

Submission to:

***Department of Housing, Planning,
Community & Local Government***

regarding

IRELAND 2040 - OUR PLAN
Draft National Planning Framework

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(by email)

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1. Introduction

1.1 Professional Background

I'm a qualified Landscape Architect, registered with the Irish Landscape Institute (www.irishlandscapeinstitute.com) and a project manager. I work in a local authority Parks & Landscape Services unit, in the Greater Dublin Area (GDA), involved in areas directly relevant to the Draft NPF. These are policy initiatives and place-making projects (Greenspaces, Nature-based Solutions - NBS) in Blue-Green Infrastructure [B-G.I] and Spatial Planning. My work and that of my colleagues is directly related to Climate Change Adaptation, especially in respect of Quality of Life, Risk Management and Health & Well-being. I am involved in spatial planning - as an in-house advisor to planners in Development Management & Forward Planning - and in the planning, provision, design and management of urban Blue-Green Infrastructure (parks/open spaces, semi-natural habitats, woodlands, amenity trees, coastal and transport landscapes, recreational and play provision and facilities).

As Hon. Secretary of ILI (Irish Landscape Institute. www.irishlandscapeinstitute.com), I chair the ILI's working group on B-G.I. I'm networking at international level through European conferences on B-G.I and travels in Canada and USA. It's evident that the Irish State could learn from best international practices, in terms of applying evidence-based research and robust design to practical actions; and in moving from policy rhetoric to real delivery.

1.2 Welcoming the Draft NPF

I welcome this opportunity to contribute positively to the Draft Plan. Its publication contemporaneously with the DoCCA's Draft National Adaptation Framework 2017 is a fortunate coincidence. Policy-integration is vital to achieving synergies across government, so necessary to achieving sustainable development and climate resilience.

In particular, I welcome the NPF's statements and commitment to Green Infrastructure (G.I), especially in the final chapters (Chapter 8 and Chapter 9). G.I. is still in its infancy in Ireland, and requires a much more systemic and systematic governance. However, I have serious concerns as to the capacity of the public sector to deliver G.I planning, design and management, and the related governance gaps. Concerns relating to capacity arise because of the significant lack of in-house expertise in Landscape Architecture and Parks Management, in all government departments, in most state agencies (e.g. EPA, Teagasc, NTA) and most of the 31 local planning authorities.

For that reason, I would ask that the department invite the Irish Landscape Institute to join its advisory group on the implementation of the finally-adopted NPF.

2. Specific Comments

Chapter 8 Realising Our Sustainable Future

Page	Contents	Comments
109	<p>Green Infrastructure Planning</p> <ul style="list-style-type: none"> Protecting and valuing our important and vulnerable habitats, landscapes, natural heritage and green spaces. 	<p>This governmental aim is welcome, but should be expanded beyond solely “vulnerable” landscapes, to include ordinary and everyday landscapes, as per the definition of landscape in the Planning & Development (Amendment) Act 2010, i.e. as defined in the ELC (European Landscape Convention), that the State ratified in 2004.</p> <p>(see: National Landscape Strategy 2015-2025).</p> <p>To achieve this aim requires government investment in systemic governance and capital funding (see comments under page 117 below).</p>
112	<p>“... the Government will support:</p> <ul style="list-style-type: none"> Green adaptation which seeks to use ecological properties to enhance the resilience of human and natural systems in the face of climate change, such as creation of green spaces and parks in an effort to counteract the urban heat island effect.” 	<p>1) Assuming that “Green adaptation” means Nature-based Solutions using Ecosystem Services (the emerging technical term used by policy-maker, researchers and practitioners in Europe, EU and North America), is a welcome commitment by Government.</p> <p>2) I suggest adding “trees and woodlands” after “parks”, thereby encompassing almost all Green Infrastructure components that play a vital role in Climate Adaptation and resilience. This is particularly applicable to Urban Forestry (non-commercial, amenity) of at sub-regional and metropolitan scales (ref. U.C.D Dublin Tree Canopy Study for commissioned by Parks & Landscape Services of D.C.C, Dlr, Fingal, S.D.C.C and OPW-Parks; https://dublintrees.wordpress.com/2017/03/13/first-round-results-dublins-tree-canopy-cover)</p> <p>3) The open statement should go further by adding “<i>and promote</i>”, to indicate an clear commitment to real outcomes.</p>
117 – 119	<p>As part of Ireland 2040, Government supports Green infrastructure (GI) planning to inform the preparation of regional and city and county development plans by:-</p> <ul style="list-style-type: none"> Ensuring that sufficient and well planned green spaces, commensurate in scale to the long term development 	<p>1) The open statement should go further by adding “<i>and promotes</i>”, after “support” to indicate an clear commitment to real outcomes.</p> <p>2) Well-planned green spaces are vital to quality of life, health + wellbeing and climate resilience. However, planning is not solely enough. Evidence-</p>

	<p>requirements, are designated in statutory plans.</p>	<p>based research highlights that - for greenspaces to be fit for purpose (climate-resilient and sustainable (socially, ecologically, economically) – their planning must be followed by professional design and appropriate maintenance and management [see Appendix A]. Therefore, the NPF should formally recognise the importance of establishing a systemic governance model for - not just the planning - but critically, the design and management of greenspaces and parks at local authority level.</p> <p>That recognition should include an additional National Strategic Objective to put the Planning, Design and Management of Urban Green Infrastructure (including greenspaces and parks) on a statutory, and mandatory basis. This would require modernisation of the department’s outdated, 1987 national policy on Parks and Open Space (Dept. of Environment, 1987).</p> <p>Appendix A to this submission, makes the business case for a new policy and corresponding legislation.</p>
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Chapter 9 Implementation and Investment

Page	Content	Comment
137-	<p>National Strategic Outcomes</p> <ul style="list-style-type: none"> o Enhanced Urban Amenity <p>Green Networks and Infrastructure</p> <p>Metropolitan Area Strategic Plans will be required to include a metropolitan parks and amenity strategy.</p>	<p>ditto. – comments above in respect of putting the Planning, Design and Management of Urban Green Infrastructure (including greenspaces and parks) on a statutory, and mandatory basis</p> <hr/> <p style="text-align: center;">Metropolitan Area Strategic Plans</p> <p>This needs underpinning by legislative provision as outlined in Appendix A.</p> <p>A requirement to merely publish a strategy is not enough to ensure implementation. A corresponding obligation to implement actions arising from a strategy, is vital to ensuring effective delivery of strategic goals.</p> <p>The corollary is the need for the State to allocate dedicated funding, human and ITC resources for in G.I projects.</p>

		<p style="text-align: center;">_____</p> <p>NCP (National Capital Investment Plan)</p> <p>should include following:-</p> <ul style="list-style-type: none"> ○ increased funding of Eco-tourism projects (e.g. Greenway, Blueways) at regional and sub-regional levels in partnership with Local Authorities, NGOs, Rural Partnerships etc. ○ Research funding directed through the EPA for innovation and progressive practices in Green Adaptation (Nature-based Solutions) that will inform Forward Planning (Statutory Plans) by planning authorities. Research topics, partners and stakeholders include:- <ul style="list-style-type: none"> ○ Topic: Urban Climate Adaptation Measures at regional and sub-regional levels ○ Topic: Urban Community Forestry ○ Topic: 'Grey to Green', i.e. 'Soft' or Eco-SuDS ** (Sustainable Urban Drainage Systems) – Rain Gardens, Green Streets, Green Roofs, Roof Gardens: cost-benefit analysis, pilot demonstrator projects, etc. ○ Partners: local authorities and academia (3rd. level universities, colleges, institutes of technology) ○ Stakeholders: construction and property development sectors (e.g. CIF), professional bodies (Engineers Ireland, Irish Landscape Institute, I.P.I, RTPI, RIAI, SCSI, IEEM-Irish Branch)
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****** Sustainable Stormwater Management: A Landscape-Driven Approach to Planning and Design.

By Thomas W. Liptan (Author), J. David Santen Jr. (Contributor). 2017. Timber Press, Portland, OR, USA.

