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Statement of Strategy  
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**Consultation on Statement of Strategy 2016 – 2019**

[An Taisce](#) would like to make the attached comments on the consultation for the Statement of Strategy 2016-2019 in relation to Cultural Institutions, built and natural heritage, regional development and rural affairs, that we request the Department take into consideration.

Yours sincerely,

Ian Lumley

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# 1.0 Introduction

It is imperative that the Statement of Strategy 2016-2019 set out a clear, rational, evidence-based and plan-led strategy to address critical emerging global challenges, **most importantly, climate change and bio diversity loss.**

The provisions of the Climate Act and Low Carbon Development 2015, requires that all Government departments and agencies address and be part of a national mitigation and adaptation plan for a low carbon future. This requires major policy change for regional and rural development where the emission impact of car dependence, sprawl patterns of one off housing, peat burning and management of peatlands has to be addressed.

Ireland needs to play a leading role in the implementation of the UN Biodiversity Convention and the EU Habitats and Birds Directives in enhancing biodiversity. These strategic considerations need to prevail over deference to vested lobby interests which for example have resulted in the ill-advised "Slash and Burn" Heritage Bill 2016 which runs counter to the departments very own National Biodiversity Action Plans.

The Statement of Strategy needs to be based on clear targets and actions. The publication of sectoral strategies such as those currently for peatland or landscape are inadequate, without any legal force, targets and horizontal integration with other strategies and policies for climate and land use.

The protection and management of cultural heritage requires resources and action. The national cultural institutions need to be world class in conservation standards, with major investment required in the National Library to upgrade secure storage standards. While major heritage targets have been achieved including, the completion of the National Inventory of Architectural Heritage outside Dublin, the enactment of improved National Monuments legislation is long overdue.

The preparation of the new Strategy needs to be based on an evaluative process to address where natural and cultural heritage protection is deficient and does not comply with Conventions, EU legal obligations and Council of Europe Conventions, and the most progressive international best practice generally.

The following recommendations and considerations are set out focusing on the areas relevant to An Taisce's remit as an internationally affiliated environmental NGO and body concerned with climate, the natural and built environment, sustainable rural and regional development and cultural legacy

## Overarching Recommendations

- To recognise the incalculable current and future value of the natural and cultural endowment, for current and future generations, and that achieving immediate and long term climate stability and ecosystem enhancement must prevail over individual sectoral and short term interests;
- To recognise that the natural and cultural endowment has an intrinsic value which cannot be monetised;
- To proactively address the mitigation of climate change on the natural environment and cultural endowment;
- To recognise the unprecedented scale of anthropogenic biodiversity loss and to take decisive action to address the threats and pressures identified within the NPWS (2013) Article17 report.
- To effect by legal force and policy the most progressive implementation of the UN Biodiversity Convention, the EU Birds and Habitats Directives, UNESCO Charters, Council Of Europe Conventions and the Wildlife Act.
- To adopt the most effective legal provisions and polices and provide adequate fiscal support in the protection and management of natural and cultural heritage;
- To ensure horizontal integration of the foregoing objectives with other Government policies, plans, programmes and spending;
- To ensure the most effective awareness of these objectives to the public, decision makers and sectoral interests.
- To integrate regional and rural development with the UN Sustainable Development Goals, Climate Mitigation and Adaptation and resource protection;
- To ensure that public engagement and participation are prioritised and that the department is sufficiently staffed and resourced to achieved the aforementioned points.

## 2.0 National Cultural Institutions

The national cultural institutions require appropriate support and resources for public access, conservation work and education programmes, as well as ongoing and future development.

### General Recommendations

- To provide effective support and resources for the development of national cultural institutions including additional tax relief support for acquisitions;
- To review the current *National Cultural Institutions Act 1997* and to revise the current management structures of the institutions to provide independent management boards, to include external nominees by appropriate organisations such as the Royal Irish Academy, An Taisce and expertise on best international curatorial practice.

### 2.1 Enhancing Section 1003 tax relief status

The availability of the Section 1003 scheme by which donors obtain tax relief for gifts to national institutions is crucial for the acquisition of items for their collections. In 2015/16 it allowed three of the Beit collection paintings to be secured for the National Gallery of Ireland, which would otherwise have been exported. The Crawford Gallery has used the scheme very effectively for the acquisition of collections for display in Cork and Fota.

