

An Taisce – The National Trust for Ireland  
Tailor's Hall,  
Back Lane,  
Dublin 8

17<sup>th</sup> Nov 2011

**RE: Consultation on the Strategy Issues Paper for the National Landscape Strategy for Ireland:**

An Taisce, The National Trust for Ireland, welcomes this opportunity for public consultation on Ireland's proposed Landscape Strategy. An Taisce was established in 1948 and is Ireland's oldest voluntary environmental organisation. It is a national organisation and a prescribed body under a number of environmental and planning, acts and regulations in Ireland.

An Taisce Natural Heritage supports the European Landscape Convention in its aims to increase awareness of the value of landscapes; to improve training and education about the landscape; and to provide a procedure of landscape identification, assessment, protection and quality objectives. In Ireland there is currently a lack of integrated and comprehensive study to characterise, analyse and document the physical and historic landscape and seascape. There is the need for national consistency in characterisation and valuing of the landscape. An Taisce Natural Heritage support a National Landscape Strategy that should unite the landscape and override local administrative boundaries. Landscape must become a mainstream political concern and demands a forward-looking attitude. National policy should recognise the ecosystem services set in the natural landscape upon which humans rely for everyday life.

In recent years Ireland has had the fastest population increase in the EU. The unprecedented physical and infrastructural investment which occurred between the mid 1990's and 2007 has put extreme pressure on our landscape both urban and rural.

An Taisce wishes to emphasise the value and importance of all landscape and seascapes, not just designated or special areas. An Taisce recognises the role that systematic characterisation can play in the assessment of new development and land management. Landscape and seascape is primarily considered from a homocentric view, ie. as a resource to be utilised by humans, but it also has an intrinsic value, in particular as a range of natural systems. Greater consideration is needed in the way we manage our landscapes to ensure that negative impacts are minimised and positive impacts enhanced.



Ireland's distinctive yet diverse landscape is a key resource providing the physical setting for everyday life, it gives a sense of place and belonging to individuals and communities. Biodiversity and natural heritage are integral elements of the past and present landscape. This should not be forgotten in the future, where dominant human activity threatens the natural integrity of the landscape.

An Taisce supports the definition of landscape provided by the European Landscape Convention (with the additional recognition of seascape) - a "Landscape or Seascape" means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.

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**An Taisce Submission to the Department of Arts, Heritage and the Gaeltach for the consultation on the Strategy Issues Paper for the National Landscape Strategy for Ireland.**

**November 2011**

## **INTRODUCTION:**

Any consideration of landscape policy and legislation Ireland must as a starting point provide for the implementation of the provisions of the European Landscape Convention 2000

The "Strategy Issues paper and its overriding objective to provide "A National Landscape Strategy for Ireland" does not meet this requirement.

In section "Context and Review of Strategy" the production of a "National Landscape Strategy" is provided for as one of "suite of strategies with the National Spatial Strategy (2002-2020) and National Climate Change Strategy (2007-2012). These strategies have no legislative basis, have been ineffective in implementation and have been significantly disregarded in decision making by Government and local authorities and government agencies and bodies.

The provision of non statutory and ineffective strategy document does not meet the requirements of implementing the Convention particularly with regard to Landscape protection, planning and management.

### **A. KEY PROVISIONS OF EUROPEAN LANDSCAPE CONVENTION**

Article 1 of the Convention defines landscape as: an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors

Article 1 provides further definitions on:

‘landscape policy,’

‘landscape quality objectives,’

‘landscape management and’

‘landscape planning’

Article 3 of the convention states that ‘the aims of this convention are to promote landscape protection, management and planning and to organise European cooperation on landscape issues’.

## **B. CHALLENGES FACING EUROPEAN LANDSCAPE CONVENTION IMPLEMENTATION IN IRELAND**

Ireland faces particular strategic challenges because of absence of national landscape policy, a lack of implementation of the statutory protection measures already introduced to comply with Article 1C of the convention, namely Landscape Conservation Areas under Section 204 Planning and Development Act 2000 and ineffective policies of landscape protection, landscape management and landscape planning.

