

## Heather Cooke

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**From:** Kevin J. Halpenny <info@emra.ie>  
**Sent:** 23 January 2019 16:30  
**To:** RSES  
**Subject:** RSES - Online submission  
**Attachments:** 5c4896a49cb4c.zip

From: Kevin J. Halpenny <[REDACTED]>  
Organisation: Irish Landscape Institute

### Message Body:

Response to EMRA RSES

The Irish Landscape Institute (ILI) welcomes the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region.

The focus on Landscape, Green Infrastructure and Ecosystem Services and the stated recognition for the importance of Natural and Cultural assets represents a positive development in strategic thinking. The Regional Spatial and Economic Strategy references a wide range of objectives, many of which are highly dependent on Local Government management and oversight. Only 5 (Fingal, South Dublin, Dun Laoghaire Rathdown, Kildare and Dublin City Council) of the 12 local authorities in the region currently employ landscape professionals with the necessary specific knowledge and experience required to make operational and deliver many of these ambitious plans and to provide the ongoing management expertise to ensure the long-term sustainability of the projects and programmes outlined in the strategy. The situation is further greatly exacerbated by a lack professional landscape expertise at Regional and National government levels.

With this in mind and with a view to assisting with delivery of the objectives in the strategy; the Council of the Irish Landscape Institute would like to meet with you at your offices and present directly to the Eastern and Midland Regional Assembly in relation to the appropriate resourcing of the plan and in particular the necessary professional landscape input required. In addition to the above I attach a document prepared by my colleague and former ILI President MaryAnn Harris in response to the Strategy.

We look forward to engaging further with the Assembly on the basis outlined above.

Kindest Regards,

Kevin J. Halpenny

President

Irish Landscape Institute

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This e-mail was sent from a submission form on Eastern & Midland Regional Assembly (<http://emra.ie>)



## **EMRA Draft Regional Spatial & Economic Strategy –**

### **Submission by Irish Landscape Institute**

**Maryann Harris MILI (Past-President, 2011-2013)**

**January 2019**

The Irish Landscape Institute (ILI) welcomes the opportunity to provide input into the drafting of the Draft Regional Spatial and Economic Strategy (RSES) by the Eastern & Midland Regional Assembly (EMRA). The ILI has, through its Policy Working Group, provided guidance and direction to Government policies and plans over the past 25 years. It has been a key organisation in the development of the National Landscape Strategy (2015). It has also been an early proponent of Green Infrastructure (GI) policies, with the first national publication in 2010 on the subject and also through its organisation of an international conference on GI in 2012 and several public seminars. The ILI is an international body under IFLA which represents 150 no. landscape professionals working in both public and private practice in Ireland. Its members are experienced nationally and internationally in the strategic planning, design and management of Green Infrastructure.

The ILI aims to:

- Set standards of excellence in the fields of landscape planning, landscape architecture and landscape management.
- Encourage and facilitate the Continued Professional Development of its members.
- Increase public awareness of landscape professionals and their work.
- Support the interaction of landscape architecture with related disciplines such as engineering, architecture and planning.
- Support the development of landscape education at all levels in Ireland.

The Institute sees the RSES as potentially aligned with our aim of setting standards of excellence in landscape planning and it is in that regard that we wish to submit the following comments on the draft document:

#### *Objectives of GI as a component of the RSES*

The RSES (1.3) includes reference to GI as a component of the Climate Action Strategy. We would consider GI measures to deliver on a broader range of objectives across all five components of the RSES listed.

#### *Measurability of goals in Strategic Vision for GI, ecosystem services and biodiversity*

The Strategic Vision (2.3) calls for both 'enhanced GI and ecosystem services' and 'enhanced biodiversity'. It is unclear what this means because realisation of some GI functions may be of greater value than others in terms of ecosystem function. Similarly, there may be different ecosystem services that are of greater benefit over time or trade-offs in benefits through realisation of some. Enhancement of biodiversity is not a scientific or a measurable concept. Do you mean improved conservation of certain habitats or species? Even for protected species, there can be conflicts in their requirements within the same habitat. Do you mean increased numbers of species? In an urban context this is common and may indicate increase in invasive or common species at the expense of indigenous or rare species.

