

Response ID

Submitted to Regional Balance Bill

Submitted on

Introduction

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Yes

If yes, please provide the name of the organisation or business below:

Glenshane Community Development Ltd.

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Regional Balance Bill

Clause 1 - Strategic Regional Balance Framework

6 Do regional economic and related disparities need legislation in order for them to be addressed appropriately?

Yes

7 Should the obligation on the development of a Strategic Regional Balance Framework sit with the Executive?

Yes

8 Does the Bill correctly set out what should be in the Strategic Regional Balance Framework including: the roles of Departments; the mechanisms to address disparity; the criteria and methodology for assessing regional disparities; the setting of targets and milestones; the use of cross-border data; the identification of a baseline year etc.

Yes

9 Does the Bill correctly set out the consultation process for the development of the Strategic Regional Balance Framework, its publication and revision?

Yes

10 Do you have any other comments on Clause 1 or suggested amendments for this clause?

Clause 1:

Glenshane Community Development Ltd (GCDL) strongly supports Clause 1 and the establishment of a statutory Strategic Regional Balance Framework. Drawing on our experience as a rural local economic development organisation operating since 1989, we have seen how regional disparities have persisted despite successive strategies, programmes and funding initiatives and recognise that a statutory framework is therefore necessary to ensure that regional balance becomes a sustained, cross-Executive responsibility rather than an aspiration attached to individual Departments or programmes. Regional imbalance is cross-cutting and cannot be addressed effectively by one Department acting alone. Placing responsibility on the Executive should ensure that economic development, infrastructure, transport, skills, health, housing and public investment policies work collectively towards agreed

regional balance outcomes.

GCDL supports the inclusion of baselines, targets, milestones and cross-border economic data, but considers that the methodology must also assess disparity at sufficiently local and sub-regional levels as large council-area averages can mask significant inequalities experienced by rural towns and their surrounding hinterlands. The Framework should therefore use appropriate NISRA geographies and functional economic areas, including travel-to-work patterns, to provide a more accurate picture of regional imbalance. We further recommend that regional investment is measured by its value and outcomes, not simply by the number of projects or interventions. Reporting should demonstrate whether investment is improving employment, productivity, incomes, business creation and retention, reducing economic inactivity and widening access to opportunity.

Consultation on the Framework must be capable of influencing its content and should not become a procedural exercise undertaken simply to demonstrate that engagement has occurred. The Executive should demonstrate how stakeholder evidence, including differing or critical views, has informed the final Framework. Engagement should also extend beyond established representative structures. Where Local Enterprise Agencies are consulted, this should not be confined to Enterprise NI; independent Local Enterprise Agencies should also be engaged directly.

Clause 2 - Reporting, Review and Support Functions

11 Is it reasonable and sufficient to require all Departments in developing, adopting, implementing or revising any policy, strategy or plan, to have due regard to the need to reduce regional disparity and to the Strategic Regional Balance Framework?

Yes

12 Is it reasonable and sufficient to require all Departments to exercise their functions, so far as is reasonably practicable, in a manner calculated to contribute to the outcomes and targets set in the Strategic Regional Balance Framework?

Yes

13 Do you have any other comments on Clause 2 or suggested amendments for this clause?

clause 2 :

Glenshane Community Development Ltd (GCDL) supports the requirement for all Departments to have due regard to the need to reduce regional disparity and to contribute, so far as reasonably practicable, to the outcomes and targets contained within the Strategic Regional Balance Framework. This cross-departmental duty is essential as regional imbalance is not created or resolved by economic development policy alone. In rural areas, economic opportunity is directly affected by transport, infrastructure, digital connectivity, education and skills, childcare, health provision, housing, regeneration and the location of public investment and services. Decisions taken by one Department can therefore either reinforce or undermine the objectives of another.

However, GCDL considers that "due regard" should result in demonstrable consideration rather than becoming a procedural requirement. There is already an established precedent through rural proofing and the Rural Needs Act (Northern Ireland) 2016, under which public authorities are required to have due regard to rural needs and are encouraged to demonstrate this through Rural Needs Impact Assessments. A similarly transparent approach should apply to regional balance where Departments should be expected to demonstrate, where relevant, how major policies, programmes, investment decisions and spending proposals have been assessed for their potential regional impact, including whether they could widen or reduce existing disparities, and how they contribute to the outcomes of the Strategic Regional Balance Framework.

