

Mr Martin Colreavy
Principal Advisor
Built Heritage and Architectural Policy
Department of Arts, Heritage and the Gaeltacht
Custom House
Dublin 1

18th September 2014

Ref NLS 001.1

Re: A Draft National Landscape Strategy for Ireland 2014 – 2024

Dear Mr. Colreavy,

The Environmental Protection Agency (EPA) acknowledges the invitation for submissions in relation to a draft *National Landscape Strategy for Ireland 2014 – 2024* and welcomes this opportunity to provide observations on the draft Strategy. Specific comments on individual actions outlined in the draft Strategy are also provided in Attachment 1.

The preparation of this draft Strategy, based on the European Landscape Convention, is welcomed by the EPA. The development and implementation of a National Landscape Strategy has the potential to integrate environmental protection policies and actions across a number of sectors including for example forestry, agriculture, land use planning, energy, transport, and telecommunications. The Strategy can contribute to managing the various elements of landscape (landforms, waterforms, ecosystems, geosystems, and human-social systems) as well as contributing to the understanding of the processes and interconnection of these elements. This will facilitate the delivery of a range of sustainable environmental outputs including biodiversity gain, good water status, flood risk management, sustainable soils management, and climate change mitigation.

The Strategy recognises the importance of landscape protection and its interconnectivity with biodiversity and climate change. Landscape characterisation should be integrated with and where appropriate informed by green infrastructure strategies for local authorities. Strategic networks of green and blue (water) spaces can provide a wide range of environmental benefits including flood water storage, urban cooling, improved air quality and habitats for wildlife as well as contributing to human health and well-being. Conserving and enhancing these networks through appropriate land use and management is critical. The Strategy, its actions and associated deliverables should reflect the provisions and requirements of the Water Framework Directive, the Floods Directive and the Habitats Directive.

Landscape and Water

The inclusion in the Strategy of a greater emphasis on i) ensuring that all the relevant elements, such as water/hydrological elements, are included, ii) the linkages between them are highlighted and iii) the policies and regulations that govern them, would be welcomed. This will provide an opportunity to develop, to a greater degree than currently outlined in the Draft Strategy, a more integrated approach to landscapes.

From a water/hydrological perspective, Ireland's landscape can be considered as consisting of a network of distinctive, topographically-based river catchments. Water in catchments, supplies drinking water, provides recreation, sustains aquatic ecosystems and supports industry and farming. In addition, water forms an intrinsic component of the landscape.

Integrated Catchment Management (ICM) as a means of delivering improved water quality is emerging as a mechanism for effective water and catchment management, which is supported by the

EPA. In this context, the Strategy should highlight the interaction of water (including groundwater, inland water, coastal and marine areas) and water quality, landscape and landuse.

The European Landscape Convention requires that specific landscape policies should be formulated to protect, manage and plan landscapes. This is particularly relevant where the restoration of a landscape may contribute to improved water quality status under the Water Framework Directive (for example in the restoration of degraded wetland). Similarly, the development of regional and local landscape character assessments should have regard to the Programme of Measures specified in the River Basin Management Plans where such measures are related to landscape and water quality.

Landscape, Soils and Agriculture

Soils and Geology are a key component of Ireland's landscape and the role of soils and geology in defining and forming our landscape should be recognised in the Strategy

Key environmental issues relating to soil include the use of soil as an irreplaceable natural resource (resource efficiency), soil related ecosystem services, soil biodiversity and soil as a major store of carbon. Influences on our soil resource can occur from a range of human activities, including urban developments, transport networks and agricultural and forestry activities.

A 'green and natural' image is fundamental to the attractiveness of Ireland's environment as a tourist destination. Farmers and farm enterprises, as custodians of a large area of Ireland's landscape, have the potential to significantly contribute to the protection and management of our landscape, with measures such as hedgerow expansion, field margin enhancement, native tree planting, grassland management, water protection, providing riparian margins and maintaining a network of intact Natura 2000 sites.