The donor tax relief was reduced to 80% and the annual qualifying threshold reduced to 6 Million euro, which limits its effective use. To put this in context the tax relief on the Le Brocquy "a Family" donated to the National Gallery of Ireland in 2002 was on a valuation of near half this, at 2.75 million euro.

The Section 1003 provision needs to be restored to its original level of relief and enhanced.

## Recommendation

- To restore the Section 1003 tax scheme to its original level of 100% relief and increase the annual allocation threshold from 6 million euro to 15 million euro.

## 2.2 The National Library and National Photographic Archive

There is a major investment requirement to upgrade the conservation and storage of the National Library and Photographic archive collections to appropriate international standards.

The 10 million euro capital investment announced in September 2015 represents an important first phase, which needs to be continued with further investment in secure storage and maintenance of collections to international fire protection and conservation standards.

## Recommendation

- To properly resource the National Library of Ireland and National Photographic Archive, its public service and cultural remit;
- To secure ongoing capital funding for the full upgrading of the National Library of Ireland and National Photographic Archive to meet international fire safety and curatorial standards.

## 2.3 National Gallery of Ireland

The current refurbishment of the Gallery should ensure its upgrading to meeting international fire safety and curatorial standards. Given the development of regional museums and other properties meeting higher accreditation standards for curatorial management through the Heritage Council Museums Accreditation programme a more active policy for the loaning of Gallery holdings not on display should be pursued, particularly items of Irish interest.

## Recommendation

- To resource the National Gallery of Ireland with an appropriate annual budget to maintain full public access and opening of rooms, conservation work and education programmes including an active policy for the appropriate loaning of holdings to other institutions.

## 2.4 National Museum of Ireland

The National Museum is seriously under-staffed. Yet the collections continue to expand, as the National Museum is the legal repository for **ALL** retrieved or acquired archaeological material. It is logical, therefore, that resource and staffing levels should rise accordingly.

## Recommendation

- To resource the National Museum of Ireland with an appropriate annual budget to maintain full public access and opening of rooms, conservation work and education programmes.

## 3.0 Regional and County Museums and other collections

The significant investment in regional museums, which has been achieved, needs effective national support. The multiple value of making heritage, particularly of local relevance accessible across the country cannot be sufficiently emphasized.

## Recommendation

- To support regional, county and other museums and collections including the resourcing of the Heritage Council's *Museums Standards Programme*, curatorial management and conservation of artefacts;

- To support the curatorial management of regional museums and other collections to allow appropriate art and artefact loans from the National Museum, National Gallery, National Library and other institutions.

## **4.0 Privately Owned Artworks and Historic Collections**

The current unresolved future of the Bantry House collections, the sale of Westport House, and continued dispersal of the Beit Collection contents dispersal shows that Ireland still has no policies or procedures in place to avert the dispersal of artworks or historic collections, including those integral to the character of major country houses open to the public and which have received major grant support for roofing and other work.

When a major factory closure threat arises, it is rightly treated as a political emergency with action taken at the highest level to find a solution. The same political urgency is required when a threat to a significant part of the national cultural patrimony arises. Cultural heritage has a multi-generational value which is unquantifiable.

Ireland lacks the sort of expert control measures applied to cultural patrimony in other European countries. The provisions of the National Cultural Institutions Act 1997 are ineffective.

The resolution of threats to historic houses and collections require imagination and initiative. The State, Cultural Institutions, Local Authority and voluntary organisations need to work more effectively together in building new partnerships in securing and averting dispersal of art works or collections of national importance.

An appropriate mechanism in such cases would be to facilitate the acquisition by a National cultural institution with the support of a section 1003 donor. The institution would then loan the contents back to the house or other location subject to appropriate conservation and curatorial management and public access. Arrangements of this kind are widely used across Europe to maintain cultural patrimony.

## Recommendation

- To provide the legal structural and financial support for the maintenance of nationally important historic art works and collections in their original or appropriate locations, through cross-sectoral partnership, including with NGOs and benefactor donor support.
- To review the National Cultural Institutions Act 1997 and to provide for the effective registration and export control of cultural patrimony

## 5.0 Archaeology

The longstanding promise of significantly revised National Monuments legislation remains unfulfilled.

