



***Public Consultation on  
'A Framework for Sustainable Development for  
Ireland'***

**Submission from the  
Western Development Commission  
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Western Development Commission  
Dillon House  
Ballaghaderreen  
Co. Roscommon  
Tel: 094 986 1441  
Fax: 094 986 1443  
Web: [www.wdc.ie](http://www.wdc.ie)

# WDC Submission on ‘A Framework for Sustainable Development for Ireland’

## 1. Introduction and Context

The Western Development Commission (WDC) welcomes this opportunity to make a submission to the public consultation on A Framework for Sustainable Development for Ireland (FSDI).

The WDC is a statutory body established by government to promote, foster and encourage economic and social development in the Western Region.<sup>1</sup> It operates under the aegis of the DECLG.<sup>2</sup> The WDC works in co-operation with national, regional and local bodies involved in western development to ensure that the Western Region maximises its full development potential. It does this by:

- analysing economic and social trends and making policy recommendations;
- promoting the Western Region through the LookWest.ie campaign;
- supporting the rural economy through facilitating strategic initiatives (e.g. renewable energy, creative economy, rural tourism); and
- providing risk capital to businesses through the WDC Investment Fund.<sup>3</sup>

One of the functions of the WDC is regional policy analysis. The WDC seeks to ensure that government policy reflects the needs and maximises the potential of the Western Region in such areas as infrastructure, natural resources, enterprise and rural development. It also tracks the implementation of policies and recommends adjustments as appropriate.

The Western Region is a predominantly rural region; almost two thirds of the population live outside settlements of 1,500 people (Census of Population, 2006). Because of this, the WDC is particularly cognisant of the impact of any changes in government policy on rural areas. The region has four National Spatial Strategy (NSS) gateways (Letterkenny, Sligo, Galway and Shannon (part of the Limerick/Shannon gateway)) and three hubs (Ballina/Castlebar, Tuam, and Ennis). There are also other towns which are involved in driving local development, and which are important local economic centres in areas distant from designated gateways and hubs.

The WDC regards sustainable development as core to development of the Western Region, in particular because of the region’s significant natural resource base which can be used as a driver for green growth and green jobs, but which must also be managed carefully and protected.

The WDC’s submission will focus on the aspects of the draft FSDI which are directly related to regional development and its work areas.

## 2. The Importance of Sustainable Development for the Western Region

Sustainable development is fundamental to the Western Region’s future. The importance of sustainable development for the Western Region can be thought of in two ways, firstly the role that

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<sup>1</sup> Counties Donegal, Sligo, Leitrim, Roscommon, Mayo, Galway and Clare.

<sup>2</sup> Department of the Environment, Community, and Local Government.

<sup>3</sup> See [www.wdc.ie](http://www.wdc.ie)

the Western Region can play in contributing towards a more sustainable future for Ireland and secondly how a more sustainable approach can increase the Western Region's level of development.

The Western Region is particularly well placed to benefit from, and contribute towards, more green or sustainable growth. It is a predominantly rural region with a long coastline. It is endowed with considerable natural capital including relatively undeveloped land, lower population density, ocean, wind (onshore and offshore) and wood energy resources, beautiful and unspoilt landscapes and abundant rainfall. These natural assets present huge potential for development of the green economy, regionally and nationally, and need to be developed in a sustainable manner.

The green economy is also a critical growth sector in achieving a more diversified and sustainable enterprise and employment base in the region.<sup>4</sup> The region already has a higher reliance on natural resource based sectors than other areas of the country. In early 2011 7.1% of all those at work in the Western Region were employed in the agriculture, forestry and fishing sector compared with 4.1% in the rest of the state.<sup>5</sup> In addition 6.3% were working in accommodation and food service (a proxy for tourism employment) in the region, compared with 5.6% in the rest of the state.

This higher reliance on natural resource based employment highlights the importance of sustainable development for the region. The fact that the share employed in agriculture, forestry and fishing in the region has declined from over 10% in 2006 to the current 7.1% reinforces the need to develop new employment opportunities in the green economy, particularly in the area of renewable energy. Active development of the Western Region's assets should be facilitated through the FSDI and be incorporated in its implementation.

### 3. Draft Framework Document

This section sets out our specific comments on the draft Framework document. Comments are primarily focused on topics of relevance to regional development and the WDC's work areas.

