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Submission to the Public Consultation on the Draft Regional Spatial and Economic Strategy for the Northern and Western Region

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This response has been prepared by the Centre for Cross Border Studies as a contribution to the Northern and Western Regional Assembly's public consultation on the Draft Regional Spatial and Economic Strategy for the Northern and Western Region.¹

About The Centre for Cross Border Studies

The Centre for Cross Border Studies (CCBS), based in Armagh, has a strong reputation as an authoritative advocate for cross-border cooperation and as a valued source of research, information and support for collaboration across borders on the island of Ireland, Europe and beyond.

The Centre empowers citizens and builds capacity and capability for cooperation across sectors and jurisdictional boundaries on the island of Ireland and further afield. This mission is achieved through research, expertise, partnership and experience in a wide range of cross-border practices and concerns (for more details visit www.crossborder.ie).

The response that follows, therefore, is closely informed by the Centre's particular knowledge of and experience in cross-border socio-economic development involving a range of sectors from both Northern Ireland and Ireland, including public bodies, business and civil society. Given the Centre's remit, therefore, this response will focus primarily on the extent to which the Draft Regional Spatial and Economic Strategy includes any cross-border, North-South and all-island dimensions.

1. The Centre for cross Border Studies (CCBS) welcomes and fully supports the position of the Northern and Western Regional Assembly as a leader in identifying regional policies and coordinating initiatives that support the delivery and implementation of national planning policy through its RSES. Indeed, the RSES clearly and explicitly resonates with the ten strategic objectives of the NPF.
2. The draft Strategy's underlying vision is to promote the '[t]ransformation of this region into a vibrant, connected, natural, smart, [...] great place to live'² through a focus on creating better

¹ This response was authored by Dr Milena Komarova (Research Officer of the Centre for Cross Border Studies) and Ms Carolin Beez (Centre for Cross Border Studies intern).

places, achieving regional competitiveness, and engaging in a process of deep-seated collaboration. Of particular note in this respect, and given the geographical position of the region as bordering Northern Ireland, is the draft Strategy's full recognition of the importance of cross-border relationships and networks. There have clearly been tremendous advances in all forms and structures of cross-border collaboration and relationships between the Northern and Western Region and its adjacent counties in Northern Ireland. We applaud the work of the NWRA in planning for and supporting these.

3. It is particularly encouraging to see a vision of the Northern and Western Region as a place 'without border; nor boundary', connected to both Northern Ireland and Great Britain, articulated in the RSES. It is essential, therefore, that continuing attention is paid to, and dialogue is maintained with, policy-makers and policy development at regional and local levels in both Northern Ireland and Great Britain in order to maximise any opportunities arising from beneficial synergies.
4. In particular, CCBS welcomes the draft Strategy's position vis-a-vis strengthening all island cohesion. Given that it will be the border counties who will be most detrimentally affected by Brexit, it is essential that specific and sustained support is offered to bigger population centres in the region, avoiding the further exacerbation of disparities between Dublin and Belfast on the one hand and other cities and settlements such as Letterkenny on the other.
5. CCBS notes that the draft Strategy will be complemented by the Local Economic and Community Plans (LECPs) prepared by the Local Authorities as well as by the Regional Development Strategy for Northern Ireland 2032 (RDS) in several parts. CCBS appreciates the Regional Assembly's collaboration with Local Authorities on both sides of the border and encourages the Regional Assembly to maintain its determination to work together for such collaboration, whatever uncertainty may surround the UK's departure from the European Union. Nevertheless, CCBS calls on the Regional Assembly to strengthen the important cooperation with Government Agencies in Northern Ireland. For its part, and in line with its core mission, CCBS will advocate for a reciprocal approach from relevant actors in Northern Ireland in the first instance, as well as UK Government representatives in light of the current lack of a functioning Northern Ireland Assembly and Executive.
6. Further to the point above, CCBS will continue its engagement with policy-makers at UK Government level in relation to the proposed UK Shared Prosperity Fund in order to ensure it will offer adequate support to cross-border cooperation.³ CCBS will also continue to seek to participate in the development of the proposed PEACE PLUS programme, encouraging the widest possible support for North-South and cross-border initiatives.
7. CCBS notes that the Regional Assembly's ambition is to '[...] shape and coordinate planning, economic and spatial development and infrastructure investment at *national, regional and local levels* through the forthcoming Regional Spatial and Economic Strategies (RSESs).⁴ In this

² Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.33, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

³ See, for example, Centre for Cross Border Studies, "Submission to the APPG on post-Brexit funding Inquiry" (28 August 2018), <http://crossborder.ie/site2015/wp-content/uploads/2018/10/CCBS-Response-to-APPG-on-Post-Brexit-Funding.pdf>.

⁴ Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.24, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

context it is necessary to clarify the draft Strategy's ambition with respect to the third sector. It is essential that, at local level, communities are continually regarded as active participants in the shaping of the places they inhabit, and therefore their participation is explicitly stated as part of collaborative process. Moreover, such a process – where it relates to a cross-border dimension – should also integrate citizens' participation on a cross-border basis. In this regard, proper examination of community development strategies at local authority level *on both sides of the border* should be undertaken in order to identify any potential opportunities for cross-border cooperation. Given its knowledge of the relevant policy domains and its work with community groups in both jurisdictions in articulating their vision for cooperation within and between these islands,⁵ CCBS is ideally placed to assist regional and local authorities in making the appropriate cross-border and cross-sectoral linkages that will contribute to ensuring the achievement of a better future for all.

8. CCBS welcomes that the Regional Assembly is aware of the need for strong cooperation '[...] between central and local government, the private sector, institutions and non-government organisations, and most importantly [...] communities'⁶ during implementation. We would add that, in the interest of efficacy, such cooperation should begin at the early stages of strategic planning.
9. The RSES rightly identifies that '[w]orking together with our neighbours will be vital for continued development of our economy, as well as the co-ordination of economic and social infrastructure, in areas such as energy, healthcare, transport provision, management of environmental assets and co-funding of projects, which will be vital particularly within our Border Counties.'⁷ The RSES is entirely correct in acknowledging that delivery can only come through collaboration and coordination that includes a cross-border dimension and involving a range of organisations. In addition, we would underline the benefits of collaborating with the local authority-led cross-border networks. Such collaboration, together with the previously emphasised role of civic society organisations and local communities on a cross-border basis, is an area where the Centre for Cross Border Studies is ideally placed to assist.
10. CCBS is cognisant that the NWRA's draft Strategy demonstrates awareness of the risks Brexit brings for the border region and the '[...] the inter-connectivity of services, industry, communities and local economies across territory.'⁸ The document further recognises the 'significant and sustained' impacts Brexit may have on the North West City Region (Letterkenny with Derry City and Strabane Cross-Border City Region) 'unless coherent, decisive, mitigating actions are put in place'.⁹ Therefore, once again, it means to develop appropriate structures¹⁰

⁵ See, for example, CCBS's project "Towards a New Common Chapter": <http://crossborder.ie/towards-a-new-common-chapter/>.

⁶ Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.297, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

⁷ Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.286, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

⁸ Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.43, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

⁹ Northern and Western Regional Assembly, "Draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly" (2018), p.89, https://www.nwra.ie/wp-content/uploads/2018/11/Final_NWRA_RSES_18.11.19-2.pdf [last accessed 24/01/2019].

and attract funding which can support and encourage cross-border and North-South cooperation. Indeed, the need for and development of appropriate structures and funding programmes to address and deliver in complex policy areas post-Brexit is a task the Centre for Cross Border Studies has been engaged in for a significant period of time, bringing its expertise and direct practical experience of cross-border cooperation to its assessment of what these structures and programmes might entail.¹¹ The Centre is ready to assist the Regional Assembly in this area if it would find it beneficial.

11. We stress, however, that because Brexit will alter the legal, administrative and political basis for cross-border cooperation and exercise pressure for increasing divergence between the regulatory frameworks on the two sides of the border, it requires more specific and renewed attention to developing new collaborative approaches to cross-border policy-making and effective cooperation. There is a particular need to understand and boost the capacity of organisations (government, third sector and business) at every level – national, regional and local – to work effectively in a changing cross-border environment.
12. In order to reflect and address these challenges at every level of spatial planning in the region, the RSES must tease out and articulate specific issues and questions with respect to individual growth ambitions, localities and networks. For instance:
 - Given the appropriate recognition of the crucial role of cross-border networks such as the Letterkenny-Derry North-West Gateway in leading future growth and development, how is the designated City Region (MASP) of Letterkenny/Derry strategically planning for the challenges to continuing collaboration posed by Brexit?;
 - How will, for example, the proposed ringfenced Brexit fund for the Border Region relate to the future PEACE PLUS Programme or to the UK proposed Shared Prosperity Fund?;
 - With respect to the draft Strategy's aim to implement not only the principles of the NPF but to reflect the strategies set out in the other jurisdiction on this island (such as the Regional Development Strategy for Northern Ireland 2032 (RDS) and the Derry City and Strabane District Council's Inclusive Strategic Growth Plan (2017-2032), among others¹²), how will these strategies continue to be reflected after Brexit in the face of a potentially significant regulatory divergence between the two jurisdictions?;
 - In addition, by what means specifically will this Strategy continue to offer 'local, regional and national governments the opportunity to take a high-level, and long term strategic approach, to the sustainable growth of the North West City Region'¹³;
 - What structures may serve as a workable forum for different levels of government to continue liaising and engaging with each other in the future?;
 - In the absence of working regional government in Northern Ireland, how is government representation to be ensured on new collaborative structures, such as the North West

¹⁰ In this sense, we commend the impressive collaborative work on the North West Regional Dashboard in counteracting the day-today uncertainty arising from Brexit.

¹¹ Some of the results of this work can be found at <http://crossborder.ie/category/research-and-policy/policy/briefings/> and <http://crossborder.ie/category/research-and-policy/policy/consultation-responses/>.

¹² p. 85. The same aspiration is articulated on p. ... Where it is stated that this strategic plan makes every effort to align with existing national, regional and local level policies (incl. outcomes and objectives) as relevant, incl. planning documents relating to Ireland, Northern Ireland and Cross-border. By what means/fora are all these coordinated? How specifically are you to achieve the strategic aim of: 'By 2038, the North West City Region Metropolitan Area and Letterkenny Regional Centre will be Connected, Vibrant, Resilient and Inclusive'? Not enough to say that this will be by 'working collectively and in an interdisciplinary manner'.

¹³ p. 85.

Strategic Growth Partnership? Similarly, how will representation by the third sector (particularly cross-border third sector organisations) be enhanced and facilitated in the future, given the changing funding environment for the sector through PEACE PLUS and the Shared Prosperity Fund?;

- How would the NWRA ensure that cross-border partnerships like that are represented and heard through the Withdrawal Agreement's governance arrangements, or indeed in other governance arrangements in the event of a no deal? Such representation will be particularly important for the NWRA's aim to stimulate and support enterprise and innovation in the North West City Region, given the size and importance of the regional cross-border economy.
13. One appropriate place in the Strategy to engage with questions such as those above could be the 'Mitigating Risks and Challenges' sub-section of 'Strategic Analysis and Vision'. As it stands, the section rightly and precisely articulates the potentially damaging effects of Brexit for Ireland as a whole but we suggest that it needs to drill deeper into the more precise risks, challenges and mitigating strategies specifically applying to the Northern and Western Region. Furthermore, each of the 'Growth Ambition' Sections of the document must engage explicitly in a dedicated sub-section with these challenges.
14. The 'All Island Cohesion' section of the draft Strategy aptly identifies three key categories of practical co-operation of strategic significance to communities on the Island, e.g.: Working Together for Economic Advantage; Co-ordination of Investment in Infrastructure; and Managing our Shared Environment Responsibly. Again, it is particularly important to note with respect to these areas of cooperation that deregulatory pressures in Northern Ireland resulting from Brexit may lead to divergence in policy and standards in each of these areas between the two jurisdictions, making cross-border cooperation more difficult.