#### *Definition and classification of GI*

The definition of GI varies within the literature and the source of definition used in the RSES should be clearly given. The report (section 5.9) puts emphasis on the metropolitan area – a term which is used in geography and planning but not in ecological concepts. It would be more useful to refer to EC guidance on this in relation to differentiation of urban and landscape scales of GI (EEA Technical report No 18/2011). This is an important distinction as it can affect how physical structures are assessed and counted as GI, such as agricultural lands (EEA Technical report No 18/2011) – which are included in the RSES as GI assets, but which should not be counted in a regional landscape context, according to the EC. The RSES needs to plan for GI at both scales.

The definition and classification of GI is an important consideration and we feel there is a tendency in the RSES to count physical features as natural assets when they are not. This, combined with the previous point, leads the RSES to therefore over-state the quantum of GI and natural areas with the Dublin region. We do not agree that canals should be defined<sup>1</sup> as natural systems in the RSES – they are clearly built structures and are classified as separate habitats in Ireland (Fossitt 2000) to natural ones. We also disagree that regional parks, agricultural lands and amenity sites are natural features – they are all human interventions in the natural landscape and are intensively managed with a more limited range of habitats generally than our found in nature. In the Dublin metropolitan region, natural ecosystems are rarely found and therefore they need to be identified clearly and conserved with highest priority. We cannot afford to muddy the waters with broad-brush classification of GI.

#### *Biodiversity and Natural Heritage*

It would be useful in the section (7.5) on Status of Designated Sites to discuss the specific threats to the sites within the EMRA region. Although climate change is potentially linked to the spread of certain invasive alien species (IAS), they are a threat to global biodiversity in their own right and should be a separate heading this section. Several local authorities in the region have taken initiatives on IAS management and the key challenges should be described specifically for this region. We would suggest that the heading ‘Non-designated Sites’ be changed as both the National Park and the UNESCO Biosphere have designated Natura 2000 sites within them and the title is misleading. There are also sites such as National Special Amenity Areas in Dublin which are designated in part due to their benefits for nature conservation (P&D Act 2000, Part XIII, S. 202). National Parks legislation is required to ensure their protection and management and, although there were previous commitments made, none has been produced to date, despite public consultation carried out in 2011. The ILI has been calling for this for nearly 10 years now and we reiterate the need for a specific piece of legislation to protect our existing national parks, including Wicklow Mountains, and the proposed new park in the RSES for Lough Ree and environs. When the ILI raised this with the NPWS concerning text on their website committing to producing such legislation, the response was to remove the commitment from the website rather than to progress it.

#### *Dublin Bay UNESCO Biosphere*

The UNESCO Biosphere zonation also includes marine core, buffer and transition zones in addition to the terrestrial ones mentioned in the RSES. Therefore, it would be useful to also consider the Biosphere in section 7.2 Integrated Land and Marine Planning. The Biosphere designation was planned in part to implement objectives for Integrated Coastal Zone Management in the Regional Planning Guidelines (see North Bull Island UNESCO Biosphere Periodic Review Report, 2014).

#### *Defining ‘strategic assets’*

The term 'strategic assets' (7.6) is used to differentiate certain parks, natural and artificial features of Dublin without any definition of the term or in what sense they are 'strategic' or of how such locations were chosen to be 'strategic'. This seems to indicate that these places are deemed part of GI but there isn't a clear indication of the meaning of this concept for GI. EMRA should refer back to those GI networks defined in each of the Dublin City, FCC, DLR Development Plans. Table 7.1 provides a list of 'Strategic Natural, Cultural and Heritage Assets in the Region' but this only further confuses the terminology by lumping them all together. For example, 'maritime towns and beaches' mashes up towns of varying size and heritage importance with important ecological zones and protected nature conservation sites. Rivers, lakes and canals may all be 'blue' infrastructure but have very different roles in a GI strategy and different levels of cultural heritage. This level of abridgement causes confusion and more space is required in the document to afford consideration of the very different categories of 'assets'. The term 'asset' itself is problematic and we would encourage consideration of the relatively low levels of investment given to our natural 'assets' in terms of their management. Government budgets in Ireland are still hugely tilted in favour of grey infrastructure over green. An example of this is to consider the scale of budgets for putting a cycle route along the River Dodder compared to managing its ecology and recreation. If EMRA is going to classify natural areas or parks as 'strategic assets', will there be a review of the appropriate levels of funding for 'asset management'? Or, are local authorities being expected to deliver premier services on a shoestring?

