Methodological fallacies and perceptions of rural disparity: How rural proofing addresses real versus abstract needs

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A B S T R A C T

In 2016, the EU committed to 'rural proofing' its policies. Rural proofing has now become a priority across Europe. Prior to this, rural proofing or mainstreaming, the reviewing of universal policies to ensure comparable treatment of rural areas, was relatively unique to England and Northern Ireland. The first case of legislating rural proofing has occurred with The Rural Needs Act (Northern Ireland) 2016. Qualitative data was collected from civil and public servants with experience of pre-legislative 'rural proofing', as well as those facing new responsibilities under the Act. Additional data was obtained from key informants active in agricultural, environmental, and rural organisations. Several key findings emerge, all underpinned by a central issue: that the approach entirely stands on an assumption of rural disadvantage, the nature of which is never articulated. We argue that this is not driven by a lack of evidence, but by a more fundamental problem: the pervasiveness of viewing rural issues through a lens tinted by methodological fallacies. Failure to correct for these weaknesses by means of a dynamic theory of rural leads to flawed policy, because it is designed to treat disparity rather than accommodate diversity. In other words, it is premised on a binary of urban/rural. The findings of this research will inform the development of rural proofing policies going forward.

1. Introduction

Rural policy has reached a crossroads. Historic patterns and perceptions are under pressure from social, economic, and technological dynamics. For example, the European Commission (EC) has communicated a future vision for 'strengthening the social and economic fabric of rural areas' that emphasises rural mainstreaming and rural proofing: the consideration of how resources, policies and programmes at the most general levels impact on rural communities (European Commission, 2017). The tensions around adopting such an approach are particularly visible within the United Kingdom (UK). The impending break from the European Union (EU) has invigorated debate on rural strategy amongst the devolved nations, particularly the future role of rural development policy. The rural mainstreaming model put forward by the EC, based on rural proofing and rural champion, was developed primarily within England (Shortall and Alston, 2016; Atterton, 2008) as a national rural strategy after the introduction of rural development within the Common Agricultural Policy (CAP) (Shortall, 2012, 2013). Similar approaches have appeared, mainly within UK, Commonwealth and Western European contexts such as Sweden, Canada, Australia and Northern Ireland. Most of these are embryonic.

Only the UK has a long well-established tradition of rural proofing. Northern Ireland is unique in that it has pioneered legislating for 'rural needs' by placing a 'due regard' duty on public bodies.

The implementation of rural proofing in these countries have tended to copy the English approach. While there are commitments to implementing rural proofing, there is very little academic literature on this policy. There have been policy reviews of rural proofing, and in England, Northern Ireland, Finland and Canada it has been found wanting because of a lack of clear policy objectives and political will (House of Lords, 2018; Cros, 2017). These cases are all similar in that they are applied to relatively advanced economies in a global context, and the approach assumes that 'rural' is in a position of disadvantage and requires additional consideration and support. Rural proofing uses a blunt rural/urban binary. Cros (2017), commenting on the EU adoption of rural proofing states his concern that rural areas are falling behind urban areas and notes that this is worrying because it continues to grow (p. 34), and questions if there is the political will to ensure rural proofing will be effective. The Department of Environment, Food and Rural Affairs in England has described their role as championing rural proofing to take account of the specific challenges and opportunities for rural business and communities, and ensure those who live, work and

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travel in rural areas are not disadvantaged (House of Lords, 2018). The rural needs act in Northern Ireland was implemented to safeguard the needs of rural communities (O'Neill, 2016). The rural proofing guidance always states that public authorities must ensure that policies do not disadvantage people in rural areas compared to people in urban areas (DAERA, 2017; 5.28). Similar to gender mainstreaming, rural mainstreaming or proofing is premised on a categorical disadvantage; women compared to men, rural compared to urban. They are policies that rely on binaries. Interestingly, research looking into the transferability of 'rural proofing' from England to Australia found that it is only effective for cases in which rural and urban are sufficiently *similar* to one another (Shortall and Alston, 2016). This suggests that rural mainstreaming, as a rural development strategy, is only appropriate when the fundamental justification for its existence (difference and/or disadvantage) is not very pronounced. This leads to fundamental questions about the relationship between how rural is *understood* within wider social and economic contexts, and the resulting impact on public policy development.

In this article, we argue that the use of this binary is methodologically flawed. The next section reviews some literature that informs our arguments. We begin by reviewing some literature that identifies the limitations of the urban/rural binary, and the dangers of attributing causality to space. Then we turn to Michael Burawoy (2013), who has written about how he committed methodological fallacies in his ethnographic research. We use his schema to demonstrate how policies on rural proofing commit the same policies. Next we review Elena Saraceno's (2013) work which argues that rural policy favours a disparity approach, 'one size fits all', over a diversity approach, which recognises contextual differences within rural areas. This helps understand the urban/rural dichotomy underpinning rural policies. Following the literature review, we summarise relevant historical developments in rural policy generally, and specifically rural mainstreaming, including the 'rural proofing' and 'rural needs' models. After this we present our methodology and research findings. The data to support our argument are from research carried out in Northern Ireland during the year 2016. The project was commissioned by the Department of Agriculture, Environment and Rural Affairs (DAERA) to investigate and provide advice on the implementation of the Rural Needs Act (Northern Ireland) 2016. Focus groups and semi-structured interviews were carried out with civil servants, public servants, and key informants associated with agricultural, environmental, and rural organisations.

