



Ireland 2040 Our Plan – Issues and Choices

Response to Public Consultation from Mountaineering Ireland

March 2017

1. Mountaineering Ireland's vision for Ireland 2040

Mountaineering Ireland welcomes the development of the National Planning Framework, particularly its long-term, strategic approach and its emphasis on how better planning can contribute to human health and wellbeing.

As the national representative body for walkers and climbers on the island of Ireland, Mountaineering Ireland is deeply aware of the contribution that enjoyment of Ireland's natural environment makes to people's physical and mental health and wellbeing. Mountaineering Ireland has over 11,800 members, the majority of whom are affiliated through our 185 registered clubs.

Over the last nine months Mountaineering Ireland has consulted with members to develop this vision for Ireland's mountains and upland areas in 2040:

Mountaineering Ireland's vision is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

The vision statement emphasises the significant value of Ireland's mountain landscapes and the many ways in which every person living on the island of Ireland gains benefits from these special places. Mountaineering Ireland believes there is an urgent need for an holistic and area-based approach to supporting upland areas, with policy measures focused on maintaining communities, supporting upland farming practices and conserving upland landscapes.

Mountaineering Ireland supports the National Planning Framework's objectives of good environmental stewardship and sustainable and best use of scarce resources. However, it is Mountaineering Ireland's assertion that there is need to go beyond that to recognise landscape and the natural environment as Ireland's ultimate asset – the natural capital which supports life and wellbeing.

Mountaineering Ireland acknowledges and respects the fact that most of the country's natural assets are in private ownership, and therefore the achievement of a sustainable future for all Ireland's people depends on attaining a reasonable balance between individual interest and the common good. This is a key issue for the National Planning Framework.

This submission sets out Mountaineering Ireland's response to many of the key questions in the Issues Paper.

2. People's Health & Wellbeing

2a - What policies can the National Planning Framework include to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?

Outdoor Recreation

While the economic and social costs of physical and mental illnesses associated with pressurised urban lifestyles are growing, the benefits of the natural environment in enhancing physical and mental health are increasingly recognised in both research and practice (Bowler *et al.*, 2010; POST,

2016). Research from the UK also shows that outdoor recreation generates a significant economic impact, as well as making a contribution to tackling the cost of physical inactivity (Comley & Mackintosh, 2014). To put it simply, recreation in natural environments make people's lives better.

The recent growth in outdoor recreation activities such as walking, mountain-biking and running etc, combined with an increase in the commercial provision of such activities, is exerting ever greater pressure on Ireland's natural environment and on the goodwill of individual landowners. Yet, with an integrated approach and strategic investment, this is a sector with potential to deliver improvements to health and wellbeing, while also protecting the natural resource base that all of this activity is dependent upon.

To complement the National Physical Activity Plan (2016), there is need for a National Outdoor Recreation Strategy which:

- Acknowledges the value of outdoor recreation to people's health and to Ireland's economy;
- Guides the provision of recreation infrastructure;
- Includes measures to secure and improve access to the outdoors for responsible recreation;
- Is underpinned by a commitment to protect the natural environment;
- Is properly resourced and implemented through an integrated approach at national and local level, involving relevant stakeholders and inter-departmental working arrangements.

2b - Are there key priorities the National Planning Framework can identify to ensure better or improved health and wellbeing of people and places in Ireland?

Are there facilities that the National Planning Framework needs to highlight for places in Ireland in order to enable greater participation in a healthy lifestyle?

The strategic planning and development of walking and cycling path networks in the vicinity of towns and villages would significantly enhance opportunities for physical activity and improved health and wellbeing.

The delivery of such a network would be assisted by placing greater priority within the planning process on improving opportunities for physical activity. Doing so would be consistent with the objectives of the National Planning Framework, especially that of facilitating improvements to people's quality of life and wellbeing, and prioritising the development of infrastructure that can deliver national benefit.

The Visitor Safety in Countryside Group (VCSG) principles, which have been endorsed by a number of State agencies in Ireland, provide excellent guidance on how to create safe access to the countryside in ways that do not spoil the landscape and heritage, or lessen the visitor's sense of exploration and adventure. It would be welcome to see the VSCG approach embedded in the National Planning Framework (see vscg.org).

3. The potential of Rural Ireland

3a - How can the National Planning Framework capture (in a national, strategic policy context) the range and quality of resources that exist in rural areas that could be leveraged to support national economic growth, climate action objectives and the development of local communities?

It is Mountaineering Ireland's position that Ireland's mountains and upland areas are vital natural assets which should be wisely managed for societal benefit through appropriate planning and landowner involvement, in a way which ensures ecological integrity and the maintenance of these cherished natural landscapes.

Mountaineering Ireland advocates that the many ways in which every person living on the island of Ireland gains benefits from Ireland's upland areas should be acknowledged and protected within the National Planning Framework.