#### Introduction

The FSDI may benefit from the statement of a vision for sustainable development for Ireland to 2020 at the outset of the Framework.

#### ***Sustainable Development is a priority for Ireland (p. 1):***

It may be useful to include a more detailed examination of some of the sustainability pressures created by the economic boom of 2002-2007. Many of these pressures continue to influence the current pattern of development such as the spatial pattern and extent of the Greater Dublin Area.

#### ***Our starting point (p. 6):***

It is stated that there has been significant progress in the development and implementation of sustainable policies and action since 1997. Providing a number of examples of this progress may be useful. The indicators in this section (population, income, government deficit, at risk of poverty rate)

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<sup>4</sup> WDC (2009), Work in the West: The Western Region's Employment & Unemployment Challenge <http://www.wdc.ie/publications/reports-and-papers/reports-2009/>

<sup>5</sup> CSO, Quarterly National Household Survey, Quarter 1, 2011, special analysis for Western Region. Rest of the State refers to all counties in the state except for the seven counties of the Western Region.

may not fully show the level of progress towards sustainable development and inclusion of an environmental indicator may better illustrate progress.

***Our commitments and principles (p. 9):***

This section is core to the FSDI and as noted above, it may be useful to include an overarching vision for sustainable development for Ireland to 2020 within this section. While it is stated later that the overall goal is ‘achieving continuous improvements of quality of life for current and for future generations’ it may be useful to state this earlier and in the context of a vision for the country.

The development of a green economy, as set out in this section, is particularly important to economic recovery for the Western Region. The region is endowed with considerable natural resources in agriculture, forestry, tourism and energy and the sustainable development of these resources to generate green growth will play a key role in the region’s future economic and social development. The success of developing Ireland’s green economy will rely on sustainably developing the potential of the Western Region’s resources.

The Western Region was highly reliant on the construction sector and has suffered considerable job losses as a result. These job losses have particularly hit smaller towns and more rural areas where the options for alternative employment are more limited. These areas also hold considerable potential for development of the green economy and the skills which were built up in the construction sector are often compatible with those required by the green economy, with relatively limited up-skilling or re-skilling. Development of the green economy will not only contribute to more sustainable development but will also create employment within the Western Region, particularly in some of its more rural and isolated areas.

***Framework for Sustainable Development for Ireland – Principles for Sustainable Development (p. 10):***

The themes and principles set out for the FSDI are broad and wide ranging and provide a useful underpinning for the FSDI. While the themes and principles set out on page 10 provide a comprehensive structure for the FSDI, they do not seem to be specifically addressed through the remainder of the Framework document. In order to be clearer on how the principles relate to the challenges in chapter 2, it may be useful if each key challenge section included a table which set out how addressing that particular challenge would contribute to achieving each theme and principle of the FSDI.

In relation to the themes and principles, we particularly welcome the theme of ‘Equity between countries and regions’ and the principle that the FSDI should ‘Promote coherence between local, regional, national, EU and global actions in order to increase their contribution to sustainable development.’ Such coherence is critical to achieving the overall aims of the FSDI and should be incorporated as much as possible within all of the measures set out in the Framework.

The relationship between sustainable development and regional development however is not limited to the contribution which regions and regional actions can make to sustainable development but also relates to how a more sustainable approach can improve regional development and equity. Natural resources and the assets on which the green economy depends are often located in more rural and less developed regions. The transition towards a greener, more competitive, low-carbon

economy will increase the value placed of the assets of such regions, and consequently their role and importance to the national economy.

The Framework should therefore include a more explicit focus on the balance of development between different localities and regions within Ireland, and a clear vision of how regional development is to be integrated across all the themes and challenges addressed in the FSDI.

***Priorities for action (p. 12):***

The list of priorities for action on page 13 very clearly sets out the purpose of the FSDI. It may be useful to state these priorities earlier in the document, at the outset, to clarify what the Framework is intended to achieve.