We conclude by showing the flawed assumptions underpinning rural proofing in Northern Ireland, in particular an assumption of disadvantage. Rural proofing does not take into account context or processes of social change. It is poorly articulated with no clear policy goals or objectives. There are important messages for the European Union given its stated commitment to implementing rural proofing in the future. While numerous policy reviews of rural proofing are highly critical of how it has been implemented, there is very little academic research. As Rural Connections (2017) notes in its focus on rural proofing, whatever one's opinion of rural proofing, we can expect to hear a lot more about it. We hope that this article will inform and inspire further debate about this policy concept.

2. Literature review

2.1. The urban/rural binary

In one of her seminal works, Massey (1992) stated 'geography matters'. She argued that space is socially constructed, and the social is spatially constructed (p.70). While she distinguishes space and place elsewhere (Massey, 2004), she does not include place in her rationale for why geography matters. She does argue though that to attribute causality to space would regress geographical theory by two decades, and she argued this over two decades ago (Massey, 1992). In sociology, the tendency is to attribute causality to place, while spatial relations are

seen as something that transcend place, and occur beyond place. Massey's arguments about space being the realm of stasis seems more appropriately attributed to place, and rural place. She does associate this stasis with nostalgia. Interestingly, while she presents time as the realm of change and progress, she does overtly link it to the urban (Massey, 1992, p. 73; 2004).

Massey (2004) dismisses ideas of local place as being more 'real', 'grounded' or 'authentic' than space. The lived reality of our daily lives is such that we move in many spatial circles, and the identity of place is produced by social relations that go far beyond a certain place. Massey particularly objects to the idea that local place is the 'victim' of globalisation (2004; p.13). Place is still important to individual identity, and remains so, despite (or perhaps because of) increased travel, telecommunication and mobility (Savage, 2010; Shucksmith, 2012). There is often an understanding of rural that is nostalgic, with a positive view of rural places (Brown and Cromartie, 2004; Shucksmith, 2012) and an attempt by rural elites to maintain the type of 'stasis' described by Massey (Shucksmith, 2012).

From the inception of sociology, and Ferdinand Tonnies' development of the concepts Gemainshaft and Gesellshaft[1], there has been an urban/rural dichotomy with urban and rural studies as distinct fields of enquiry. The value of this dichotomy has frequently been questioned (see for example Pahl, 1966; Champion and Hugo, 2004; Shucksmith et al., 2005). While context is appreciated in the social sciences, the distinction between urban and rural is seen as less useful than it was in the era of industrialisation (Brown and Cromartie, 2004). Brown and Cromartie (and many others) are highly critical of traditional approaches that treat rural (and urban) as a single undifferentiated entity. Boundaries have become blurred, spatial flows are different, and people often live in one place and work in the other. Champion and Hugo (2004) consider urban-rural differences in UN tabulations and comment that the most interesting feature of this exercise is that only 37 of the 228 countries can actually provide an urban-rural split, and only five of these 37 are More Developed Countries (Champion and Hugo, p. 5). The fact that it is not a useful way to view contemporary settlement patterns is evident in the fact that countries no longer gather data in this way.

Yet place matters for identity, and it also matters in shaping life chances. Brown and Cromartie (2004) present it nicely; place does not have causal power, but it acts in a contingent manner. They note that education is positively related to income in all locations, but the strength of that relationship varies across labour markets depending on their industrial and occupational structure. Returns are higher in some spatial contexts, and here there often is a rural urban differential, but also rural/rural differentials, and urban/urban differentials. The same social processes occur in different places, but may have a different expression; as Brown and Cromartie show for returns on education, McMichael (1996) for capitalism and globalisation, and Shucksmith (2012) for the construction of social class. However, it remains the case that distinguishing between urban and rural areas based on population density does not help us understand real differences in living conditions and quality of life (Shucksmith et al., 2005). The rural/urban binary is no longer helpful. Yet, this is the binary that underpins rural proofing policies.

2.2. Methodological fallacies

Burawoy (2013) makes an argument for facing up to and understanding methodological fallacies that can lead to the misinterpretation of evidence. These arise from his reflections on his own work where he failed to reflect on how the world had changed, and how his

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[1] Gemainshaft being understood as the 'community', close social ties and rural way of life that was being lost with industrialisation; Gesellshaft being understood as the 'society' or anonymous impersonal way of urban life that developed with the city (Tonnies, 2002).

assumptions were outdated. He identifies three contextual fallacies (ignoring, reifying and homogenizing the world beyond the field site) and three dynamic fallacies (viewing the field site as eternal, treating the present as a point of arrival instead of departure, and wishful thinking). *Ignoring* is the trap of applying a boundary on the potential forces shaping the evidence, for example leading to an overemphasis on national ideology when global institutions and markets may be relatively more important. He gives an example of how Hungarian workers he interviewed chose to emphasise the reality of their lives over ideology, however he continued to project a socialist consciousness onto them. *Reifying* is when, even in cases with sufficient scope in terms of providing context, the larger forces at work are assumed to be fixed, instead of the result of a churning of social processes in their own right. A further fallacy can obfuscate interpretation of evidence, if the external context is assumed to be *homogenous* as well as obstinate, such that conflict between competing influences is not considered in the analysis. The danger associated with *viewing the field site as eternal* stems from assuming that the patterns revealed by the evidence during the study period reflect a permanent state, when in fact they could reflect a 'short-lived, unstable holding pattern' (Burawoy, 2013; 529). What's more, there is a real danger of entering into a study from the beginning with the implicit, and unfortunately misleading, assumption that the evidence gathered reflects *the present as a point of arrival rather than a point of departure*. The final methodological fallacy Burawoy illustrates, involves the projection of a researcher's hopes and ideals onto subjects, therefore confusing the analysis of data with *wishful thinking*. Burawoy argues that these pitfalls are not *caused* by theoretical presuppositions, but rather by *insufficient* theoretical groundwork, which, if fully engaged, would have revealed the importance of both context and dynamics.