Consideration should also be given to requiring Departments to identify where a proposal could unintentionally widen an existing regional disparity and, where appropriate, set out mitigating measures. The assessment of regional impact should extend below council level where necessary, as aggregate statistics can conceal significant rural and sub-regional inequalities. GCDL would also support proportionate guidance and common reporting arrangements across Departments so that implementation can be compared consistently. This should focus on outcomes rather than creating unnecessary administrative processes.

The purpose of Clause 2 should ultimately be to embed regional balance within routine government decision-making, budgeting and investment, rather than treating it as a separate policy consideration after decisions have already been made.

Clause 3 - Annual Reporting

14 Do you agree that all Departments should be required to report annually as to how they have reduced regional disparities in the preceding 12 month period?

Yes

15 Do you have any other comments on Clause 3 or suggested amendments for this clause?

If no, please explain below:

Glenshane Community Development Ltd (GCDL) supports annual reporting by all Departments because if regional balance is to become a meaningful cross-government objective, there must be regular and transparent accountability for the contribution made by each Department. This means that annual reports should go beyond listing programmes, expenditure or actions undertaken and that Departments should be required to demonstrate, using agreed indicators and baseline data, what measurable contribution their policies and investment have made towards reducing regional disparities and achieving the outcomes and targets contained within the Strategic Regional Balance Framework.

Reporting should include, where relevant, the geographical distribution and value of public investment, changes in access to services and infrastructure, employment and economic activity outcomes, and whether particular policies or spending decisions have reduced or widened existing disparities. GCDL also considers it important that reporting is sufficiently disaggregated to identify rural and sub-regional inequalities. Reporting only at Northern Ireland or local government district level may conceal significant differences between larger towns, smaller settlements and their rural hinterlands. There are lessons to be learned from existing rural proofing arrangements. Reporting should provide genuine evidence that regional impact has informed decision-making and should not become a retrospective or administrative exercise undertaken primarily to demonstrate compliance. The Department for the Economy should therefore issue consistent guidance and reporting templates to enable comparison across Departments and over time. At the same time, requirements should remain proportionate and focus on material policies, programmes and investment decisions. Annual reporting should ultimately allow the Assembly and the public to determine not simply what Departments have done, but whether regional disparities are actually narrowing and, where progress is insufficient, why this is the case and what corrective action is proposed.

Clause 4 - Annual Reporting

16 Do you agree that the Department for the Economy should be required to report annually and the Minister make a related statement as to how all Departments have reduced regional disparities in the preceding 12 month period?

Yes

17 Do you have any other comments on Clause 4 or suggested amendments for this clause?

clause 4:

Glenshane Community Development Ltd (GCDL) supports the requirement for the Department for the Economy to prepare and publish an annual report and for the Minister to make a statement to the Assembly as this provides an important level of transparency and political accountability for progress across all Departments. GCDL considers that the annual report should be analytical rather than simply descriptive and it should clearly identify whether regional disparities are narrowing, remaining unchanged or widening against agreed baselines, targets and milestones. Where progress is insufficient, the report should explain why, identify which Departments or policy areas require further action and set out what corrective measures are proposed. The report should also enable meaningful comparison between regions and sub-regions. GCDL is concerned that reporting at too broad a geographical level could conceal persistent disadvantage in rural communities and smaller settlements. Relevant data should therefore be sufficiently disaggregated to show where inequalities remain. The Ministerial statement should similarly be substantive and should address areas where targets have not been met, rather than simply summarising activity undertaken during the previous year.

GCDL would also encourage the annual reporting process to include evidence of meaningful engagement with communities, local economic development organisations, businesses and other stakeholders. Consultation and engagement should not become a paper exercise designed simply to demonstrate that a process has taken place, rather the report should show how stakeholder evidence has influenced implementation, including where concerns or alternative views have resulted in changes to policy or investment priorities. Annual reporting should therefore provide a clear public account of what has changed, what has not changed, why this is the case and what action will follow. This is essential if the Framework is to maintain public confidence and avoid becoming another strategy against which activity is recorded without sufficient evidence of impact.