The WDC has a particular interest in three of the priorities:

- *Identifying and adopting policies that can help achieve a shift towards greener growth.* Greener growth holds considerable potential for the Western Region. It would be important that policies to support green growth would recognise regional and spatial differences in the distribution of green economy assets and would respond to differing regional needs and strengths.
- *Protecting and enhancing Ireland's Green Infrastructure which can be defined as an 'network of green spaces that help conserve natural ecosystems and provide benefit to human populations through, for example, water purification, flood control, food production and recreation.'* Such spaces include woodlands, coastlines, flood plains, inland lakes and rivers, hedgerows and city parks. The Western Region is endowed with considerable natural resources and Green Infrastructure. Protecting and enhancing this infrastructure will be central to development of the green economy and also to the quality of life of the region's residents, its attractiveness to tourists and also to inward investment (in addition to the benefits listed above).
- *Effective governance arrangements to ensure delivery of sustainable development.* It is important that in addition to national and local approaches to governance, that there is also a regional dimension. Many sustainable development challenges cross county boundaries and have a regional aspect. For example river basin management, transport and commuting flows,<sup>6</sup> education and training provision. Regional challenges need to be viewed and planned for at a regional level if they are to be effectively addressed.

## **Key Challenges for Sustainable Development**

The WDC believes it would be helpful to begin each key challenge section with a clear statement of a vision of where Ireland would like to be in relation to the specific challenge by 2020. This would provide more clarity on what the actions and measures ultimately aim to achieve.

As noted above, it would also be useful to include a short table for each challenge setting out how addressing that challenge would contribute to achieving the themes and principles of the FSDI set out on page 10, including equity between regions.

Such an approach would not only position the particular challenge in the wider FSDI context, but would also clearly highlight how it is linked to other challenges. One of the key purposes of the FSDI is to help ensure integration across policy areas to achieve sustainable development. Relating each

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<sup>6</sup> WDC (2009), Travel to Work and Labour Catchments in the Western Region: A Profile of Seven Town Labour Catchments <http://www.wdc.ie/publications/reports-and-papers/reports-2009/>

challenge to the themes and principles could very quickly identify areas of possible integration and overlap and also highlight areas of potential competition and conflict.

In the draft document each challenge is addressed in relative isolation from the others. It would be important for any issues of integration or conflict to be explicitly stated and examined for each key challenge.

### ***2.3 Conservation and management of natural resources (p. 26):***

As noted 'economic sectors such as agriculture, forestry, tourism, marine fisheries and aquaculture are reliant on the effective conservation and management of natural resources.' The higher dependence of the Western Region on these sectors has already been highlighted, making this issue critical to the region's growth.

It is clear that conservation and management of natural resources is a challenge which is very closely linked to several others e.g. economic resilience, sustainable production, clean energy, sustainable agriculture. It would be useful if these linkages and any opportunities for synergies or potential conflicts were explicitly examined in this section.

The WDC agrees on the importance of natural capital and the need to view green infrastructure as a critical infrastructure. Green infrastructure often crosses county boundaries and has a strong regional dimension. The Regional Planning Guidelines have an important role to play in policy for green infrastructure and should be referred to here. Reference could be made to the discussion of the RPGs in section 2.7.

The WDC has made a submission to the DECLG consultation on Reform of the Water Sector in Ireland.<sup>7</sup> We believe that an efficient, high quality, reliable and sustainable water service infrastructure is crucial for regional development. Given the importance of water in underpinning development we are concerned that regions such as the Western Region, with low population densities and spatially dispersed enterprise development, but high quality water bodies and abundant rainfall, are given due consideration in the development of the water sector and in investments in improved capacity.

Existing business needs robust, reliable water supply and wastewater treatment, and the infrastructure capable of maintaining quality of supply and meeting increasing demand for water. The Western Region also needs to be able to attract new enterprises and abundant water is a key natural asset which in the future should allow the region to do so. Therefore appropriate investments must be made to allow the region to compete in attracting industry and employment, while at the same time conserving and managing the region's water resources. There are opportunities for the Western Region to become a centre which can, in future, make full use of the potential of water as an asset particularly within the context of the green economy.

Landscape is also a key asset for the region which underpins its tourism sector. In a Visitor Attitudes Survey at a regional level undertaken in 2007, beautiful scenery was the most important factor in influencing tourists to visit both the West and North West regions with 88% of survey respondents

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<sup>7</sup> <http://www.wdc.ie/publications/submissions/subs2012/>

ranking it as a very important factor.<sup>8</sup> Tourism plays a relatively more significant role in the regional economy than nationally and is also considered one of the key growth sectors for the region in the future. The green economy is also a key growth sector. It is important that the FSDI would play a role in highlighting and mediating any possible conflicts that may arise between the development of the green economy and the conservation and management of the region's landscape assets.