2.3. Binaries again: disparity and diversity in rural policy

In her review of the construction of European rural policy, Saraceno (2013) identifies a fundamental weakness in rural policymaking: the modification of theoretical concepts as they transition from the academic sphere to a political one. Due to the nature of rural policy, whereby 'rural' is 'hosted' by a range of policy areas, there is a theoretical vacuum, only partly filled by a hodgepodge of concepts linked to different disciplines 'neither conceived specifically for rural areas, nor always coherent' (p. 332). She identifies two distinct concepts that have particularly suffered in translation from theory to practice, merging and mixing to justify policies in a way that is 'not always consistent with the empirical evidence behind them' (p. 333). Disparity connotes dichotomy: rural and non-rural, low and high incomes, small and large farms. The underlying assumption is that there is an ideal, or target, and that policy intervention is there to remove the barriers present within the weaker category in order to 'catch up' to the more successful one. The oversimplification of both the current state of affairs as well as the targeted outcome means that policies based on the 'disparity' framework make 'few allowances for differential local conditions, and thus end up addressing abstract rather than real needs' (p. 337). Whereas diversity as a theoretical framework is rooted in unique local characteristics that can continue to exist over time because 'diversity' policy accommodates different strategies to facilitate meeting *diverse* targets. The approach removes the assumption present in disparity frameworks that there are inherent structural impediments 'that make rural areas less competitive by definition than urban areas' (p. 336).

Saraceno (2013;333) questions why, despite considerable evidence that shows rural areas have changed dramatically with the industrial revolution and modernisation, there is a resolute persistence to maintain obsolete assumptions about rural areas. There is a tendency to think of rural areas as pre-modern. She questions why this is the case and argues that it relates to the path dependency of rural areas, which is strengthened by interest groups, established stakeholders, governance arrangements and power relationships. She argues that top down policy

prescriptions will tend towards disparity or binary approaches because they are easier to implement, even though policy reviews have repeatedly shown that they are less effective policy instruments.

In summary, there are a number of key messages from the literature review that inform our analysis. The use of the urban/rural binary ascribes causality to place and obscures the gradations between each category. There are assumptions that are made about rural that were accurate for a pre-industrial time, but which no longer hold true. Yet, path dependency within rural policy means that underlining principles are sometimes unchallenged. We return to these arguments again in our conclusions. Now we turn to look at the background and context of rural proofing.

3. Rural proofing: background and context

Rural policy largely originates from agricultural policy reform motivated by the progressively diverse structure of rural economies, and resulting decreasing benefit to rural communities from narrow industrial policies (Bryden, 2009; Bryden et al., 2010; Shucksmith et al., 2005; Shortall, 1996; Copus et al., 2006; Shortall and Alston, 2016). However, some argue that rural *development* as a *practice* is not necessarily triggered by the *political* (Douwe van der Ploeg et al., 2000).

The EU introduced a rural development programme as the 'second pillar' of the CAP (European Commission, 1998). The approach is primarily area-based, with an emphasis on local, or, bottom-up targeting and administration of resources. The application across member states of the initial EU rural development programme, and subsequent manifestations (e.g. LEADER, LEADER+), reveals numerous strengths and weaknesses of such a policy (Shortall and Shucksmith, 2001; Bock, 2004; Special Issue of Sociologia Ruralis, 2000). There is evidence of a shift within the EU towards a model of rural mainstreaming, whereby the CAP functions as the 'rural champion' but greater emphasis is placed on maximising the 'capacity to promote rural prosperity' through EU funds more broadly by implementing 'rural proofing' to systematically review policies through a 'rural lens' (European Commission, 2017; 22). The concepts and terms applied in the communication on CAP reform largely mirror the English approach to mainstreaming rural policy within wider national policies (Sherry and Shortall, 2018; Shortall and Sherry, 2017; Shortall and Alston, 2016; Shortall, 2012, 2013; Atterton, 2008), a relatively unique approach amongst Organisation for Economic Cooperation and Development (OECD) members (OECD, 2011). Canada utilises a 'Rural Lens' strategy, combining coordination and checklists to complement formal statutory structures (Eager, 2013). The 'Rural and Northern Lens' is provided to provincial government to fight a 'lack of forethought about the consequences of applying a one-size-fits-all approach to a specific policy area' while noting that 'there are many rural communities plagued by long distance and low densities of population within which it is very difficult for municipal governments to assume additional responsibilities' (ROMA, 2015; 3).