A key deficiency in current Irish legislation is the political discretion for the scheduling of monuments or issuing of Preservation Orders as shown by the continued destruction of the 800 BC Mayne Bog trackway during the summer of 2016 by peat extraction in Co Westmeath.

The application of the provisions of the 1992 Valetta Convention on Archaeology is overdue, particularly with regard to its provisions on the context and setting of monuments and designation of protected areas. Monuments that are culturally, chronologically and spatially related clearly constitute an archaeological landscape. The constituent elements must, therefore, be considered, evaluated, and addressed as an integrated whole as opposed to being regarded as isolated, unrelated monuments. The register of Recorded Monuments must be kept regularly updated.

All major commercial development sites and roadways require strict archaeological monitoring by law. Minor developments in archaeologically sensitive areas are subject to the same stringent monitoring conditions. Given their century's old proven record as the natural repositories of invaluable archaeological artefacts and associated material it is obvious that peat- and boglands should be subject to the same legal conditions and requirements.

### 5.1 National Monuments Legislation

The commitment for a new comprehensive National Monuments Act to ensure Ireland's compliance with the Valetta Convention has not been met. This means that fiascos such as the ploughing of the M3 through the Lismullen Henge and the Kilkenny Access Road through the early Christian and medieval ecclesiastical precinct around St Canices Cathedral will continue to occur.

Particular focus is required on measures for the protection of archaeological complexes and landscapes and the setting of sites and monuments.

### Recommendation

- To effect the full implementation of the Valetta Convention on archaeology and other relevant international conventions on cultural landscapes with comprehensive legislation.

## 5.2 Archaeological Monitoring of Development

While current policies relating to the investigation of archaeology in urban areas, road and gas pipelines have with the notable exception of the M3 Motorway have generally been well undertaken, a major lacuna had been allowed to be maintained with regard to extractive land use charge.

While Bord na Mona has a Code of Practice for archaeology, there is a larger area of land across the country where mechanised extraction occurs for horticultural compost and domestic burning. This is being carried out without planning permission or Environmental Impact Assessment required under EU law.

Similar concerns relate to the effectiveness of archaeological monitoring of the quarry industry and other extractive activity. Over a number of decades conditions for archaeological monitoring have been generally attached in local Authority and Bord Pleanála decisions, and since the application of the EIA Directive early 1990s, EIA consents require archaeological monitoring. However enforcement has been left to local authorities. The Irish Concrete Federation has employed an archaeologist and the better run quarries have carried out archaeological monitoring and investigation. However, in far too many continuing cases applications for quarry expansion, or Substitute Consent to An Bord Pleanála under new legislation, fail to show evidence of archaeological monitoring of previously permitted and extracted quarry areas even where such conditions were legally required.

Agricultural intensification is creating new pressure on areas of archaeological sensitivity as shown by large scale unregulated farm road construction and a problematic dairy intensification application in 2016 at Loughcrew Co Meath.

### Recommendation

- To ensure effective implementation of the provision by which the cost of archaeological investigation and resolution is borne by the developer including for urban development, infrastructure and peat, quarrying and other extraction.

### 5.3 Agriculture and Forestry

The level of annual loss or damage to sites and monuments remains unquantified, and needs to be properly investigated and assessed. This should be easier than in the past with the access to high quality aerial data. Cases of destruction are rarely prosecuted, and loss and site interference is dispersed and incremental.

Professor George Eoghan has repeatedly drawn concern to the lack of appropriate advisory and monitoring standards even within the Burgh na Boinne World Heritage site and buffer area

Farm planners and forestry consultants do not have the training, expertise or adequate access to advice on archaeology, particularly in understanding the importance of buffer areas and protecting the landscape setting of monuments and features

### Recommendation

- To ensure that Agriculture and Forestry management is integrated with the effective protection of archaeological monuments and sites.

## 6.0 Architectural Heritage and Designed Landscapes

The completion of the National Inventory of Architectural Heritage outside Dublin City is a major achievement of the Architectural Heritage Protection division of the Department. The map based Survey of Historic Gardens and Designed Landscapes is a significant parallel achievement. However the

provision of Local Government Planning Government Planning and Development Act 1999 incorporated into the 2000 Act has not worked in leaving the scheduling of buildings as protected structures to local authorities.