Clause 5 - Reviewing the Framework

18 Do you agree that the operation and effectiveness of the Framework should be revised by the Executive every 5 years?

Yes

19 Do you have any other comments on Clause 5 or suggested amendments for this clause?

clause 5:

Glenshane Community Development Ltd (GCDL) supports a formal review of the operation and effectiveness of the Strategic Regional Balance Framework at least every five years as a statutory review will provide an important opportunity to assess whether the Framework is delivering measurable change and whether its targets, indicators and mechanisms remain appropriate. If annual reporting demonstrates that disparities are persisting or widening, targets are consistently being missed, or significant economic or social changes occur, the Executive should be able and expected to respond before the five-year point. Five years should represent the maximum period between substantive reviews rather than preventing an earlier review where circumstances require it.

The review should focus on outcomes rather than simply examining whether Departments have complied with processes. It should consider whether disparities in economic opportunity, living standards, access to services and public investment have actually narrowed, including at rural and sub-regional level. GCDL also considers that the review process should involve meaningful engagement with communities, local economic development organisations, businesses and other stakeholders with direct experience of regional disparity. Consultation should not become a paper exercise or a mechanism for validating conclusions already reached. The Executive should publish clearly what issues were raised through engagement, including contrary or challenging views, and demonstrate how that evidence influenced any revisions to the Framework. Where the review identifies inadequate progress, recommendations should include clear corrective actions, responsible Departments and timescales for implementation.

The purpose of the five-year review should therefore be not simply to renew the Framework, but to test whether it is working and, where it is not, to require meaningful change.

Clause 6 - Guidance and Research

20 Do you agree that the Department for the Economy should provide guidance and information and undertake, commission or support research on regional disparities?

Yes

21 Do you have any other comments on Clause 6 or suggested amendments for this clause?

clause 6:

Glenshane Community Development Ltd (GCDL) supports the Department for the Economy providing guidance and information and undertaking, commissioning or supporting research into regional disparities as a strong evidence base will be essential if the Strategic Regional Balance Framework is to identify where inequalities exist, understand why they persist and assess whether interventions are achieving meaningful change. GCDL considers that research should be sufficiently detailed to identify disparities below local government district level, as broad regional averages can conceal significant differences between towns, smaller settlements and rural hinterlands. Research should therefore make appropriate use of sub-regional data, functional economic areas and, where relevant, cross-border economic evidence.

The research programme should also extend beyond traditional economic indicators to consider access to employment, transport, digital connectivity, skills and education, childcare, health services, enterprise infrastructure and public investment, all of which directly influence economic opportunity and living standards. Importantly, research should combine quantitative evidence with the practical knowledge of communities, Local Enterprise Agencies, community anchors, businesses and other organisations working directly in areas experiencing disadvantage. Where Local Enterprise Agencies are engaged in research or evidence gathering, this should not be confined to Enterprise Northern Ireland or its member agencies. Independent Local Enterprise Agencies, such as GCDL, can provide local economic development experience and evidence that may otherwise be absent from the research base.

Commissioned research should be transparent and published wherever possible, including its methodology, geographical coverage and limitations. It should also be capable of informing policy and investment decisions rather than simply adding to the existing evidence base. GCDL would therefore welcome a research programme that is independent, longitudinal and sufficiently responsive to emerging disparities, with findings clearly linked to the development, implementation and review of the Framework.

Clause 7 - Defining regional disparity and regions

22 Do you agree with how regional disparity may be defined by the Bill?

Yes

23 Should regional disparity indices be specified in the Bill?

Yes

24 What other indices should be used to define regional disparity?

clause 7 :

Glenshane Community Development Ltd (GCDL) supports the indices identified in Clause 7 but considers that a wider set of measures is necessary to reflect the lived reality of regional disparity, particularly in rural areas. Additional indicators should include:

- access to public transport and average journey times to employment, education and essential services;
- digital connectivity, including broadband quality, reliability and affordability;
- access to further and higher education, training and skills provision, apprentices;
- availability and affordability of childcare;
- access to primary, secondary and specialist healthcare;
- availability of affordable enterprise workspace and business support infrastructure;
- business start-up, survival and growth rates;
- levels of wages and quality of employment, not simply employment rates;
- population change, youth out-migration and the retention of working-age people;
- access to public-sector employment and major centres of employment;
- fuel poverty and household energy costs; and
- the value, per-capita distribution and long-term impact of public capital investment.

