

Committee for the Economy
Call for Evidence - Regional Balance Bill
Response from Fermanagh and Omagh District Council
September 2026

Introduction

Fermanagh and Omagh District Council welcomes the opportunity to contribute to the Call for Evidence for the Regional Balance Bill. The Council strongly supports the overarching objective of reducing regional disparities across Northern Ireland, particularly given the persistent structural challenges experienced in predominantly rural and peripheral regions such as Fermanagh and Omagh. Whilst the Council agrees with the principle that NI needs a more systematic approach to addressing regional disparity, and the Regional Balance Bill and proposed framework could provide the basis for that, the goal of economic convergence across the region will depend on the details within the framework, the provision of adequate funding, and genuine partnership working, all delivered in the long term. If these aspects are not fully realised, the Regional Balance Bill's impact will be limited, achieving little more than an additional layer of reporting.

The Council's response to the call for evidence is laid out with an introduction to the Fermanagh and Omagh District, followed by responses to each of the questions as laid out in the survey questionnaire.

1.1 The Picture within the District

Given the historic underinvestment in the rural west and the additional challenges associated with the district's cross-border location, there is a clear need for a sustained, whole-of government commitment to addressing regional imbalance. The Council area is home to 117,700 people and spans approximately 3,000km², making it Northern Ireland's largest Council area by land mass but smallest by population. With a population density of 39 people per km², it is the most sparsely populated district. As the most rural Council district with 70% of residents living in rural areas (outside the two main towns of Enniskillen and Omagh), Fermanagh and Omagh District Council is uniquely well placed to contribute to this consultation. Outside of the two main towns:

- 7% of residents live in the 5 local towns (Carrickmore, Fintona, Dromore, Irvinestown, and Lisnaskea)
- 16% live in villages / small settlements
- 47% live in the open countryside

Five of the ten most deprived areas in Northern Ireland in terms of access to services are located in Fermanagh and Omagh, with 23 Super Output Areas among the worst 100.¹ Socioeconomic outcomes continue to reflect rurality, dispersed settlements and limited service access. The Fermanagh and Omagh District shares over 400km of land border with

¹ Northern Ireland Multiple Deprivation Measure (NIMDM) 2017
<https://www.nisra.gov.uk/statistics/deprivation-and-poverty/northern-ireland-multiple-deprivation-measure-2017-nimdm2017>

the Republic of Ireland, representing over 40% of the NI/ROI land border. All the District is further than 60 minutes' drive time from Belfast. These characteristics significantly increase the cost and complexity of service delivery, limiting economies of scale and increasing the unit cost.

Economically, there are approximately 54,000 jobs located in the Fermanagh and Omagh District. Productivity and wage levels, although improving, are typically below the NI average. There are 8,850 businesses, with key sectors including agriculture, construction, and manufacturing. The business base is dependent on micro businesses.

Research undertaken by the Rural Affairs Sub-Committee found that between 2020 and 2025 FODC received £13² million in Invest NI assistance, representing just 3% of total support despite containing 11% of Northern Ireland's businesses. Organisations located within the District also recorded lower levels of business research and development activity, accounting for only 2% of Northern Ireland's total R&D expenditure. Measures of economic output similarly point to regional disparities, with both GVA per filled job (£53,068)³ and GDP per head (£22,672)⁴ below Northern Ireland averages. These indicators suggest that Fermanagh and Omagh District continues to experience structural economic disadvantages that limit growth potential and reinforce the need for targeted interventions to achieve regional balance.

1.2 Regional Disparity - The Evidence

Fermanagh and Omagh District has no commercial airports, no rail links, no motorway and only 600m of dual carriageway. Roads in FODC receive less expenditure per km on development and maintenance. The public transport network in FODC is poor; there are reasonable linkages between Enniskillen/Omagh and Belfast, but the intra-connections within the District are poor and ultimately unusable for commuting purposes. Transport deficits are compounded by underinvestment in water and wastewater infrastructure. FODC receives just 2.25% of all Northern Ireland Water investment in new and upgraded assets, equating to only £233 per capita compared with the Northern Ireland average of £633 per capita. These infrastructure constraints are already restricting economic development and housing growth across the district through limited wastewater treatment capacity, while also reducing the area's ability to attract inward investment.⁵

The challenges faced by Fermanagh and Omagh District result in difficulties in creating opportunities for economic agglomeration. It requires more than equal public investment alone to deliver outcomes. Despite recent improvements, FODC continues to experience longstanding structural disadvantages in infrastructure provision that inhibit its

² Invest NI: <https://www.investni.com/support-for-business/regional-business-network/western-regional-office>

³ ONS Subregional Productivity, Table B3:

<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/labourproductivity/datasets/subregionalproductivitylabourproductivitygvaperhourworkedandgvaperfilledjobindicesbyuknuts2andnuts3subregions>

⁴ ONS Regional Gross Value Added Per Capita:

<https://www.ons.gov.uk/economy/grossvalueaddedgva/datasets/nominalregionalgrossvalueaddedbalancedperheadandincomecomponents>

⁵ Fermanagh and Omagh Rural Affairs Sub-Committee, October 2024, Item 7, Paper B:

<https://fermanaghomagh.public-minutes.com/#75ab8bd7a46ec7f1f8696c75dbffb860>

competitiveness and reinforce the imbalance West of the Bann. Only through sustained targeted initiatives, equitable levels of investment (which may require above average per capita spends in historically disadvantaged areas on a sustained basis), and partnership working can these longstanding disparities be addressed.

2.0 Response to the Call for Evidence

2.1 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, reflecting the crosscutting nature of the regional balance and the needs for coordinated processes across government departments, and strategic oversight at the highest level of regional government.

However, as outlined in Q10, the Framework should also recognise the important role of local government, Community Planning, Local Economic Partnerships (which sits within Fermanagh and Omagh's Community Planning Structure) and other existing strategic partnerships as key delivery partners to support an evidence based, place-based understanding of region wide needs, and avoid duplication by seeking to establish any new partnerships.

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.

Broadly yes, but it is limited in the detail of what will be contained in the Strategic Regional Balance Framework. The Council welcomes the opportunity to be consulted on this in due course. The Council also believe that the legislative language could be enhanced, as outlined elsewhere in this response.

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?

Fermanagh and Omagh District Council welcomes the establishment of a statutory Regional Balance Strategic Framework and looks forward to reviewing the detail if/when it becomes available.

Regional disparities have persisted across Northern Ireland despite successive strategies and interventions. This Council's experience demonstrates that the Rural West continues to

experience historic underinvestment and lower levels of economic opportunity, reinforcing the need for a statutory framework that provides long-term focus and accountability.

The Council supports the Executive having responsibility for developing and implementing the Framework, recognising that regional balance is influenced by a broad range of interconnected policy areas including economic development, transport, planning, housing, education and skills, health, digital infrastructure and public services. An Executive-led Framework is therefore well placed to promote coordinated action across departments and ensure strategic oversight. This aligns with The Productivity Institute's Investment in Places report *Framing a place-based investment strategy for Fermanagh & Omagh*, which emphasises that improving productivity and living standards requires coordinated investment across multiple forms of capital and strong collaboration between national, regional and local partners.⁶

The Council welcomes the requirement for the Framework to include outcomes, departmental responsibilities, mechanisms for delivery, measurable targets, milestones and a baseline against which progress can be assessed. These provide an important foundation for monitoring progress and demonstrating the impact of interventions over time. The Council further recommends that all NI Departments, Invest NI and other relevant Arms-Length Bodies should be required to publish expenditure and investment figures for each Council area. This transparency and a comprehensive review of the distribution of expenditure are essential in understanding whether regional disparities are narrowing. To ensure the legislation translates to measurable action, the Framework should establish binding sub regional targets, alongside performance improvement plans for any area where the target is not met.

From the outset, the Strategic Regional Balance Framework should be underpinned by a robust analysis and evidence base which identifies where the existing gaps lie, establishes clear priorities, and sets specific KPIs. This evidence base must be reviewed and updated regularly to assess progress and inform the revision of the Framework.

The Council would indeed, recommend that the Framework explicitly recognise the role of local government, Community Planning Partnerships, and Local Economic Partnerships (LEPs) in supporting both the delivery and monitoring of regional balance objectives. While Clause 1 identifies the roles of Executive Departments and requires consultation with district councils before the Framework is adopted, councils also provide important place-based leadership through Community Planning and established partnerships (including, but not limited to, Local Economic Partnerships). These partnerships, including collaboration with Invest NI and other Community Planning partners, can support implementation of regional strategy and help ensure that the priorities are translated into local action.

This Framework should also align with existing strategic, place-based and regional delivery mechanisms, including Local Economic Partnerships, Labour Market Partnerships, and established regional partnerships such as the Mid South West (MSW) regional partnership, and should be considered in the development of the new Rural Development Programme for NI.

⁶ The Productivity Institute Framing a place-based investment strategy for Fermanagh & Omagh <https://www.fermanaghomagh.com/app/uploads/2026/02/Executive-Report-for-Place-Based-Study-FODC.pdf>

The MSW Growth Deal Heads of Terms commits partners to a programme of investment across infrastructure, regeneration, tourism, innovation and digital connectivity, deriving from the objectives of the MSW Regional Economic Strategy and underpinned by a commitment to job creation, skills and employability, inclusivity and sustainability. These partnerships already bring together local government, central government and other stakeholders around agreed regional economic priorities and provide an established governance platform capable of supporting implementation. Recognising and aligning with existing investment frameworks would strengthen implementation, avoid duplication, embed regional balance objectives within established local structures, thereby maximising the impact of existing regional investment programmes.

