

Northern Ireland's Landscape Charter

Response to January 2014 consultation document from Mountaineering Ireland

July 2014

1. Introduction

As the representative body for a large cohort of people who actively engage with landscape, Mountaineering Ireland welcomes the development of a Landscape Charter for Northern Ireland and the opportunity to contribute to this process.

Development of a Landscape Charter represents a step towards fulfilling Northern Ireland's obligations under the European Landscape Convention and putting in place stronger mechanisms to recognise, protect and manage Northern Ireland's landscapes. As noted in the Minister's message, the Charter comes at a critical time in local governance with the transfer of planning powers to the new councils in April 2015.

The context for this response is set in Section 3 which identifies what Mountaineering Ireland values in landscape. Section 4 includes specific responses to the draft Charter.

2. Mountaineering Ireland

Mountaineering Ireland is the representative body for walkers and climbers on the island of Ireland. Mountaineering Ireland's mission is to represent and support the walkers and climbers of Ireland and to be a voice for the sustainable use of Ireland's mountains and hills and all the places (coastline, crags, forests) we use.

Mountaineering Ireland is recognised as the National Governing Body for the sport of mountaineering by both the Irish Sports Council and Sport Northern Ireland. The term mountaineering refers to a wide spectrum of activities that includes walking, rambling, hillwalking, rock and ice-climbing, bouldering and alpinism. Mountaineering Ireland has over 11,500 members, comprising 161 clubs and approximately individual members (October 2013).

3. What Mountaineering Ireland values in landscape

As the representative body for walkers and climbers, Mountaineering Ireland's primary landscape interest is in the upland environment - hills, mountains, forests, bogland, sea cliffs and associated areas.

Upland areas are a major element in our landscape, providing defining geographic features, some of our most beautiful scenery and our largest areas of relatively wild land. As well as being a distinct landscape type, these high quality, living, lived-in farmed environments are a rich tapestry of heritage and biodiversity. The uplands incorporate a large area of Northern Ireland's semi-natural vegetation and also encompass a substantial proportion of designated Natura 2000 sites. Our upland landscape is the product of a system of low intensity agriculture; in addition to farming, the uplands delivers a host of ecosystem services including biodiversity, carbon storage, water quality and flood mitigation. Upland areas attract people for passive and active recreation and for education purposes, thus making a hugely valuable contribution to community well-being.

Northern Ireland has a very limited stock of relatively wild and undeveloped natural landscape; mountains, moorlands and heaths cover about 12% of Northern Ireland's land surface, compared with the UK average of 18% (UK NEA, 2011, p106). The character of much of this 12% has already been altered by development; we are using up this vital resource at an unsustainable rate.

The challenges facing Northern Ireland's landscape are myriad and include the following:

- Failure to adequately protect and manage designated landscapes such as AONBs, ASSIs, SACs and SPAs (e.g. absence of management plans, damage from off-road vehicle activity);
- Industrialisation of natural landscapes (e.g. windfarm developments, telecommunications infrastructure);
- Agricultural practices (e.g. reclamation, burning, fencing of previously open hillsides);
- Abandonment of hillfarms (resulting in over-growth of vegetation and landscape change);
- Over-development of wild landscapes for recreation (e.g. by trail-marking, signage and unnecessary safety features).

The granting of planning permission in April 2014 for a boardwalk, including steps and handrails, across blanket bog and up to the summit plateau of Cuilcagh Mountain, provides a telling example. Despite this being one of Northern Ireland's wildest landscapes, planning consideration focused on avoiding impacts on the designated site features of the SAC and ASSI, with no reference to landscape impact.

It is Mountaineering Ireland's assertion that protecting the natural and undeveloped character of Northern Ireland's upland environment should be a key concern within the Landscape Charter.

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

For many people the appeal and value of wild areas lies in their natural and unplanned character. The landscape itself is often the only facility that people need for recreation. Most wild landscapes are best left alone and not managed like a public park.

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

Mountaineering Ireland is concerned that the draft Charter is overly focused on the cultural value of landscape, and does not accord sufficient importance to the value of undeveloped landscapes. From Mountaineering Ireland's point of view, it is essential that the Northern Ireland Landscape Charter respects and protects the integrity of our mountain and coastal landscapes.

4. Response to draft charter

4.1 Why our landscape matters

Mountaineering Ireland supports Terry A'hearn's view that variety and distinctiveness within a small land area give uniqueness to Northern Ireland's landscape. Much of this distinctiveness is derived from agricultural practice, and future management of the landscape will need to be achieved through a process of co-operation with the people who own and farm the land. It would be good to see the central role of agriculture acknowledged within this section.

We have already highlighted the accelerated pace of change in Northern Ireland's landscape in Section 3 above. In this context we urge caution with regard to phrases such as 'in order to value the asset that is our landscape'. This is the language of business, development and individual gain; when dealing with landscape it is imperative to think in the long term and for the common good. It is too easy to be swayed by our current period of economic difficulty.

