RESPONSE BY ICBAN TO 'IRELAND 2040: OUR PLAN

- THE NATIONAL PLANNING FRAMEWORK', (March 2017)

1.0 INTRODUCTION AND CONTEXT

- 1.1 This submission is made on behalf of the Irish Central Border Area Network (ICBAN) Ltd. ICBAN is a local authority-led cross-border development organisation which works in the area of the island known as the Central Border Region. The local authority members of the partnership are from Republic of Ireland, Cavan, Donegal, Leitrim, Monaghan and Sligo and from Northern Ireland, Armagh City Banbridge and Craigavon, Fermanagh and Omagh, and Mid Ulster Councils.
- 1.2 This response focuses on two key areas which the organisation has been actively involved in:
 - 1) Promoting Cross-Border Co-operation
 - 2) Advocating for the Key Infrastructure Needs of the Central Border Region:
 - I. Key Arterial Roads in the North West Quadrant of the Island
 - II. Improved Broadband Connectivity
 - III. Canals and Waterways
- 1.3 In responding we draw upon particular study projects completed by the organisation:
 - o 'Regional Strategic Framework for the Central Border Region', 2013¹
 - A Roads Advocacy Study from 2012 sub-titled a, 'Socio-Economic case for improvements to the N16/A4 Sligo to Ballygawley and N2/A5 Monaghan to Letterkenny Transport Corridors' (completed by ICBAN in conjunction with the North West Region Cross-Border Group).²
 - o 'Telecommunications Action Plan for the CBR', 2012³
 - Infrastructure Solutions Report on High Speed Internet Connectivity, 'Fibre at a Crossroads-Part I', June 2016 ⁴ (which is now being expanded for the border County Council areas).

¹ http://www.icban.com/The-RSF/Download-the-Regional-Strategic-Framework

² http://www.icban.com/Home/Publications/Roads-Study-Reports

³ http://www.icban.com/Home/Publications/Telecomms-Study

⁴ http://www.icban.com/Home/News/Fibre-at-a-Crossroads-Summary

2.0 GENERAL COMMENTS

- 2.1 ICBAN welcomes the opportunity for the forward planning that the National Planning Framework (NPF) provides.
- 2.2 ICBAN also appreciates the opportunity to comment on the interests of council areas out-with the jurisdiction on issues affecting the NI area. In the past there have been separate planning processes in both Ireland and Northern Ireland, creating 'back-to-back' development short-comings, which have only served to increase peripherality for communities in the border region. The recognition of north-south and cross-border initiatives in latter years and in particular the referencing by the National Planning Framework to inter-connecting issues with Northern Ireland, is therefore welcomed.
- 2.3 We acknowledge the changing external environment at EU and global levels and recommend that where appropriate and agreed, that collaborative approaches to planning and development between Northern Ireland and Republic of Ireland are pursued. We make these comments as a cross-border partnership on the island with an interest in both jurisdictions.
- 2.4 We note that the NPF states the desire to replace the concept of balanced regional development with 'effective regional development'. The document also states on page 4 that the NPF will assist more effective regional development, 'In order to ensure that positive outcomes arising from national growth can be shared by people throughout Ireland, the potential of all areas will need to be realised, relative to their capacity for sustainable development'. Key opportunities for regional development in Ireland will come from drawing upon strengths associated with development in: Regions; in Rural Areas; the All-Island Context and relationship with Northern Ireland, as outlined in Section 4 'A Place Making Strategy'.
- 2.5 The next sections will focus on addressing the organisation's 2 key areas of interest, with reference to the NPF.

3.0 CROSS-BORDER CO-OPERATION

3.1 The relevant Key Questions set out in the consultation which this submission responds to include:

How can the NPF facilitate co-ordination between settlements that share connections across the border between Northern Ireland and Ireland and how should this be reflected in the document?

What economic opportunities and sectoral clusters exist that can benefit economies within both jurisdictions and how can this be best captured and supported in the NPF?

What mechanisms are needed to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension and are there examples of best practice?

In terms of delivering cross-border infrastructure as detailed for example in the IBEC-CBI All Island Investment Project, what structures need to be developed to leverage joint financing, including through the private sector?