For a document purporting to be "Strategy Issues Paper for" A National Landscape Strategy for Ireland the lack of even an overview of the issues affecting Ireland is inexplicable.

The 'Strategy Issues Paper' guidelines is entirely deficient in addressing the multiplicity of challenges affecting the achievement of 'landscape quality objective' standards 'landscape protection' and landscape management in Ireland including the level of retrospective action by the Convention.

A multiplicity of pressures have affected the Irish landscape over the last decade. These are listed below:

### **1. RURAL HOUSING**

A non strategic approach to housing position combined with laissez faire planning policies have led to a majority of houses being single one-off planning design and construction in over 95% in road front plots. It is a pattern of housing development which is essentially a non plan based non strategic and car dependant. At the peak of the Irish construction boom during the middle of the last decade, over 20,000 housing units were being constructed on an annual basis in this one-off pattern outside designated or zoned town and village boundaries.

### **2. AGRICULTURAL DEVELOPMENT**

Teagasc provides data from their National Farm Survey which evidences the large extent to which the Irish landscape is shaped and managed by agriculture. Approximately 64% of total land area in Ireland is used for agriculture. Of this 80% is devoted to grass (silage, hay and pasture), 11% to rough grazing and 9% to crop production. There are around 130,000 farmers in Ireland. Average farm size is 32 hectares, with almost 50% of farms less than 20 hectares. Some current farming practices associated with the intensification and specialisations of agriculture have the potential to threaten environmental quality and change the landscape character of Ireland.

Despite farming dominating Irish land use, the countryside is multifunctional and farmers are acting as guardians of the countryside for future generations (rather than owners). Recognition of this will help to protect the traditional rural landscape of Ireland from irreversible change.

The impact of continuing agricultural development is likely to be significant since the Department of Agriculture, Forestry and Food has adopted a target to increase milk yield by over 50%. There is no strategic or environmental assessment has been carried out for the adoption of this objective so that the consequences in land reclamation. Land clearance, field drainage and amalgamation and additional agricultural building capacity has not been assessed.

Notwithstanding the implementation of the Rural Environmental Protection Scheme (REPS) for qualifying farm holdings Irish agricultural policies as favoured to continue land reclamation and removal of field boundaries without planning control or consideration of environmental impacts. This resulted in the European Court of Justice finding against Ireland in Case C66-06. Revised legislation and regulations including new consent procedures to Department of Agriculture, Forestry and Food does not provide for adequate monitoring or addressing of landscape sensitivity in evaluating reclamation/infill schemes.

Hedgerows are a man made feature of the countryside, created as barriers to stock around field boundaries. Today their appearance contributes to the character of Ireland and the conservation of hedgerows is a national priority. Hedgerows provide an important wildlife habitat, hosting a range of trees, shrubs, climbers and wildflower species. The connectivity and continuity of hedgerows and field margins create vital corridors of shelter, food resources and movement for insects, birds and mammals.

The development of agricultural buildings is significant in landscape impact, is not accompanied by landscape evaluation and Irish farm development is in general characterised of any action to reflect special areas of landscape sensitivity eg in particular the more exposed western sea board counties or carry out appropriate planting to soften the impact of new shed buildings.

### **3. FORESTRY**

At the beginning of the twentieth century only 1% of Irish land remained as woodland cover. The woodlands of Ireland are made up of a number of native species of tree, but most remaining woodlands now incorporate exotic species. These exotic species give the landscape a different character, while native species (such as ash and oak) are far more important for native biodiversity, as they have evolved together over thousands of years. Veteran trees are a key

feature in the landscape, contributing to a locality's sense of place. Veteran trees are among the oldest living objects in Ireland and are also important genetic resources.