In addition to explicit economic interventions, evidence from FODC Co-Poverties Mapping Report, undertaken by academics at Ulster University, demonstrates that rural communities can experience multiple and interconnected disadvantages relating to accessibility, transport, and fuel and food poverty, reinforcing the need for policies and investment decisions to reflect the differing circumstances of rural and urban areas.⁷ The report found that Fermanagh and Omagh has the highest average fuel poverty eligibility score of all council areas in Northern Ireland, with the greatest levels of risk concentrated in open countryside and village settlements. It identified more than one-third of domestic properties are located more than a ten-minute walk from a bus stop, increasing the risk of transport poverty and social exclusion.

Thus, measures of regional balance should extend beyond the outlined infrastructure indicators, such as proximity to airports, and include factors that more accurately reflect the lived experience of rural communities, including;

- accessibility to essential services
- public transport connectivity
- roads infrastructure development and maintenance, and travel times
- digital connectivity
- access to and affordability of fuel and food, and;
- access to employment, education and healthcare.

By incorporating these considerations at the outset, the Framework will be better aligned with the requirements of the Rural Needs Act (Northern Ireland) 2016 and ensure that efforts to reduce regional disparities are responsive to the needs of rural communities.⁸ This would support a more coherent approach across relevant policy frameworks, avoiding duplication and the potential for unintended consequences. It is the view of the Council that the application of the Rural Needs Act has not always translated into meaningful changes to policy development or delivery; and can, at times be perceived as procedural or ‘tick box’. Aligning the Framework more closely with the objectives of the Rural Needs Act would help strengthen both the proposed legislation and rural proofing in practice. The Council therefore recommends that the Framework explicitly recognises the importance of rural proofing in the development of its criteria, methodology and delivery mechanisms, and clearly demonstrate how its approach complements existing objectives, ensuring that consideration of rural needs is embedded at the earliest stages of policy development and economic intervention.

⁷ Fuel, Transport and Food Poverty Mapping in FODC (Ulster University 2023)

<https://www.fermanaghomagh.com/your-council/keystatisticsanddata/your-council-projects/>

⁸ Rural Needs Act (Northern Ireland) 2016 <https://www.legislation.gov.uk/nia/2016/19/contents>

In addition, reporting against the Framework needs to demonstrate how it has improved outcomes for communities in the historically underinvested, left-behind Rural West, specifically in relation to the distribution of public expenditure. This is something which the Council considers is lacking in the reporting requirements of the Rural Needs Act.

2.2 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?

The Council is concerned that the term 'due regard' is insufficient to achieve the desired goal of the Regional Balance Bill.

Stronger legislative provisions are required to move beyond consideration and compel Departments to take active, measurable steps to address regional imbalance. The evidence supporting the Council's position is set out in its response to Question 13.

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?

Fermanagh and Omagh District Council supports the concept of a legislation requiring Northern Ireland Departments, and the public bodies they sponsor (including but not limited to Invest NI, NI Water etc.), to work collaboratively to reduce regional disparities when developing, adopting, implementing and reviewing policies, strategies and plans. Regional balance is a cross-cutting issue that cannot be addressed by any single department. Embedding consideration of regional disparities within departmental decision-making will help promote greater collaboration across government, improve policy coherence and encourage departments to consider the cumulative impact of their decisions on places and communities. Given the cross-cutting nature of regional balance, the duty will help ensure that regional considerations become an integral part of policy development rather than being addressed through isolated interventions.

However, the Council considers that the proposed duty to have '*due regard*' to regional disparities may not in itself be sufficient to drive meaningful progress towards regional balance. While this language creates an important procedural obligation, its operation remains substantively weak. Departments may be able to demonstrate consideration; however, while the bill is intentionally narrow, such an approach risks lacking the operability to effectively drive action towards regional balance. This is indeed significant as both the Minister and Bill Sponsor have expressed concern that the existing requirements and isolated policy interventions have failed due to a lack of commitment to tackling regional imbalance.

The Council notes that Departments are already required to undertake rural screening and, where appropriate, Rural Needs Impact Assessments under existing legislation. While these mechanisms provide an important framework for considering the impacts of policy decisions on rural communities, they do not in themselves place a specific duty on Departments to actively reduce regional disparities or achieve strategic regional balance. Indeed, the Council has seen limited evidence that the Rural Needs Act, and undertaking of Rural Needs Impact Assessments, has had a positive tangible impact on rural communities.