- 3.2 We welcome the reference on page 35 of the NPF to the 'Regional Strategic Framework for the Central Border Region' (completed by ICBAN) as an example of a regional and local leadership initiative.
- 3.3 Cross-Border Cooperation has been recognised under the *Fresh Start Agreement* as important to both governments on the island. Both governments have committed to key infrastructure investments such as A5/N2 arterial road, North West Gateway Initiative and exploring opportunities such as cross-border Greenways and Blueways, development of the Ulster Canal and the concept of the Narrow Water Bridge. These commitments need to be built upon and new ideas fostered and developed for the future challenges that lie ahead.
- 3.4 Cross-Border Cooperation is an instrument which the EU has long advocated in helping address regional imbalances in peripheral areas of member states, such as border regions. The Central Border Region is largely rural in character with the only urban elements being small settlements and only a handful of towns exceeding 10,000 people. It is remote from national or

regional capitals, meaning that the area and its communities are regularly overlooked in terms of attracting investment.

- 3.5 The area exists as a key trans-European interface, and will be significantly impacted by the redefinition of the EU as a result of the UK's exit by 2019. This issue is particularly relevant due to the complexities that Brexit creates for the large numbers of people commuting across the border for work, study, and social purposes.
- 3.6 With the potential implications of the UK Referendum decision to exit the EU still to be felt, continuing Cooperation between local authorities and communities on both sides of the border will help ensure the region is not marginalised and neglected, economically and socially. Even though the border areas could eventually see some communities within the EU and some not, the issues of cooperation across the border will remain. In this regard, ways and means must be found to attend to these challenges, for all impacted, irrespective of Brexit.
- 3.7 It is in this context that ICBAN argues that to sustain current levels of cross-border cooperation will require local, regional and central government in both jurisdictions to be attentive to the needs of communities in the border region, and to consider developing a specific territorial cohesion policy for the island of Ireland. Component areas of such a policy already have precedents for exploration for example, in 2014 the Centre for Cross Border Studies ⁵published a Scoping Study into the creation of a Cross Border Development Zone. The zone's objective would be to promote the economic development of the cross-border zone between Northern Ireland and Ireland on a coordinated basis, maximising the use of national resources and stimulating the use of local resources and expertise.
- 3.8 The importance of Cross-Border Cooperation in an economic sense is particularly vital for small firms. Intertrade Ireland note that nearly two thirds of the exports of small firms in Northern Ireland go to Ireland, while almost a sixth of the exports of small firms in Ireland go to Northern Ireland. The cross-border market is also critical for the first-time exporter in both jurisdictions. Cross-border sales represent the first export market for almost three-quarters of businesses across the island (73%), with 90% of Northern Ireland firms taking their first export steps in the Irish market and two thirds (63%) of Irish exporters taking the same steps in the opposite direction. The experience gained in cross-border trade acts as an export

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⁵ http://crossborder.ie/towards-a-border-development-zone/

- stepping stone for a majority of firms. It has had a significant influence on the development of additional export markets in 71% of businesses.
- 3.9 ICBAN as a local authority-led cross-border organisation has been promoting cross-border cooperation for over 20 years. There have been many changes in these times, some quite seismic and significant. This focus of work has resulted in ICBAN helping lever significant investment into the Region and has seen relationships between people, North and South, develop and thrive. Cross-Border projects between local authorities have had a great impact on the local communities. The significance of these investments upon both sides of the border cannot be underestimated and given the importance of the challenges in the times ahead, this must be a key strategic priority for the outworking and delivery of the NPF.
- 3.10 The 'Regional Strategic Framework for the Central Border Region' driven by ICBAN with its member Councils, represents one such strategic context and mechanism to help address common issues between settlements on adjoining sides of the border. The RSF, similar to the NPF, recognises the need to build regional resilience before growth can be expected to take place.