The island of Ireland is now aiming to increase tree cover, primarily to reduce the impact of climate change, where carbon sequestration benefits are a secondary by-product. Increasing tree cover will change the landscape character of Ireland. The new tree cover needs to be appropriate to the Irish landscape and the character of particular areas. The Forest Service (2000) states that any approach to forest landscape planning and design should deal with the forest in the context of the surrounding landscape, and aim at achieving a sympathetic response to the distinctive landscape character of that given location. Forestry is a relatively new industry in Ireland and has a large impact on the landscape, due to its visual and environmental impact on the surroundings. The Irish state forestry company Coillte holds 445,421ha of afforestation, primary in short rotation clear-fill conifer plantations. This has a significantly and problematic landscape impact through the continued cycle of clear-filling and replanting. Coillte is no longer expanding its land take with a private sector forestry being grant funded and incentivised. This continues to be predominantly in conifer, clear-fill plantation. The forestry consent process carried out by the Department of Agriculture, Forestry and Food is deficient in evaluating individual and cumulative landscape impact.

#### **4. GENERAL DEVELOPMENT CONTROLS**

Notwithstanding the development of zoning and strategic planning policy provisions both in national policy documents and Local Authority Development Plans, the level of planning applications for non-residential developments outside town and village speed limits is significant and problematic.

#### **5. QUARRIES**

The control of quarry development by Irish Local Authorities since the implementation of current planning legislation 1964 has been ineffective. The provision granting legal status to all development in place in 1964 has been used to justify major intensification of small quarries existing that date or as well as a significant number of entirely new quarries particularly developed during the boom years without claiming pre 1964 status without any basis. Attempts to remedy this thorough a registration process under Section 250-61 Planning and Development Act 2000 resulted in a level of fraudulent registrations, the nature and extent of which has not been established. There is no evidence that this issue will be resolved in the revised registration procedure provided under Planning and Development Act 2010.

## **6. PEATLANDS**

Bogs are a unique landscape feature, some of the oldest examples date back more than 10,000 years and now represent some of the last true wilderness areas. The distinctive bog landscape can be one of vivid colour, where the vegetation consists of a more or less continuous cover of Sphagnum moss and a somewhat stunted vegetation of flowering plants, heathers, sedges and grasses that grow through it. The low vegetation and even, low lying ground often provides extensive visibility across the landscape. A rich archive of archaeology is preserved in bogs, peat is a rich store of carbon and the habitat is home to many rare and protected species of plant and animals. Ireland's raised bogs and blanket bogs are particularly important in a world context and are protected under the EU Habitat's directive. These most vulnerable and sensitive landscapes require further protection.

20% of the Irish land areas and peat soils and blanket bogs are a particular and characteristic feature of the Irish landscape. Mechanised peat cutting for domestic sod production and horticultural compost is being carried out on an industrial scale in the Midland Raised Bogs without any planning or licence control or monitoring to establish the nature and extent of activity. There is significant level of dispersed mechanised peat cutting including use of sausage machines for use for domestic sod extraction from the blanket bog in blanket bog areas in the western seaboard counties.

In addition to the ecological impact on carbon sink loss, this represents a significant cumulative impact on the landscape quality of Irish peatlands. Despite current controls which have been introduced by Special Area of Conservation designated mainly Midland raised bogs, the overall impact of mechanised peat extraction in Ireland is increasing.

## **7. TRANSPORT INFRASTRUCTURE**

Since 1999 Ireland has developed and planned one of the most dense inter regional motorway networks in Europe. Motorway/dual carriageway has been constructed between Dublin and the main urban centres with further proposals to link the western and southern seaboard counties with Atlantic corridor scheme have been largely shelved due to expenditure cuts. This has represented a significant cumulative impact in landscape severance. It has furthermore paradoxically led to the acceleration of urban sprawl as planning controls were relaxed the old national roads which have been superceded by the new motorways.

## **8. RENEWABLE ENERGY**

Ireland has adopted a 40 per cent renewable power generation target for 2020. This requires significant investment in large scale wind turbine clusters and grid connection.

DOEHLG and local authority planning policy has proved ineffective and led to planning conflicts, including the overturning local authority planning decision, based on local development plan grounds on the basis of adverse impact on nationally sensitive landscapes

In a recent major case An Bord Pleanála overturned a 27 turbine windfarm in Connamara PL07.238734.

## **9. URBAN LANDSCAPE**

Our urban landscapes are as much a part of national identity as rural coastal bogland or mountain areas.