The WDC strongly agrees with the need for good quality spatial data on Ireland's natural resources as a basis for robust policy making. The WDC, as lead partner in the RASLRES (Regional Approaches to Stimulating Local Renewable Energy Solutions) project,<sup>9</sup> has undertaken a number of initiatives to map the biomass natural resource of the Western Region. Its 2011 report *Energy Crop Opportunities in the Western Region* maps the areas of potential for energy crop production in the Western Region and also maps the areas under private forestry in order to identify the available wood energy resource.<sup>10</sup> The WDC believes that mapping of natural resources is particularly important to identify differing local and regional assets and to assist in ensuring that policy fully reflects differing regional opportunities and needs.

The WDC agrees with the need to develop an integrated marine and coastal management process and intends to make a submission to the ongoing consultation 'Our Ocean Wealth: Towards an Integrated Marine Plan for Ireland'. The WDC has a particular interest in the development of the region's marine energy resource (offshore wind, tidal, wave). It would be important that the FSDI and the Integrated Marine Plan be consistent and mutually supportive.

#### **Measures:**

12: It would be important to adopt a fully integrated approach to green infrastructure that addresses the sustainable development and use of the resources, as well as conservation and management. The FSDI provides the opportunity to mediate between conservation and development of resources.

14: It would be important to specifically include the development of mapping and spatial data, in addition to indicators and satellite accounts. Given the geographic nature of natural resources, mapping is critical.

18: Given the central role of water resources in sustainable development, a broader measure which incorporates the need to develop the water sector, manage water resources and make investments to improve capacity and reduce leakage may be useful here.

#### **2.4 Climate change and clean energy (p. 32)**

It may be useful to more explicitly examine the interactions between this challenge and other aspects of the FSDI e.g. economic resilience, sustainable production. Competing policy objectives and the need to reconcile and balance these is referred to. The FSDI presents a good opportunity to clearly set out the mechanisms and approach to be taken to reconcile meeting climate change targets with achieving sustainable development and employment growth.

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<sup>8</sup> Fáilte Ireland (2008), Visitor Attitudes Survey: A regional perspective

<sup>9</sup> RASLRES is funded through the INTERREG Northern Periphery Programme [www.raslres.eu](http://www.raslres.eu)

<sup>10</sup> <http://www.wdc.ie/wp-content/uploads/WDC-RASLRES-Energy-Crop-Report-June2011.pdf>

Increasing renewable energy output is fundamental to meeting this challenge. The necessity of increasing renewable energy generation and the benefits of this not only for meeting climate change targets, but also for economic growth, could be examined in more detail here. Such an examination should include the spatial distribution of renewable energy resources and potential and the policy implications of this. The Western Region is home to considerable renewable energy resources in wind (onshore and offshore), tidal, wave and wood energy. Only a proportion of the region's total potential is currently being tapped and substantial opportunities exist to develop these resources further. The FSDI could outline some of the key policy actions and measures which are to be taken under the Renewable Energy Action Plan to facilitate increased generation of energy from renewable resources. .

The WDC is actively involved in developing the wood heat market in the Western Region through the RASLRES project. This project is helping to stimulate sustainable local supply chains within the region by working with both the supply and demand side of the wood heat market.<sup>11</sup> This project is an example of the green economy at work, where a local renewable resource owned primarily by small scale land owners, is being developed to supply heat to local commercial and public sector buildings, generating activity, income and employment in the local economy. The WDC believes this project represents a good practice model for regional sustainable development.

**Measures:**

25: More detail on the policy actions to be taken to support the development of renewable energy would be useful here. Actions to support increased production of renewable energy, and also those to encourage increased uptake, for example through incentives or regulation.

**2.5 Sustainable agriculture (p. 36)**

Agriculture plays a very important role in the Western Region's economy. In 2011 agriculture, forestry and fishing employed about 23,000 people in the region, which was 7.1% of all regional employment.<sup>12</sup> The numbers employed have been declining however, over 30,000 worked in the sector before 2006 and farming in the region has become predominantly part-time. Drystock cattle and sheep are the main agricultural activities in the region. The recent strong performance of the agriculture and agri-food sectors, as well as the loss of alternative employment opportunities in the construction sector, are likely to lead to some growth in the region's agriculture sector. Sustainable agriculture must be key to any such growth.

According to the preliminary results of the Census of Agriculture 2010 there are 56,058 farms in the Western Region, which is 40% of all farms nationally. Farm size in the region tends to be smaller than other areas, and every county in the region had an average farm size below the national average in 2010 (ranging from 25.1Ha in Leitrim to 32.6Ha in Clare). Despite this the region still accounts for 35% of the total Utilised Agricultural Area (including commonage) in the state and therefore plays an important role in national agricultural activity and in any efforts to achieve more sustainable agricultural practices.

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<sup>11</sup> <http://www.raslres.eu/>

<sup>12</sup> CSO, Quarterly National Household Survey, Quarter 1, 2011, special analysis for Western Region.

The three objectives of the EU Communication on CAP towards 2020 include 'balanced territorial development'. While the objectives of food production and sustainable management of resources are discussed in some detail, the role of the CAP and agriculture in achieving more balanced territorial development is not addressed in this section. Given the strong spatial patterns of agricultural production, evidenced most recently in the preliminary results of the Census of Agriculture 2010, the issue of agriculture's role in territorial balance should be considered in the FSDI. The WDC's submission to the public consultation on 'The shape of the Common Agricultural Policy after 2013' may be useful in this context.<sup>13</sup>

The WDC strongly agrees with the importance of further developing Ireland's forests. The region is home to 40% of the national forestry resource and the WDC has been actively engaged in developing 'a more innovative, value-added, competitive, market-focussed wood processing sector' for several years. The WDC's work has primarily focused on the use of wood for heat generation and in 2008 we set out a comprehensive *Wood Energy Strategy for the Western Region*.<sup>14</sup> We have subsequently been active, primarily through the INTERREG-funded RASLRES project, in supporting the development of a commercially-viable and sustainable wood heat market in the Western Region. We believe that our work in this area contributes towards meeting the challenge of sustainable agriculture in the Western Region.

#### **Measures:**

27: The objective of maintaining the maximum number of active farmers is of particular concern for the Western Region given that many farmers in the region are part-time, landholdings are relatively small and the majority of farmers are engaged in lower value agricultural activities. Policies to promote sustainable agriculture and to allow for food production as well as the active management of the landscape and other natural resources must ensure that the needs of such farmers are addressed. As there are moves towards more market driven and commercial agricultural production in larger units, the role of small scale, part-time farmers in contributing towards a sustainable approach to Ireland's agriculture may become increasingly important.

### **2.6 Sustainable transport (p. 40)**

While it is important that transport policy should be closely aligned to land use planning it is also vital that transport supports existing demand patterns and any latent demand in services not yet serviced. The WDC believes that in the national interest growth in all regions should be optimised and research from the OECD<sup>15</sup> argues that all regions need to have a strong infrastructure base with competitive transport links enabling them to compete to attract and retain investment and jobs.

With regard to the EU targets by 2050, it is likely that Ireland's transport modal mix will be somewhat different to mainland EU countries, with a heavier reliance on air transport. Nonetheless where opportunity exists efforts should be made to promote more sustainable transport. For example the recently published *Rail Vision 2030* recommends the introduction of a rail freight grant to support this mode. While the volumes carried by rail freight have been declining, there is a trend

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<sup>13</sup> <http://www.wdc.ie/wp-content/uploads/sub-2009-CAP-post-2013.pdf>

<sup>14</sup> <http://www.wdc.ie/publications/reports-and-papers/reports-2008/>

<sup>15</sup> OECD (2009), *How Regions Grow: Trends and Analysis*

towards more profitable traffic and rail freight is now generating a surplus (approx €1million in 2010).

Rail freight is five times more carbon efficient than road and this environmental imperative is likely to grow with companies needing to demonstrate carbon savings. The most significant rail freight route is from the West – from Ballina to Dublin and Waterford ports. Future sustainable transport policy needs to ensure good connectivity between rail and seaports as well as supporting rail freight through network development and freight facilities.

**Measures:**

29: Bullet one, while it is important to reduce distance travelled by private car, there is a need to ensure that this is not replaced by long distance train or bus commuting. There is some evidence that the introduction of the major inter-urban routes encouraged long-distance car commuting. With proposals to introduce high speed intercity rail services this may lead to an even greater increase in long distance commuting. Policy on employment and population growth needs to be cognisant of the NSS and the various designated regional growth centres.

**2.7 Social inclusion, sustainable communities and spatial planning (p. 45)**

This is a long section and there may be an argument for dividing it in two – one dealing with social inclusion and poverty and a second with regional development, spatial planning and sustainable communities. Such a division would allow a more comprehensive review of each of the topics. Their amalgamation in a single section may not give either challenge the focus it requires.

Creating a section on regional development and spatial planning would allow a broader discussion of the many dimensions of more balanced regional development (e.g. enterprise development, innovation, health and education provision, public transport, regional assets, employment creation) and their linkages with achieving sustainable development. It would also be consistent with the stated FSDI principle of encouraging greater equity between regions. Spatial planning plays a key role in regional development, however regional growth results from actions across a wider range of policy areas and its consideration in the context of the FSDI should not only relate to spatial planning.<sup>16</sup> In many respects regional development is similar to sustainable development in that it depends on an integrated approach across a broad range of policy areas.

In addition to examination of the role of the NSS gateways and hubs, reference should also be made to the role the NSS envisages for smaller urban centres and rural areas. For example figure 5.1 in the NSS sets out a spatial hierarchy, from household to city, in terms of the appropriate spatial level at which to access services. Such a spatial hierarchy, focusing on provision of the appropriate level of service at each level, can make a major contribution to sustainable development by minimising travel distances to access services which are most appropriately provided at local level. This concept could be reflected in the FSDI.

It is also important that the FSDI incorporates a clear vision of the role that urban centres of all sizes and different types of rural areas play in achieving sustainable development. Spatial differences in areas' capacity to achieve sustainable development and the challenges they face in doing so will

<sup>16</sup> WDC (2010), Why care about regions? A new approach to regional policy <http://www.wdc.ie/publications/reports-and-papers/reports-2010/>

have a major impact on the country's ability to meet its FSDI targets. The differences in the sustainability challenges facing large urban centres compared with remote rural areas must be acknowledged and addressed if the FSDI's objectives are to be met.

### **2.10 Innovation, Research and Development (p. 61)**

The important role of non-technological (e.g. process, organisational) innovation in sustainable development and the need to support this form of innovation should be incorporated in this section. Innovation is not only about research but about new ways of doing things including more sustainable ways. Currently the draft Framework discusses research and development within the science and technology fields. However non-technological innovation can play a key role in increasing sustainability, particularly for smaller companies and those in the services sector. The central role of non-technological innovation was highlighted in *Innovation Ireland: The Report of the Innovation Task Force* (2010) and should be incorporated within the FSDI.

The reference to the EU's flagship initiative of the Innovation Union should also refer to the central role that regions and regional policy can play in achieving the targets of the Innovation Union. This is to be achieved through developing 'smart specialisation strategies' for regions which will focus innovation activity and European Regional Development Fund (ERDF) innovation funding in areas of key regional strength.<sup>17</sup> Within the Western Region the green economy, and in particular renewable energy, is a key strength which could be targeted under a smart specialisation approach.

#### **Measures:**

Support for non-technological innovation in the area of sustainable development should be included within the measures, in addition to support for research.

### **2.11 Skills and Training (p. 65)**

The challenges set out for skills and training should specifically refer to the upskilling opportunities provided by the green economy, for those made unemployed from the construction sector. Many activities of the green economy (e.g. retro-fitting, wood energy boiler installation) require skills which are compatible, with some upskilling or re-skilling, with those of the construction sector. Given the high level of dependence on construction employment across the Western Region, and particularly in more rural areas, upskilling for the green economy could play an important role in addressing the unemployment challenge of these areas.

Currently this section only deals with skills and training for sustainable development, it does not address the issue of more sustainable delivery of education and training. More flexible forms of education and training provision, particularly for adult learners, can reduce the amount of travel involved and therefore the environmental impact of participating in education and training. Increased provision through distance, online and part-time methods, as well as outreach programmes which bring education and training closer to participants, will improve the sustainability of skills and training provision. Widespread availability of highspeed broadband services at competitive rates is a key factor in this, particularly for smaller towns and more rural areas. The sustainability aspect of skills and training provision should be incorporated in the FSDI.

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<sup>17</sup> COM(2010) 553 final, Regional Policy contributing to smart growth in Europe 2020

**Measures:**

A measure to increase the provision of more flexible forms of education and training which can reduce the environmental impact should be included. This should include a reference to the importance of broadband provision to facilitate this.

**Implementation****Governance (p. 73):**

The WDC agrees with the importance of taking an integrated approach to policy formulation for sustainable development. An approach which takes account of the linkages and interactions of policy across sectors is required to ensure sustainable development. This is also true for policy to ensure more balanced regional development and the WDC has examined the importance of such an integrated and 'broad' policy approach in its WDC Policy Briefing *Why care about regions?*<sup>18</sup>

It would be important to incorporate a regional aspect in the governance arrangements for the FSDI. Currently it states 'It requires integrated thinking and practice at three levels: across Departments and agencies nationally; across local level bodies; and between national and local levels.' We believe that the regional level should also be incorporated in the integrated approach to governance. The important role of the RPGs in achieving sustainable development has already been highlighted in section 2.7. As discussed previously many of the issues and challenges of sustainable development cross local and county boundaries and can be most effectively addressed by taking a regional approach. It would be important to incorporate a regional perspective in the governance and implementation of the FSDI.

The WDC is currently working with the local authorities in the Western Region on a number of joint actions to address regional issues related to sustainability. Most notably the development of the regional wood energy sector and the investigation of possibilities for use of wood energy in buildings owned by the local authorities and other public sector organisations. Such initiatives illustrate the benefits and added value of taking a regional approach to sustainable development issues.

**Monitoring and reporting (p. 76):**

It is suggested that the FSDI should have a 'review and reporting cycle and be complementary to and coherent with the arrangements for the Europe 2020 Strategy'. It would be useful to briefly outline what this review and reporting cycle is.

The WDC also believes that monitoring and reporting on implementation of the FSDI at a regional level should be included as far as possible. As noted above there are substantial regional and local differences in the potential for development of the green economy and also the potential impacts of unsustainable patterns of development. These spatial differences should be reflected in reporting on the effectiveness of the FSDI.

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<sup>18</sup> WDC (2010), *Why care about regions? A new approach to regional policy* <http://www.wdc.ie/publications/reports-and-papers/reports-2010/>

**Measures (p. 80):**

Given the discussion of the importance of developing a long term vision for sustainable development for Ireland to 2050, it may be useful to include the development of such a vision as a measure in this section.

**Measuring Progress on Sustainability (p. 81)**

The WDC believes it would be important for the Sustainable Development Indicators (SDI) set to be produced at a regional level, as well as at the national and local level as proposed. Many sustainable development challenges have a regional dimension and a regional SDI set would measure progress in addressing such challenges. At a practical level, as noted in the document, there can be data constraints in accessing information at a local/county level due to sampling and confidentiality considerations. Regional SDI sets could go some way to addressing this to support the 'bottom-up' data of the local SDI sets.

The WDC also believes that a national SDI set should include an indicator of the level of regional development. The Sustainable Development Indicators Conceptual Framework set out in Figure 21 does not include an indicator of regional development / regional equity. The principles underpinning the FSDI included 'equity between regions' and progress towards greater regional equity should therefore be included in measuring progress towards sustainable development.

**4. Conclusion**

The proposed Framework for Sustainable Development for Ireland is an important step towards a more comprehensive focus on sustainable and balanced development in Ireland in the future. A clear coherent Framework document is important, but well planned, co-ordinated and monitored implementation is essential in the future. It is important that staffing and skills are available to do this.

The WDC is pleased to have the opportunity of making a submission to the consultation on the Framework for Sustainable Development for Ireland. We are happy to provide further information or examples in relation to this submission, or discuss any of the issues raised should this be required.

**Western Development Commission  
February 2012**

If there are any queries in relation to this submission, please contact

Pauline White  
Policy Analyst

Western Development Commission  
Dillon House  
Ballaghaderreen  
Co. Roscommon  
Phone: 094 986 1441  
E mail: [paulinewhite@wdc.ie](mailto:paulinewhite@wdc.ie)