This was highlighted by the case of the 2014 demolition of Berwick Hall Co Donegal which The National Inventory of Architectural Heritage for Berwick Hall identified it as being of Regional importance, being a mid-18th century house occupying the site of an earlier house used by the son of James 11 the Duke of Berwick during the Siege of Derry,. However the Council did not make the building a Protected Structure.

Monitoring of the protected building stock is a key requirement, to identify where risk arises through vacancy or other causes, and take targeted action on the individual sites, particularly where of national importance. The current legislation and administration by local authorities has failed to prevent major continuing architectural losses when buildings are neglected by their owners, and malicious fires destroy major 18<sup>th</sup>. c interiors as occurred at Vernon Mount Cork and Belcamp Fingal in July 2016

The Department's Survey of Historic Gardens and Designed Landscapes have provided the basis for identifying significant landscapes. Enhanced legislation and guidelines are needed to give specific recognition to designed landscapes; including cases where a landscape may be of value despite the loss of the original main house other features.

Current legislation and Architectural Heritage Protection and Planning Guidelines has proved inadequate in protecting the setting or protected structure, particularly relating to country house demesnes. This was reflected by the pressure to develop demesnes as housing developments , hotel and golf resorts in the boom years with very damaging results such as Lough Rynn Co Leitrim. The problem is continuing with the 2016 rezoning proposal by Meath Co Co for a business park in the woodland area of the walled Carton demense

Consideration is also required on other types of designed landscape including industrial complexes.

### **Recommendation**

- To effect the full implementation of the Convention on Architectural Heritage and other relevant international conventions on cultural landscapes.

- To adopt a targeted approach to identify and take action in securing the future of the most architecturally and historically important Buildings at Risk.
- To introduce effective legal and planning protection of the landscape setting of protected structures, and designed landscapes.

## 7.0 Habitats and Species

An Taisce have made a detailed submission to the NPWS on the third National Biodiversity Action plan. Here we wish to reiterate some of the key points raised in that submission and make recommendations which need to be addressed if we are to achieve the EU Commissions overarching objective of no net biodiversity loss by 2020.

Ireland has a poor record when it comes to protecting the natural environment. An example of this is the fact the European Commission has brought infringement proceeding against Ireland in a number of cases involving breaches of EU environmental law relating to nature.

Ireland hosts fifty-nine habitat types listed under Annex I and twenty-six species listed in Annex II of the Habitats Directive. According to the Department of Arts, Heritage and Gaeltacht's 2013 report on the *Conservation Status of Ireland's Habitats and Species* only:

- 9% of the habitats examined had a 'favourable' status;
- 50% of the habitats examined were 'inadequate'; and
- 41% of the habitats examined assessed were 'bad'.

Of the sixty-one species examined:

- 52% were assessed as 'favourable';
- 20% were assessed as 'inadequate';
- 12% were assessed 'bad'; and
- 16% were assessed unknown.

In particular many species of waders and bird's associated with lowland farmland have suffered shocking declines of over 80% in their populations over the proceeding decades. A third of Irelands wild bees are threatened with extinction. It is likely that many species will follow the corn bunting towards national extinction in the coming decades unless urgent steps are taken to address biodiversity loss.

There are still gaps in our knowledge of key conservation criteria for many habitat and species and nationally many designated areas lack site specific

conservation objectives and management plans. Another key knowledge gap which needs to be addressed is the socio-economic relationship between marginal farming communities and the management of semi-natural habitats. The continuation of traditional farming practices is key for the ongoing conservation of semi-natural ecosystems. Identifying regional socio-economic issues and linking them to site specific conservation objectives and management plans is critical. Education, communication, public participation and the ongoing evolution of the locally led agri-environment scheme approach will be key if we are going to deliver a viable future for rural communities and our shared natural heritage.

The department needs to work with the other departments to change the image of designation and promote the value of Ireland's network of protected sites. These designations are more often than not described within the media as hindrance requiring compensation rather than an opportunity for communities living in areas with marginally productive land. Government officials constantly scape-goat the EU and blame legal compliance with environmental legislation in response to public dissatisfaction with designation. This approach is short sighted and critically undermines public perception of the EU and nature conservation. A cross party and cross departmental agreement should be made that any criticisms of the designation process should be rooted in reality and reflect the finding of the 'EU Commissions Evaluation Study to support the Fitness Check of the Birds and Habitats Directives', which concluded that the Habitats and Birds Directives are fit for purpose, and clearly deliver added value. In addition the fitness check has identified that the failure of the directives to halt biodiversity loss is the result of inadequate implementation at member state level.