The Regional Strategic Framework for the Central Border Region

- 3.11 The RSF is a Framework for the development of the Central Border Region, for the period up to 2027 and embraces the opportunities that regional thinking might create. The document aims to inform and effect policy change, and create a region that can make a distinctive contribution to regeneration and growth of the island economy. This is emphasised within the Vision of "A sustainable region that delivers the best quality of life for its people and makes a distinctive contribution to economic and social renewal and growth on the island".
- 3.12 The RSF has been developed to influence the Governments of Ireland and Northern Ireland to consider the Central Border Region as an investment priority. It also seeks to address the inequalities and social outcomes between the Central Border Region and other regions of Ireland and Northern Ireland. The document represents the concerted efforts of local authorities, stakeholders and communities from both sides of the border working together to identify opportunities to improve the quality of life and prosperity of the communities in the area.
- 3.13 In order to achieve these benefits, four objectives have been set, and linked to the European Union's EU2020 Strategy: a smart and internationally competitive region; a people centred and inclusive region; a sustainable region; and an accessible and connected region. From these objectives 47

strategic priorities have been identified, many of which are already being advanced.

Responses to Key Questions

- 3.14 On how can the NPF facilitate co-ordination between settlements that share connections across the border...The 'Framework for Co-operation between Ireland and NI' on Spatial Planning provides a helpful foundation to take forward such issues. Accepting of course that new arrangements must be agreed by both governments, it is recommended that the existing North-South arrangements between both governments on the island should actively explore such to the benefit of the 2 jurisdictions, which though separated by a Brexit process will nevertheless continue to be interdependent and intrinsically linked.
- 3.15 On what economic opportunities and sectoral clusters exist that can benefit economies within both jurisdictions...The RSF document sets out 47 strategic priorities for cross-border co-operation, which were identified during a rigorous public consultation and development process in 2012-14. These include identification of key sectoral clusters including creative industries, engineering / light manufacturing etc.
- On what mechanisms are needed to ensure a joined-up approach to strategic infrastructure and investment decisions...It is recommended that consideration is given to opportunities in developing an island wide territorial cohesion policy, which would include a Cross-Border Infrastructure and Investment Plan, to replace the loss of common INTERREG and Peace funds which the area has benefited from. Existing North-South institutional arrangements should be considered as potential mechanisms at inter-governmental level. At local government and community levels, again with reference to the RSF, this document and process provides a strategic context for attention to be given to the Central Border Region. It offers an opportunity to provide a focus for the area in the same way that the North West Gateway Initiative and Belfast-Dublin corridor provide for the North West and Eastern Border areas respectively. ICBAN as the cross-border group for the Region and with experience in coordinating cross-border interactions and investments since 1995, provides a mechanism to be used by both governments for such, involving other sectors including local government, business and education/academia/research. It is therefore recommended that such an approach is embraced and supported by the governments of both Ireland and Northern Ireland to deliver effective development in the central border area.
- 3.17 On what structures need to be developed to leverage joint financing, including through the private sector...to expand on the detail of 3.16, structures such North-South institutions including SEUPB and others which have used joint-financing sources could be reconceived and developed for the use of new joint investment tools between the governments on the island in the future.

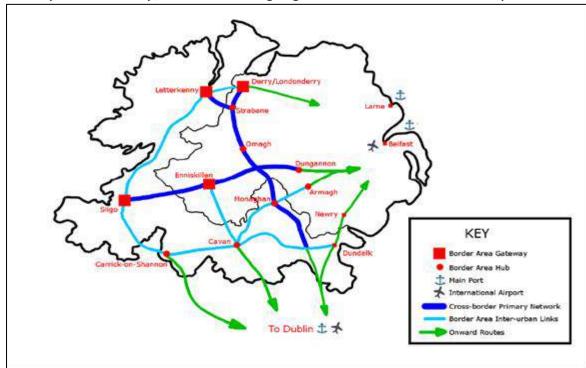
4.0 KEY INFRASTRUCTURE NEEDS OF THE CENTRAL BORDER REGION

4.1 The relevant Key Question set out in the consultation which this submission responds to include:

What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?