Fermanagh and Omagh District Council considers that neither the current statutory requirements for rural screening and Rural Needs Impact Assessments, nor the proposed Bill's general duty to have '*due regard*' will be sufficient to tackle entrenched regional imbalance alone. These mechanisms principally promote consideration of impacts rather than requiring demonstrable action or outcomes, and therefore stronger legislative provisions are needed to compel Departments and delivery partners to take active, measurable steps to address regional imbalance.

The Council considers that the effectiveness of the Regional Balance Bill would be significantly strengthened through the introduction of a Regional Impact Assessment mechanism. Similar to existing equality and regulatory impact assessment processes, this would require major policies, programmes, and plans above an agreed threshold to assess and publish their likely impact on regional balance. Such a mechanism would move the Bill beyond a procedural requirement to merely consider disparities and provide a more practical means of embedding regional balance within decision making and investment strategies. It would also improve transparency and strengthen evidence-based decision making, ensuring investment priorities are informed by robust data, research, and spatial analysis. In this regard, the Strategic Regional Balance Framework should align with, and draw upon, the research and evidence functions proposed through DAERA's Rural Research and Evidence Model proposed within Rural NI: Our New Approach 2026-2041.⁹ Finally, clear alignment with PfG outcomes, Executive budgets (preferably beyond annual budgeting) and wider public investment strategies would help ensure that regional balance principles are embedded across the remit of all NI Departments. Such an approach would support a more coordinated and strategic framework.¹⁰

The Council supports the requirement for Departments, so far as is reasonably practicable, to exercise their functions in a manner that contributes to the outcomes and targets contained within the Regional Balance Strategic Framework. This provides an appropriate balance between establishing a meaningful statutory duty while allowing sufficient flexibility for Departments to deliver their respective statutory responsibilities. To support effective implementation, the Council recommends robust guidance providing a consistent standard of implementation, auditing and/or reporting across government departments to demonstrate how regional disparities have been considered during policy development and decision-making and what impacts have (or are likely to) be achieved. This would promote greater

⁹ Rural NI: Our New Approach 2026-2041 Public Consultation Document https://www.daera-ni.gov.uk/sites/default/files/2026-03/Annex%20A%20-%20Consultation%20Document%20Rural%20NI%20%20Our%20New%20Approach%20%282026-2041%29_0.PDF

¹⁰ INI Investment Strategy <https://www.investni.com/sites/default/files/2024-10/business-strategy-invest-ni-2024-2027.pdf>

transparency, consistency and accountability across Departments while avoiding unnecessary administrative burden.

The Council would reiterate that the implementation of this duty would be strengthened through continued engagement with local government and established local partnerships (including the Local Economic Partnership). Councils possess detailed knowledge of local needs, opportunities and regional challenges through Community Planning, Local Economic Partnerships, and wider place-based partnerships, which can provide valuable evidence to inform departmental policy development and implementation.

2.3 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?

Fermanagh and Omagh District Council supports the requirement for all Northern Ireland Departments to compile, retain and provide information to support annual reporting on progress in reducing regional disparities. Consistent reporting across government will be essential in providing a robust evidence base, promoting transparency and enabling progress towards the objectives of the Regional Balance Framework to be monitored effectively. As noted, annual reporting should include a clear assessment of expenditure levels by DfE, and other arms-length organisations such as Invest NI and NI Water, demonstrating the progress made on agreed targets and identifying corrective actions where disparities persist.

The Council also welcomes the requirement for Departments to evaluate the impact of their actions, rather than simply report on activities undertaken. There is a subtle but important distinction between *considering* regional balance and *improving* regional balance. Redressing regional imbalance requires real commitment to the latter. Annual reporting must focus on **how** the impact of activities is identified and measured. The Council believes that this impact should be seen in every departmental Annual Report and Accounts, not just something that is *provided* to DfE. To maximise the value of annual reporting, the Council recommends that the Department for the Economy develops clear and consistent guidance on reporting requirements, including common indicators, methodologies and reporting templates. This would support a consistent approach across Departments, improve comparability and over time, strengthen accountability with a greater focus on outcomes and continuous improvement.

The Council also considers that annual reporting should, where possible, include both quantitative and qualitative evidence. While performance indicators are essential for measuring progress against agreed outcomes and targets, qualitative evidence and good practice case-studies can provide valuable insights into the effectiveness of interventions and the lived experiences of people, places and communities across all districts.