Ireland's mountains and upland areas:

- Are Ireland's largest areas of relatively undeveloped wild land. They provide defining geographic features in the landscape and encourage a sense of place;
- Support human wellbeing by providing high quality places for passive and active recreation, with associated mental and physical health benefits;
- Have distinctive landscapes that have been shaped by many centuries of low-intensity farming activity;
- Provide some of Ireland's most beautiful scenery, which is also the cornerstone of the rural tourism industry;
- Are living, lived-in landscapes;
- Are Ireland's largest expanses of semi-natural habitats, and important for biodiversity;
- Are the source of 82% of Ireland's drinking water;
- Hold much of Ireland's carbon store in peaty soils;
- Contain some of the best-preserved examples of Ireland's archaeological heritage and are significant within our cultural heritage.

The incorporation of a natural capital and ecosystems services approach in the development of the National Planning Framework could be instrumental in maintaining the benefits above and in achieving the sustainable management of Ireland's natural resources and in guiding future investment and development.

Mountaineering Ireland also urges greater focus on implementation of the National Landscape Strategy (DAHG, 2015). Many actions within this strategy are relevant to the National Planning Framework, most notably the principal action of developing a National Landscape Character Assessment.

The importance of undeveloped or semi-natural land

For many people the appeal and value of Ireland's mountains lies in their relatively wild character, the lack of manmade structures and development, the openness of mountain landscapes, and the

way in which the mountains contrast with the crowded urban environment in which the majority of people spend most of their lives.

Given the prominence of mountains in Ireland's landscape and culture, many people are surprised to learn that just under 6% of Ireland's land area is over a height of 300m, and only 0.35% lies above the 600m contour (Egan, 2014). Ireland's upland terrain and landscape is a very scarce resource. Only a portion of this small area remains in a relatively wild or undeveloped condition.

Ireland's extremely limited stock of undeveloped land is irreplaceable and it is being depleted every day by renewable energy developments, afforestation, extractive industry, the erection of new fences and communications masts, the construction of new roads and tracks, and other built development including inappropriately sited housing.

The small area of undeveloped upland landscape or wild land which remains in Ireland is a very valuable national asset. Mountaineering Ireland contends that the continuing loss of Ireland's limited stock of undeveloped land is unacceptable and not in the best interest of the nation.

The work of the Scottish government in mapping and describing their wild land areas provides a relevant model for Ireland. Scotland's third National Planning Framework recognises wild land as a 'nationally important asset' requiring strong protection. Scottish Planning Policy sets out how this should be achieved, by identifying and safeguarding the character of Wild Land Areas (WLAs) in Development Plans and in Spatial Frameworks for onshore wind farms, and considering the effect of development on these areas (SNH, 2017).

While Ireland's landscape is undeniably less wild than Scotland's, those semi-natural areas with fewer signs of human influence are a key component of Ireland's identity and also have real economic value. These wilder areas are highly attractive to overseas visitors, they have a role in securing foreign direct investment, and images of these places are used extensively in marketing Ireland's agricultural exports. Mountaineering Ireland urges the mapping of Ireland's undeveloped or semi-natural landscapes as a spatial planning tool and the development of guidance for assessing impacts on these areas as part of the planning process.

3b - What are the solutions to maintaining population in those rural areas where decline has been experienced?

Reliable and reasonably fast broadband is a key support measure needed to maintain population in rural areas, enabling people to do work or study from home and to operate businesses from their local area. This improves people's quality of life and leaves them with more time for involvement in their local community.

The National Planning Framework should provide for built development in rural areas which does not diminish the character of the rural landscape; residential development in or immediately adjoining existing settlements or villages should be favoured as the cost of services is less and it is more conducive to engagement between neighbours.

Heritage has the potential to be a unifying force in rural communities, strengthening local pride and engaging both local locals and those who have settled in the area. This also links into tourism.

Improved support for local heritage projects, events, publications and place-based education in schools would all contribute to the sense of vitality within rural communities, thus making these more attractive places to live.

Ireland's mountains and upland areas are living landscapes, home to people who have a resourcefulness born of coping with remoteness and poorer services. Perhaps because of the many challenges they face, the sense of community and pride of place tend to be strong in upland areas.

Mountaineering Ireland welcomes the plans by the Heritage Council and the Irish Uplands Forum to instigate a programme of support for a network of upland partnership groups committed to working towards the sustainable management of their area. It would be beneficial to those groups if the National Planning Framework could embrace the value of voluntary groups engaging in bottom-up, integrated planning for the future of their area. The upland partnership model, where groups are made up of different stakeholders with a shared concern for a defined geographic area, could be helpful in addressing the management of the cross-border catchments referred to in section 4.4 of the Issues Paper.

4. Ireland's unique environment – sustainability

4a - How can the National Planning Framework help to ensure we get a sustainable balance between catering for a growing population and avoiding or addressing environmental pressures?