4.2 KEY ARTERIAL ROADS IN THE NORTH-WEST QUADRANT OF THE ISLAND

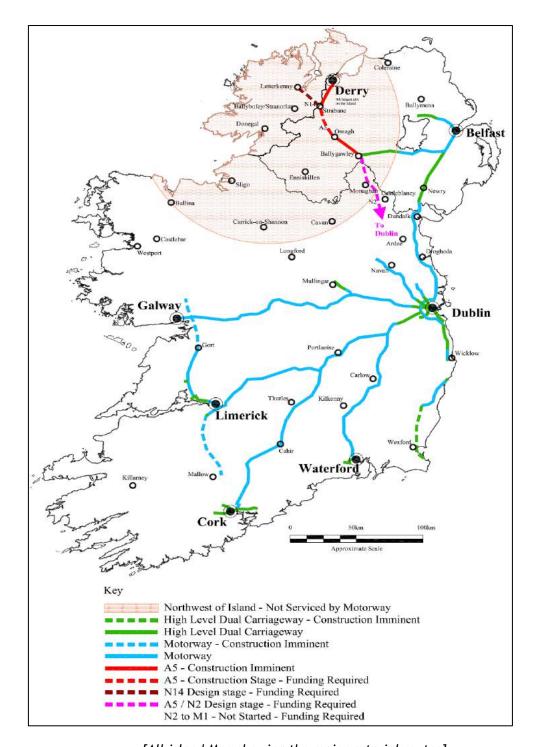
4.2.1 This submission focuses attention to key cross-border roads such as the A4/N16 Belfast to Sligo Road and N2/A5 route linking Dublin to Derry/Londonderry, both shown highlighted in blue on the next map.



[Map of the North West Quadrant of the Island, showing highlighted A5/N2 and A4/N16 Corridors in blue]

- 4.2.2 Reciprocal investment by the Irish government into these infrastructure investments, on top of the commitments agreed by the NI Executive, will help address the roads infrastructure requirements of the North West quadrant of the island.
- 4.2.3 The NPF acknowledges the net population loss in north-west since 1996. The document notes the influence of the investment in the national motorway network as having an impact on regional development and settlement

- patterns; leading to underdevelopment, a negative effect on the provision of associated health and well-being services, an imbalance of rural: urban growth outcomes, combining to reinforce social disadvantage.
- 4.2.4 It is welcomed that the Framework suggests that a 'business as usual' approach should not be the future regional development policy. Greater consideration must instead be given to the potential of the north-west and the contribution of these areas and communities, including the city region of Derry/Londonderry, to play a part in terms of all-island economic growth. Investing in key transport corridors in the Region will help promote the strategic development of this area.
- 4.2.5 ICBAN welcomes the related referencing within the NPF: In Section 4.4.12 under 'Connecting Places Through Infrastructure', it is stated, 'The Importance of a co-ordinated approach to national infrastructure on both sides of the border is evident...More recently, the Irish government reaffirmed its commitment to contribute to the upgrade of the A5 Dublin-Derry/Londonderry road in Northern Ireland, which also serves North Donegal and the north-west.'
- 4.2.6 On 15th February 2017 the Taoiseach reiterated strategic investment support for the N2/A5 road as part of his address on 'Ireland at the heart of a changing European Union', referencing European Investment Bank and other financing opportunities.
- 4.2.7 The map below from 2011/12 shows that the North West Quadrant on the island, home to a c.3/4 million population, remains a significant land area of the island that is not being served by a major arterial route. [It is recognised that since the completion of this map there have been other strategic roads infrastructure developments completed on the island, though not in the north western areas].



[All-island Map showing the major arterial routes]

4.2.8 The research undertaken as part of the study by ICBAN in 2012 clearly identified the importance of both corridors, N2/A5 and N16/A4, in supporting the future economic prosperity of the border area. The analysis is not to read as N2/A5 versus N16/A4 but that both corridors will have to be improved if the Border Area is to realise its goal of sustainable regional development.

4.2.9 The NPF references the related mid-term review of the Capital Infrastructure Plan (2016-2021). It would therefore be recommended that support for these key roads schemes are formally reviewed within such a budgetary and prioritisation process.