This is particularly important within the context of the Northern Ireland Programme for Government (PfG) Wellbeing Framework, which uses a broad range of economic, social,

environmental and democratic indicators to assess progress across ten wellbeing domains. For example, the Stronger Economy domain includes measures such as employment levels, economic inactivity, earnings, productivity and business performance, providing an important statistical picture of economic conditions across Northern Ireland. The PfG Wellbeing Framework recognises the importance of understanding the factors that sit behind the indicators and how their analysis can be used to inform policy development. Combining statistical trends with place-based case studies and stakeholder perspectives, annual reporting can provide a more comprehensive account of progress against PfG outcomes and offer greater insight into the grassroots impact of interventions, as well as identify where socio-economic disparities persist. This will highlight where further action may be required, and which sectors should be prioritised.

2.4 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?

Fermanagh and Omagh District Council supports the requirement for the Department for the Economy to prepare and publish an annual report on the implementation of the Act and the operation of the Regional Balance Framework. Annual reporting to the Assembly, supported by a Ministerial statement, will provide an important mechanism for transparency, accountability and scrutiny of progress in reducing regional disparities across Northern Ireland.

The Council considers that the annual report should provide clear evidence of how regional disparities are changing over time at regional, sub-regional and local level. Again, reporting should move beyond describing departmental activity and demonstrate whether public policy and investment are delivering measurable improvements in outcomes for areas that have historically experienced lower levels of economic investment and opportunity. In doing so, reporting should not only highlight progress but also identify where interventions have failed to deliver the intended outcomes and why.

The Council further emphasises that infrastructure *must* be recognised as a fundamental enabler of regional balance. While targeted economic development programmes and investment is important, they will not be enough to address regional disparities if they are not accompanied by investment in critical infrastructure such as transport networks and wastewater capacity. Rural districts such as Fermanagh and Omagh, despite significant economic strengths and growth potential, have historically experienced lower levels of inward investment, lower productivity and infrastructure deficits when compared with other parts of Northern Ireland. The Council therefore considers it essential that annual reporting is sufficiently granular to demonstrate whether disparities between districts are narrowing over time and whether investment is becoming more regionally balanced. This is essential for

demonstrating whether the ambitions of the Framework are translating into tangible improvements.

Furthermore, given that many of these major infrastructure investments fall within the remit of other departments, the Council welcomes the strong emphasis on cross departmental responsibility. The framework should act as a mechanism to ensure that all departments actively contribute to regional balance and identify where deficits continue to constrain economic development.

Finally, the Council recommends that the annual report should, where practicable, present information at Local Government District level alongside regional analysis. Annual reports should include commentary on the effectiveness of cross-departmental working and highlight examples of successful place-based interventions. This would provide greater transparency, enable progress to be monitored across all parts of Northern Ireland and allow stakeholders to understand whether the Framework is delivering improved outcomes for rural, border and historically under-invested areas. Benchmarking performance could also support the sharing of good practice and provide greater understanding of the approaches that are most effective in reducing regional disparities.

2.5 Clause 5

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

The Council considers this to be an appropriate timeframe for assessing the operation and effectiveness of the Framework, recognising that many outcomes and impacts may take time to materialise. However, the Council also acknowledges that the initial Framework may warrant earlier review if implementation evidence indicates that adjustments are required to improve delivery and impact.

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

Fermanagh and Omagh District Council supports the requirement for the Executive to review the operation and effectiveness of the Regional Balance Strategic Framework within five years of the first Framework being laid before the Assembly and at least once every five years thereafter. Periodic review is important to ensure that the Framework remains responsive to changing economic, social and demographic circumstances, global conditions and continues to support the objective of reducing regional disparities across Northern Ireland. While annual reporting in the initial years may necessarily focus on activity undertaken, the impact of those activities may not fully materialise until the five-year review point. Accordingly, the Council considers that the review should extend beyond assessing whether actions have been delivered and should evaluate whether the Framework has resulted in the measurable and timebound targets set out in Clause 1(3)(a). This should include consideration of the effectiveness of the Framework's governance arrangements, cross-departmental working and delivery mechanisms, as well as whether the agreed outcomes and targets remain appropriate.

The Council also recommends that the review should be informed by evidence gathered throughout the implementation period, including annual reporting, stakeholder engagement

and the experiences of local government. As noted, councils are uniquely positioned, through their Community Planning responsibilities, established Local Economic Partnerships and place-shaping role, to provide evidence and insight into how the Framework has operated in practice and whether interventions have translated into improved outcomes for local communities.

Moreover, given the persistent regional inequalities experienced across Northern Ireland, the Council considers that the review should include an assessment of whether the Framework has contributed to a more equitable distribution of public investment and to improved economic and social outcomes across the remit of all Departments. This assessment should be underpinned by robust analysis against clearly defined, measurable KPIs and binding targets, with progress reported annually, including by delivery bodies such as Invest NI, and comprehensively evaluated as part of the five-year review process. As historically under-invested rural and border sub-regions, areas such as Fermanagh and Omagh should be given equitable consideration to determine whether longstanding structural disparities are narrowing and whether additional policy interventions or revisions to the Framework are required.