#### *GI deficits and decline in the Dublin region*

There is no mention of any objectives to address the GI deficits cited in various City and County Development Plan. How is this going to be addressed? EU data shows a projected decline of GI for the Dublin FUA ongoing to 2050 and a decline in recent years (Kompil et al 2015). The MOLAND study indicated loss of green spaces has already occurred during the last economic boom. These well-published issues need to be realistically acknowledged and planned for by EMRA in the RSES.

#### *Metropolitan Greenway Network*

What is the Metropolitan Greenway Network? This is an unknown concept to us. As per previous comment, the application of the greenway approach in Ireland is limited. GI strategies do not necessarily advocate for compact cities as compactness may further exacerbate the deficits of green space in Dublin city centre. This is acknowledged in the RSES in the section on Farming (p. 128). These green space deficits in turn are linked to poorer health and greater social deprivation (see EPA/EMRA/UCD study on this – Foley et al 2018). The zoned lands for green infrastructure and green belt are the baseline, not 'suggested', as they are legally designated in the Development Plans and adopted by the Councils.

Identification and mapping of GI relies upon an agreed definition of GI. It would be best if local authorities each did their own as they can bring local knowledge to this. Ownership of GI assets is a key factor. DCC assets have been mapped and analysed through a joint research project with UCD and the EPA. An Urban Tree Canopy Project was a joint project of the 4 local authorities and UCD. Identification and mapping of GI assets has been ongoing in the Dublin local authorities' parks and planning for the past 20 years. For example, in DCC biodiversity mapping was undertaken in 2006 with the development of the BAP (2008).

Figure 5.5 should be an enlarged map of 'Dublin Metropolitan GI Network' added to this as the scale is too small to read. This would show deficits in city centre where new GI should be provided, areas of impairment of ecosystem function where restoration is necessary and vulnerabilities of GI to

urbanisation into the future. Given the projected population increases and demands for new housing outlined in other sections of the RSES and the evidence of recent GI losses it would be naïve to assume that existing GI is going to remain intact without greater protection measures. In particular, due to the objectives of the Residential Density Guidelines, GI near the coastline will be further impaired or lost due to intensification of recreational usage and GI near public transport routes will be lost through urbanisation. Even Natura 2000 sites are already impaired and conservation value has declined due to recreational pressures and increasing population and pollution (see NPWS site Conservation Management Plan reports, 2013-present, for all Dublin sites). This analysis of the existing evidence on GI in Dublin and the wider region is omitted from the RSES. Without recognition of the scientific evidence, and a clear strategy which starts to address the core issues for GI management, the vision of the RSES will fail to be achieved.

#### *Guiding Principles for Local Authorities on preparation of GI Strategies*

This section (p. 125) left members slightly bemused/amused as we have been taking all of these actions for many years. As an example, many of the river valley routes that exist today were initiatives progressed over decades by local authority parks and planning departments through numerous compulsory purchase orders and other mechanisms as specific objectives of various county and city development plans since the 1980's. We would strongly urge EMRA to consider 'co-creation' as the approach on these matters, rather than a 'top-down' one. We are glad to see the consideration given to the fact that greenways can introduce pressures on natural areas and that increased connectivity for one species (humans) can be detrimental to others. We would like to inform EMRA that we work jointly on a transboundary basis with colleagues in local authorities and for many years we also have voluntarily organised joint training events through an informal network ('Parks Professionals Network') in liaison with a formal network (ILI and IFLA). We also have hosted the World Urban Parks Initiative in Ireland. All of these interactions inform GI design and management in the Dublin region. Furthermore, through the ILI's involvement in the Urban Forum, we published in 2010 the first guide in Ireland on GI <http://www.irishlandscapeinstitute.com/wp-content/uploads/2012/08/GreenInfrastructure.pdf>

#### *Development of Greenways, Blueways and Peatways*

The term 'flagship greenways' needs to be clearly defined. Are these of greatest importance ecologically? Are they the longest distance? Do they connect the most populated areas? What is the key distinction of these? While 'planning has a key role to play', it must be multi-disciplinary and this is not the case to date for most of the greenways in Ireland (see above Greenways for Dublin Mountains should be developed in conjunction with the Dublin Mountains Partnership. Blueways should be planned with primary consideration of biodiversity issues in sites with protected species, such as Grand Canal Dock. The section on Blueways is primarily focused on navigation and water sports without reference to water quality, fisheries and ecological habitats.

