



An Roinn Cultúir,
Oidhreacht agus Gaeltachta
Department of Culture,
Heritage and the Gaeltacht

Heritage Ireland 2030 Public Consultation

Vision:

Ireland's heritage is valued, enjoyed and protected for future generations.

Theme 1: National Leadership and Heritage

Theme 2: Heritage Partnerships

Theme 3: Communities and Heritage

Have Your Say questions in the consultation document:

What is the most important thing Heritage Ireland 2030 needs to deliver?

A time-bound action plan endorsed and resourced by Government to deliver immediate, meaningful change in the management of Ireland's natural heritage.

Better land management is required to ensure that Ireland's natural environment can continue to support the well-being of our citizens. Mountains and upland areas have a key role to play in this, especially in relation to water supply and carbon storage.

Mountaineering Ireland supports the aspirations of Heritage Ireland 2030; achievement of the objectives in Heritage Ireland 2030 requires commitment from the highest level, a radical approach and substantial investment. It requires an inter-departmental action-planning process, a timeline for action, and clear allocation of resources.

This urgent need for a radical change of direction in the management of our natural heritage was communicated effectively by President Michael D Higgins to the recent National Biodiversity Conference and can be summed up in this one line from the President's address: 'If we were coalminers we would be up to our knees in dead canaries.'

What do you think of the vision for Heritage Ireland 2030? Is there anything we should add?

Mountaineering Ireland has a particular interest in Ireland's mountains, the wider uplands and our coastal areas. If well-managed these extensive semi-natural areas provide not only quality outdoor recreation experiences, but a range of ecosystem services that underpin the wellbeing of society and our economy, including supply of fresh water, carbon storage, flood mitigation, space for biodiversity, and scenic landscapes. Mountaineering Ireland welcomes the references in the consultation document to the importance of access to heritage, and people having opportunities to engage with heritage, we believe this is essential to securing societal support for investment in the care of Ireland's natural and built heritage.

It is Mountaineering Ireland's position that Ireland's 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.

The draft vision in Heritage Ireland 2030 is coherent with Mountaineering Ireland's vision for the future of Ireland's mountains and uplands areas (published in 2017):

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

Mountaineering Ireland recommends the addition below to strengthen the vision for Heritage Ireland 2030 and to focus towards achievement of the vision:

Ireland's heritage is valued, enjoyed and protected for future generations **through a commitment by Government to prioritise best practice management of our natural and built heritage.**

What are the biggest challenges facing our heritage?

It is Mountaineering Ireland's assertion that the principal challenge facing Ireland's heritage is **a lack of government commitment and joined-up action to protect Ireland's natural environment.**

Mountaineering Ireland has identified a number of challenges to the heritage of Ireland's mountains and upland areas. The examples below, grouped under thematic headings, provide evidence of the need for stronger policy and better practice to

protect and support these areas.

Access

Biodiversity

- Habitat loss, fragmentation and degradation are widely acknowledged as key drivers in the decline of Ireland's biodiversity. The underlying causes include uncontrolled burning of uplands, afforestation, agricultural intensification and development pressure.
- Compared with other European countries Ireland has one of the smallest areas of land designated for nature conservation as EU Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). All these sites require management plans and resources to implement those plans. We are also failing to adequately our nationally designated Natural Heritage Areas (NHAs), the majority of which do not have any legislative protection. Without these provisions Ireland's natural heritage sites are protected in name only.

Landscape

- Undeveloped land in upland areas is seen by some people as a waste, or not having value, where in fact these areas provide significant benefits to society that are not associated with intensively-farmed land.
- Ireland's limited stock of wild or undeveloped land is being depleted every day by a wide range of developments such as windfarms, roads and afforestation. Unfortunately there is no mechanism in place to measure the loss of Ireland's undeveloped land, as there is in Scotland.
- There is a virtual absence of integrated planning for upland areas both at a national and local level, embracing community development and all aspects of land-use including recreation.
- There is a lack of effective development control and enforcement by local government planning authorities to deal with unauthorised developments in mountains and upland areas.
- Poor legal protection for wild and scenic landscapes has resulted in an over-reliance on nature conservation designations to protect upland areas, with nature sometimes being portrayed negatively as a restriction on development.