Finally, the Council welcomes the provision enabling the Department for the Economy to publish recommendations arising from the review. Publishing recommendations will strengthen transparency and accountability, provide an evidence base for any revisions to the Framework and support continuous improvement in the delivery of regional balance objectives.

2.6 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?

Fermanagh and Omagh District Council welcomes the functions conferred on the Department to provide guidance and information and to undertake, commission or support research on regional disparities.

Research commissioned or supported under Clause 6 should be sufficiently place-based and granular to capture the circumstances of rural, border and historically under-invested areas such as Fermanagh and Omagh District. In particular, it should examine the existing structural influences that contribute to regional disparities, including infrastructure deficits, transport connectivity, access to services, digital connectivity, productivity, skills, demographic change and the distribution of public investment. This will help ensure that policy interventions are informed by evidence which reflects the lived experience of communities across Northern Ireland rather than relying solely on regional averages.

The Council also recommends that the Department engages with local government, Community Planning Partnerships, Local Economic Partnerships (which sits within Fermanagh and Omagh's Community Planning structural framework) and other stakeholders when developing guidance and identifying research priorities. Councils hold valuable local

evidence and have established place-based partnerships which can support the identification of challenges, opportunities and the effectiveness of policy interventions. These functions will be important in ensuring that the Framework is supported by a robust and consistent evidence base and that Departments are aligned in the implementation of the legislation.

2.7 Clause 7 – Defining Regional Disparity and Regions

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

The Council is in agreement that there is no single indicator that could define regional disparity and broadly agrees with the indicators outlined in the Bill. However, the Council notes its longstanding concerns regarding the Northern Ireland Multiple Deprivation Measure (NI MDM), and notes that multiple iterations of the NIMDM have led to the directing of funding into a limited number of urban areas in Belfast and Derry~Londonderry at the expense of more rural areas. Thus, it has failed to promote regional balance, and its use in defining regional disparity should be carefully considered. The Council has outlined these thoughts previously and has suggested that consideration be given to alternative measures of deprivation, such as, but not exclusively, the HP Pobal Index used in the Republic of Ireland.¹¹

Similarly, consideration will need to be given to the difference in statistical measures between ‘residence based’ (where people live) and ‘workplace based’ (where people work), but a clear distinction as to what balance is being redressed and how it is being measured.

23. Should regional disparity indices be specified in the Bill?

Yes. It is important to outline how the indicators for measuring regional disparity will be used and tracked over time. The creation of regional disparity indices (or a single Index) is a good idea, but details on the proposed domains and underlying data would be useful and should be consulted upon.

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

The Council considers that the list of indicators provides a strong foundation and appropriately recognises that regional disparities extend beyond economic performance. However, consideration should also be given to including indicators relating to:

- **Access to essential public services** — Including healthcare, education and childcare.
- **Digital connectivity** — Recognising the importance of high-quality digital infrastructure in supporting economic growth, service delivery and social inclusion.
- **Public transport accessibility and connectivity** — particularly for rural and peripheral areas.
- **Road infrastructure quality and connectivity** — Recognising the importance of a safe, well maintained road network is vital in supporting economic activity, access to

¹¹ HP Pobal Deprivation Index ROI

<https://data.pobal.ie/portal/apps/experiencebuilder/experience/?id=3b0acba7eb694ffa85340a60f81d516c>

public services and connectivity, particularly in rural and peripheral areas. Consideration should be given to disparities in road condition, investment levels and travel within and between regions.

- **Journey times to key employment centres and essential services** — Recognising the impact of geography on economic opportunity and quality of life.
- **Population change and demographic sustainability** — including working-age population trends, recognising the challenges associated with population decline and outward migration in some regions.

Including these measures would provide a more comprehensive understanding of regional disparities and better reflect the circumstances experienced by rural and border communities. This would help ensure that geographical disadvantages, including accessibility, connectivity and demographic change, are appropriately recognised alongside more traditional economic measures.

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

Yes. The Council strongly believes that Local Government District boundaries are the basis of regional/sub-regions within NI. They are well established and ensure political oversight at a local level. Using NISRA statistical geographies and LGD boundaries facilitates the assessment of impacts, monitoring of progress, and identification of where continuous disparities lie.

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

Fermanagh and Omagh District Council welcomes the broad definition of regional disparities set out in Clause 7 and supports the inclusion of a non-exhaustive list of economic and social indicators on the face of the Bill. This reflects the complex nature of regional inequality, consistent with both the PfG and the UN SDGs.

