



A National Landscape Strategy for Ireland

Response to Issues Paper from Mountaineering Ireland

November 2011

1. Introduction

Mountaineering Ireland (MI) welcomes the consultation on a National Landscape Strategy. This represents a necessary step towards fulfilling Ireland's obligations under the European Landscape Convention, and putting in place stronger mechanisms to recognise, protect and manage Ireland's landscapes.

On page 27 of the Issues Paper, responses are sought on what the Irish public thinks of as quality in landscape. In section 3 of this submission MI provides its response to this question, followed by additional comments on the three chapters in the Issues Paper.

2. Mountaineering Ireland

MI is the representative body for hillwalkers and climbers on the island of Ireland. MI is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council and Sport Northern Ireland. The term mountaineering refers to a spectrum of activities that includes hillwalking, rock and ice-climbing, rambling, bouldering and alpinism. MI has 10,500 members comprising 153 clubs and over 1300 individual members (October 2011).

The work of Mountaineering Ireland includes:

- Representing the interests of hillwalkers and climbers;
- Providing a comprehensive range of services to members;
- Improving and securing access to Ireland's hills and crags;
- Promoting conservation and responsible use of the mountain environment;
- Encouraging safe practice and promoting skills and leadership training.

3. What MI sees as quality in landscape

As the representative body for hillwalkers and climbers in Ireland, MI's primary landscape interest is in the mountain environment - hills, mountains, forests, bogland, sea cliffs and associated areas. While limited in its extent, the mountain environment is a significant element in Ireland's landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land.

It is MI's assertion that protecting the natural and undeveloped character of Ireland's mountain environment should be a key concern within the National Landscape Strategy. Ireland has a very limited stock of wild areas, and we are using these up at an alarming rate.

It is ironic that the 'Issues' Paper does not identify the issues or challenges facing Ireland's landscape; MI provides the following as examples:

- Failure to adequately protect protected landscapes such as NHAs, SACs and SPAs (e.g. from turf-cutting and damage caused by recreational use of off-road vehicles);
- Industrialisation of natural landscapes (e.g. windfarm developments, telecommunications infrastructure);
- Suburbanisation of rural landscapes (e.g. unsuitable design and siting of houses);

- Agricultural practices (e.g. reclamation, burning, fencing of previously open hillsides);
- Abandonment of hillfarms (resulting in over-growth of vegetation and landscape change);
- Over-development of wild landscapes for recreation (e.g. by trail-marking, signage and unnecessary safety features).

The importance of mountain areas is difficult to capture. We know these are important areas for biodiversity, as carbon stores, as the source of clean water, as part of our cultural heritage, as vital spaces for recreation, as part of our tourism ‘product’. But do we understand the extent to which human well-being is bound up with the health of the natural environment?

Mountains and other wild areas provide a stable backdrop to our constantly changing urban or suburban environment. But do we recognise that wild areas have an innate value, beyond their role in serving human need? The National Landscape Strategy, and the awareness initiatives arising from it, must communicate the multiple values of our wild landscapes.

MI is concerned that the Green Infrastructure approach adopted in the Issues Paper is planning-led and does not accord the necessary importance to undeveloped landscapes. For many people the appeal and value of wild areas lies in their natural and unplanned character. The landscape itself is often the only facility that people need for recreation. Most wild landscapes are best left alone and not managed like a public park. From MI’s point of view, it is vital that the National Landscape Strategy respects and protects the integrity of our mountain and coastal landscapes.

4. Context and overview of strategy – MI response

4.1 Definition

MI notes that the definition of landscape in section 1.1 mirrors the definition in the European Landscape Convention (ELC), with the exception that the word ‘local’ has been added.

It is MI’s view that this change contradicts both the spirit of the ELC, which presents landscape as being of importance to all citizens, and Article 5c which provides for the participation of the general public and other interested parties in the definition and implementation of landscape policies. Hillwalkers and climbers often have a strong connection with landscapes some distance from where they live and therefore represent a ‘community of interest’ in the area. On this basis MI requests, as a matter of importance, that the word ‘local’ is removed from the definition.

This also (in part) answers the question at the bottom of page 6 about why landscapes are of importance to those who do not own them. The question is also answered by John Feehan in his 1983 book *'Laois – An Environmental History'*:

"The landscape is an open book. From an educational viewpoint it is a resource book of incomparable richness, though we have been accustomed to consult only a few pages. It belongs to all of us, and it cannot survive unless all of us care, because particular pages are in the keeping of individuals who may not understand what they possess."

To develop this analogy further, Ireland's landscape, like the Book of Kells, is part of our national heritage and belongs to all of us. MI recognises that most land in Ireland is privately owned, however the right to private property in the Irish Constitution is not absolute. The use of private property is restricted in the interest of the common good, through mechanisms such as the Planning Acts.

MI notes that the Planning and Development (Amendment) Act 2010 states that landscape in that Act has the same meaning as in Article 1 of the ELC. This supports the argument for removing the word 'local' from the definition.

4.2 Why is a National Landscape Strategy being developed in Ireland now

In section 1.2, at the bottom of page 6, square kilometres and hectares are used in the same sentence, units of measurement should be standardised in future documents.

4.3 The changing landscape and changing uses

Agriculture

In addressing changes in land use, section 1.3 of the Issues Paper acknowledges the role that agriculture has played in shaping Ireland's rural landscape, but is not clear on what the future may hold for those involved in agriculture. While it is true that there has been a shift in the population away from agriculture, and an increase in non-agricultural expectations of landscape, this has not been reflected in a change in land ownership. Over 60% of Ireland's land is devoted to agricultural activities, and much of the remainder (including wetlands, forestry and semi-natural vegetation) is also owned by farmers (Kelly, 2009). The future of most of Ireland's landscape is in the hands of its owners. It follows that the agricultural sector should be centrally involved in the development of Ireland's National Landscape Strategy.

A distinction should be made between intensive and extensive agriculture. Intensive agriculture is effectively an industrial use of landscape, with significant emissions, use of machinery and large buildings. This is appropriate and productive in certain landscapes. Extensive agriculture, which is less productive in terms of farm outputs, contributes to landscape quality, but this model of agriculture requires external financial support.

Agriculture in the uplands

Upland areas share many attributes with islands – they are iconic landscapes, physically remote, subject to harsh weather conditions and sparsely populated. The traditional extensive farming practices that created Ireland’s distinctive upland landscapes are no longer economically viable. With land abandonment already emerging as an issue in some upland areas, it is clear that policy mechanisms are required which will ensure that Ireland’s upland landscapes are maintained in condition that is favourable towards their many functions (including agriculture, recreation, carbon storage, biodiversity, tourism and water collection).

It is likely that the most cost-effective means to achieve this would be through a targeted upland agri-environment scheme, centred on the management of vegetation through appropriate grazing. Without this, the over-growth of upland vegetation is likely to result in further devastating fires and degraded landscapes. MI proposes that the National Landscape Strategy should incorporate a recommendation for the management of upland landscapes through an upland agri-environment scheme. The options for funding such a scheme should be explored in the current discussions on the CAP programme.

Avoid urban / rural divide

Section 1.3 suggests an urban / rural divide regarding perspectives on landscape; this is overly simplistic and unhelpful. It should also be borne in mind that three out of four rural households have no direct involvement in agriculture (Meredith, 2010).

Biodiversity

MI agrees that the protection and management of designated sites is key to maintaining biodiversity, and that supports the view in the Issues Paper that the management of landscapes and ecosystems outside of designated sites is also necessary to stem biodiversity loss and ecosystem degradation.

Ireland is required to report on the status of protected species and habitats under the EU Habitats Directive. The first such report was published by the National Parks & Wildlife Service in May 2008. The report found that only 7% of the habitats examined were in good status, with 46% inadequate and 47% bad. The situation with Natural Heritage Areas (NHAs) is probably even worse; we have 630 proposed NHAs that remain without statutory designation since they were listed in 1995. The National Landscape Strategy should highlight the poor protection afforded to sites in Ireland that have been designated for nature conservation and the need for resources to be allocated to give effect to such designations.

4.4 Managing and planning landscapes of quality

In Section 1.7, under the heading of ‘Managing and planning landscapes of quality’ the Issues Paper refers to improving public understanding of the contribution of good design, quality in the design of landscapes and the design of new places. This provides an example of the ‘green infrastructure approach’ referred to in Section 3 of this submission. This approach is appropriate in an urban or per-urban environment, but not when dealing with rural landscapes and the natural environment – the very landscapes that most people would identify as landscapes of quality.

It is notable that the Issues Paper makes no reference to remediation of damaged landscapes, as technology changes telecommunications masts will become redundant, how will we manage exhausted quarries, what will be done with areas of clear-felled forestry when it is no longer considered acceptable to plant trees on sensitive upland sites? The strategy should advocate remediation in such situations, or at least suggest mitigation techniques.

5. Shaping our Future with the National Landscape Strategy – MI Response

MI welcomes the intention in the Issues Paper that future landscape policy and management will support sustainable development. While acknowledging that our landscape is subject to ongoing change, MI's wish is that the National Landscape Strategy will place a higher value on natural and undeveloped landscapes, so as to prevent unnecessary consumption of these areas. It is time that environmental matters are taken seriously in Ireland, otherwise we face payment of further fines to the European Commission for failure to maintain designated sites in 'favourable conservation status'.

It is difficult to envisage how a national policy and framework would assist in resolving issues and tensions related to land use (as indicated in 2.0). MI would like to see this explained further in the National Landscape Strategy. Issues with conflicting land uses, such as agriculture and public access, are probably best mediated at local level within national guidelines. The Strategy should make clear how actions will be implemented at local level.

MI found Diagram 1 to be particularly useful and suggests this be reproduced at a larger size in the National Landscape Strategy. The presentation and numbering of the High Level Objectives in Section 2.1 was somewhat confusing.

MI supports the view that Action Theme 1 (Awareness-raising) should be a starting point for implementation of the National Landscape Strategy. During the period of public consultation on the Issues Paper, MI was surprised how few organisations with an interest or role in landscape were aware of the consultation. This would suggest that an opportunity to identify what people value in landscape was missed.

6. Developing Mechanisms for the Implementation of the National Landscape Strategy – MI response

It is surprising that landscape, as something which surrounds us and affects our everyday lives, remains such an amorphous subject. Unfortunately the current Issues Paper has done little to improve that situation. It is MI's view that Draft action 1.2 is a key priority. The language, definitions and tools to clearly communicate the ideas, values and proposals inherent to the National Landscape Strategy are absolutely essential. Consideration should be given to bringing this work forward so that it can inform the National Landscape Strategy

itself. Plain language and clear presentation are prerequisites to securing Government, public sector, landowner and public support for the National Landscape Strategy. It is likely that lessons can be learnt from other countries that have implemented the ELC.

Implementation Objective 1, establishing an inter-departmental structure or network as the implementing body for the National Landscape Strategy, is fundamental. The implementing body should be put in place at the time the National Landscape Strategy is launched.

The powers and responsibilities of the implementing body will need to be set out clearly in the National Landscape Strategy. The implementing body will require expertise and capacity to ensure there is professional and public understanding of how to assess, value and manage Ireland's landscapes. The implementing body will need to make a technical input to national policy development, and also provide direction to regional and local authorities and state bodies with regard to their role in implementing the National Landscape Strategy. The remit of the implementing body should include the power to appraise all legislation that affects Ireland's landscape and propose changes where desirable. The ability of the implementing body to communicate effectively with people, at all levels and through a range of media, will be vital.

The National Landscape Strategy must have clear and measurable outputs. The Issues Paper indicates that of 20 draft actions, only one (draft action 3.5 – National Garden Survey) is expected to be completed within the first five years of the Strategy. Much more will need to be achieved in Phase One if Ireland is to fulfil its ELC obligations during the 10-year timeframe of the strategy.

MI believes draft actions 1.1, 2.1, 2.2, 3.1 and 3.2 should be progressed in the early stages of implementation. Draft action 1.1 should include a programme for engagement with the agricultural community (draft Action 5c will neither be sufficient, or early enough, to gain the cooperation of landowners).

MI proposes that an action be included to promote national understanding of the value of small detail within landscape, e.g. traditional dry-stone walls versus modern mortared walls. While details such as this might appear small, they make a crucial input to overall quality. This action would fit into either the Awareness-raising or the Training, Education and Research themes.

The finalised actions, their timeframe and the agency responsible should be shown in tabular format. The current presentation is difficult to read.

7. Closing comments

We are fortunate to have great diversity and rich quality in Ireland's landscapes. Although the written and visual arts have long celebrated our landscape, to date there has been little protection for landscape, and poor recognition in policy of the contribution that landscape makes to our national identity and well-being.

MI's particular concern is mountain and wild landscapes, which we see as being the most untouched and therefore the most worthy of protection. MI accepts change in our upland landscapes, provided it is done reasonably slowly. It is imperative that in the management of landscape, balance is achieved between individual interest and the common good.

MI urges Government to move forward with publication and adoption of the National Landscape Strategy. In the current period of economic difficulty, we need this strategy to ensure the wise management and protection of Ireland's outstanding natural assets.

The National Landscape Strategy itself, and the processes to support its implementation, should be accessible and kept as simple as possible, yet there must be clear accountability for delivery of the Strategy.

We trust you will take MI's views and recommendations into consideration in the process of completing the National Landscape Strategy

8. Further information

MI would be happy to elaborate on, or discuss, any of the ideas contained in this submission.

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9. References

Kelly, M. (2009) 'The Environment and Landscape Land Cover and Land Use in Ireland – Key Issues and Challenges' in *The Irish Landscape 2009*, published by the Heritage Council, Kilkenny.

Meredith, D. (2010) 'Rural Areas in Transition: Evidence of Rural Restructuring in the Republic of Ireland' in *Geographical Perspectives on Sustainable Rural Change*, published by Western Washington University Press.