Our legal and moral obligations in relation to climate change, biodiversity loss and the environment in general are often afterthought. Indeed many government policies such as Food Harvest 2020 and Food Wise 2025, Marine Harvest, and the Forestry Programme 2014 - 2020 are completely unsustainable from an environmental point of view, yet the interests of short term economic gain always trumps long term sustainability.

Commercially Ireland continues to profit from our supposed green image via tourism and the agri-foods sector. Green washing terminology such as "green credentials", "sustainable produce", "sustainably green" and "conservation grade" currently lack credibility in light of current trends in biodiversity loss. The perception of the Irish agri-food sector as being green is recognised as a key marketing tool within the export market. Ireland's built and natural heritage is recognised as a key reason tourists chose to visit our country. The role that Ireland's fisheries and agricultural sector is playing as the leading

driver of biodiversity loss, a source of a third of our greenhouse gas emissions and the greatest challenge to our compliance with the Water Framework Directive seriously undermines the brand image of the Irish agri-food sector. The NPWS have identified agriculture as a key threat and pressure on Ireland's environment. Agricultural policies are not aligned with our environmental obligations and strategies. An Taisce have highlighted many of the issues with the Irish agri-food and forestry sectors within our recent contribution to the "Not So Green" - Revealing the truth behind Ireland's green image report <http://www.antaisce.org/articles/not-so-green-revealing-the-truth-behind-irelands-green-image>

The supports under the Rural Development Programme need to be more targeted. The agri-environmental payments should result in tangible measurable outcomes. With the notable exception of the development of Locally Led Agri-Environment Schemes such as the Burren LIFE project, this has not been the case to date. Despite billions of euros having been paid to Irish farmers through agri-environment schemes over the proceeding decades little or no environmental benefit has been demonstrated. On the admission of the Department of Arts, Heritage and Gaeltacht, this has been as the result of poor design of prescriptions, inadequate targeting and baseline setting and little or no monitoring of results.

The Department of Agriculture, Food and the Marine have openly admitted to An Taisce in the past that "greening" would have a negligible impact on Irish biodiversity. The failure of agri-environmental schemes and environmental regulation to halt biodiversity loss should be reviewed. All government expenditure should be evaluated based on deliverable and value for money.

Biodiversity needs to be protected at a landscape level both within and outside of the Natura 2000 network. Areas of High Nature Value farming need to be identified and protected. The provisions around vegetation management in Section 40 of the Wildlife Act need to be properly implemented and not undermined by the current Heritage Bill 2016. The National Pollinator Plan should be supported and the NPWS should work with Bord Bia to ensure that Origin Green has strong biodiversity credentials.

Ongoing work is needed on land eligibility issues. Progress must be made in addressing damaging management activities such as scrub removal, fencing, reseeding, burning of upland vegetation in both the Natura 2000 network and in the wider landscape.

At times there has been a lack of oversight from the National Parks and Wildlife Service in relation to forestry and planning applications. The Forestry Service are failing to carry out field studies to properly inform appropriate

assessments. Many of the appropriate assessments that are carried out are merely desktop studies and not compliant with the requirements of Article 6 (3) – (4) of the Habitats Directive. There is a clear need for a review of the forestry services AA procedure process. The NPWS need to highlight clear direct and indirect negative impacts on Natura 2000 sites and to point out in combination and cumulative effects when advising on forestry and planning applications. It is clear that often shortcomings on the behalf of the NPWS are not a reflection of the expertise within the NPWS but rather are a reflection of ongoing resource constraints. An Taisce have identified a number of issues within Irelands forestry sector and the forestry consent process in our recent submission to the European Commission 'The environmental integrity of Irish forestry in the context of the EU's effort sharing decision (2016)'

<http://www.antaisce.org/publications/the-environmental-integrity-of-irish-forestry-in-the-context-of-the-eu%E2%80%99s-effort-sharing>

The National Parks and Wildlife Service are over-stretched and underfinanced. They are given little support by An Garda Síochána in upholding the Birds or Habitats Directives. The Department of Agriculture, Food and the Marine and the Forestry services are negligent in their cross-departmental obligations towards the environment. These serious issues need to be challenged by the NPWS going forward. Greater cross departmental support and coordination is needed. The Environmental Protection Agency have considerable expertise and should work more closely with the NPWS. For example the recently established LAWCO reps should be supported by NPWS rangers to improve the conservation status of High Status Sites under the WFD and designated aquatic sites.