Agriculture and community

- The labour-intensive nature of farming in upland areas, combined with the low rate of return and the high age profile of hill farmers are driving changes in agricultural practices and in some places leading to land abandonment.
- Changes in agricultural practice have had adverse impacts on upland landscapes (e.g. through reclamation, burning of vegetation, the fencing of previously open hillsides and the construction of wide access roads on the hills).
- Mountains and upland areas are physically distant from decision-making, have a lower population, fewer employment opportunities, poorer services and infrastructure (e.g. roads, broadband, public transport), and rarely have a representative body to highlight their issues.

Outdoor recreation and tourism

- All land in Ireland, is either owned privately (>80%) or by the State (<20%). Although there is no legal right of entry to land in Ireland for recreation* the vast majority of landowners have traditionally allowed informal access to upland areas. However, this goodwill and access could easily be withdrawn, for example due to inappropriate behaviour by one group or even an individual. The complex pattern of land ownership in Ireland's hills and countryside makes it more difficult to secure agreement regarding access, and therefore more difficult for people to enjoy Ireland's natural and built heritage sites. The lack of certainty regarding access for recreation in Ireland contrasts with most of Europe, where varying degrees of public access to land are formally defined. **Other than land owned by Waterways Ireland.*
- The current growth in outdoor recreation activities such as walking, mountain-biking and running, combined with the success of projects such as the Wild Atlantic Way, and the power of social media, are all bringing more people, and exerting ever greater pressure on the goodwill of individual landowners and on the natural environment.
- Due to increased recreational and tourism activity, trampling and path erosion are ever more evident on Ireland's mountains. Significant financial resources will be needed to repair the worn and muddy scars on our more popular mountains. As

most hillwalking routes are informal, rather than being designated trails, in the majority of upland areas there is no upland management group to take a lead in addressing this issue.

What do you think of the draft objectives in the document? In your view, is there something important missing?

Theme 1: National Leadership and Heritage

The introductory statements under theme 1 (to do with culture, economy and society, and also the beauty and irreplaceability of our built heritage and habitats), do not communicate effectively the fact that continued human life depends on our ability to reverse current unsustainable patterns of natural resource usage.

The objectives are wide-ranging positive statements, many of which are urgent in the context of climate change; to deliver on these will require a comprehensive and well-resourced action plan.

The interaction between agriculture and the natural environment is crucial, this will need to be resolved at national level and also locally. Local authorities also have an important role to play in protecting built and natural heritage, through the planning process and also the programmes they administer.

Theme 2: Heritage Partnerships

The introduction and objectives read well, but we have seen similar language in so many previous government documents (the National Biodiversity Action Plan, the National Landscape Strategy and some of the other documents listed on page 9) and so little action has resulted. The objectives need to speak strongly of commitment and a new approach, especially in relation to caring for our natural heritage.

The consultation document quite rightly identifies the key role of the Heritage Council in facilitating heritage partnerships, however the Heritage Council and other bodies within the heritage sector, including the National Parks & Wildlife Service have experienced funding cuts that make it impossible for them to engage in heritage partnerships. Significantly increased funding is needed if Ireland's heritage is to be valued, enjoyed and protected for future generations.

Theme 3: Communities and Heritage

Mountaineering Ireland acknowledges the central role of local communities in caring for Ireland's heritage, however we would also like to see the role of 'communities of interest' included in Heritage Ireland 2030.

Mountaineering Ireland represents a community of interest in mountain, upland and coastal areas which may be drawn from a wide geographic area. Mountaineering Ireland works with upland community groups, with landowners and other

organisations that share an interest in Ireland's mountains, with the aim of achieving a positive and sustainable future for these important areas.

What changes are happening right now that might impact on our heritage?

There are many changes currently occurring that place greater pressure on Ireland's natural heritage:

- Climate change – EPA reports show that upland habitats are amongst the most vulnerable.
- Loss of biodiversity – well documented and across all habitat types.
- Declining water quality – the small streams and rivers in upland areas make up 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.
- Uncontrolled burning and other removal of scrub to maximise agricultural payments is resulting in landscape change and loss of habitat – the apparent conflict between agricultural and environmental policies needs to be resolved.
- Increased numbers enjoying Ireland's natural environment and the potential of social media to suddenly drive large numbers of people to places without the physical infrastructure, or the management capacity, to cope with an upsurge in numbers.
- Fencing – increased fencing of uplands which detracts from the quality of the landscape and presents a barrier to recreational users.
- Path erosion in upland areas arising from increased footfall.