#### *Landscapes*

The preamble of this section (7.7) should include references to all kinds of landscapes, especially urban landscapes as they are a dominant landscape character type in the region. This approach would be more in keeping with the European Landscape Convention (ELC) which states: "[ELC] concerns landscapes that might be considered outstanding as well as everyday or degraded landscapes" (Article 2, ELC). There is an over-emphasis in the RSES on the scenic quality of landscapes. Furthermore, it is important to recognise that the factors which determine landscape change are wide-ranging and therefore to say that only "the provisions of the Planning and

Development Acts 2000 – 2018 (as amended) will continue to govern decision making in relation to landscape” in Ireland is simply untrue. There are many activities which are exempted from the P&D Acts (such as agricultural ones) but which cause decisions to be made which in turn cause landscape changes (positive and negative). Due to Ireland’s dual structure of environmental management, many activities are not regulated strongly enough or are regulated through the Environmental Protection Agency rather than planning authorities (Scott et al 2016).

We welcome the references to aspects of the National Landscape Strategy, but we find no commitments given in the RSES to cause it to be implemented. The national landscape character assessment referred to is stalled – an issue which is to the detriment of good landscape planning and policy and has been highlighted in the national press

(<https://www.irishtimes.com/news/environment/we-re-all-lost-without-a-national-landscape-map-of-ireland-1.3118190>). There should be a commitment by EMRA to ensure its completion for the region covered by the RSES in this vision document. Without any specific targets provided, it is likely that development proposed in the RSES will proceed without reference to landscape character, or the aims of the NLS or ELC.

### *Soils*

Due to the importance of soils as a resource to the region in terms of agricultural production, climate change adaptation and biodiversity, we find the RSES comes up short on this major issue with just a mere three sentences devoted to the topic. Soils are a key aspect across several environmental factors in the Environmental Impact Assessment Directive (EC 2014):

‘The environment’ in this context refers to the environmental factors listed in Article 3 of the Directive:

(a) Population and human health (Irish EPA advises that Soil be considered here)

(b) Biodiversity, with particular attention to species and habitats protected under the Habitats and Birds Directives (Soil biodiversity as a key issue)

(c) Land, soil, water, air and climate: “The 2014 Directive refers to the importance of the sustainable use of soil and the need to address the unsustainable increase of settlement areas over time. The economic and social significance of good land management, including soil, and the need for urgent action to reverse land degradation is recognised” (Department of Housing, Planning and Local Government 2018). Soil provides ecosystem services for water quality improvement or degradation, for air pollution abatement and for climate through carbon sequestration or release.

(d) Material assets, cultural heritage and the landscape: Soil is a cultural heritage resource and key part of the archaeological record.

(e) The interaction between the factors referred to in points (a) to (d): Soil is the interface of these interactions.

Greater consideration of soils is required in the RSES beyond the aspects briefly mentioned (types of activities which cause pressures, soil sealing and soil for stormwater retention). We suggest that an ecosystem services assessment be completed as part of the RSES to adequately examine soil and other natural resources and the measures required to plan for these services to be maintained. Furthermore, studies of soil sealing in the region should be referred to and the RSES should include mapping of the permeability in relation to flood risk and landcover.

### *Farming*

Traditional farm landscapes are identified as an asset in the RSES but these are not analysed spatially or economically. These landscapes include valuable habitats for protected species as well as cultural ecosystem services. The need to assess these assets further strengthens the call for landscape character assessment of the region to be a commitment of the RSES. We also suggest that this section include reference to the importance of urban farming initiatives and the need for provision of allotments by local authorities under the P&D Acts. Dublin City has a tradition of urban allotment gardening which began over a century ago. As Irish people are increasingly living in urban areas, there will be greater demand for provision of food production sites and this should be planned for in a strategic way at regional level.