GCDL considers accessibility particularly important. A community may appear relatively close to employment, education or health provision geographically while in practice experiencing significant disadvantage because of poor public transport, long journey times or limited digital connectivity.

Indicators should also be capable of being analysed at sufficiently small geographical levels. Local government district averages can conceal significant disparities between larger towns, smaller settlements and rural hinterlands. The statutory list should therefore establish a minimum evidence base while remaining non-exhaustive so that additional indicators can be incorporated as circumstances and evidence develop.

25 Do you agree with how the Bill may define a region within Northern Ireland?

Yes

26 Do you have any other comments on Clause 7 or suggested amendments for this clause?

clause 7:

GCDL supports defining regions by reference to a range of NISRA statistical geographies rather than relying solely on Local Government Districts as such flexibility is essential because economic and social disadvantage do not necessarily correspond with administrative boundaries. For rural communities, large geographical averages can mask very different experiences within the same council area. For example, Dungiven and its rural hinterland should not be assumed to experience the same economic conditions, access to services or investment patterns as larger settlements elsewhere within the same Local Government District. The Framework should therefore use the most appropriate geography for the issue being examined, including smaller statistical areas, rural/urban classifications, travel-to-work areas and other functional economic catchments where appropriate.

GCDL would also encourage the use of cross-border and functional labour-market data where this provides a more accurate picture of how people actually live, work, travel and access services. Care should be taken to ensure that data availability does not itself determine what is measured as some of the most significant rural inequalities may be less visible precisely because sufficiently localised data is not routinely collected. Clause 7 should therefore support the commissioning or development of additional data where important disparities cannot be adequately identified through existing datasets.

Finally, organisations embedded within local economies should contribute to interpreting the evidence. Where Local Enterprise Agencies are consulted, engagement should not be confined to Enterprise Northern Ireland or its member agencies. Independent Local Enterprise Agencies, alongside community anchors and other locally based organisations, can provide evidence of disparities and barriers that may not be apparent from statistical data alone.

Clause 8 - Commencement and Short Title

27 Do you agree that the provisions of this legislation should be commenced immediately after Royal Assent?

Yes

28 Do you have any other comments on Clause 8 or suggested amendments for this clause?

clause 7:

As regional disparities are longstanding and have been recognised across successive strategies and programmes, Glenshane Community Development Ltd (GCDL) supports commencement of the legislation immediately following Royal Assent as we see no benefit in introducing an additional delay before the statutory duties contained within the Act begin to take effect. Immediate commencement would provide clarity to Departments and stakeholders and allow work on the Strategic Regional Balance Framework, associated guidance, data requirements and engagement arrangements to begin without unnecessary delay.

GCDL also considers it important that commencement is followed promptly by a clear implementation timetable. The period allowed for developing the first Framework should be used for meaningful evidence gathering and engagement rather than simply establishing administrative processes. Early engagement should include rural communities, businesses, local government, community anchors and Local Enterprise Agencies, including independent agencies that are not members of Enterprise Northern Ireland. This would help ensure that the first Framework is informed by a broad range of regional experience from the outset. Given the persistence of regional imbalance, the emphasis following Royal Assent should be on moving quickly from legislative commitment to practical implementation and measurable action.

Proposed Additions and Amendments

29 Please provide information on any other potential amendments that you feel would enhance the Bill and the rationale for those.

