the current and previous programme, the LEADER approach is best suited for small grants, particularly relating to rural business. Such interventions could be supported through the wider economic development

initiatives of Councils.

There may be some benefit in some Access to Basic Services initiatives being considered in the first instance through the LAG. Strategic projects, Village Renewal, Tourism and community aspects of Basic Services are best removed from a LEADER delivery approach.

Omagh District Council notes with concern that no meaningful transition arrangements have yet been discussed with the Councils, Joint Committees and LAGs, to link the current programme with the new programme. This should be addressed as a matter of urgency.

Question 37

Which measures/schemes should DARD deliver itself and why?

Comment

The Council considers that DARD should deliver the Agri specific measures, which largely accounts for Priorities 1 – 5. The Department should have no role in the delivery of Priority 6.

Question 38

Which measures should be delivered by bodies (including Councils) other than Local Action Groups and why?

Comment

Omagh District Council fundamentally disagrees with the statement on p.86, para 14, in which it states DARD is not transferring any functions to local government. As well as being a complete reversal on the Department's previously stated commitments, given the wider powers allocated to Councils, including a much wider suite of functions and funding, it makes no sense.

The most straightforward approach to consider the delivery of those RDP measures aligned to Priority 6, is through a community planning approach. In this way, Councils can work with stakeholders, statutory partners and communities to identify needs, and prioritise interventions which can be supported through various funded programmes, including the RDP.

Having evidenced community need, Councils should be responsible for the delivery of economic development/support measures generally, as well as those for tourism, village renewal, basic services, and, should the opportunity arise, Strategic projects.

Omagh District Council notes with concern that no meaningful transition arrangements have yet been discussed with the Councils, Joint Committees and LAGs, to link the current programme with the new programme. This should be addressed as a matter of urgency.

Question 39

If there are insufficient funds to support the proposed programme should the available funds be distributed across all the proposed schemes?

Comment

Yes; in this regard Omagh District Council favours option two as detailed in the document.

Question 40

If there are insufficient funds to support the proposed programme which schemes do you consider to be the highest priority and why?

Comment

Please see answer to Question 39.

Question 41

If there are insufficient funds to support the proposed programme should funds be transferred from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development) to bridge the funding gap? If yes how much?

Comment

Yes; as per the answer to question 39, Omagh District Council considers the rural development suite of measures as appropriate for rural communities as the agri specific measures. The value of the current Axis 3 is £100m, and the Council would hope that as near as possible to that figure is secured for the new programme.

ADDITIONAL COMMENTS ON THE RURAL DEVELOPMENT PROGRAMME 2014 – 2020

If you would like to put forward any additional comments on the Rural Development Proposals 2014 – 2020 please use the following section:

Comments

As evidenced from the comments made, Omagh District Council welcomes the opportunity to respond to the Consultation on the Rural Development Programme 2014-2020. The Council hopes that the comments and suggestions made will be given full consideration and they will be reflected in the final document.

The Council's key recommendations/suggestions may be summarised as follows:

- The need for immediate confirmation of budgets, regulations and delivery mechanisms;
- The need for a transition mechanism to maintain experienced Project teams, support a programme of animation, develop spade ready strategic/legacy projects in readiness for the new Programme;
- The impact of Local Government Reform in Northern Ireland and in particular the enhanced functions and powers of the new Councils need to be recognised in the document and we would recommend that further consideration is given to this before the finalisation of the new Rural Development Programme 2014-2020;
- The need for a less process driven, bureaucratic programme, rather a flexible more attractive programme to the customer with a less complex delivery mechanism.

152. Society of Local Authority Chief Executives and Senior Managers (SOLACE)



22 October 2013

Rural Development Programme Management Branch
Room 407
Dundonald House
Upper Newtownards Road
Ballymiscaw
Belfast
BT4 3SB

Dear Sir/Madam

Rural Development Programme 2014 - 2020 Public Consultation

I understand that the Department is not accepting late submissions to the above consultation which closed yesterday. Solace has not been in a position to submit a separate response before yesterday's deadline.

I would point out however that Solace members have been closely involved in the compilation of the response submitted by NILGA and have given that document its full endorsement. I hope this fact might be taken into account in your analysis of responses.