Its definition also provides transparency regarding how regional disparities will be assessed while allowing the Strategic Regional Balance Framework to evolve over time as new evidence and priorities emerge. The Council particularly welcomes the recognition that regional disparities should be measured using a range of economic and social indicators rather than economic performance alone. This aligns with the place-based approach advocated by The Productivity Institute's Investment in Productive Places Study, which emphasises that sustainable productivity growth and regional development depend on the strength and interaction of 'The Seven Capitals of Productivity' - social, human, financial, institutional, and natural capital. The study identified social capital as a particular strength of Fermanagh and Omagh highlighting the contribution that strong community networks can make to resilient places.¹² Notably, the research also demonstrated that strong social

¹² Sensier, M., Penney, K., Francis, M. and McCann, P. (2025) *Executive Report for the Place-Based Study on Fermanagh and Omagh District Council*. The Productivity Institute, University of Manchester <https://www.fermanaghomagh.com/app/uploads/2026/02/Executive-Report-for-Place-Based-Study-FODC.pdf>

networks, civic participation and connections between individuals, communities and institutions can play an important role in supporting economic resilience, wellbeing and inclusive growth.¹³ Measures that reflect community participation, access to local services, social infrastructure and opportunities for engagement can therefore provide valuable insight into the capacity of places to support sustainable development and reduce disadvantage over time.

The Council supports the definition of regions by reference to Local Government Districts. Reporting and analysis at Local Government District level will be important in demonstrating whether disparities are reducing across Northern Ireland and whether historically under-invested districts, including Fermanagh and Omagh, are benefiting from more balanced economic growth, improved connectivity and increased public investment over time. The Council recognises the need to consider other function geographies and notes that the economy does not solely operate on a local government district basis. However, whilst this should be considered accordingly, the focus for reporting purposes should remain on local government districts, areas wholly within local government districts, or amalgamations of local government districts. Importantly, regional balance must not be interpreted through a simplistic distinction between Belfast, Derry~Londonderry and all remaining areas. Such an approach risks masking significant disparities experienced within rural and peripheral sub-regions. The Framework should therefore adopt a granular approach, allowing areas such as the Rural West of the Bann, including Counties Tyrone and Fermanagh, and the Fermanagh and Omagh District, to be supported according to their distinct circumstances.

As such, the Council recommends that the Executive gives particular consideration to ensuring that the Framework's methodology appropriately reflects the characteristics of rural and border areas. Reliance on regional averages can mask significant disparities and may not fully capture issues relating to accessibility, connectivity and service provision, which can have a significant influence on economic opportunity and quality of life in predominantly rural and border districts. The Council therefore recommends that the Framework gives appropriate weight to indicators that reflect rural accessibility, digital connectivity and access to essential services when assessing regional disparities. This would ensure that the Framework captures the lived experience of communities across all parts of Northern Ireland and supports a more comprehensive understanding of place-based inequality.

The Council recognises that the indicators used to define regional disparity are important, but it is equally as important to consider and outline how those indicators, and the underlying data, are analysed and used. For example, will they be used directly in funding formulas to calculate funding allocations (similar to the funding formula utilised for Regional Balance Funding), or will their use be more descriptive and thus indirect. The Council recognises that the methodology relating to this will need to be robust yet agile and thus is unlikely to be within the legislation. However, the Council would anticipate it to be contained within the Strategic Framework and looks forward to reviewing the details in due course.

¹³ Putnam, R.D. (2000). *Bowling Alone: America's Declining Social Capital*. In: Crothers, L., Lockhart, C. (eds) *Culture and Politics*. Palgrave Macmillan, New York. https://doi.org/10.1007/978-1-349-62965-7_12

2.8 Clause 8 - Commencement and Short Title

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

Yes. Given the longstanding nature of regional disparities, it is vital that this legislation is commenced as soon as practicable. As the legislation provides 12 months for the preparation of the Strategic Regional Balance Framework, the Council considers that sufficient time is available to support implementation without the need for a further delay in commencement.

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

No.

2.9 Any other comments

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

The Council considers that the following amendments, as outlined elsewhere in our response, would strengthen the effectiveness of the Bill:

1. Stronger legislative provisions to move beyond a duty to have 'due regard' and require Departments and delivery partners to take active, measurable steps to reduce regional disparities and demonstrate tangible progress against agreed regional balance outcomes.
2. Annual reporting should include an assessment of public expenditure in each Council area of Departments and Arm's-Length Bodies such as, but not limited to, Invest NI and NI Water, to demonstrate progress against subregional targets and introduce performance improvement plans for areas where targets are not met and/ or where disparities remain.
3. Regional Impact Assessment mechanism requiring major policies, programmes and investment decisions to assess and publish their likely impact on regional balance.
4. Recognition of the role of local government, Community Planning Partnerships and established Local Economic Partnerships in supporting delivery and monitoring of the framework.
5. Stronger alignment between the Framework, the Programme for Government and wider economic development strategies.
6. Require Framework to demonstrate how rural proofing has been considered in the development of regional balance indicators, targets and interventions.
7. Provision for reporting at Local Government District level to enable progress to be monitored across all parts of Northern Ireland.
8. Consideration of how funding to support the delivery of the objectives within the Regional Balance Bill will be determined and allocated.

