An Taisce
The National Trust for Ireland

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Statement of Strategy
Corporate Governance Unit
Department of Arts, Heritage and the Gaeltacht
Room 303
23 Kildare Street
Dublin 2

corporate.governance@ahg.gov.ie

12.09.14

Re: Consultation Process for Statement of Strategy 2015–2018 regarding Heritage and Culture

Dear Sir/Madam,

An Taisce would like to make the following comments on the consultation for the Statement of Strategy 2015-2018 that we request the Department take into consideration.

We are also attaching a copy of our submission to the public consultation on the Marine Strategy Framework Directive Monitoring Programmes (Article 11) given it could impact directly on both the built and natural heritage of our marine areas, in which the Department of Arts, Heritage and Gaeltacht has remit, including marine protected habitats and species.

Please acknowledge this submission.

Yours sincerely,

Ian Lumley
Built Environment & Heritage Officer
builtenvironment@antaisce.org

Consultation Process for Statement of Strategy 2015-2018

Join Us

An Taisce, the National Trust for Ireland, is a membership-based charitable organisation committed to enhancing our quality of life, heritage and environment.

www.antaisce.org/membership

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1.0 Introduction

The Statement of Strategy 2015-2018 will provide a key policy document of central importance for a critical period in Irish society and will form a contract between the government and the wider community embodying a promise to make our country more resilient and ensure the mistakes of the past are not repeated as well as future dangers prevented.

It is now, imperative that the Statement of Strategy 2015-2018 set out a clear, rational, evidence-based and plan-led strategy for the future mitigation of risk and address critical emerging global challenges, **most importantly, climate change and ocean acidification.**

While it is appropriate that the new Statement of Strategy should address commitments under the Programme for Government, it is considered that this should be part of a wider integrated strategy. The Statement of Strategy 2011-2014 was produced at a time when the public service agenda was driven by spending cuts and job promotion. It is clearly lacking in long-term strategic objectives.

The review of the Statement of Strategy 2011-2014 should be an opportunity to update and redefine overarching core objectives for heritage and culture including addressing climate change and other issues such as:

- National Cultural Institutions;
- Regional and County Museums;
- Natural Heritage including Peatlands & Landscape;
- Marine Ecosystems & Inland Waterways;
- Archaeolgoy
- Architecture
- Geological features;
- Privately Owns Collections

Many of these issues are currently given no consideration. The Statement of Strategy 2011-2014 failed to even to mention climate change.

The key commitments in the Statement of Strategy 2011-2014 have not been met. The Statement of Strategy 2011-2014 also puts significant emphasis on the preparation, and adoption of sectoral strategies including for landscape and peatlands. In both cases draft strategies have been published which are not fit for purpose being neither scientifically grounded nor integrated with other Government policies and without legally effective timetables or targets to achieve key objectives. Deference to vested landowner interests and pursuing unsustainable resource exploitation prevails. The publication of sectoral strategies such as those for peatland or landscape is a bureaucratic sham without any legal force, targets and horizontal integration with other strategies and policies for climate and land use. While major heritage targets were achieved including, the completion of the National Inventory of Architectural Heritage outside Dublin, many of the specific measure it proposed were not or have proved ineffective, such the enactment of a National Monuments Bill.

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 resourcing and guardianship of many of Ireland institutions raise the most profound concern particularly our cultural institutions, highlighted the review report by the Director of the National Library in September 2014.

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 and its 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 effect by legal force and policy the most progressive implementation of the UN Biodiversity Convention, the EU Birds and Habitats Directives, UNESCO Charters, and Council Of Europe Conventions;
- 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.

Cultural & Built Heritage

2.0 Cultural Institutions

Ireland is greatly promoting tourism, with culture being a major part of the marketing image. This was a major emphasis of the Statement of Strategy 2011-2014. However, our cultural institutions are significant under resourced and under financed to be successful.

General Recommendations

- To provide effective support and resources for the development of national cultural institutions;
- 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 The National Library and National Photographic Archive

The statement made by the Acting Director of the National Library, Catherine Fahy, in September 2014 raises the most profound concern on resource provision. It referred to the cumulative impact of a number of years of cuts in core budget - 7% alone in 2013 compared to the previous year, while public use grew by 42%. Even more serious is that a significant portion of the National Library lacks modern fire protection for its collections.