Yours sincerely

Liam Hannaway

Liam Hannaway
SOLACE NI Chairman

153. Strabane District Council

1. Introduction

1.1 Strabane District Council's response to this consultation is informed by comments made by members of the public at consultation seminars hosted by Strabane District Council on 03 October 2013.

1.2 Strabane District Council also fully supports the consultation response issued by the Northern Ireland Local Government Association in this regard.

1.3 Strabane District Council welcomes the opportunity to respond to the consultation. The feedback from the local consultation with farming groups, private and social economy businesses and community groups in the area has demonstrated the wide interest in the Programme.

1.4 The Rural Development Programme provides very valuable resources to the Rural Community and it is imperative that this funding is maximised in order to meet the needs of the farming community and also the wider rural community as well as safeguarding and enhancing our rural environment.

1.5 The Review of Public Administration places the local authorities in a strategic role as part of the Statutory Community Planning Model, working with partners to deliver essential local services and in the planning and delivery of economic development at a local level.

1.6 Local Government Reform will see the 11 new Councils formed and 11 new community plans implemented from March 2015. It is within this context that Strabane District Council welcomes the recognition of the need for an integrated and coherent approach to economic development within the region and the role of a partnership approach in delivering on this ambition. **Local economic development, including rural development, should be a primary responsibility of councils** – like Planning.

1.7 Strabane District Council welcomes the commitment by DARD in the Regulation Framework to work in partnership with the Department of Enterprise, Trade and Investment (DETI), and the Department for Employment and Learning (DEL) to ensure that the activities funded under each of their programmes will complement the activities proposed for funding under the Rural Development Programme for Northern Ireland, 2014 – 2020. The further commitment to aim for complementarity within the proposed measures under the INTERREG V and Peace 1V programmes.

2. Background

2.1 Strabane District Council is a particularly rural district. It has a population of 40,100 people and has the fourth lowest population density of all District Council areas in Northern Ireland. It covers 861 square kilometres, accounting for 6% of Northern Ireland's landmass and making it the fourth - largest district council area in Northern Ireland.

2.2 Strabane District area has a rich and diverse range of landscapes, wildlife habitats and heritage features that together distinguish its special character and identity. The protection, promotion and enhancement of these areas are of vital importance to Strabane District Council.

2.3 The majority of Strabane District is situated in the foothills of the Sperrin Mountains, this includes the highest, most scenic mountains in the Area of Outstanding Natural Beauty. The Sperrins have recently been only one of two places in Ireland to be designation within the top 101 international scenic driving routes by National Geographic.

2.4 Regarding landscape scale, Killeter's Forests collectively make up one of the largest areas of conifer planting in Ireland. Strabane District also has some of the finest angling rivers in Europe, with most of the district's rivers being designated Special Areas of Conservation.

2.5 Despite this significant natural heritage, the Strabane District Councils levels of deprivation are well rehearsed. In 2012, 44% of our population live in the most deprived super output areas in Northern Ireland. 36% of the population living within Strabane District is classified as being income deprived. The area does not have a well-developed tourism industry, receiving approximately just 2% of total visitor numbers to Northern Ireland.

2.6 Pillar 2 of the Rural Development Programme provides essential income to farmers in the Strabane District Council area given the small scale hill farming, (primarily sheep and cattle). 83% of the farms in Strabane District are classified as mainly in 'Less Favoured Areas'. Subsequently, habitat enhancement/ environmental and conservation payments and the 'Less favoured areas Compensatory allowance' are essential for the farming community in this area.

2.7 Work carried out by the New Policy Institute and published by the Joseph Rowntree Foundation found that poverty is higher in the west of Northern Ireland than in the east. For example, in the **Rural West 24% of people are in poverty** as are 23% in the urban west compared with 17% in poverty in both the rural and urban east of Northern Ireland.

3. Specific Commentary

PRIORITY 6: Promoting Social Inclusion, Poverty Reduction and Economic Development in Rural Areas

Q31 + 32 Proposed Priority 6 Schemes (Rural Business Development; Rural Business Investment; Rural Tourism; Combating Poverty and Social Inclusion-Basic Services; and Village Renewal):

3.1 Access: Consultees within Strabane District stressed the need to strengthen access to welfare information and advice/ citizens advice (e.g. benefit entitlement) to maximise income in rural areas. There is very little mention of this need/gap in the consultation documentation. This is particularly important within the context of the projected impact of planned welfare reforms for areas such as Strabane District (the research commissioned by NICVA has identified Belfast, Derry and Strabane as the council areas which will be hardest hit by the reform with a loss to the economy in Strabane estimated to be £22M).