Changes that have the potential to impact positively on the natural heritage of Ireland's upland areas:

- Mountaineering Ireland believes there is a strong argument for re-focusing farm payment schemes towards rewarding hill farmers for delivering a sustainably managed environment, on the basis of the public good this provides. The European Innovation Partnerships currently being funded through the Department of Agriculture potentially provide a model for this. This model should be reviewed and learning from it used to inform the next Rural Development Programme.
- Mountaineering Ireland supports the proposals for an integrated land-use policy, emerging from the National Biodiversity Conference and the Climate Action Committee. Previous policy decisions in relation to agriculture and forestry are not working for natural heritage, and in most situations not working for landowners either. Matching land use to the natural capacity of the land to optimise the production of ecosystem services, including recreation opportunities, has the potential to work for landowners, for nature and for society as a whole.
- The Development and implementation of River Basin Management Plans offers potential for holistic and integrated management of upland catchments.

- The Visitor Safety Group guiding principles are becoming established as best practice in relation to visitor management in areas of natural and built heritage in Ireland (<https://vscg.org/>).

How can we work better together and engage all our communities under Heritage Ireland 2030?

The Wicklow Uplands Council, established in the late 1990s, provides a positive model for bringing together the different stakeholder interests in an upland area to work collectively towards the sustainable management of their area. The Wicklow Uplands Council (WUC) would not have survived for over 20 years without modest core funding from the Heritage Council, which in turn has enabled WUC to leverage other funding.

Inspired by the WUC model, bottom-up groups have emerged in other upland areas, and community wetland fora are pursuing a similar agenda in their respective areas. All these groups face challenges in securing funding that will enable them to deliver partnership-based, sustainable management of natural heritage. Heritage Ireland 2030 should prioritise **a programme of support for locally-based upland partnership groups committed to working towards the sustainable management of their area**. Any evaluation should show that these initiatives deliver value for money, care for heritage and community engagement that is coherent with the Heritage Ireland 2030 vision of valuing, enjoying and protecting Ireland's heritage for future generations.

In addition to the reference above to the need for increased funding for the Heritage Council and the National Parks & Wildlife Service, the National Biodiversity Data Centre, the Irish Uplands Forum, the Irish Environmental Network and the other agencies and NGOs that have a role in supporting communities to care for Ireland's natural heritage all require greater funding to do so.

The first step to securing this funding is achieving a radically different approach to the management of Ireland's natural heritage, and securing Government commitment and inter-departmental cooperation to lead the way in valuing, enjoying and protecting Ireland's heritage for future generations.

How can we ensure Heritage Ireland 2030 delivers?

- The proposal for a review after three years again fails to recognise the urgency of progress, especially in relation to care Ireland's natural environment.
- Heritage Ireland 2030 should be adopted as Government policy, an action plan developed within 6 months and an implementation group put in place

which is accountable to the public through annual reporting of progress, and an annual public forum (open to all citizens and webcast).

- Heritage Ireland 2030 should be embedded in the next Programme for Government.

Other comments

Mountaineering Ireland is the national representative body for hillwalkers and climbers on the island of Ireland, the organisation is funded by members and by core funding from Sport Ireland and Sport Northern Ireland. Mountaineering Ireland currently has more than 13,000 members, the majority of whom are affiliated through 186 member clubs spread across the island of Ireland.

Respect for the wonderful, but fragile environment enjoyed by hillwalkers and climbers, and being a positive voice for its protection, is one of Mountaineering Ireland's core values. Mountaineering Ireland works to improve environmental awareness amongst its members and encourages members to get involved in local upland partnership groups.

Mountaineering Ireland trusts that you will take the views of our members into consideration in the finalisation of the Heritage Ireland 2030 plan. Should you have any queries, or require additional informational in relation to this submission, please do not hesitate to contact us.

Your contact details – Name & organisation (where applicable)	Address	Email
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It is really important that we get your views. They will help shape Heritage Ireland 2030 and our vision for Ireland's heritage for years to come. A series of questions have been posed throughout this document, to guide the process, though we welcome views on all aspects of heritage and how we can best protect and value it. Please contact us through any of the contact routes below with your thoughts on the consultation questions and any other comments or views around Heritage Ireland 2030.

- Online survey at

www.chg.gov.ie/heritage/heritageireland2030

- Email the Department of Culture, Heritage and the

Gaeltacht at heritageireland2030@chg.gov.ie

- By post to:

Heritage Ireland 2030

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Note – consultation closing date 31 March 2019