The safety of the basement archive storage of the National Photographic Archive in Temple Bar also needs to be addressed. As the Decade of Commemorations proceeds, the resource of the National Photographic Archive will be particularly in demand for research and exhibitions. The report from the Director of the National Library advised of the particular pressure that the operation of the Photographic Archive is facing with resulting curtailment in opening hours, exhibitions and public service.

Recommendation

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

2.2 National Gallery of Ireland

The currently progressing 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, 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 loaning of holdings to other institutions.

2.3 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 staffing levels should rise accordingly.

The National Museum of Ireland needs a comprehensive centralized record of its collections with systematic inventory checks also being essential. All objects must be traceable as there are in the region of four million objects or items of historical/scientific interest (from antiquities to insects to stamps etc.). Ths will require significant investment.

Objects and other material must be readily available for research and educational requirements. To this end the storage facilities for all four divisions, urgently requires upgrading.

The conservation facilities also urgently require expansion. There should be ongoing condition audits to identify objects material in imminent danger of deterioration.

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, such as Waterford Treasures, which has been achieved, needs effective national support. The multiple value of making heritage of local relevance and 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*, facility and curatorial enhancement 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 case of the threat Bantry House contents dispersal shows that Ireland still has no policies or procedures in place to avert the dispersal or artworks or historic collections, including those integral to the character of major country houses open to the public and which have receive 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 with 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 an ineffective.

The resolution of threat such as now arise to Bantry require imagination, initiative and ingenuity. The State, Cultural Institutions, Local Authority and voluntary organisations need to work together to find a resolution in the public interest that would ensure the maintenance of threatened art works or collections

An appropriate mechanism in such cases is to facilitate the acquisition by a National cultural institution for the Nation. 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. There is a particularly well establish structure in Britain for responding to situations such as now arise in Bantry. A good example was the securing of key items of English furniture in Powderham Castle near Exeter, seat of the Earls of Devon. These were acquired by the Victoria and Albert Museum and placed back on loan in the castle subject to continuing public access. Developing institutional administrative and financial support in England Wales and Scotland makes continuing actions of this kind possible, as well as significant public and charitable trust finding, such as the Art Fund (formerly National Art Collections Fund.)

The benefit is that cultural legacies are thereby maintained in public ownership in perpetuity in the appropriate historic setting or location

The current threat to Bantry should provide the impetus to establish a similar structure in Ireland. The initiative for this need to be led by the Department of Arts Heritage and Gaeltacht. It is matter that requires sensitive negotiation where individual cases arise, and the identification of funding sources by the State, other public bodies and potential private donors availing of tax relief under Section 1003 of the Taxes Consolidation Act to secure purchase of historic items.

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

5.1 National Monuments Legislation

The promise of a National Monuments Act was unfulfilled. The ultimate status of a National Monument must be placed above political whim or expediency. A set of clearly defined criteria should be applied as opposed to ministerial discretion.

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 centuries 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.

The commitment for a new compressive 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 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 it without planning permission or Environmental Impact Assessment required under EU law.

The ineffective Department of Arts, Heritage and Gaeltacht response to the discovery of a 1,800 BC timber trackway in Mayne Bog Co Westmeath highlights legal and policy and failure in this area.

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.

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, quarry and other extraction.

5.3 Agriculture and Forestry

The level of annual loss of or damage to site and monuments remains un quantified, 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 or 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 Department Of Arts, Heritage And Gaeltacht. 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 has been highlighted by the case of the demolition of Berwick Hall Co Donegal at the start of Heritage Week 2014. Donegal has lost a significant historic building in a demolition that was unauthorized and undermines the credibility of the planning system in protecting heritage. The demolition of residential building required planning permission
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. There was also a fine complex of outbuildings[1].

The Council had refused permission on a 2006 application for demolition of the house on heritage policy grounds, and offered advice and assistance to the owner in securing its refurbishment. The question must be asked why despite these to considerations 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.

Major country house including Bellamont Forest Co Sligo, and Hazelwood Co Sligo, Aldborough House in Dublin and significant former industrial complexes such as the Monasterevin Distillery and institutional buildings notable former Mental Hospitals are currently risk and need special targeting to endure maintenance and achievement of new uses.

Current legislation and Architectural Heritage Protection and Planning Guidelines have proved inadequate in protecting the setting or protected structure, particularly relating to country house demesnes. This was highlighted 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 Department Of Arts, Heritage And Gaeltacht 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.

[1] http://www.buildingsofireland.ie/niah/search.jsp?type=record&county=DG&regno=40907924

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 identity and take action in securing the future of Buildings at Risk.
- To introduce effective legal and planning protection of the landscape setting of protected structures, and designed landscapes.

Natural Heritage

7.0 Habitats and Species

Ireland has a poor record when it comes to protecting the 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.

Many species of waders and bird's associated with lowland farmland have suffered shocking declines of over 70% in their populations over the proceeding decades and it is possible that many species will follow the corn bunting towards national extinction in the coming decades.

Despite this, the government continues to cash in on Ireland supposed green image via tourism and the agri-foods sector. Green washing terminology usually trundled out in government policy documents such as "green credentials", "sustainable produce", "sustainably green" and "conservation grade" lack proper definitions.

There is a lack of habitat and species assessments nationally with many SAC's and SPA's lacking management plans. Many aspects of Ireland's agriculture and forestry industries are completely unsustainable from an environmental point of view and will lead to further biodiversity loss and national extinctions moving forward. There is a lack of joined up thinking in relation to government policy. Our legal and moral obligations in relation to climate change, biodiversity loss and the environment in general are an afterthought. Indeed many government policies such as Food Harvest 2020, Marine Harvest, and the draft Forestry Programme 2014 - 2020 are completely unsustainable from an environmental point of view, yet the interests of short term economic gain always trumps any drive towards a long-term sustainable society.

The EU's approach to tackling biodiversity loss over the previous decade was too wide-ranging and not effective enough and as a result it failed to halt biodiversity loss by 2010. The Pillar 1 and Pillar 2 payments under Rural Development Programme have failed to deliver sufficient protection for Ireland's biodiversity, or ensured that ecosystem services can support the agri-sector in the long term. The Rural Development Programme has

failed to deliver for biodiversity. The government cannot be allowed to continually highjack taxpayer's monies to prop up an unsustainable agri-food sector. The short-term boom and bust economic policies fuelled by greed failed to deliver any long-term benefit for the Irish people and similar attitudes towards the Irish Food and Forestry will similarly fail with far more catastrophic consequences.

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 Burren LIFE project, this has not been the case to date. Despite billions of euros having been paid to Irish farmers through programmes like REPS 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.

'Greening' under Pillar 1 of Common Agriculture Policy will be an abject failure. In a recent meeting between the Department of Agriculture, Food and the Marine and An Taisce, it was agreed by all parties that "greening" would have a negligible impact on biodiversity. This effectively means that money has been wasted on additional bureaucracy. This is an example of the Irish Authorities doing the bare minimum required of them to meet their EU obligations. As the department responsible for the protection of the environment the Department of Arts, Heritage and Gaeltacht has failed to deliver any positive benefit under "greening". In addition, the issues of "perverse incentives" to "destroy" or "abandon" habitats not described as "permanent grassland under Common Agriculture Policy has yet to be resolved. Common Agriculture Policy has failed to deal with Ireland's strict interpretation of land eligibility. As a result An Taisce are deeply concerned that the Department of Arts, Heritage and Gaeltacht will struggle to deal with damaging management activities such as scrub removal, fencing, reseeding, burning of upland vegetation in both the Natura 2000 network and in the wider High Nature Value landscape.

It is An Taisce's opinion that the amount of money allocated to the Natura 2000 network and High Nature Value Farming is insufficient. This underinvestment is resulting in a net economic loss for Ireland as vital ecosystem services are being degraded and lost, more EU fines loom on the horizon and our lucrative green image continues to be eroded.

The Department of Arts, Heritage and Gaeltacht must ensure that the Ireland's semi-natural grassland both inside and outside of Natura 2000 are managed appropriately and that the necessary management plans are drafted and funding sourced.