Mountaineering Ireland is wholeheartedly supportive of the statement in the Issues Paper that, 'Ireland's landscape offers a wealth of natural and cultural assets which support our quality of life and our visitor economy'. Continued depletion of Ireland's finite stock of natural capital will undermine the opportunities and quality of life of future generations. Achievement of the sustainable balance referred to in the question above requires recognition by policymakers and the general public of the extent to which human wellbeing and Ireland's economy depend upon the country's natural resources.

Flood mitigation is one of the ecosystem services that can be provided through better management of upland habitats. Upland habitats in favourable condition have greater capacity for absorption of rainfall, thus slowing the flow of water to areas downstream (O'Meara, 2015). Improved habitat condition could be achieved by incentivising landowners to maintain appropriate grazing levels, through peatland restoration projects and by planting of native tree species such as birch, alder and willow in upland areas.

Most of Ireland's drinking water (81.9%) comes from surface water, i.e. rivers and lakes, which in turn have their origin in upland areas (DECLG, 2012). These small streams and rivers make up 77% of Ireland's river network, and due to a low level of dilution they are extremely susceptible to pollution (WRBD, 2007). The condition of the natural environment in the catchment around these upland streams and rivers has a direct bearing on the quality of this water and therefore also the cost to treat it.

Overall there is a very strong rationale for adopting an ecosystems services approach and sustainable land-use planning in the development of the National Planning Framework.

4b - What strategic energy infrastructure is needed to support the economy and society and realise the transformation of Ireland's energy system to meet climate change and energy obligations and in what areas should it be located?

Mountaineering Ireland wishes to highlight that wind farm development in upland landscapes has a disproportionate impact, due to the relatively wild and undeveloped character of these areas and the dominance of turbines over the surrounding landscape. Wind farm development introduces a large-scale industrial use which is inappropriate in most upland areas.

Mountaineering Ireland believes there should be greater focus on developing offshore renewable energy generating capacity, otherwise valuable landscapes and habitats will be irreversibly damaged.

Due to the unreliability of wind there is need for diversity in Ireland's renewable energy sources, the growth in solar generation is welcome, however progress with harnessing wave and tidal energy appears to be slow. Investment in research and development to utilise these renewable energies should be stepped up and accommodation made for these in the National Planning Framework.

4c - What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?

Mountaineering Ireland has direct experience of situations where local authorities and An Bord Pleanála have failed to address significant damage to the upland environment in a timely manner. It is vital that the National Planning Framework includes stronger mechanisms to ensure effective development control and enforcement by local authorities to deal with unauthorised developments.

The mapping and consideration of undeveloped or semi-natural landscapes outlined above is also required to safeguard these special places.

5. Enabling the Vision - Implementing the National Planning Framework

5a - How best can sustainable planning outcomes be recognised and rewarded?

Mountaineering Ireland recommends that the National Planning Framework should be underpinned by a structure of indicators and measures, with annual online reporting of progress. The Scottish government's reporting of progress on their Programme for Government through the www.gov.scot website may provide a useful model.

Positive examples of sustainable planning should be highlighted through case studies and videos on the National Planning Framework website.

5b – What are the key indicators for measuring the successful implementation of the National Planning Framework?

The indicators for measuring implementation of the National Planning Framework should include:

- Natural capital asset index;
- Area of undeveloped land;
- Participation in outdoor recreation;
- Progress on delivery of actions in relevant policies, e.g. National Landscape Strategy.

Measures would be derived from existing statistics with new measures developed where suitable ones don't exist.

6. Summary of key measures

Mountaineering Ireland's vision for 2040 is that Ireland's mountain landscapes will be valued and protected as environmental, cultural and recreational assets.

Mountaineering Ireland accepts that change is part of an evolving, living landscape, but such change needs to be planned and done in a well-considered and long-term way. To achieve sustainable management of Ireland's mountain and upland areas the very limited extent of Ireland's upland environment, and its inherent fragility, must be fundamental considerations. It is imperative that in the management of landscape, balance is achieved between individual interest and the common good.

Mountaineering Ireland recommends that the following national policy measures are incorporated in the National Planning Framework:

- Recognition and protection of Ireland's mountains and upland areas as environmental, cultural and recreational assets;
- The incorporation of a natural capital and ecosystems services approach in the development of the National Planning Framework;
- Implementation of the National Landscape Strategy including development of a National Landscape Character Assessment;
- A supportive framework for voluntary groups engaging in bottom-up, integrated planning for the future of their area;
- The mapping of Ireland's undeveloped or semi-natural land and the development of guidance for assessing impacts on these areas as part of the planning process;
- Stronger mechanisms to ensure effective development control and enforcement by local government planning authorities;
- Development of a National Outdoor Recreation Strategy to guide investment and development so as to leverage the potential in this sector;

- Priority within the National Planning Framework on improving opportunities for physical activity.

7. Further information

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

Please contact:

Helen Lawless, Hillwalking, Access & Conservation Officer

Mountaineering Ireland, Irish Sport HQ, National Sports Campus, Blanchardstown, Dublin 15.

Telephone: 01 6251103

E-mail: helen@mountaineering.ie

Website: www.mountaineering.ie

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