The threat that invasive species pose to Ireland's biodiversity and economy needs to be given the credence it deserves. Budgetary cuts have seen Invasive Species Ireland being shelved. While recognising the financial pressures that all departments are operating under this are a shortsighted move. The Department of Arts, Heritage and Gaeltacht needs to review the threat posed by all invasive species irrespective of any outside vested interests. The inability of the Department of Arts, Heritage and Gaeltacht to control invasive species such as *Rhododendron ponticum* within Ireland's National Parks does not bode well for the department's ability to control invasive species across the rest of the country. Local Authorities appear willing to hire contractors judging from the amount of hedges being cut nationally during the nesting season. If a fraction of this effort could be harnessed and directed towards the eradication of invasive species, it would go a long way towards dealing with their pervasive threat.

## Recommendation

- Supports under Rural Development need to be more targeted. Agri-environmental payments should result in tangible measurable outcomes that benefit the habitats and species that are threatened by the intensification of agriculture rather than being used to support intensification of agriculture.
- The amount of money allocated to the Natura 2000 network and High Nature Value Farming should be increased. Agri-environment schemes must be better targeted and evaluated on a rolling basis.
- A review of the Forestry Services AAP must be carried out and brought into line with the requirements of the Habitats and Birds Directives.
- The Department of Arts, Heritage and Gaeltacht has to work with the other departments to change the image of the Natura 2000 and NHA network.
- The Department of Arts, Heritage and Gaeltacht must improve on its level of engagement with local communities.
- The NPWS needed to be properly resourced.
- The NPWS need to improve enforcement of the Birds and Habitats Directives and the Wildlife Act nationally. Improved engagement with An Garda Síochána, local authorities and the DAFM and Forestry services is also needed.
- Ireland needs an Invasive Species Management Plan. The management plan should reflect the threat that invasive species pose to Ireland's ecosystems and economy.

## 8.0 Peatlands

Peat soils comprise 20% of the Irish land area, and 75% of organic soil carbon. While extensive though damaged areas of blanket bog remain, raised bogs have been decimated by decades of peat extraction and drainage and now constitute a rare European habitat.

Despite this continuing peat extraction was allowed to occur for 15 years after the SAC designation requirement of the Habitats Directive 1992 came into place. The cessation of cutting fifty-three raised bog cSAC was deferred causing continuing habitat and integrity loss. While Ireland designated additional raised bogs as NHAs as part of a settlement on an European Commission legal action, a similar failure to control cutting applied, and now 42 of these are proposed to be de-designated.

The current Raised Bog Conservation Plan being advanced by the NPWS, is the result of legal proceedings by the European Commission and simply represents actions that should have been completed in the late 1990s.

No management strategy has been initiated for blanket bogs where a multiplicity of pressures by peat extraction, drainage, over grazing, invasive species and general development apply. Ireland faces legal action for lack of management plans for natural 2000 sites in particular of blanket bogs e.g Peat cutting is occurring even in the cSAC area of the Glenveagh National Park.

The wider systemic failure to apply the Environmental Impact Assessment Directive and regulate industrial horticultural extraction and domestic cutting is also causing degradation and run-off affecting lakes and rivers, for example the Lough Derryvarragh SPA.

The 2015 National Peatland Strategy produced by the Department failed to adopt the scientific recommendations in the 2011 EPA Bogland report. It panders to individual sectoral interest and does not reflect international or Irish scientific advice on carbon management. It is not integrated with an effective strategy to contain carbon loss form peatlands or with agricultural and forestry management. Accordingly, it is not fit for purpose.