Rural mainstreaming can be described as meeting rural objectives by auditing general policies to ensure comparable benefits accrue to rural, as well as urban, communities across a relatively broad context (e.g. national). In other words, *coordination* and *cooperation* amongst policymaking and delivery is preferred over parallel *rural* policy. Although motivated by concerns around rural disadvantage, the policy assumes undesirable impacts can be remedied by the review of general policies (see OECD, 2011; 21/22). The auditing process, referred to as 'rural proofing' in the English model, has historically focused on *processes* rather than *outcomes*, with the government department housing rural affairs acting as a 'rural champion' by providing training, guidance and some form of monitoring (see for example, DARD, 2015; Defra, 2015). The practical application of rural proofing often depends on the use of some form of rural impact assessment, with the mixed objectives of walking civil servants through an evaluation of rural impacts, as well as offering some visible evidence to feed into monitoring by the rural champion.

While the intention behind mainstreaming, ensuring fair or equitable access to public interventions, is not in itself contentious, considerable weaknesses in the practical application of rural mainstreaming have been identified. The historical reliance of rural proofing on processes such as statutory training, procedures and audits (see for example, DARD, 2015; Defra, 2015) over identifying specific targets or desired outcomes has raised concerns over how a single *process* could adequately reflect the diversity of rural issues relevant to the direct and indirect impacts of public policy (Shortall and Alston, 2016). Similarly, the authenticity of the auditing mechanism has been questioned because rural communities themselves are not adequately consulted (Atterton, 2008). External and internal reviews of rural proofing in England found numerous inconsistencies with how it is applied across different areas of government, allocation of responsibility, leadership and monitoring (OECD, 2011; 25) as well as insufficient uptake within the application of impact assessments and very minimal documented evidence (Defra, 2015; 14). Most recently, the House of Lords Select Committee (2018) concluded that the implementation of rural proofing had failed and they recommended that responsibility for rural proofing be removed from Defra and given to the cabinet Office. Similar issues have been identified in Northern Ireland, where the application of the English model was also reviewed and found 'disappointing' in its ability to shape policy (DARD, 2015; 11). Northern Ireland is an interesting case study to consider because it has launched a previously un-tested legislative approach to rural mainstreaming.

3.1. From rural proofing to rural needs

Rural proofing was introduced in Northern Ireland along with the first Programme for Government, committing all ministers to 'ensure that the rural dimension is routinely considered' (Northern Ireland Executive, 2001, p.48). Subsequently, the Department of Agriculture and Rural Development (DARD) published guidance (DARD, 2002) as part of its responsibility to develop and help implement the initiative. The Minister of Agriculture and Rural Development chaired the relatively high-level Rural Proofing Steering Group, made up of representatives across government, and charged with providing guidance, and reviewing the effectiveness of rural proofing by gathering information on the number and nature of policies subject to rural proofing, specific provisions to meet rural service delivery, and examples of best practice, to contribute to publishing an annual report.

Despite the production of evidence on how to reform rural proofing to be more *outcome* than *process* focused, such as separating advisory and watchdog functions as Defra in England had done (Northern Ireland Assembly Research and Library Services, 2009) the next iteration of rural proofing largely followed the existing approach. The changes included the publication of revised guidance, including a new 'Rural Issues Statement' pro-forma, replacing the existing rural impact assessment as part of the standard policymaking 'toolkit' (DARD, 2011). There is emphasis placed on incorporating rural proofing earlier on in policymaking, and extension of responsibility by government departments to apply rural proofing to activities of sponsored non-departmental public bodies. The role of DARD remained consistent: providing guidance, training, and an advisory service on their website. How the new Rural Impact Statements should be quality assured and signed off within Departments is not specified, although it is expected they be made available as part of public consultations, offering the only potential avenue for review and challenge. No monitoring committee or independent watchdog are identified. 'Equitable' is defined as proportionate to the need in rural areas – however, what constitutes specifically 'rural needs' is not defined. Instead, two rural organisations are listed as representing the 'needs of rural stakeholders'.

The characterisation of rural proofing becomes broader changing from examining policies 'carefully and objectively to determine whether or not they have a different impact in rural areas' (DARD, 2002, p.2) to using a 'proper assessment' to find the 'direct and indirect

impact' of a policy on rural areas (DARD, 2011, p.3). The issue of economies of scale is also treated differently. Instead of allowing higher unit costs as a potential 'adaptation' to differential rural impacts (DARD, 2002) the more emotive term 'rural premium' is used– and suggest it is something to be avoided if possible (DARD, 2011).

A FAQ from the 2011 guidance asking 'Who is responsible for monitoring the quality of rural proofing?' reveals that 'An independent evaluation will look at the revised guidance and training and how it has translated into effective rural proofing across government. The evaluation will also examine if there is a need for legislation.' While an independent review of rural proofing in Northern Ireland was not realised, a decision was taken to pursue a legislative route. The Minister of Agriculture and Rural Development introduced legislation to the Northern Ireland Assembly in November 2015 to put rural proofing on a statutory footing, and further devolve responsibility to include non-departmental public bodies themselves, and also local governments. The resulting Rural Needs Act (Northern Ireland) 2016 was granted Royal Ascent on 9 May 2016[2]. The Act places a duty on public authorities to have 'due regard to rural needs' when 'developing, adopting, implementing or revising policies, strategies and plans, and, designing and delivering public services'. 'Rural needs' are defined as 'the social and economic needs of persons in rural areas'. As passed, the responsible public authorities include government departments, local government, and a selection of non-departmental public bodies. Public authorities are obligated to compile information on how rural needs are addressed for inclusion in their own annual reports, and for submission to the rural ministry. Government restructuring led to the transition from DARD to the Department of Agriculture, Environment and Rural Affairs (DAERA).