Information on any potential amendments:

Glenshane Community Development Ltd (GCDL) supports the overall purpose of the Bill and considers that several additions would strengthen its ability to deliver meaningful regional change:-

1. Require demonstrable regional impact assessment - The duty to have "due regard" to regional balance should be supported by a transparent assessment process, drawing on the precedent of rural proofing. For significant policies, programmes, spending and investment decisions, Departments should demonstrate how regional impacts were considered, whether a proposal could widen or reduce existing disparities and what mitigation is proposed where adverse impacts are identified. Assessment should take place early enough to influence decisions rather than becoming a retrospective compliance exercise.
2. Strengthen sub-regional and rural measurement - The Bill should make clear that Local Government District averages must not be relied upon where they conceal significant disparities within those areas. Appropriate smaller statistical geographies, rural/urban classifications, travel-to-work areas and functional economic catchments should be used. Where important inequalities cannot be measured because suitable data are unavailable, provision should be made to develop or commission that evidence.
3. Broaden indicators of regional disparity - Alongside the indices already identified, the Framework should consider access to public transport, digital connectivity, childcare, healthcare, further and higher education, skills provision, enterprise infrastructure, quality of employment, wage levels, business start-up and survival, population change and youth out-migration.
4. Measure investment by value and impact - Regional distribution of public investment should be assessed by financial value, per-capita investment and resulting economic and social outcomes, rather than simply counting projects or interventions. Reporting should demonstrate whether investment has contributed to improved employment, incomes, productivity, business growth and access to opportunity.
5. Provide for corrective action - Where annual reporting shows that regional disparities are not reducing, Departments should be required to explain why and identify corrective actions, responsible bodies and timescales. The Executive should not have to wait for the five-year review where evidence demonstrates that the Framework is not delivering.

6. Strengthen meaningful stakeholder engagement - Consultation should be capable of influencing the Framework and its implementation. Government should publish how stakeholder evidence has affected decisions, including where views were not accepted and why. Engagement should continue throughout implementation and review and should not become a process undertaken simply to validate decisions already substantially determined.

Consultation with Local Enterprise Agencies should not be confined to Enterprise Northern Ireland but include the independent Local Enterprise Agencies, as well as community anchors and other locally embedded organisations, as these should similarly be recognised as important sources of evidence and potential delivery partners.

Taken together, these amendments would help ensure that the legislation measures real regional outcomes, captures inequalities that can otherwise be hidden within broader statistics and creates meaningful accountability for reducing disparities rather than simply demonstrating that processes have been followed.

Additional Comments

30 Please provide any additional comments on the Bill you feel should be considered.

additional comments:

Glenshane Community Development Ltd (GCDL) welcomes the principle underpinning the Regional Balance Bill. As a Local Enterprise Agency established in 1989 and working within the local economic development sector, GCDL has almost four decades of direct experience of the challenges involved in creating employment, enterprise, services and investment opportunities within a rural area. We consider that regional imbalance is longstanding and cannot be addressed through individual funding programmes or short-term initiatives alone but that it requires sustained political commitment, coordinated action across government and a willingness to examine where public resources, infrastructure and economic opportunities are located.

GCDL does not consider regional balance to mean that every place must receive identical provision or that successful areas should be disadvantaged. Rather, people and businesses should have a reasonable opportunity to prosper regardless of where they are located and government should recognise where geography itself creates additional barriers to employment, enterprise, services and participation. Particular attention should be given to rural areas and smaller settlements, whose circumstances can disappear within wider administrative statistics.

The success of the legislation will therefore depend considerably upon the quality of the evidence used, the geographical level at which disparities are measured and whether Departments are prepared to alter policy and investment decisions in response to that evidence. GCDL would also emphasise the importance of genuine and inclusive engagement. Consultation should not become a paper exercise in which engagement continues until a preferred or sufficiently supportive set of responses is obtained. Those developing and reviewing the Framework should ensure that all relevant sectors, places and organisations have a fair opportunity to be represented, particularly those operating in areas experiencing persistent disadvantage or whose voices may not be captured through established representative structures. The process should also demonstrate transparently how that evidence has influenced decisions. This requires engagement beyond established representative bodies. For example, consultation with Local Enterprise Agencies should not be regarded as complete solely through engagement with Enterprise Northern Ireland and its members but that independent Local Enterprise Agencies should have an equal opportunity to contribute their experience and evidence.

The Bill offers an opportunity to move regional balance from a recurring policy aspiration to an enduring responsibility of government. Its value will ultimately be judged not by the number of strategies produced, consultations undertaken or reports published, but by whether measurable differences in economic opportunity and living standards between places are reduced. For communities that have experienced regional disadvantage over many decades, implementation, accountability, inclusive engagement and demonstrable outcomes will be the real test of the legislation.

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