The unsustainable nature of peat based industries must be recognised. These industries have no long-term future and the massive environmental and climate impact of these open mining operations is currently externalised. If subsidies were removed and the true cost of these operations was borne by the polluters then these industries would no longer be-viable. An exit date and an exit strategy must be set for all peat based industries and the date should be set for 2020 at the latest. Tax payer subsidies should be redirected to reskill employees in sustainable industries. Companies and semi-states who have profited from the destruction of our peatlands should have to restore and rehabilitate all cut-over bogs so that they are contributing positively to biodiversity and water quality. This strategy should place a strong emphasis on the opportunities presented by the creation of a network of eco-parks akin to Lough Boora and the possibility for a joined up series of eco-tourism attractions within the Shannon Basin. The Bord na Mona cut-over bogs offer the greatest opportunity for biodiversity enhancement in the history of the Irish state and this should be grasped while the opportunity for peatland conservation remains in many of these sites.

## Recommendation

- To ensure the full application of the Habitats Directive and conservation management of all Natura 2000 protected peatlands
- To provide for the integration of peatland management with carbon management and agricultural and forestry policy;

- All continued peat cutting for all end uses including horticulture domestic cutting be subject to Environmental Impact Assessment and planning control;
- All peat cutting in or affecting natural 2000 sites to be subject to Appropriate Assessment.
- An exit date and an exit strategy must be put in place for all peat based industries by 2018.

## 9.0 The Marine Ecosystem

Ireland, as one of Europe's leading maritime countries and with a marine jurisdiction ten times the land area, should be setting an exemplary standard in the implementation of the Marine Strategy Framework Directive.

Ireland has a legal obligation under EU law to provide an effective and compliant strategy to (i) meet the obligations of the Marine Strategy Framework Directive, (ii) to maintain the Good Environmental Status of the marine ecosystem, (iii) to apply the precautionary and polluter pays principles in achieving this, and (iv) to set out environmental targets and indicators to achieve and maintain the Good Environmental Status of the marine environment by 2020.

This should be a key part of Ireland's wider role in promoting action on the overriding threats to the global marine environment through climate change, ocean warming, ocean acidification, overfishing, marine litter waste and pollution, both through national initiative, through membership of the EU and taking a proactive role in the UN IPCC process, OSPAR, ESPOO and other international structures.

Major leadership is required to reduce carbon emissions in order to reverse ocean acidification as much as climate warming. The most recent UN data highlights the converging impact of anthropogenic greenhouse gas on increasing ocean temperatures, and the inability of the ocean to absorb additional CO<sub>2</sub>, causing acidification and the accelerated damage to the marine ecosystem.

The measures Ireland has taken to comply with the Marine Strategy Framework Directive to date are tokenistic and in horizontal integration with the ongoing policies and action of other Government departments advancing the objectives of 'Our Ocean Wealth 2012', and promoting oil and gas exploration and drilling and marine life exploitation are being promoted.

Climate, ocean acidification and biodiversity impacts are being systemically disregarded. The restoration of fish stocks is also key to restore declining populations of internationally important breeding colonies of birds around our coasts.

There is a major opportunity for Ireland to take up one of the key provision of the MSFD in the designation of Marine Protected Areas. These protected sites should have site specific management plans which protect marine ecosystems from unsustainable practices. Public participation should be promoted so that Marine Protected Areas can provide alternative forms of income for coastal communities as well as helping to restore depleted fish stocks.

### **Recommendation**

- Ensure resource provision and horizontal integration between Government Departments and agencies in the legal implementation of the Marine Strategy Framework Directive;
- Ensure integration for Marine Strategy Framework Directive with legal remit plans and programmes of Government Departments and agencies;
- To assemble and maintain baseline data on: Marine food web, including maintenance of feed sources for birds, Seabed habitat including biogenic reefs deepwater coral.
- Evaluation and where required remedial action on 1 deep trawling impact on sea bed 2 monitoring and maintaining population stability of all commercially fished species in Irish waters
- Evaluation of the cumulative impact of aquaculture on foreshore on the marine environment including fish feed and nutrient impact on sea floor and interaction with other species and escapee impact or threat.,
- Evaluation of mobility and feeding patterns for cetaceans, changing patterns in migration of non-indigenous species, sources of marine litter;
- Meeting objectives of Good Practice in all of the target areas defined in the Marine Strategy Framework Directive;
- Taking European leadership in the introduction of large scale Marine Protected Areas.
- Utilising the opportunities presented by Marine Protected Areas to create sustainable employment such as ecotourism and support the restoration of depleted fish stocks.