3.2 Access to education is a basic requirement and requires further high level discussion between DARD and DEL to rural proof current policy. For example a minimum requirement of 14 people to run an adult education programme is not feasible in rural areas, with education programmes to address this gap then deemed ineligible as considered statutory responsibilities).

3.3 Rural transport was missed out in last programme due to limitations on mobile infrastructure. As this is a key basic service, rural transport should be exempt from this rule.

3.4 Accessibility: Strabane District Council endorses the increased commitment to improve “animation” – access, information and support as well increased advertising/promotion to make people aware of the programme.

3.5 Change in geographical boundaries: There is a need for a provision for cross-LAG projects to minimise complications. This would be particularly important for projects running across two areas within a current LAG area (e.g. Strabane/Omagh). It is unclear would the project have to apply to 2 different LAGs post reform of local government?

3.6 There is a need to provide revenue funding (e.g. salaries, programme costs etc) as well as capital to contribute to sustainability of infrastructure invested in. A reliance on other departments/agencies providing the revenue funding is not realistic – it assumes a level of cross-departmental alignment and joint working which may not be in place.

3.7 Community groups need access to advance funds to help with cash-flow. Time taken to process payments also results in cashflow difficulties for small businesses. This is a particular issue for groups/businesses in deprived areas.

4. Q33 & 34 All Island Co-operation:

4.1 There is a greater need for support for economic development in border areas and there needs to be a recognition of the complexities associated with 'frontier' workers.

4.2 Strabane District Council suggests that the scheme to address deprivation through North/South co-operation should only focus on border counties. This scheme should not include regions beyond the border.

4.3 There are clear anomalies between programmes in NI and RoI. Subsequently there is a need to address differentials in grant levels/rates as they are higher in RoI (e.g. 75% compared to 50% in NI). There are also inconsistencies in the definition of match funding re cash and in-kind contributions. For example, in NI, the restriction on using in-kind contributions as part of match funding for farm diversification is an unnecessary barrier. Need consistency for cross-border working.

5. DELIVERY MECHANISMS

Q35 & Q36 Delivery through the LEADER approach:

5.1 There is no clear rationale for reducing the allocation to a LEADER approach going forward. It should be the same, or a higher percentage if the overall funding is reduced. It is also vitally important to have local control and ownership of the funding. Strabane District Council would also suggest that there is scope to broaden LEADER to Priority 4 to tie into rural tourism and Priority 1 for training.

Q37 Delivery through DARD:

5.2 There is a significant concern with how departments currently work together. DARD needs to work more closely with other departments such as DSD to deliver projects in rural areas. The programme should include “rural proofing” across all departments/ agencies – with consideration given to easement of rules for rural areas where appropriate.

Q38 Delivery through other bodies:

5.3 Implications of ‘State Aid’ is a good example of why Councils should lead programmes.

5.4 Mechanisms should be put in place for councils/agencies to apply on behalf of community organisations who do not have the capacity, resources or cash flow to develop and deliver projects.

6. FUNDING SCENARIOS & PRIORITISATION OF INTERVENTIONS

Q39 Distribution across proposed schemes if insufficient funds:

6.1 If one scheme is under-subscribed within a priority, there should be the opportunity to re-distribute funds within other schemes/priorities of the specific LAG – not to allocate to another area/LAG.

6.2 Grant rates should be reviewed to maximise spend i.e. increase intervention rates in NI to bring in line with RoI. The ‘DeLorean’ rule has been used as the rationale for limiting the intervention level in NI but State Aid is also applicable in the RoI where intervention rates are higher. This has been a huge obstacle to spend in current economic demand rather than lack of demand for funding as well as difficulties associated with the overall bureaucracy of the programme.

Q40 Highest Priority if insufficient funds:

6.3 Each sector would prioritise the priority most relevant to them – would need strong rationale for basis of prioritisation (e.g. evidence of need considered?). Otherwise, funding should be allocated equally across the schemes.