Within the framework of the Rural Needs Act (RNA), DAERA maintains an advisory role, continuing the historical approach by DARD before it of issuing guidance and training, but also takes on responsibility for compiling information about rural proofing across public bodies into an annual report to lay before the legislative assembly. While the minister is tasked with making a statement, there is no clear indication of how, if any, formal 'watchdog' will be part of the monitoring and evaluation process.

4. Methodology

Qualitative data was gathered by means of focus groups and interviews. Three focus groups were carried out, one for each of the three categories of public bodies subject to the RNA: Northern Ireland Government Departments (GDs), Local Government Districts (LGDs), and Non-Departmental Public Bodies (NDPBs). The number of participants in each focus group ranged from 9 to 15 participants. There were two GDs unable to attend the focus groups, and in these cases semi-structured interviews were carried out with the nominated representative. The discussion was prompted by asking about what types of rural issues need to be considered in the context of their organisation, how and if rural proofing had been undertaken previously, and if any lessons had been learned and what issues were being raised within their organisation with the introduction of the RNA.

An additional three semi-structured interviews were carried out with key informants to obtain perspectives from rural, environmental and agricultural organisations. The conversations were initiated by asking participants how they felt their respective interests were addressed by rural proofing, how it could be improved, and how they understood the motivation and potential usefulness of the RNA.

Project information sheets describing the funding source, motivation and objectives of the research, and contact information for the researchers involved were provided to all participants. Written consent

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[2] http://www.niassembly.gov.uk/assembly-business/legislation/2011-2016-mandate/primary-legislation-current-bills/rural-needs-bill3/.

was also obtained. Focus groups and interviews were audio-recorded and transcribed. Transcripts were analysed by hand and with the software package MAXQDA (VERBI Software).

5. Findings

5.1. Reluctance and scepticism

A key theme emerging was a sense that the existing framework set out for rural proofing was more about meeting an administrative requirement than influencing or improving policies, programmes or projects. This was a common response amongst participants who already had experience with rural proofing.

> *It's another hurdle. That we, we can't go any further in the process until we, we tick that box. (GD#11)*

There was also reluctance from participants newly subject to rural proofing requirements under the RNA. This was based on experience with other impact assessments, such as those required for certain groups protected under equality legislation.

> *I suppose that's something I've learned as well from the equality side of things. It's so important that it's the relevant policies that we focus on, and that we don't establish a process where you have this 'whatever is to go through' whenever you develop any policy. We've learnt – we've paid the price, in relation to equality in doing that, when it turned into nothing other than process. (NDPB#1)*

There was also concern, particularly amongst LGDs with planning responsibilities, that there were likely to be conflicts between different dimensions of impact assessments, such as environmental and rural, and confusion over how to prioritise.

> *I'm going to say the overarching regional policy is what you say focus development in urban centres, not focus development in your rural area. Then whenever you've got various levels of national and international designations on top of that, that's a further reason why we would say, well in this particular area the balance should be towards, say, the protection of the environment as opposed to allowing one individual to build the business in the back garden because the potential multiplier factor is undermining your sustainability argument. (LGD#1)*

The RNA is largely seen as legislating the existing process-oriented approach. While some participants expressed that there may be potential for legislation to address rural interests, there was an opinion that the RNA was unlikely to be successful. One observed weakness was that there are no clear objectives for public bodies to focus on and work towards achieving.

> *So a wee bit of guidance maybe rather than you need to rural impact assess every policy you have, because it then becomes a tick box exercise. (LGD#8)*

Another issue was that there is no specification of the context under which a public body is defined as having failed to meet its obligations under the Act, and no indication of what, if any, sanctions would be imposed.

> *Well the act we thought was a really good opportunity and in principle was an excellent idea but it lacked, it was so vague and open to so much interpretation and the definition of rural wasn't there and until you have clear guidelines and good training and accountability is another thing as well, so if somebody isn't rurally proofing, what's going to happen because the rural needs bill never dealt with that, so there was no effort to have to do it right then, so things like that need to be brought in. (agricultural organisation)*

So in this sense, the RNA has failed to offer either a 'carrot' or wield a 'stick', as there is no beneficial outcome that is made clear to public bodies motivating them to adopt the procedure, and no foreseeable

consequences for largely ignoring it. There are additional uncertainties within the Act, stemming from the absence of solidifying key concepts. These are explored next.

5.2. Ambiguous policy

A pervasive theme across discussions with participants was the ambiguity, or lack of practicable understanding, of the key terms and concepts within the RNA. No definition of rural is provided or referenced within the Act. This omission has generated frustration amongst those whose organisations are built on representing agricultural/rural interests, because it is viewed as a potential 'loop-hole' through which public bodies can avoid more comprehensive rural proofing.