The Council believes these amendments would improve accountability, strengthen implementation arrangements and help ensure that the legislation drives practical action rather than operating solely as a reporting mechanism.

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

Fermanagh and Omagh District Council broadly supports the Regional Balance Bill and welcomes its ambition to address longstanding regional disparities across Northern Ireland. The Council considers that a statutory framework has the potential to provide a more coordinated and consistent approach to regional development than has previously been achieved through a series of disconnected initiatives.

The success of the legislation will ultimately depend not on the existence of the Framework itself but on how it influences policy decisions, public investment and service delivery across government. The Council therefore emphasises the importance of strong implementation mechanisms, robust guidance, meaningful accountability arrangements and sustained cross-departmental collaboration. Particularly, the needs of rural, border and historically under-invested areas, where structural disadvantages continue to constrain economic opportunity and growth, must be understood and addressed. The Mid South West Growth Deal provides a practical example of a regional investment approach involving local government, the Northern Ireland Executive and UK Government, with projects focused on infrastructure, regeneration, tourism, innovation and digital connectivity. If supported by adequate funding and resources, effective governance and a genuine commitment to place-based investment, the Bill has the potential to make a significant contribution towards achieving more balanced and inclusive regional development across Northern Ireland.

The principles set out in the legislation are welcome, however, their effectiveness is constrained by the absence of any budgetary obligation. The legislation and supporting Memorandum provide little detail on how funding should be directed to address imbalance. Whilst duty is placed on departments to give '*due regard*' to regional balance, there is no legislative requirement to commit investment. As a result, there is a risk that compliance becomes focused on process and assessment rather than the delivery of tangible outcomes and measurable change. Therefore, implementing this framework will require departments to identify and allocate dedicated funding to support their regional balance objectives. Crucially, a proportion of this funding should be ring-fenced to ensure that commitments to regional balance are translated into tangible investment in rural areas and communities.

It should be noted that the Council's Rural Affairs Sub-Committee has engaged with a series of Departments, including DfE regarding research undertaken which suggests current funding mechanisms within Central Government do not adequately account for peripherality, and the costs associated with service provision in a particularly sparsely populated sub region. A continued reliance on per-capita distribution models or the broad classification of settlements and value for money investments, for rural districts, they often limit opportunity in rural areas and reinforce existing regional inequalities.

There is a concern from Fermanagh and Omagh District Council that funding decisions could be disproportionately influenced by factors such as population, anticipated economic return or service demand, rather than by the need to achieve equitable geographic distribution (as the Council has experienced numerous times in the past). It will therefore be important to recognise that some investments may be less cost-effective on a purely economic or value-for-money (VFM) basis but may nevertheless be essential to achieving regional balance.

The decision-making framework must not place undue emphasis on VFM alone, as this could result in disadvantage towards areas with existing disparities and ultimately undermine balanced regional investment. If the objective is to achieve genuine regional balance, FODC wishes to see funding frameworks that recognise unique rural challenges.

The Council notes that, as per the supporting Memorandum, during an earlier consultation process, 86.2% of respondents either agreed or strongly agreed with the proposal to require Invest NI to develop, publish and report against sub-regional economic targets on an annual basis. However, the Council is disappointed that this proposal has not been carried forward into the Bill as introduced, with the Memorandum stating that there is no intention to amend the statutory framework governing Invest NI. Given Invest NI's central role in driving economic development and addressing regional disparities, the Council believes that establishing, publishing and reporting against sub-regional targets would provide further transparency and help to ensure that economic investment is felt by the historically under-invested Rural West of the Bann.

Broadly, Fermanagh and Omagh District Council supports the ambition of the Regional Balance Bill and recognises its potential to provide a statutory basis for addressing longstanding regional disparities. However, if the legislation is to deliver meaningful change, it must move beyond procedural consideration and reporting towards stronger legislative provisions, clear accountability, dedicated funding and measurable outcomes. For rural, border and historically under-invested areas such as the Fermanagh and Omagh District, regional balance will only be achieved where public policy and investment decisions actively recognise structural disadvantage, address infrastructure and service deficits, and deliver tangible improvements in economic opportunity, connectivity and quality of life.