Q41 Funds Transfer from Pillar 1 (Direct Payments) to Pillar 2 (Rural Development if insufficient funds):

6.4 This is hugely dependent on the sector. Community groups /businesses would be supportive of this approach but farmers are unlikely to support it.

7. PRIORITY 1: Fostering Knowledge Transfer and Innovation

Farm Visits

7.1 There was a high level of interest in farm visits as a good way to exchange information/ innovative ideas with other EU countries.

Training

7.2 Whether training for farmers should be compulsory would depend on the individual requirements (and not put the farmer outside of their comfort zone). The training should last for 1 or 2 nights (not 12 weeks) and should be open to any of the farm family members. There were different opinions as to whether the farmer should be reimbursed for training; some felt that reimbursement should be in place if training was compulsory and to assist in meeting the cost of providing cover for their work whilst at training. However it was also highlighted that other businesses have to pay for their own training and that farmers should be no different, particularly if benefiting from funding. Training should be appropriate to/ tailored to the needs of the specific farmer (e.g. a recent graduate unlikely to need generic business training if it was part of their degree course).

8. PRIORITY 2: Enhancing Competitiveness and Farm Viability

8.1 Investment/support to sustain existing core activities is important – if farmers can't sustain these then it is unlikely they would have the capacity/resources/time to support innovation or diversification. Upgrading of farm buildings/yards/fields is critical. It was felt that, by replacing farm buildings, farmers should be allowed to re-position/re-locate as a location may no longer be appropriate if it cannot accommodate modern machinery or access for vehicles.

8.2 Drainage was also highlighted as an issue due to the productivity of land being diminished. It was felt that more money should be prioritised for this area because of the high costs associated with making improvements necessary to increase productivity and sustain agriculture.

8.3 Upgrading of rubber slats, cubicles, slurry mixing points, outside sheds, calving pens and concreting yards all should be considered. Consultees felt that this falls under animal welfare and a risk assessment should be carried out to show the need. The importance of health and safety was also highlighted.

Young Farmers

8.4 It was felt that a support scheme is needed for young farmers.

What is an active farmer?

8.5 It was felt that a definition of this is needed. An active farmer is not just someone who keeps stock, growing crops is also a farm business.

9. PRIORITY 3: Promotion of Food Chain Organisation & Risk Management

9.1 Large-scale food processing was not considered to be as high a priority as other sectors/areas given the small minority of people affected.

10. PRIORITY 4: Restoring, Preserving and Enhancing Ecosystems

10.1 Concern was raised around the LFA scheme removing the stock requirement. It was felt that without stock grazing the whole fabric of the countryside would look different. The importance of retaining a link to stock was highlighted. Similar scheme did not work in Scotland. A farmer who is under grazing could be penalised.

10.2 In the Consultation document all the land mentioned was SDA (severally disadvantaged areas) - there was no mention of DA (disadvantaged areas) or lowland.

10.3 It was felt that there should be support provided for farmers for the breeding of stock under Pillar 1.

11. PRIORITY 5: Promoting Resource Efficiency, Low Carbon & Climate Resilient Economy

Manure Efficiency Technology Scheme (METS)

11.1 It was felt that the MET scheme was more applicable to contractors than farmers due to the high cost of equipment. Unlikely to affect people in Less Favoured Areas (proposed to be re-designated as Areas of Natural Constraint ANC).

Renewable Energy

11.2 It was felt that the grant rate for this should be increased.

Countryside Management Scheme

11.3 Currently this is being tied to Single Farm Payments. It was felt that these should be separate as many farmers are missing out as they don't know that they should be claiming for both together.

12. OTHER COMMENTS UNDER PRIORITIES 1-5 CONSULTATION:

12.1 It was felt that there needed to be more publicity and 'animation' around grant deadlines. This will ensure that applicants are aware of timescales and of what is eligible. Consultees supported any efforts to improve accessibility, awareness, information and support.

12.2 In respect of priorities if funding is limited, the upgrading of buildings (Priority 2) should be a greater priority and less should be included in Priority 3 for food processing. There was agreement that no money should be moved from Pillar 1 into Pillar 2 as proposed, particularly if spend targets not achieved for Pillar 2.

12.3 The difference between grant rates in Northern Ireland and Republic of Ireland should be addressed as a matter of priority. Strabane District Council would advocate for a consistent approach and stress that this alignment would help achieve spend targets.

Ends ----