> *I guess also one thing that we've always said that is a really limiting factor of rural proofing is that there is no clear definition of what rural is and until you have that defined then what are you actually proofing then? At the same time, we understand that rural areas can't all be clearly defined so there needs to be a certain amount of flexibility but if you keep it too vague, it's not going to be used properly in the appropriate manner, so. (agricultural organisation)*

> *And we would have found … we would have asked them what was their definition and a high proportion of people maybe didn't even know … and then whenever we would have given the urban rural definition, they were surprised … there wasn't uniformity, there was no consideration to what they were actually trying to assess. So, if they said they rural proofed but they haven't the definition of rural, how did they do it? (rural organisation)*

Those representing public bodies subject to the Act were also frustrated. The complications of determining what constitutes 'rural' in different organisational and policy contexts was raised by many within GDs who have previous experience with rural proofing.

> *Just thinking about the definition of rural as well. You're talking about rural there, well, is this people that work in rural areas, or live in rural areas?...Maybe we just need about 10 or 12 different ways of defining rural. Centrally agreed upon so people can draw down off it as they need to. It's easier said than done of course. (GD#2)*

> *So the whole idea of classification and understanding exactly what – who people are and what business we're serving and what needs we're targeting I think – and this is on a much broader front than this. But this obviously ties into it. It comes back to this issue again, what are you talking about if you say rural? Is this what you mean? Because we may have a very different understanding of it. (GD#3)*

Here we see individuals tasked with rural proofing grappling with the limitations of the urban/rural binary. They understand that individuals move between spaces and that these are not homogeneous categories.

Participants were also concerned about identifying rural needs. It was unclear if this meant needs that are particular to rural areas, or, addressing all need in rural areas in the same manner as other more densely populated areas, and the difficulties this presented in terms of resource constraints.

> *… the reasonable provision to meet needs, and, you know, when does a need become a want? That leads us on to the evidence or, lack of, at times. (GD#4)*

> *And one thing I've been struggling with is the balance between the needs and demands of the small rural against the fee-paying public for the whole service, because to provide more, you have to increase the fee and the charge to even break even and cover it. And therefore everybody has to pay for it in its entirety. So there's that balance between a need and a want and a cost and an impact, we're finding that in our particular kind of business, you know? (GD#1)*

Sometimes you will assess the rural needs, and maybe say, "Look, this doesn't adequately meet the rural needs." but then there's a resource implication as well and a value for money implication. (LGD#4)

The ambiguity around 'rural need' is closely linked to issues identified by participants related to achieving 'due regard' to those needs, as required by the Act, and what would constitute a 'reasonable' adjustment to a strategy, policy, plan or service.

I think that's one of the challenges – what is reasonable? Obviously because I have chosen to live in rural area, I expect to travel further to a hospital. But where does that balance lie? (NDPB#3)

We're making assumptions and assessments saying, "So many minutes, so many miles is reasonable. (GD#1)

Participants raised concerns over the subjective nature of determining, or accepting, something as reasonable.

Even in terms of jobs, there is a culture that we don't want to travel further than a certain distance to work and that's a cultural thing here. Whereas if you look at some other countries, you wouldn't think twice of travelling an hour each way every day. So there's an issue with that as well. (GD#9)

For example, in our plan we had people objecting to the plan because they were living in an [Area of Outstanding Natural Beauty] and we were applying regional policy. We had letters coming in saying, "This is denying me my birth right. I've got 12 children and they all want to live at home." So straightaway, potentially there's another 12 houses in the countryside from one family. That's to say, where do you draw the line? (LGD#7)

Participants also raised concerns that the decision as to what is reasonable often falls to the individual preparing the impact assessment, and other individuals involved with the policy process or representing rural interests. Therefore the outcome of the rural proofing was felt to be subject to individuals' perceptions and opinions, as opposed to an objective and quality assured process.

When looking across the whole thing, it's down to my judgment as the person completing the assessment, and whoever that is in each of these other policies, it's down to that person's judgment based on contact with individuals. Depending on which individual you've talked to in the rural community, you've just said, some of them will say, "It's fine, dead on, crack on." And then you'll get 102 who go nuts in one area. And you're thinking, where is the balance, that can't be right. So for me it's that bit that's really missing, that definition of reasonableness. (GD#1)

There was also frustration expressed by key informants from rural organisations with a lack of clarity on who or how it is decided that a rural adjustment, if applied, is appropriate. In one example, a government department had adjusted qualifying criteria for rural areas, but this was not seen as sufficiently accommodating rural because of an over-reliance on objective, rather than subjective, indicators.

There were three or four other things, you know whether they were well linked into a community but ultimately it was about numbers … So, those are the three key factors and when we approached them then to ask them what have you thought about in terms of rural proofing, oh, well we have rural proofed it, and we go well how, there's not a rural proofing statement? Yea, but we've a separate target for rural. (rural organisation)

A lack of clarity about the rural proofing process is obvious. It is a policy without clear objectives.

5.3. Political sphere

Although the RNA (and previous iterations of rural proofing in Northern Ireland) has been driven by the minister responsible for agriculture and rural at the time, responsibility for it has been progressively devolved both organisationally (e.g. from just Government Departments to all public bodies) as well as within each organisation (e.g. from an initial working group at ministerial and senior-level to no documented standard as to how each organisations approves rural proofing activities). It became apparent in discussions with civil and public servants who participated that there was considerable confusion over what function elected officials should serve within the rural proofing process. Interestingly, none of the participants identified elected officials as a legitimate avenue for providing quality assurance or serving a 'watchdog' function. In some cases there was the feeling that the RNA devolved rural issues to public bodies to displace responsibility from the legislature.