Supporting Context / Reports

- 4.2.10 <u>St Andrews Agreement, October 2006</u> The Irish Government agreed to part-fund the scheme with £400 million contribution as part of the St Andrews Agreement. This commitment was withdrawn on 10 November 2011. Since then, the Irish government has provided £50 million in investment.
- **4.2.11** <u>ICBAN / North West Region Cross-Border Group Advocacy Document, 'Socio-Economic case for improvements to the N16/A4 Sligo to Ballygawley and N2/A5 Monaghan to Letterkenny Transport Corridors', October 2012 The document sets out a compelling socio-economic case on issues affecting the area, and how these could be addressed through improvements in transport infrastructure.</u>
- 4.2.12 There was a focus on the two key road corridors:
 - 1. Derry / Londonderry Aughnacloy Dublin (A5/N2) including: Lifford and Letterkenny (N14); and
 - 2. Sligo and Ballygawley (N16/A4).
- 4.2.13 This case was founded upon infrastructure improvements that would benefit the entire Border Area, rather than focusing on just a small number of counties within it. While there is general support for transport improvements that could be of benefit to specific parts of the Border Area, the focus in this study was largely on schemes that were contained within the Area.
- 4.2.14 The key questions addressed were:
 - What are the benefits to government of investing in new transport infrastructure in the Border Area?
 - What should the investment priorities be?
- 4.2.15 Other related questions addressed were:
 - What are the problems?
 - What are the benefits of improved transport?

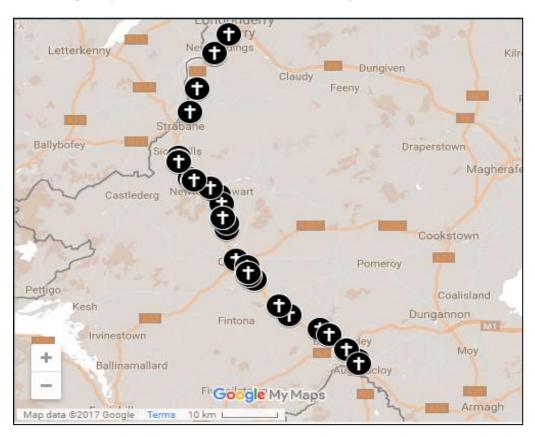
4.2.16 There is compelling evidence to suggest that the border area has not received its fair share of infrastructure investment compared to other areas. For example, a review of NRA investment in road schemes suggests that spending per head on transport infrastructure in the border area is only around 45% that of other Irish regions. This is a key point - if this disproportionate spending pattern continues, the border area will fall further behind economically, amplifying the issue of a 3-speed economy.

Key Recommendations Noted in the Report

- 4.2.17 The Northern Ireland Assembly and the Government of the Republic of Ireland should make an immediate, unequivocal and time specific commitment to upgrade both the A5/N2 and A4/N16 corridors in their entirety, following the prioritisation framework set out in the document.
- 4.2.18 There are therefore clear benefits to government of investing in the identified Border Area transport improvements, namely:
 - The Border Area realises its full economic potential, delivering the objectives set out in the various governments' strategies and plans.
 - The Border Area contributes positively towards the economic development of both Northern Ireland and the Republic of Ireland.
 - Equity and social inclusion the equalisation of investment in the Border Area with other areas on the island of Ireland will ensure that it is an attractive place to live, work, invest and do business in.
- 4.2.19 Decision-makers must also consider the consequences of not channelling an appropriate level of investment into the Border Area. The long-term financial costs of this failure to invest would be significant, as it will become more costly to address the economic challenges of the area as the local economy underperforms relative to the rest of the island. In addition, government must also consider the island-wide opportunity cost the Border Area will become a resource intensive drag on economic growth rather than fulfilling its positive economic potential.
- 4.2.20 <u>IBEC-CBI Joint Report</u>, "Connected: A prosperous island of 10 million <u>people"</u>, (July 2016) This report has identified the A5/N2 as one of the Top Ten key transport infrastructure priorities on the island of Ireland. The report states; the "Efficient movement of people, capital, goods and services is crucial to an effective, competitive and modern economy."

Road Safety Arguments

4.2.21 It is important to also factor in the Road Safety argument to the debate. In October 2016 the Ulster Herald completed the map below illustrating that 30 lives have been lost on the A5 route in past decade (since April 2006). The paper also cited that during the recent public enquiry hearing in Omagh, Co.Tyrone that Departmental Officials had claimed that the new A5 dual carriageway will save some 22 lives over 60 years.