APPENDIX A: THE CASE FOR URBAN GREEN INFRASTRUCTURE being put on a STATUTORY and MANDATORY BASIS

A.1 Critical Issues and Challenges – Governance and Delivery

- Governance – modernising policy, introducing primary law and regulations and guidance
- Capacity – lack of sufficient and appropriate professional expertise as ‘in-house champions’ to serve and partner with civil society, business and academia

A1.1 International Comparators, Irish Capacity and Commitment

Despite G.I’s increasing incorporation in planning, Ireland – in terms of delivery - lags significantly behind more progressive states and cities, including Denmark, Germany, Sweden, Scotland, Canada and USA and Malmo, London, Lisbon, Barcelona, Berlin, Portland, Seattle Melbourne, Vancouver). There, key G.I components such as Urban Parks are political priorities, are promoted as generators of green-collars jobs, quality of life, Climate Change Adaptation, optimum health and social solidarity. Investing in parks makes environmental, economic and social sense.

In Ireland, parks are only a discretionary public service. So, unlike all other local services that are statutorily required, there’s no such statutory obligation in regard to G.I, and specifically Parks and Landscape Services. There is no primary legislation in this area (the 1906 Open Space Act was repealed).

Consequently, only 9 of the 31 local authorities employ qualified, professional and technical staff, with key skills required for G.I. The provision and management of Urban Parks and Greenspaces is optional, so is not on a par with other essential services (drainage, roads, planning, housing, etc.), This represents a serious gap in governance

B.1 Solutions – Towards Optimum Governance and Delivery

B1.1 Local Services – Parks and Landscape Services

There’s increasing, justifiable public demand for improved public services that deliver Quality of Life, Climate Resilience and Health and Well-Being. At local level, some of these expectations were in part generated by the property tax. Departmental planning guidance has gone some way in recognising the role of parks and greenspaces. However, it needs to go further:-

- Parks are not discretionary luxuries - parks are vital infrastructure, requiring state support, law and investment, and professional planning, design and management
- Urban G.I is indispensable to the imperative of Climate Change Adaptation and Mitigation; accepting that, its provision and management requires statutory provision

- Urban Greenspace is a natural capital asset; parks are landscape lungs vital to sustaining human culture, Climate Resilience, spirituality, health and well-being, leisure, social cohesion, prosperity and to natural biodiversity

B.1.2 Key Recommendation

"The measure of any great civilisation is its cities and a measure of a city's greatness is to be found in the quality of its public spaces, its parks and squares". - John Ruskin

Ireland needs a modern system of statutory governance for Green Infrastructure in a comprehensive frame. By doing so, the State would ensure and assure G.I actual contributions to Climate Change Adaptation and Mitigation.

- **The State should invest in appropriate, accountable governance** (updated national policy, law, regulation) **and in capital funding, technology and human resources** (professional specialists and skills-capacity building).
- **The foundation of this governance would be Primary Legislation that would provide for mandatory, obligation on the largest, urbanised local authorities** to plan, provide and manage (including maintenance) Urban Green Infrastructure, principally public Parks and Greenspaces.

By introducing and passing primary legislation for urban Blue-Green Infrastructure, the Irish State would be a leader, in being one of the few states to provide a statutory, mandatory basis for the planning, provision and management of urban B-G.I.

C.1 Policy and Law

I am aware that the Irish Landscape Institute has updated and modernised the 30-year-old departmental policy guidance on parks and greenspaces. In parallel, I have drafted a primary legislative proposal for a [Bill \(Business case, Explanatory Memo, Definitions, Heads of, etc.\)](#) to take to government.

The Bill's provides for mandatory regional and local Green Infrastructure Strategies (synchronised with the Development Plan-making cycle) linked to the sectoral Climate Change Strategies (required under the Climate Change and Low Carbon Development Act, 2015). It also mandates local authorities to implement those Strategies, including a duty of care and landscape and general maintenance of publicly-owned parks and greenspaces.

Appendix B - Sources and Resources

Articles, Books Reports

- Michael Lynch. A Policy for the Provision and Maintenance of Parks, Open Spaces and Outdoor Recreation Areas by Local Authorities. Department of Environment, Dublin, Ireland. February 1987.
- 'Urban green spaces: a Brief for Action'. World Health Organisation (Regional Office for Europe). 2017. Copenhagen, Denmark (www.euro.who.int).
- Dlr County Council. Green Infrastructure (G.I) Strategy 2016-2022. Dlr Parks & Landscape Services and Planning departments. Dublin. (www.dlrcoco.ie/files/devplan2016_2022/media/pdf/Appendix_14.pdf)
- People, Place and Quality of Life - Achieving Green Infrastructure and Sustainable Placemaking - Lessons from Ireland. International Making Cities Liveable Conference. Caring for Our Common Home. Sustainable, Healthy, Just Cities & Settlements. Pontificia Università Urbaniana, Vatican City, Rome. 17 June, 2016
- How cities use Parks: for Green Infrastructure, for Climate Change Management, to Create Safer Neighbourhoods, to Improve Public Health, for Community Revitalization, for Economic Development, Promote Tourism. City Parks Forum Briefing Papers series on how cities can use parks to address urban challenges. American Planning Association, Chicago, IL USA [www.planning.org/cpf]
- The Value of Green Infrastructure. A Guide to Recognizing its Economic, Environmental and Social Benefits'. CNT, American Rivers, USA_2011).A. MacLaren, S. Kelly, Andrew MacLaran, editors . *Neoliberal Urban Policy and the Transformation of the City: Reshaping Dublin*. Springer, August 2014.
- Randolph T. Hester Jr._ Design for Ecological Democracy_. Hester is Professor Emeritus of Landscape Architecture & Environmental Planning at UCC Berkeley, USA
- 'Making the Links. Greenspace and the Partnership Agreement'. Greenspace Scotland. March 2005_ www.greenspacescotland.org.uk
- Robert France Grey World, Green Heart? Building Nature's Ruin? Harvard Design Magazine. No. 18, Spring/Summer 2003.
- Sustainable Stormwater Management: A Landscape-Driven Approach to Planning and Design. By Thomas W. Liptan (Author), J. David Santen Jr. (Contributor). 2017. Timber Press, Portland, Oregon, USA.

Websites- Climate Adaptation and G.I / Greenspaces

- <http://webarchive.nationalarchives.gov.uk/20110118100541/http://www.cabe.org.uk/publications/grey-to-green>: CABE's (U.K's former **Commission on Architecture & Built Environment**) '**Grey to Green**' campaign, fuelled a debate

about whether this is smart, given the dangers of climate change and the opportunities to improve public health.

- <http://climate-adapt.eea.europa.eu/> **European Climate Adaptation Platform (CLIMATE-ADAPT)** - a partnership between EU European Commission (DG CLIMA, DG Joint Research Centre and other DGs) and [European Environment Agency](#) supporting Europe in Climate Adaptation. It helps users to access and share data on:
 - Expected climate change in Europe
 - Current and future vulnerability of regions and sectors
 - EU, national and transnational adaptation strategies and actions
 - Adaptation case studies and potential adaptation options
 - Tools that support adaptation planning
- www.greenspacescotland.org.uk: **Greenspace Scotland**, Glasgow, Scotland: an inspiring, practically-orientated, social enterprise that works with a wide range of local and national partners, to support planning, development and sustainable management of greenspaces and networks, as a key part of the green infrastructure of towns and cities.
- www.centralscotlandgreennetwork.org/delivering/our-themes/a-place-in-balance: **The Central Scotland Green Network** – Scotland is leading the way in ‘walking-the-talk’ of Green Infrastructure; this is another NGO that is part of a strong and vibrant civil society (third sector) that embraces the partnership model of delivering quality places and landscapes, that are climate resilient and adaptive to change.
- <http://greensurge.eu/>: Green Infrastructure & Urban Biodiversity for Sustainable Urban Development & Green Economy: EU project (24 partners - 11 countries); identify, develop, test ways to link greenspaces, biodiversity, people and economy, to meet urban challenges (land use conflicts, Climate Change Adaptation, demography, human health)