## 10.0 Landscape

The National Landscape Strategy published by the Department does not meet the obligations set out in the European Landscape Convention. In particular it does not contain the required legal, policy and practical measures required for landscape protection. It does not address and provide for the cross-sectoral changes required in planning, forestry and agriculture and the protection of scenic and culturally significant landscapes. There is no proper consideration given the sensitivity of marine and coastal landscapes, seascapes or cultural heritage landscapes such as abandoned famine era cultivated areas or country house demesnes.

The continuing level of car based road front ribbon development outside town and village speed limits is untenable, including long stretches of the “Wild Atlantic Way” promoted by Fáilte Ireland. A significant percentage of houses built annually in Ireland continue to be single rural dwellings mainly of suburban design for car-based commuters scattered across the countryside.

Forestry and agriculture policies are not addressing landscape impact. Current controversy relating to wind and pylon development highlights the lacuna in the identification and protection of sensitive landscapes.

### Recommendation

- To revise the National Landscape Strategy 2014 to include more detailed and focused actions, particularly in relation to gaps in the legislation and policy for landscape, and attach detailed and scheduled targets and give assurances of financial resources to secure compliance with the European Landscape Convention.

## 11.0 Geological Heritage

Geology is one of the eleven areas defined under Heritage in the Heritage Act 1995. Ireland complex geology has created a rich a varied range of geological features, such as the rock folding at the end of the Beara peninsula or the well-defined eskers of the midlands. While the Geological Survey has identified by descriptive inventory a range of geological sites warranting protection no action has been taken. It was considered that the sites would be designated as Geological Natural Heritage Areas. However, given the

inadequate legal status of NHA designation as currently constituted this would not be effective.

Special legal provision and planning guidance is required to identify and protect geological heritage sites.

#### **Recommendation**

- To apply effective legal protection to Irelands diverse endowment of geologically significant sites.

## **12.0 Management of Waterways Ireland**

The Heritage Council has funded a significant and detailed waterways Corridor survey that needs to be considered in all development affecting water corridors.

Current potential conflict between enhanced walker and cycling access on navigation towpaths, and the maintenance of existing river and canal bank character and ecology needs to be resolved.

#### **Recommendation**

- To ensure that the protection and enhancement of biodiversity, landscape character, bridges and other historic features are the overriding consideration in the maintenance and development of the Waterways Ireland managed area.

## **13.0 Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs Prescribed Planning Status.**

Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs needs to effectively exercise its prescribed planning function in an effective systemic manner. Planning authorities are not applying appropriate standards in dealing with applications affecting ecology or cultural heritage including developments affecting European sites, infilling or drainage of wetlands and more effective intervention by the Department is required.

### **Recommendation**

- The statutory consultee role of Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs shall be effectively use at all levels in the planning process, including individual cases.

## **14.0 Regional and Rural Development**

Over the past fifteen years there has been no shortage of very well intentioned policy statement documents and submissions on regional and rural issues and reports published in Ireland by Government and Non-Governmental Organisations.

It must be recognised, the direct legacy of decades of planning policy favouring car dependent development and sprawl, that Ireland now has one of the most unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns anywhere in Europe.

The opportunity of forthcoming National Planning Framework creates the opportunity to reverse this and advance regional and rural policies providing:

- for the strengthening and enhancing of neighborhoods and communities,
- for the focus of new housing in rural areas to be directed to locations with walkable access to schools, public transport, and local services

There is irreconcilable conflict between current volume driven beef and dairy export targets, and climate mitigation , biodiversity and water quality.

[http://www.antisce.org/sites/antisce.org/files/not\\_so\\_green\\_reportdraft.pdf](http://www.antisce.org/sites/antisce.org/files/not_so_green_reportdraft.pdf)

There are major opportunities for rural communities in switching to decarbonised energy through community based energy efficiency and alternative energy projects

There is major opportunity to build on and expand on current tourism initiatives in outdoor activity, walking, hiking, cycling, kayaking and nature appreciation in Ireland which are of benefit to health and wellbeing, low in environmental impact, and of extended benefit to local communities

#### **Recommendation**

- Fiscal and other support for new and upgraded residential and small business accommodation as the prime means of reviving declining urban and villages centers;
- Support for community based energy efficiency and renewable energy schemes;
- • Continued and enhanced investment rural outdoor in walking and cycling routes.

**-END-**