Local Authorities have a motive to maximise commercial rates and development contributions in their areas. This has undermined compliance with building height provisions in development plans, shown by the level of overturns or variations of decisions in the Dublin City Area by An Bord Pleanála.

## **10. WATER**

The influence of the sea is dominant in the Irish landscape in creating the extensive coastline, which can be rocky and dramatic, including features such as coastal stacks and islands. The type of coastline will create different landscape character areas, such as pebbly beaches, sand dunes, salt marshes or cliffs. Inland hydrological features are of fundamental importance to current and evolving landscape character, including rivers, lakes, wetland, canals, turlocks and drainage systems. These systems are often connected and all need protection for their importance to wildlife and humans alike. The way in which water is managed effects the landscape, for example sustainable urban drainage systems are becoming a more common feature within larger towns and cities. Integration with the Landscaper Character Assessments with Water Framework Directive River Basin Management Plans and Catchment Flood Risk Assessment and Management Studies will be essential.

### **C. Section 1: Context and Overview of Strategy of the Strategy Issues paper:**

The definition of a landscape is given as “A landscape is an area, as perceived by local people, whose character is the result of the action and interaction of natural and/or human factors.” An Taisce support the definition of landscape provided by the European Landscape Convention and supported by the Planning and Development (Amendment) Act 2010 (No. 30 of 2010) (with the additional recognition of seascape) - a “Landscape or Seascape” means an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”. An Taisce submit the definition within the National Landscape Strategy for Ireland should be amended to the European Landscape Convention definition:

*A landscape is an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.*

An Taisce also supports the vision of An Chomhairle Oidreachta (The Heritage Council of Ireland): “The Irish landscape will be a dynamic, living landscape, one which accommodates the physical and spiritual needs of people with the needs of nature in a harmonious manner, and as a result brings long term benefits to both.”

### **D. Section 1.2 Why is a National Landscape Strategy being developed in Ireland now of the Strategy Issues paper:**

This Landscape Strategy is too anthropocentric and mainly views the landscape as being a resource and commodity to humans. However, the landscape should also be considered valuable for the natural environment it supports, i.e. the different flora, fauna, habitats, and ecosystems and we should be willing to protect it for its intrinsic values, not just for the value humans can gain from it. Both the anthropocentric and intrinsic value of landscape should be highlighted within the National Landscape Strategy. Examples of where this strategy needs to be amended to be more inclusive of the natural environment have been included below.

In paragraph 4 it states: *it is where people, society, economy, history, identity and natural resources meet and therefore should be accorded a value in our collective decision making processes.* An Taisce submits this sentence should be amended to include the following *it is where people, society, economy, history, identity, natural resources, nature and biodiversity meet and therefore should be afford a value in our collective decision making processes.*

In paragraph 6 it states: *The way it evolves affects how communities - and their culture – change.* This sentence does not account for the influence that an evolving landscape, especially when anthropogenically induced, will have on biodiversity. Therefore, as an evolving landscape affects

communities, it will also affect the natural environment and this should be accounted for within the Landscape Strategy.

The final paragraph on page 6 states: *Most of the agricultural landscape and much of the mountain land is private property. Why then should it, and its management, be of importance to those who do not own it, live on it or make their living from it? The answers lie in changes in perceptions and in the pace of physical change, which has been accelerating since the late twentieth century.* This gives the perception that the landscape is only of value as a commodity but it should be perceived as our natural heritage, and should be valued as being more than just a commodity.

General points:

- The final points within the last paragraph of page 6 mentions km<sup>2</sup> and hectares in the same sentence. There should be consistency in the metric system used within this paper.
- In addition, within paragraph 6 a few habitat types are mentioned yet, there are many more habitat types which are extremely important within the landscape. For example, hedgerows, natural woodlands, natural/ semi natural grasslands, fens, turloughs, and lakes. The importance of each of these habitats within the landscape will have to be recognised within the strategy. The Landscape Character Assessment will have a significant role to play in addressing and identifying the importance of semi-natural habitats, rich in biodiversity within the landscape.