I think the [Members of the Legislative Assembly] need to get their heads around what the rural strategy is for Northern Ireland because they come and ask us – Seems to be very disjointed the way they approach it. They're requiring us to deliver services that in theory they're legislating for. If they want them to be better for rural areas, they should try and legislate or set policy in that regard. (NDPB#2)

This resonates with Cros' (2017) concern that the EU commitment to rural proofing lacks teeth and detracts from the lack of rural policy commitments at the EU level.

The issue was raised that the RNA could be used to block initiatives put forward by public bodies that don't fit with a position held by individual politicians. The concern is that elected officials will react to a rural proofing exercise based on how their constituency is impacted.

I suppose that issues and the expectation would be of our esteemed [Members of the Legislative Assembly] who live in particular areas who maybe don't particularly like one of our proposals. Who would use the lack of rural proofing, and evidence of the lack of proofing, "Let me see exactly how you rural proofed that?" as a method to perhaps, to stall the implementation of particular proposals. (NDPB#4)

[Councillors] have historically lobbied on behalf of their constituents invariably. For example, they're coming in and saying, "This man, he should have his house in the countryside." But as a policy decision-maker they have to appreciate that they are governed by a set of rules. If you were to impose rural proofing as part of the process, we may end up that we never get the councillors to agree anything because the policy driving the rural proofing is going to show a negative impact and they're not going to be popular. (LGD#5)

There were conflicting opinions on the potential for evidence to ameliorate the tensions between politicians and civil/public servants. One participant did feel that evidence could be used to align public and political decision-making.

Your hope is a minister will make a reasonable decision. But for the minister to make that reasonable decision, I know that politics is where it always falls down. But it's by making sure you've got a good robust evidence base, and so that underpins everything you do, when you're rural proofing or anything else, to make sure you have a good data set. (GD#2)

However, the pervading impression is well summarised by one interviewee, who strongly states what was under the surface of the earlier quote from a rural organisation, that the motivation for, and therefore decision-making related to rural proofing, is (or in the opinion of the rural organisation, should) not be based on quantifiable indicators.

Doesn't matter, it's not about facts, it's about narratives, it's about framing, it's about values, it's about the heart, it's about a perception, it's not about the facts at all. (Interview#3)

Next we discuss how many of the issues raised previously often relate to the type and degree of ownership taken by the Ministry tasked with agriculture and rural issues for rural proofing and the RNA.

5.4. Lack of ownership

A common theme expressed across the range of participants was concern over how the RNA relates to the Department charged with representing agriculture and rural (DAERA) and to specifically rural strategies, policies, plans and services they administer. There was concern, particularly amongst officers within LGDs with rural development delivery responsibilities and rural interest groups, that in practice the Act will mute, rather than intensify, the visibility of rural issues.

I think the ethos of it was that everybody will have responsibility for it, but if everybody has responsibility for it, it's diluted then. (LGD#6)

One participant foresaw the possibility that the Act could be used to justify the dissolution of rural policy altogether.

My fear will be that they will hide behind the act as their requirement to deliver for rural development so you know that will be it in the future, that we're responsible for the Rural Needs Act, you know we're making sure everybody else is doing something for rural but us as a department don't actually have to deliver anything for rural because everyone else is doing it. (rural organisation)

The trepidation experienced by those with rural associations is most likely fed by the failure of DAERA to take on, or nominate, some agency within the Act to provide quality assurance and 'watchdog' functions. Participants with previous experience rural proofing, and no rural expertise, were surprised that there was so little oversight. The resulting inconsistency also made learning from best practice an unrealistic option for those tasked with rural proofing for the first time.

But it's hard to believe that DAERA wouldn't have a role, you know what I mean, in some kind of, you know to assess the quality of these, it's hard to imagine that our audit people would want to do it without, you know, it's hard to imagine it could be done without DAERA having some kind of a role in it, in the quality assurance of these things. (GD#7)

We've also struggled to find examples of existing rural statements and the ones that we did find, there's quite a lot of variation in them, too, which wasn't particularly helpful. (GD#8)

DAERA have not been clear as to what specific 'rural needs' are currently an issue, and what they are expecting public bodies to deliver in terms of outcomes by complying with the RNA. The absence of a clear strategic vision for rural areas probably goes a long way in explaining why a legislative approach was pursued. Given a clear rural vision, DAERA would have been more confident to rely on a strategy of cross-departmental interaction and influence, as described by a participant from a different department.

But, really what we're doing there is we're trying to talk to departments on an ongoing basis about their policy development and the areas in which we can collaborate, and we're trying to influence them on an ongoing basis, just through our structures. (GD#12)

5.5. Equating rural with neediness

A fundamental theme underlying many of the issues discussed earlier is the presupposition that the only policy-relevant feature of 'rural' is 'neediness' relative to the non-rural. This assumption permeates the Act, and raises several issues amongst participants. One perspective is that labelling 'rural' as 'needy' demeans those communities and can generate negative self-image or feed stereotypes.