There is a lack of oversight from the National Parks and Wildlife Service is relation to forestry and planning in general. The Forestry Services are not carrying out sufficient appropriate assessments. Many of the appropriate assessments that are carried out are merely desktop studies and are therefore completely inappropriate. The standard of input from the National Parks and Wildlife Service varies from ranger to ranger. There is a clear need for direction from the top down and there is a need for National Parks and Wildlife Service submissions to be screened centrally. One major failing of the National Parks and Wildlife Service is their consistent failure to consider in combination and cumulative effects when advising on forestry and planning. An example of this is the current situation in

many of our upland Special Areas of Conservation and Special Protection Areas where commercial plantations and wind farms continue to be approved despite the clear scientific evidence that the proliferation of these activities in our uplands is having a significant negative effect on designated habitats and species. In addition to this, it is considered that all too often the mitigation measures prescribed by the National Parks and Wildlife Service for forestry and other developments are inadequate to compensate for the clear significant negative effects that such activities will have on designated sites and species. An Taisce considers that the National Parks and Wildlife Service needs to develop clear policy documents in relation to forestry that are grounded in peer reviewed scientific research and make this information available to the public for comment.

The Department of Arts, Heritage and Gaeltacht has to work with the other departments to change the image of the Natura 2000 and Natural Heritage Area network. These designations are seen as a nuisance rather than an opportunity. This has not been helped by the lack of targeted objectives associated with agri-environmental payments. Public relations have been one of the major issues for the department over its long history. The Department of Arts, Heritage and Gaeltacht must improve on its level of engagement with local communities. The support of local communities is essential in ensuring the long-term viability of designated habitats and species.

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. Local authorities are unhelpful in their disregard for legislation pertaining to planning, water quality and biodiversity. 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 Department of Arts, Heritage and Gaeltacht going forward.

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. Invasive species Ireland urgently needs to be resurrected. The Wild Boar (*Sus scrofa*) is recognised by Invasive Species Ireland on its most unwanted species list while the Pacific Oyster (Crassostrea gigas) and the American Mink (Neovison vison) are suspiciously absent. To the casual observer this would appear to be the result of the vested interests within Ireland in oyster and mink farms. 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-environmnetal 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 through Food Harvest 2020.

- The amount of money allocated to the Natura 2000 network and High Nature Value Farming should be increased.
- The Department of Arts, Heritage and Gaeltacht must ensure that the Ireland's semi-natural grassland are mapped both inside and outside of Natura 2000 are managed appropriately and that the necessary management plans are drafted and funding sourced.
- The National Parks and Wildlife Service submissions on planning and forestry need to be centralised. A greater emphasis needs to be placed on in combination and cumulative effects on vulnerable habitats and species.
- The National Parks and Wildlife Service needs to develop clear policy documents in relation to forestry which are grounded in peer reviewed scientific research and make this information available to the public for comment.
- 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 National Parks and Wildlife Service are needed to be better funded.
- The National Parks and Wildlife Service need to improve enforcement of the Birds and Habitats Directives 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 Irelands ecosystems and economy irrespective of vested interests.

8.0 Peatlands

Peat soils comprise 20% of the Irish land area. However while extensive area 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 major damage 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 similar failed to control cutting applied. The current action of the NPWS is seeking to remedy the situation simply represents actions that should have been completed in the late 1990s.

No management strategy has been initiated for raised bogs where a multiplicity of pressures by peat extraction, grazing, invasive species and general development apply. 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 draft National Peatland Strategy currently being prepared by the Peatlands Council is lacking in scientific competence. 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 manage and contain carbon loss form peatlands and is not integrated with agricultural and forestry management. Accordingly, it is not fit for purpose for presentation to Government and for public consultation.

Recommendation

- To ensure a revised Peatland Strategy with legally enforceable timetables and targets to maintain and restore Natura 2000 peatland sites to favourable conservation status, including compensatory designation for loss of habitat in designated areas;
- 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 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.

9.0 Landscape

The National Landscape Strategy recently published by the Department does not meet the obligations set out in the Convention. In particular it is 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 in untenable, including long stretches of the "Wild Atlantic Way" promoted by Fáilte Ireland. A significant percentage of houses built in the last year in Ireland were 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 entire 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.

10.0 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.

The June 2014 report published for this consultation by the Department of the Environment Community and Local Government, in association with the Department of Arts Heritage and Gaeltacht, Department of Agriculture and Food and the Marine, and Department of Transport Tourism and Sport is not fit for purpose. It significantly fails to meet the legal obligation under Article 11 of the Directive for environmental targets and associated indicators

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 published in September 2014 is alarming. It addresses the converging impact of anthropogenic greenhouse gas on increasing ocean temperatures, and the inability of the ocean to absorb additional C02, 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 merely a paper exercise. There is no horizontal integration with the ongoing policies and action of other Government departments advancing the objectives of 'Our Ocean Wealth 2012'. Increasing oil and gas drilling and marine life exploitation and aquaculture is booing promoted, oil and gas drilling is being facilitated. Climate, ocean acidification and biodiversity impacts are being systemically disregarded.

Annex V (11) of the Directive states the "Need to include, as part of the initial assessment provided for in Article 8, an assessment of major changes in the environmental conditions as well as, where necessary, new and emerging issues".

Current and future major issues a plan need to be addressed:

10.1 Aquaculture

A major extension of caged salmon breeding is proposed the first between Galway Bay and the Aran Islands and two others to follow. This has major issue on scale of nutrient source required for caged fish breeding, lice infestation and risk.

10.2 Oil and Gas Drilling

The scale and impact of deep sea drilling in areas covered by exploration licenses by Department of Communications, Energy and Natural Resources is not addressed.

10.3 Renewable Energy in Marine Environment

The impact of large-scale wind energy and future development of wave and tidal energy needs to be assessed, including sound impact on cetaceans.

10.4 Cultivation of Marine Biomass

The potential impact of future marine biomass cultivation of pharmaceutical, food nutrient or bio energy use needs to be addressed.

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 of deep trawling impact on sea bed Accurate monitoring data on the population stability of all commercially fished species in Irish waters and 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., Mobility and feeding patterns for cetaceans. Changing patterns in migration of non-indigenous species, Sources of marine litter;
- Meeting objective 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;

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

The current conflict between enhanced walker and cycling access on navigation towpaths, and the maintenance of existing river and canal bank character on the Barrow navigation 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 land area.

Procedural

13.0 Department Of Arts, Heritage And Gaeltacht Prescribed Planning Status.

Department Of Arts, Heritage And Gaeltacht is not exercising its prescribed function in an effective of a systemic basis. Planning authorities as not applying appropriate standards in dealing with applications affecting ecology or cultural heritage including developments affecting European sites and more effective intervention by the Department of Arts, Heritage and Gaeltacht is required

Recommendation

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

14.0 Implementation & Monitoring

Over the past fifteen years there has been no shortage of very well intentioned policy statement documents published in Ireland by Government, Quasi-Government and Non-Governmental Organisations.

However, the reality has been (and remains) a widespread absence of implementation and an almost complete divergence between policy and practice. Policy guidance documents have been heretofore habitually ignored in favour of pressing short-term economic requirements, the requirement to promote commercial rate revenue and lobbying from special interest groups. As a result and it must be recognised, the direct legacy of the recent 'Celtic Tiger' era and associated expansion in construction activity is that Ireland now has one of the most unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns anywhere in Europe.

We therefore submit that it is now, more than ever, of paramount importance that the Department moves beyond the mere rhetoric of commendable strategy towards **robust targets, actions and measures** to achieve the tangible. Implementation of policy has been the Achilles heel of development in Ireland and must therefore now at this critical juncture be the focus of this strategy.

15.0 Conclusion

Ireland's unique built and cultural heritage is increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and to the Granda Convention ratified in Ireland in 1985. These conventions provide the basis for our national commitment to the protection of the architectural heritage the importance of 'handing down to future generations a system of cultural references'. It relies for its effectiveness on its signatory countries implementing their own national protective regimes. Despite the vital economic importance of cultural and built heritage to tourism, Ireland has a very lax record in protecting our unique built and cultural heritage.