Mountaineering Ireland welcomes the decision to renew the Landscape Character Assessment for Northern Ireland as the first commitment to the Landscape Charter. We suggest that the final draft of the Charter should include a suite of commitments, with a timeframe and responsible body assigned to each one.

4.2 Affirmations for Northern Ireland's landscapes

This section could be improved by a brief introduction to put the affirmations in context and an outline of the mechanisms to deliver the affirmations. While the first four points are written as affirmations, numbers 5 to 10 are aspirational statements; there should be consistency in the language or two separate sections.

Mountaineering Ireland has considerable concern about the draft affirmations. The first six are strongly focused on the cultural value of landscape, and while this is important it is overwrought, with overlap between numbers 1, 3 and 6.

Numbers 7 to 9 are focused towards business and economic gain, effectively endorsing the exploitation of landscape. One can readily imagine the images that would be used – dramatic mountain and coastal landscapes – yet the draft includes no affirmation of the value of natural landscapes, no commitment to maintain landscape quality and no

statement of the need to invest to protect the integrity of Northern Ireland's landscapes. Mountaineering Ireland urges that these serious omissions be rectified in the next draft.

Mountaineering Ireland appreciates that the European Landscape Convention embraces all landscapes, from the outstanding to the everyday. However we should not lose sight of the fact that certain landscapes, such as undeveloped uplands and the coast, are valued more by society and that there is a responsibility to protect these landscapes for future generations.

4.3 A vision for Northern Ireland's landscapes

Overall the vision is quite good, however Mountaineering Ireland would prefer to see a vision that is centred on the best interests of landscape, rather than what landscape provides for people. This could perhaps be achieved by giving greater prominence to the final line about maintaining the distinctiveness and quality of our landscapes.

4.4 Guiding principles in decision-making

As with the affirmations, a brief introductory note about the purpose of the principles would be useful. The wording of some of the principles, particularly numbers 3 and 6, is convoluted and unclear.

Mountaineering Ireland notes and welcomes the first principle that 'each of us has the right to derive the benefit of those places that matter to us'. The difficulty and lack of clarity regarding access to the countryside in Northern Ireland is a barrier to public engagement with landscape. Access to landscape is crucial to achieving public understanding and support for landscape protection. This should remain a principle within the Charter and could perhaps be worded more clearly.

4.5 Call to action

Mountaineering Ireland is prepared to sign up to the Landscape Charter process, and willing to work with other organisations in promoting understanding of, care for, and protection of Northern Ireland's landscapes. With changes in local government and planning imminent, it is critical that momentum is maintained in this work.

Consideration should be given to how NIEA's Landscape team can actively engage with all those who have signed up to finalise the Charter and work towards achievement of the Vision. The Landscape Matters Task Force within NIEL may be able to assist in this regard. The work being done by the various landscape partnerships in Northern Ireland is commendable in terms of improving understanding of landscape and building pride and they too should be valuable contributors.

It should be noted however that all this involvement needs to be underpinned by appropriate statutory and regulatory mechanisms, such as putting AONBs on a statutory footing and providing them with sufficient resources to be effective in the management of their respective landscapes.

4.6 After signing

There are many references in this section to improvement, enhancement or development; Mountaineering Ireland wants to take this opportunity to reiterate the importance of respecting and protecting the integrity of Northern Ireland's landscapes.

There are also references to including local people, particularly in the Government and Public Agencies section. Mountaineering Ireland emphasises the need to provide for the participation of the general public and other interested parties in the definition and implementation of landscape policies (as set out in Article 5c of the European Landscape Convention). Walkers and climbers often have a strong connection with landscapes some distance from where they live and therefore represent a 'community of interest' in certain landscapes, as distinct from the local geographic community.

5. Closing comments

The process of developing a Landscape Charter for Northern Ireland is most welcome, however much more needs to be done to finalise the Charter and to support delivery of the Vision. There is need to secure cross-departmental support for the Vision, to develop guidance for those with a role in planning and land management, and to strengthen landscape protection within the planning process. Mountaineering Ireland recommends that the commitments associated with delivery of the Vision are listed in the Charter.

The development of a Landscape Strategy for Northern Ireland seems a necessary and logical next step following completion of the Charter. Priority should also be given to putting in place mechanisms for landscape management and protection, particularly for Northern Ireland's eight AONBs as these are our most outstanding landscapes.

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

Mountaineering Ireland is committed to the idea of a Landscape Charter for Northern Ireland and we look forward to contributing to further stages in this process.

6. Further information

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

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7. References

UK NEA (2011) The UK National Ecosystem Assessment: Chapter 5 – Mountains, Moorlands and Heaths, published by UNEP-WCMC, Cambridge, see: http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx