

EMRA Public Consultation submission to the RSES (Jan 2019)

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comhaontas glas

A. Rail infrastructure

Objective 1: Support the extension of Metrolink into south Dublin between the existing Luas lines, connecting suburbs such as Harold's Cross, Terenure, Rathfarnham and Knocklyon.

Objective 2: Support a south orbital Luas, connecting Tallaght to Booterstown (Via Firhouse, Knocklyon (Metro), Ballyboden, Marley Park, The Mint, Kilmacud (Luas), Goatstown and UCD (Metro)).

Objective 3: Support a public rail transport corridor between Saggart and Hazelhatch, linking the greater Tallaght area to the west via Saggart/Citywest, Greenogue/Baldonnell & Newcastle, facilitating future sustainable development.

Objective 4: Support the opening of the Navan rail line for commuters and sustainable development.

B. Wood First Objective

RSES supports a Wood First Policy to facilitate a culture of wood, by requiring the use of wood as the primary building material where practical in all new and modified Local Authority funded buildings. In a manner consistent with the Irish Building Regulations and National/EU sustainability policy objectives that substantially reduce embodied energy and CO₂ emissions, which in turn protect our environment. Similar policies exist across the globe, some include the Wood First Act in British Columbia, Japan's Law No. 36 of 2010 promoting the use of Wood materials for Public Buildings, in 2012 Hackney in London became the first Local Authority to promote timber construction in its planning policy, and South Dublin County Council adopted a similar policy in 2017.

C. Building Materials

Construction material production has a considerable impact on the environment, in the context of energy required and CO₂ emissions. Part D of the building regulations has minimal obligations, with only 2 pages dedicated to the topic. LCA (Life Cycle Analysis) of building materials has been proved to reduce energy costs and CO₂ emissions, thus reducing the environmental impact of building procurement.

RSES supports the use Life Cycle Analysis on Local Authority procurement projects, prohibiting value engineering or other such exercises that extract environmental protective measures in order to make short term fiscal gains.

Life Cycle Analysis for state tenders shall utilise environmental product declarations (EPDs) and environmental cost indicators (ECI's). This system monetises environmental performance of construction materials at the tender stage, mitigating environmental damage (UK Green Building Council (UKGBC), 2014). By implementing an LCA system which requires EPDs on materials that feed into their assessment tools, thus giving the building an environmental rating, akin to a BER (Building Energy Rating).

D. Rural Towns

RSES supports the RIAI's Town and Village Toolkit which aims to inform, support and inspire the future development of Irish towns.

E. Rain water harvesting objective:

RSES supports the requirement of commercial and large residential planning applications to design and integrate rain water harvesting systems as set out in BS 8525. This objective provides an opportunity for the region to promote water conservation. Dublin Councils already stipulate SuDS compliance in planning applications, which reduces the burden on municipal waste water treatment, this proposed policy/objective would also reduce the burden on sourcing of water.

F. CEM III

Use of CEM III cement in Local Authority Procurement Projects.

Where a Local Authority procures construction projects, CEM III/A or an equivalent cement will be specified in the tendering process following Green Public Procurement Directives (2004/17/EC and 2004/18/EC) & Green Procurement Government Policy (CEM II = Core & CEM III = comprehensive). This regional assembly initiative will set an example by increasing the sustainability of regional development practices and will have a positive effect on climate change by contributing reductions with regards to our national CO2 emission targets.

CEM III/A embodies the lowest levels of CO2 in the market and requires significantly lower levels of energy in its production. For every 10,000 houses built, using Cem III/A there will be a saving of 43,400 tonnes of CO2 and 46,400 MWh of energy use, which is the energy required to supply approx. 8,500 homes with electricity for one year. Further to assisting our national environmental objectives, CEM III/A has greater strength compared to other cement, it's aesthetically superior and has enhanced durability, making the concrete suitable to all projects including those set in extreme environments such as flood defences. It should also be noted that environmental and technical advantages of CEM III/A comes with no premium placed on it, therefore being cost competitive with traditional cement.

At a meeting of the Organisation Procedure and Finance committee of South Dublin County Council on Thursday, May 21, 2015 Motion no. 9 was passed requiring CEMIII to be specified in the Local Authorities procurement policy.

F. Rights of Way Objective:

1. All Local Authorities endeavour to verify and list the public rights of way and begin the formal process for designating rights of way under Section 14 of the Planning and Development Act 2000 (as amended).

2. Creation of additional rights of way and extend existing ones to facilitate the development of waymarked ways and loop walks, by undertaking a review of walking and cycling routes either by agreement or by the use of compulsory powers, for the creation of public rights of way particularly in areas of high amenity and to areas of high amenity, uplands, lake shores, river banks, forests, heritage sites, areas of historic or archaeological importance, National Monuments, to create a meaningful network. Provide linkages from built up areas to the countryside and to link with public rights of way in adjoining counties.

3 Provide adequate signposting and waymarking on rights of way.

4 Protect and promote Green ways and consider designating them as public rights of way.

5 Identify and map on an ongoing basis public rights of way and incorporate them in the Development Plan.

6 Recognizing the importance of established public rights of way for the common good, especially in tourist areas and those which provide access to archaeological sites, National Monuments, lakeshores, riverbanks, upland areas, water corridors or other places of natural beauty or recreational utility and to encourage cycling and walking, maintain, preserve, protect, conserve, enhance, promote and improve them. Ensure that they are effectively maintained by controlling undergrowth, trees and bushes.

7 Prohibit development and keep free from obstruction existing rights of way, and take legal action if necessary, to prevent any attempt to close them off.

8 Existing Public Rights of Way and established walking routes shall be identified prior to any new forestry planting, new infrastructural, energy/telecommunications or golf course developments and any other development capable of affecting the respective right of way.

9 Development will not be permitted where a public right of way will be affected unless its character and convenience is maintained by:

(i) the footpath/bridleway being diverted by the minimal practical distance and the route continues to be segregated from vehicular traffic;

(ii) Appropriate legal procedures have been undertaken to extinguish the existing right of way and to establish the new right of way to replace it.