Other Key Accessibility Routes

- 4.2.22 There are other key strategic accessibility routes in the Region which should be prioritised within the timeframe of the NPF: (1) the N3/A509 strategic route and (2) the Dundalk/Cavan/Sligo East West strategic route.
- 4.2.23 The Ireland 2040 Issues and Choices Paper discusses the important interaction between Cavan and Enniskillen and the number of car trips that cross the border at this location. Important to the success of this Region is connectivity to the Dublin Region.
- 4.2.24 The upgrade of the Dundalk/Cavan/Sligo East West strategic route is also very important to the Region. This is currently a heavily trafficked poorly

aligned route serving significant FDI and indigenous businesses moving goods to Dundalk, ports and Northern Ireland.

IMPROVED BROADBAND CONNECTIVITY

- 4.3.1 The National Broadband Plan is recognised as a vitally important infrastructure investment project for the state. The European Commission acknowledges that the investment planned is one of the most ambitious connectivity infrastructure projects across Europe, if not the most ambitious, and would see Ireland take its place as a leading digitally connected nation. There are however concerns about the pace of delivery with a 2022 timespan being set for completion of all premises. It is vital that the target deadline now of 2022 is adhered to and that peripheral areas such as the border region are not left until the end by virtue of geographic location.
- 4.3.2 Related to this, equally ambitious programmes should ensure that mobile telecommunications coverage are also effectively delivered. The investments in Fibre roll-out can help ensure that mobile infrastructure can be enhanced and that 'not-spots' are corrected and negated. Together both platforms will help the country effectively plan for a confident digital future.
- 4.3.3 Connectivity / broadband / telecommunications is an area which ICBAN has become actively engaged in for the past number of years. The organisation sees connectivity as a key enabler in helping rural areas and towns to flourish again. Broadband advances enable anyone/anywhere to plug into the world regardless of location.
- 4.3.4 It is vital therefore that the NPF takes careful consideration of the impact and 'disruption' caused by advances in digitalisation, technology and connectivity. The world is now advancing through the 4th Industrial Age, the Digital Age, when the planet will become smaller, more connected, globalised and advanced. This frenetic pace of change will have profound implications for governments, business, society and indeed traditional planning approaches. For example, it is regarded that by 2025 that 50%-80% of car sales will be electric: that by 2045 the human world and the cyber worlds will begin to merge man will be connected to the Cloud by 2045 according to Time Magazine: and that advances in telemedicine will mean that doctors can remotely diagnose patients from distances through digital eyewear and smart devices, negating the need for such travel.
- 4.3.5 Former UK Chancellor, George Osbourne had cited in 2015 a 30% rise then in rural business creation and a reverse migration flow of people from cities and urban area to remote locations of the UK. This is because connectivity enables many businesses to operate outside of urban areas and to be attracted to rural areas instead, which offer the added attractiveness of

- idyllic locations, leisure & recreation, cheaper living, less crime etc. Our small towns and villages can flourish again, because they will also become 'future-proofed' effectively.
- 4.3.6 Ireland, it is sometimes argued, tends to react more slowly to such advances. At the moment many remote European and Irish dwellers don't have fast broadband connections but in the lifetime of the NPF this will certainly have changed. Given the ambitions for delivery of the National Broadband Plan, the commitments made by government and the furtherance of ambitions being promoted by the EU, the impact of many of these global trends are likely to be quickly felt on the island. Economists point to a growing evidence of the direct positive correlation between investments in digital connectivity, infrastructure / broadband penetration and resultant increases in jobs, GDP and economic growth.
- 4.3.7 These advances will pose questions for traditional planning approaches. Currently 2/3 of internet users shop online, a figure that will increase. What impact will this have on high streets therefore? What impact will increases in electric cars have for energy, traffic systems, filling stations, charging points, journey times etc.? What impact will the enhanced attractiveness and connectivity functions of rural areas have on planning and infrastructure investment decisions between now and 2040?
- 4.3.8 The world and its global society is becoming increasingly complex and difficult to predict and it is in this environment that tools such as the NPF are needed to help make the most effective decisions and plans. This raises the question, is the NPF and its associated regional plans, sufficiently future-proofed and forward thinking in their nature?