Integration of the Strategy

The Strategy is for the most part landuse focussed and consideration should be given to a broader integration of other relevant sectors. Article 5(d) of the European Landscape Convention requires that landscape is integrated into regional and town planning policies and into cultural, environmental, agricultural, social and economic policies, as well as in any other policies with possible direct or indirect impact on landscape. In this context, it is recommended that an inventory be prepared of all programmes and policies that have or may have a significant impact on landscape (for example, the National Forestry Programme, the Rural Development Programme, Renewable Electricity Policy and Development Framework etc.). This inventory should be updated to reflect emerging policies and to ensure that landscape has been appropriately considered in the development of relevant sector policies.

The Strategy should also highlight the importance of Strategic Environmental Assessment (SEA) in the context of the future development of sectoral Plans and Programmes. Consideration should be given to including an action which provides a commitment to preparing guidance on addressing landscape in such SEAs

The implementation of landscape protection, management and planning for sectors other than land use should be addressed in the Strategy. The impact of relevant sector policies on the landscape needs to be considered and the methodology for integrating this should be formulated across all sectors.

Implementation and Review

It is recommended that the actions in Section 3.0 should be strengthened and assigned specific timeframes for completion of the Strategy Actions. In addition, the lead authority responsible for delivery of individual Actions should be identified. In this context, we recommend the development of an implementation plan with clear accountability and actions assigned a specific time scale for commencement and duration. A commitment for a mid-term review of the Strategy and implementation plan would also be worth considering.

Promoting strong collaboration with key stakeholders in the long term management of Ireland's landscape will be essential to ensuring an integrated national coordinated approach to the implementation of the Strategy. A commitment to increasing awareness and understanding of our landscape and its various components by the public, landowners and decision makers would promote a more proactive approach to implementing evidence based best practice approaches to the management and protection of our landscape.

Finally, the EPA is willing to provide advice and information to support the implementation of relevant aspects of the Strategy. We would welcome an opportunity to discuss possible options in this regard.

Should you have any queries or require further information in relation to the above please contact Tadhg O'Mahony at t.omahony@epa.ie. Please provide an acknowledgement of receipt of this submission to sea@epa.ie.

Yours Sincerely



*Dr. Micheal Lehane
Programme Manager
Office of Environmental Assessment*

Attachment 1

Comments on Specific Actions in the Draft *National Landscape Strategy for Ireland 2014 – 2024*

Section 3.0 - Objectives and Actions

Action 1

Action 1 relates to complementary legislation to support any gaps in planning legislation that may exist. This Action should also apply to other sectors to ensure that they are legislatively required to take account of landscape in drafting policies.

Section 3.2 - Develop a National Landscape Character Assessment

Action 2

The broad concept of landscape character should be developed, with a more complete inclusion of all relevant landscape related elements. This would enable a more holistic approach to landscape characterisation and protection. In particular, the inclusion of water catchments as a landscape feature should be considered. The implications from the implementation of the Water Framework Directive and the associated integrated catchment management approach, the Floods Directive and the National Biodiversity Plan should be included in this approach to landscape management.

Action 2 (i) and (ii)

The data framework should encompass a greater range of data than currently mentioned. This could include, for example, geological heritage sites/areas that have a landscape element; hydrological/catchment features (e.g. rivers, lakes, reservoirs); and geosystem features (e.g. quarries, mines, dry (karstified) valleys). In addition, Landscape Character Maps should include all relevant elements that comprise the landscape, such as river/lake catchments.

Section 3.3 - Develop Landscape Policies

Action 5

Action 5 is linked to cross integration of landscape across other sectors. Consideration should also be given to preparing guidance to ensure that sector-specific policies, strategies and relevant legislation are fully consistent with the objectives set out in the Strategy. This would assist in developing a more cohesive approach to integrating landscape considerations into decision-making across sectors.

The main policies with potential to influence landscapes should be specified as a means of ensuring that all those that are relevant are considered, for example Water Framework Directive, National Climate Change Adaptation Framework, National Peatlands Strategy, Rural Development Programme etc.

There may be merits in including a specific reference to our offshore islands in this Section.

Section 3.4 - Increase Awareness

In addition to “....., *its layout and ecology and the well-being of people*”, reference should be made to geology and hydrology as two other key factors.

Section 3.5 - Action 12 a.

The terms ‘geology’, ‘hydrology’, ‘hydrogeology’ and ‘planning’ should be included in the list in the brackets.