#### **E. Section 1.3 The changing landscape and changing uses of the Strategy Issues paper:**

The impact that Climate Change will have on the landscape should be noted within section 1.3. It is an increasingly significant issue and as appropriate management of the landscape will help to mitigate against and adapt to the effects of Climate Change. Climate Change is an issue which should be highlighted more within the Landscape Strategy.

The physical and cultural component attributes of the landscape are shaped, to varying degrees, by climatic conditions. Climate changes could, directly or indirectly, lead to dramatic changes in landscape character (such as loss of whole landscape through rising sea levels or flooding events) or more subtle and gradual changes (such as longer growing seasons or low river flows). It is possible that some of the characteristic features of valued landscapes could be compromised and in some cases new landscapes created. Such shifts in the balance of landscape character could prompt the emergence of new perceptions of what landscapes are valued and why. Consideration should be given to implementing compensation or adaptation methods now. For example, where the loss of coastal marshes is unavoidable, this could be compensated for elsewhere through the planned provision of wetlands further in land. The planting of drought

tolerant tree species is an adaptation strategy that could be considered to maintain characteristic tree cover in certain landscapes where water supply may be restricted in the future. By anticipating climate change and understanding the potential impact upon landscape character, suitable planning and management practices could, where appropriate, be adopted.

The second paragraph of section 1.3 states: *urbanised populations use and appreciate the countryside in different ways. They expect it to provide scenery, amenities and nature – the narrower view of ‘landscape’ – as well as food.* This needs re-working since it is not appropriate to assume urban populations do not value the landscape in the same way as the rural communities, nor that they have a narrower view of it. While there is an increasingly urbanised population within Ireland, the majority of people still have ties to the rural environment.

*Adapting the ways in which we manage our landscapes and ecosystems outside of designated sites is also necessary to stem biodiversity loss and ecosystem degradation. Targeted actions such as well-designed agri-environment measures are an example of this type of management.* The potential impact of agri-environment measures on the landscape is an important issue and should be given more weight within the upcoming strategy. In addition, particular reference to REPS should be removed, and with the forthcoming reform of CAP, it may be best to leave it at agri-environment measures as it is not known yet what AEOS will evolve into.

The paragraph on biodiversity within the strategy should be improved, as it does not provide adequate information on the significance of biodiversity within the landscape, nor the potential benefits proper protection and management of the landscape will provide for biodiversity.

On page 9 it states: *The National Landscape Strategy will change policies and structures so that we manage our interlinked landscape, society and economy more effectively.....* An Taisce submits that the environment should be included within this statement. *The National Landscape Strategy will change policies and structures so that we manage our interlinked landscape, environment, society and economy more effectively*

The second bullet point on page 10 should be re-worded to include *what it holds - its natural heritage, resources and cultural importance, and...* This is again to widen the perception of the landscape from being viewed as a commodity to including its value for natural heritage.

The final sentence of page 10 states: *Landscape Character Assessment can be used as the basis from which to develop local, regional, or national policies or proposals – such as those for green infrastructure, recreation or transport.* An Taisce submits the Landscape Character Assessment should also feed into Biodiversity and Species Actions Plans.

Page 12: *The National Landscape Strategy will be a framework for ways of managing our landscape that anticipate and avoid conflict between the present and emerging uses, as society and economy become ever more complicated and increasingly influenced by fast-developing technologies.* Suggested rewording *The National Landscape Strategy will be a framework for ways of managing our landscape, **and all its environments**, that anticipate and avoid conflict between the present and emerging uses **and pressure**, as society and economy become ever more complicated and increasingly influenced by fast-developing technologies.*