### *Peatlands*

There are no measures for peatlands restoration proposed in the RSES. The peatlands of the region should be mapped and spatially analysed particularly in relation to water supplies and filtration as well as protected habitats and commercial forestry operations. While promoting the recreational potential of peatlands, consideration of erosion of uplands should also be stated to ensure sustainable recreation strategies. One of the main threats to peatlands and uplands – illegal dumping – has not been stated in the RSES. This is an economic issue and requires strategies at regional and national levels in cooperation with the EPA and local authorities to be successfully overcome. It is an issue highlighted in the current Wicklow Mountains National Park Management Plan (NPWS 2005), which is woefully out of date and which the RSES should be calling for an update.

### *Climate Change*

We are surprised to see no mention of the need to plant trees and protect mature trees in this section. In terms of the Current Situation (7.8), it should be noted that there is currently no legal protection for felling of trees in urban areas in Ireland, despite revisions to the Forestry Act in 2014. This presents a failure in environmental management which needs to be addressed, particularly as the report highlights the emissions levels from Dublin City and its surrounds. ILI members have initiated measures, such as the Urban Tree Canopy Project (2017) with UCD, to assess the current levels of tree cover in the Dublin region and the carbon storage provided. We suggest that text be included to acknowledge the significant contribution which tree protection and planting in the region can make to climate change adaptation strategies, the economic benefits (which include many aspects in addition to climate change) and measures to further these goals. A specific RPO is needed to deal with the threats to urban trees.

### *Walking and Cycling*

This section (p. 153) requires further elaboration both in terms of its guiding principles for investment and the objectives for environmental protection.

### *Quality of Life*

The section (9.1) should include specific references to the proven links between GI supply and health outcomes in Ireland and elsewhere, particularly EMRA's joint research (Foley et al 2018). ILI is organising a national seminar on the issue in February 2019 and is happy to provide further updates on this to EMRA.

### *Placemaking*



We welcome the text in this section (9.4) on the importance of high quality public realm design but respectfully point out that it is incomplete.

#### *Regeneration*

We welcome the proposal (9.5) for local authorities to compile a database of brownfield sites. We would like to see consideration given not just to sites which are contaminated but also to degraded soils. There should be objectives to rehabilitate brownfield sites for provision of green spaces, particularly in urban areas with deficits, flooding or of past land reclamation, not just for re-development as building sites. Many public parks in Dublin are brownfield sites which were former landfills and quarries. Regeneration should include funding for re-development and remediation of these sites to improve GI and ecosystem functions as they are impaired.

#### *Healthy Communities*

We welcome the guiding principles in this section (9.8), and would add that there should be an initiative to promote the provision of high-quality green spaces in schools, particularly in urban areas where deficits occur.

#### *Cultural Heritage and Historic Landscapes*

Although there is reference to historic landscapes in this section (9.9), there are no RPO's to address their protection and management and this should be provided. There should also be reference to preservation of historic views and vistas in landscapes.

#### *Regional Policy Objectives – specific comments*

RPO 5.7: we note that, to date, EMRA hasn't engaged with local authority staff who design, plan and manage GI to write these objectives for the RSES. Much of this work has been done already by the local authorities themselves. To achieve GI coordination at regional level requires the additional expertise within EMRA of landscape architects and ecologists and we urge that EMRA be staffed accordingly to reflect the need to have a multi-disciplinary team as recommended by the EC and the EPA. The purpose of the greenbelt isn't explained here. How has it been determined that a greenbelt is now needed and is the right tool for GI planning for Dublin? It could be argued that, in light of the form of urban sprawl that Dublin has taken, particularly in 2000-2006 with low connectivity, high dispersal and high car-dependence evident in an analysis by UCD (Nedovic-Budic et al 2016), it is too late for this measure. Fragmented patterns of urban development and inadequate regulation of dispersed development and urban sprawl continue to undermine habitat protection in Ireland, as cited in a recent EPA report (Kitchin et al 2010 in Scott et al 2016). [Cite earlier attempts, e.g. by Fingal County Council to hold onto their green belt]. Furthermore, the effectiveness of green belts in other EU cities has been questioned, and the concept is being replaced by GI (Scott et al 2016).