Well it's almost like then you, you're already priming, you're gaming the system or you're priming it already to be, it basically becomes then a, a welfare recipient model because you've already pre, you've already built in, rural by definition is you're a victim, you're in need, you're vulnerable, okay therefore you, I think it's disparaging, it's inaccurate, I mean imagine in the same way that often deprived communities, and you hear this

all the time by local politicians, oh I represent a deprived community, then I mean just realise what you've said in terms of, do the people that you represent want you to portray them as a deprived area, I can see where it's appropriate, we can say yeah, there's evidence here in terms of free school meals and so on but to make this a public badge, rural equals neediness, I think it's something like describing women as always victims. (environmental organisation)

Another observation is that the approach acts as a self-fulfilling prophecy. Because there is no 'screening out' process, and a rural impact assessment expected with every new and revised strategy, plan, policy and service, there has been a tendency to keep looking until a rural need is identified. This has, according to some participants, in itself generated a perception of need in rural areas, rather than evidence.

There seems to be, what came first, rural needs or a rural impact, or a rural needs act, or rural impact assessment? So, I think it's kind of– it's almost creating its own demand. (GD#3)

In fact, participants with experience analysing their evidence base along a rural dimension identified relatively greater need in areas classified as *urban*.

So, for example we have data such as the [statistical report] which looks at population wide but it also looks at rural and urban issues across a number of indicators and actually, whenever you look at the urban-rural analysis, rural is better, rural people have better [outcomes] but they've actually started to look at mixed urban and rural, and mixed urban and rural looks, now this is just sort of, analysis becoming more and more refined and we're putting more and more stock and information into it, but looking at the mixed urban and rural, actually that looks like a better, you know even better for your [outcome] than either urban or rural. (GD#12)

Participants generally expressed confusion regarding the relationship between the RNA, equality, equity and rights. For example, they were not sure if meeting 'rural needs' should be understood as rural 'needing more resources' to meet the same 'needs' as everyone else. Or, understood to mean that there are 'needs' particular to 'rural' that require distinct initiatives and resources to achieve equity.

I think for us the big issue is this definition of equitable. (LGD#9)

6. Conclusions and discussion

An examination of the first legislative approach to rural proofing has revealed several problematic issues surrounding the new framework including: scepticism and reluctance; ambiguity surrounding the objectives, main concepts, incentives and sanctions; the role of politicians and potential impact of political influence; and, lack of clear ownership and governance including quality assurance. All these issues stem from a core weakness: it assumes a rural/urban binary, and the justification for the approach is entirely dependent on rural being equated with neediness. Therefore, the statutory extension of rural mainstreaming to all policy domains by means of the RNA also imposes a disparity-based theoretical perspective. As Saraceno (2013) illuminates, disparity-based policy leads to oversimplification and flawed policy because it addresses abstract, instead of actual need. It assimilates all rural areas into one undifferentiated aggregate, with urban as the other. This cycle is perpetuated by a historical balance favouring experiential knowledge over other forms of evidence (Shortall, 2012). The absence of a coherent and comprehensive theoretical understanding of 'rural need' that incorporates local diversity with wider contexts and dynamics leaves the process of interpreting evidence to assess 'rural impacts' vulnerable to numerous methodological fallacies as described by Burawoy (2013). This in turn further reinforces, rather than challenges, the dichotomous perception of rural disparity.

Links between Burawoy's contextual fallacies, rural disparity, and the structure and interpretation of the RNA can be identified. For

example, the failure to identify needs explicitly, and failure to follow through with a formal review process to try and fix established problems with the existing 'rural proofing' framework prior to introducing legislation indicate that, institutional and contextual considerations beyond the scope of the Ministry responsible for agriculture and rural affairs were largely *ignored*, and to a fair extent subject to *reification* as well. The non-rural sphere is assumed to be *homogenous* in that all public bodies, regardless of remit, function, scale or extent of powers, are expected to meet identical obligations, and, non-rural areas assumed to be uniformly better-off.

Arguably the most damaging fallacies in terms of perpetuating the disparity framework are related to dynamics. The failure to reflect on the historical and inevitable future changes in rural areas indicates that rural has been considered as *eternal*. What's more, the onus appears to be on avoiding change in rural areas, revealing a tendency to treat the rural *present as a point of arrival instead of departure*. The avoidance of a frank conversation surrounding the unavoidable fact that often service delivery in sparse areas has higher unit costs, and placing the expectation that 'creative solutions' can meet rural needs without requiring a higher proportion of resources brings considerable suspicion of the influence of *wishful thinking*.

Although the RNA places a burden of presenting evidence on those subject to the legislation, the structure and interpretation of the Act by the advocating Ministry 'primes' the framework in favour of numerous methodological fallacies. This in turn leads to the reinforcement of 'rural disadvantage' and dichotomous rural/urban thinking subjecting conceptualisations of rural to those of disparity, otherness, and weakness. This limits the adaptation and incorporation of renewed theoretical approaches, as such propositions will be drowned out amidst the knowledge power struggle within policymaking (Shortall, 2012). The fundamental, and in many respects controversial, concepts surrounding rural policy need to be critically re-examined and debated head on. It is in this way, a coherent and dynamic theoretical framework may be developed to assist with the transition towards policy designed to accommodate rural diversity, rather than treat rural disparity. Rural diversity will require identifying the specific rural policy issue that needs to be addressed and it will require a policy approach that recognises the rural policy issue will vary for different rural areas. This type of approach recognises that rural is diverse within itself, and not simply the binary of urban. It will facilitate an approach that recognises some rural regions are thriving and rural is not simply a category of need or disadvantage. When diverse policy issues are identified, it will allow for meaningful and effective policy design.

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Appendix A. Supplementary data

Supplementary data to this article can be found online at https://doi.org/10.1016/j.jrurstud.2018.12.005.

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