#### **F. High Level Objective 3 - Landscape Character Assessment**

- The development of the Landscape Character Assessment is going to be essential in influencing national, regional and local policies.
- To ensure this the Landscape Character Assessment procedure should be developed through stakeholder and public consultation.
- Training of state bodies to carry out the Landscape Character Assessment is essential. Just as a standard will be developed for the Landscape Character Assessment procedure, to ensure there is consistency across all states bodies, a training and qualification standard will also have to be developed for those carrying out the assessments. It should be ensured that persons carrying out the Landscape Character Assessments are all suitably qualified, since as noted within this paper, valuing the Landscape can at times be a subjective matter. For example, bullet point 1 on page 10, making an assessment of the landscape's appearance; this is going to be a complicated aspect of the assessment to carry out in an objective and quantitative manner.
- In addition to ensuring an appropriate level of training and qualification, the assessment must be carried out and produced in a collaborative manner. Experts from different sectors should work together on the assessment. For example, qualified ecologists should be included. Since, hedgerows, as one habitat example, are an extremely important feature within our landscape. However, an ecologist will be required to carry out a full botanical assessment of the hedgerows and this information will be vital in assessing the significance of a hedgerow within a landscape.

Landscape character is influenced by 1) natural attributes of the landscape - elevation, slope, geology, land cover, habitats, biodiversity, 2) human influences – land use, settlement, archaeology, communications, agriculture and 3) interpretation – aesthetics, culture. Summarised here are some of the main issues An Taisce submit are of importance and how they relate to landscape character and which An Taisce submit have not been adequately mentioned within this document.

## **G. General Comments to be considered for the development of the National Landscape Strategy:**

### **I) 40% Renewable energy target by 2020**

Ireland faces major challenges in meeting the 2020 40% renewable energy target. This requires a strategic approach to grid enforcement and wind energy distribution while at the same time minimising impact on biodiversity peatlands and sensitive landscapes.

### **II) Tourism and outdoor recreation**

Much of the focus of Tourism investment during the boom years was for visitor accommodation and golf resort development in sensitive landscape locations or country house parklands. This can undermine the key asset base which makes Ireland attractive in the first place. Tourism investment should be linked with the protection and enhancement of the Ireland's landscapes. There are particular opportunities to develop Ireland as a focus for outdoor recreation and in particular walking/hiking, cycling/mountain biking, surfing, canoeing/kayaking. A key focus is the integration of a tourism investment with local communities and stake holders with parallel benefit in protecting the landscape.

### **III) Sustainable use of the components of biodiversity**

All human activities, including all our economic activities, take place inside, and cannot exceed, the carrying capacity of our environment. The carrying capacity of our environment is dependent on the healthy functioning of our biodiversity and ecosystems. From an economic perspective, numerous attempts have been made to understand the value of biodiversity to humanity in terms of ecological goods and services for instance insect pollination, water regulation and purification, carbon storage.

The Millennium Ecosystem Assessment (MA) assessed the condition of 24 of the earth's natural systems that it considers humanity's "life support systems". It concluded that over the previous 50 years, four of these systems have shown some improvement, fifteen are in serious decline, and five are in a stable state on a worldwide basis, but threatened in some parts of the world. The establishment of the TEEB (The Economics of Ecosystems and Biodiversity) study (<http://www.teebweb.org/>) is another initiative to highlight economic benefits of biodiversity, cost of biodiversity loss and ecosystem degradation, and make practical management recommendations. These recommendations tie into the protection of Ireland's landscape.

Yet other reasons to conserve biodiversity are equally valid and must not be lost in the rush to weigh up its economic value to humans. There is also our ethical responsibility to conserve biodiversity and facilitate a shift toward societal respect for nature. In the words of Richard Frankham “*The ethical justifications for conserving biodiversity are simply that one species on Earth does not have the right to drive others to extinction, analogous to abhorrence of genocide among human population*”.

#### **IV) Pollination**

The value of crop pollination in Ireland by all pollinating insects has been estimated as €53million per year in Ireland<sup>1</sup>. Unfortunately, the current status of Irish pollinators appears to be in decline, with 30% of the wild bees and 18% of butterfly species in Ireland considered threatened according to the International Union for Conservation (IUCN). The Landscape Strategy is an opportunity to allow for a holistic approach to enhancing our pollinator’s habitats and reversing in trend in their decline.