RPO 5.8: The Dublin Area Cycle Network Plan does not take the design approach that a greenway should, in accordance with best international practice. The design process of a greenway includes an assessment of ecological infrastructure at earliest stage and then to design the route to take this into account so as to improve ecosystem function. Unfortunately, this did not happen in Dublin as the plan was engineering-led and solely focused on transport issues with a 'green' label of calling the routes greenways being applied after the design was done by engineers. The Dublin Cycling Strategy approach was to design a cycle network for transport concerns, with an undertaking to assess ecological impacts of the designed routes. Some of the cycle routes have been presented for public consultation yet the ecological surveys are still incomplete. A greenway design is a multi-disciplinary process and doesn't work this way. This form of connectivity may or may not be meeting the needs

to conserve ecosystem function and may not be 'greenways' depending on the design. GI and greenway concepts differ (Scott et al 2016) and there needs to be greater clarity in the RSES on the two.

RPO 7.18: The production of an updated Management Plan for Wicklow Mountains National Park should be the objective of this to include all aspects of park management, not just visitor management and tourism aspects.

RPO 7.19: This proposal is premature in the absence of national governing legislation for National Parks.

RPO 7.20: This should state that it will be done in cooperation with the Dublin Bay UNESCO Biosphere Partnership, as mentioned in the previous section of the RSES.

RPO 7.21: This is already the case and furthermore our members are obliged professionally and through the ILI Code of Ethics to do so.

RPO 7.22: We believe that there is a need for more engagement by EMRA with local authorities on what mapping they are coordinating and have undertaken to date as we already have mapping done.

RPO 7.23: We strongly believe that the capacity of a greenway must be limited to what is ecologically sustainable.

RPO 7.24: It is worth noting that the definition of Greenways in the cited national Strategy for the Future Development of National and Regional Greenways (Dept. of Transport and Tourism 2018) is: "a Greenway is a recreational or pedestrian corridor for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area." It is not an ecological corridor by this definition. The standards for performance of a greenway according to the national strategy are not that they provide improvement to ecosystems but rather more narrow: "routes should meet satisfactory standards of width, gradient and surface condition". EMRA is supporting this approach in this RPO but it conflicts with the wider considerations of those working in local authorities on GI to promote sustainable development and to conserve biodiversity. It should also be noted that the national Strategy promotes the use of impermeable surfaces (asphalt) as the TII Standard (p. 17) which is contrary to existing policies and objectives for Sustainable Urban Drainage and flood risk management in the various City and County Development Plans in the Dublin region. EMRA cannot promote both approaches for the same routes. The national Strategy allows for use of other surfaces based on factors of 'attractiveness' in keeping with rural settings. Thus, greenways will contribute to further urbanisation of rivers in urban and suburban areas.

RPO 7.25: We suggest that, considering the advanced level of work done on landscape character assessment in some of the counties of the region and the intensity of development pressures throughout the region, a regional landscape character assessment can and should be completed immediately and without cause for further delay due to inaction at national level.

RPO 7.26: We welcome this and suggest to work with local authorities to identify sites for food production in urban areas to increase food security.

RPO 7.27: We welcome the text on rehabilitation and re-wetting of habitats and request that Coillte and Dublin Mountains Partnership be included in the text on peatlands management. We also suggest that a reference be added to involvement of the National Parks and Wildlife Service who

have responsibility for the management of peatlands and woodlands, including the Wicklow Mountains National Park. We request a specific RPO to ensure that the Management Plan for the National Park be updated urgently – it is from 2005 (<https://www.npws.ie/protected-sites/conservation-planning/available-plans>).

RPO 9.1: To support this, an additional RPO is required to commit to identifying and addressing the deficits of green spaces within the region to ensure better health outcomes and overcome disadvantage in certain communities. There should be a commitment to equality in access to green spaces.

RPO 9.10: The re-development of large land banks must ensure that they are designed to prevent landscape fragmentation and habitat loss.

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<sup>i</sup> “Green Infrastructure (GI) is the network of interconnected natural, semi-natural and managed areas that weaves through the metropolitan area, conserving natural ecosystems, managing flood risk and providing health and recreation benefits to people. Metropolitan scale GI includes natural features such as rivers and canals, our coastline, regional parks, agricultural lands and amenity sites.” (RSES 2018)