CANALS AND WATERWAYS - THE ULSTER CANAL PROJECT

- 4.4.1 The Updated Outline Business Case of February 2015 for the Ulster Canal highlights the many positive outcomes attached to the project including that it is the last major unrestored waterway in Ireland, North or South and that the project can be achieved on a phased basis to minimise short-term demands on public funds. The Ulster Canal development has the further potential to help regenerate the border region.
- 4.4.2 All three Councils directly involved in the immediate proposal (Cavan, Monaghan, Fermanagh & Omagh) support the regeneration as a key strategic intervention, and planning permission has already been secured. Furthermore, waterways-based tourism has been identified as a sector of unexplored potential for the growth of high value added visitor spend helping create business and community development opportunities.

4.5 Responses to Key Questions

- **4.5.1** On what are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?... These include the aforementioned key strategic routes. It is recommended that the reaffirmed commitment by the Irish Government to the upgrading of the N2/A5 corridor is now supported by the pledge to provide the original committed match-funding share of c.£400million, which will enable the road to be advanced for completion.
- 4.5.2 Though not officially highlighted to the level of other large-scale road projects, the importance of N16/A4 scheme must also be recognised with support to complete realignments between Sligo and Enniskillen.
- 4.5.3 Other important accessibility routes for the Region include the N3/A509 strategic route, and the Dundalk/Cavan/Sligo East West strategic route, which must also be highlighted for consideration in the investment decision-making process during the delivery on this plan to 2040.
- 4.5.4 That the **National Broadband Plan** and associated improvements in mobile telephony infrastructure are delivered on time, within all areas of the country, to help ensure that all citizens and businesses can avail of the opportunities arising.
- 4.5.5 That consideration is given to the impact and disruption caused by advances in digitalisation on traditional planning and infrastructure decisions. Connected rural areas can become more attractive locations for residents and businesses, effectively causing a rethink in terms of spatial planning.
- 4.5.6 Support for the phased development of the **Ulster Canal** and the associated tourist amenities planned.

5.0 OUTCOMES DELIVERED

- 5.1In response to the NPF Consultation questions, the following Outcomes are to be realised from delivering on the recommendations set out herein:
 - A mutually connected island: A connected Central Border Region to the rest of the island
 - Delivering on previously agreed important infrastructure projects for both Ireland and Northern Ireland for example, A5/N2
 - Pro-active responses to the mobility and co-operation challenges which Brexit brings as the latest serious challenge to the island
 - Tangible investments in interaction with NI
 - Enabling areas in north-west area of the island to capitalise on their economic and social potential, including the Central Border Region and North-West metropolitan area
 - Embracing the European model of Inclusion and 'fair play' as key 'place-making' assets
 - Supporting an area lacking in strategic transport infrastructure
 - Arresting challenges of underdevelopment and disadvantage and proofing against future shocks
 - Enabling rural and outlying areas to flourish and thrive again
 - Relieving pressure on Dublin and the east of the island, by strategically supporting the Central Border Region and north west of the island
 - Delivering on the Objectives of the Regional Strategic Framework for the Central Border Region, as 'an Accessible and Connected Region.

6.0 CONCLUDING REMARKS

- 6.1 It is clear that the infrastructure network in the border area is incomplete and requires significant investment to bring it up to a 'fit for purpose' standard.
- 6.2 It is acknowledged that transport infrastructure cannot resolve all of the Border area's economic difficulties. Any infrastructure improvements would need to be accompanied by investment in communications technology, industrial premises and skills development etc. through an over-arching strategic response such as the cross-border Regional Strategic Framework advocates. Indeed the long-term development of the area may be best supported by designating it as an enterprise area i.e. a border development zone.
- 6.3 ICBAN welcomes the opportunity to submit these comments as a first major step towards the preparation of a new Irish Spatial Plan.
- 6.4 ICBAN will also engage on these issues through the development of regional strategies such as a Regional Spatial Economic Strategy for the Northern and Western Region, and local County Council development plans and District Council Plans.