#### **V) Soil Protection**

To achieve food security in face of an ever growing population, Ireland and the world, will require large areas of fertile land. However, increasing pressures such as urbanisation, afforestation, industry, erosion and overgrazing are putting soil quality at risk. As yet there is no program to monitor and protect this essential resource in Ireland. In the European Union it has been estimated that soil deterioration costs 38 billion a year, however to date; no such figure appears available for Ireland. The Landscape Strategy should account for soil types to ensure inappropriate land uses are not promoted on unsuitable soil types and areas.

#### **VI) Flooding**

With a predicted rainfall increases of 17% in western areas of Ireland and possibly as much as 25% in places, the importance of adequate flood management is immediate. The Landscape Strategy and landscape character assessments should tie in with Catchment Flood Risk Assessment and Management Studies. In addition, An Taisce commissioned a report “The Use of Wetlands for Flood Attenuation” which highlights amongst other issues the draining of many small wetlands. “*Small isolated wetlands, or ‘kettle holes’ within a landscape probably have limited storage capacity and flood attenuation potential on an individual basis, but studies show that when many small wetlands occur within a catchment, the aggregate storage capacity may give rise to considerable flood attenuation potential.*”

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<sup>1</sup> Bullock, C., Kretch, C. & Candon, E. (2008) The Economic and Social Aspects of Biodiversity: Benefits and Costs of Biodiversity in Ireland. (ed Department of the Environment Heritage and Local Government). Government of Ireland, Dublin.  
The Tailors’ Hall, Back Lane, Dublin 8 Telephone 01 4541786 Fax 01 4533255 Website: [www.antaisce.org](http://www.antaisce.org)  
Company Registration No.:12469; Charity Reference No.: CHY 4741

## **VII) Natural Heritage Areas (NHA's) and proposed Natural Heritage Areas (pNHA's)**

NHA's are areas that contain flora and fauna, habitats, or geological or geomorphological features which are of interest for their diversity of natural attributes, and which are thus worthy of conservation. These areas are protected under the Wildlife (Amendment) Act of 2000. Currently, only bog NHAs have been granted statutory protection. There are a further 617 pNHAs which still do not have the full legal protection they require although have been proposed since 1995. Many conservation professionals are alarmed by the unchecked destruction of pNHAs across the country. The landscape strategy and landscape character assessments should recognize the importance of proposed NHAs and help protect from damaging activities, though appropriate policies, especially until they are afforded full legal protection.

Protecting NHAs with statutorily awarded NHA Orders is crucial to strengthen the coherence and benefits of Ireland's network of ecosystems and 'Green Infrastructure'; to protect the functional values and ecosystem services of Ireland's Environment; to buffer against the impacts of Climate Change; to deliver commitments under European Nature Directives; and a worthy task toward achieving Ireland's objectives under Sustainable Development objectives and the EU 2020 biodiversity strategy.

### **H. Actions required to protect ecosystem services.**

- **Stricter protection** of the wider countryside utilising the natural buffer zones provided by biodiversity in relation to pollination, flooding mitigation etc.
- Future strategies for Flood Risk Management should refer to increasing research into the services of wetlands in flood attenuation and the incorporation of wetland protection and management into flood risk management plans.
- A **National Hedgerow Conservation Plan for Ireland** should be realised.
- Prioritisation of a national action plan on Green Public Procurement (the importation of illegally felled timber being a particularly significant issue); and detailed actions for ensuring legal protection of Ireland's Natural Heritage Areas.
- Urgent action is required as regards **habitat mapping for Ireland**.
- It is imperative that each Local Authority has a **designated biodiversity officer** to undertake natural heritage conservation responsibilities, such as inputting to the landscape character assessments.

The above actions should be tied into the development of the landscape strategy.

## **CONCLUSION**

There is no evidence that the introduction of national landscape guidelines even if protection standards were to be set out, it would be achievable since there are a multiplicity of agencies regulating land use and both through the Local Authority planning system and the Department of Agriculture, Forestry and Food.

There is no evidence that these guidelines will meet the requirement of Article 5e of the convention on implementation ‘to put landscape policies into effect, each Party undertakes to introduce instruments in protecting, managing and/or planning the landscape’.

An Taisce have highlighted a number of issues that need to be further addressed within the strategy issues paper as well as having made a number of recommendations for inclusion within the landscape strategy.