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Submission by Brendan McGrath concerning Draft National Planning Framework (NPF)

1. INTRODUCTION

Thank you for the opportunity to make a submission. I am the author of *Landscape and Society in Contemporary Ireland*¹ and am currently working on a Management Plan for the Burren National Park for the Department of Culture, Heritage and the Gaeltacht. I previously worked as a planner in local authorities in Clare, Dublin and Cork. I was a member of the Landscape Working Group in the Heritage Council in 2015 and 2016.

There are two matters which I wish to raise and which I hope will be given serious consideration. First, the NPF is explicitly omitting 'new town' development as a strategic option and, second, the NPF, as it stands, has no place for Ireland's iconic rural landscapes. I believe that building new towns should be open for consideration and I also believe that planning the country's iconic rural landscapes should be an integrated part of Irish national planning.

2. NEW TOWNS

The NPF preface (p17) contains the statement that '...it is apparent that we have so many authentic communities and places with so much potential that there is no clear justification for the creation of entirely new settlements'. In my opinion this statement does not stand up to scrutiny. The greater part of most urban areas in Ireland is low density suburbia developed at gross densities of around 17 dwellings per hectare (7 per acre) and net residential densities below 4 dwellings per hectare (10 per acre). The situation is well summarized in the NPF (p86) where it states that 'development sprawl at every settlement level in Ireland has manifested as scattered development, 'leapfrogging', continuous

¹ Brendan McGrath, *Landscape and Society in Contemporary Ireland* (Cork University Press, 2013)

suburbs and linear patterns of strip or ribbon development'. Most Irish towns do not have public transport and there is no prospect of this changing in the foreseeable future, given the low densities of settlement. Most urban areas can only function through high levels of private car ownership and use. Retrofitting these areas to enable more sustainable travel will be expensive and take decades. In other words the development potential of existing urban areas in Ireland is seriously constrained by their pattern of development during the last century and the first decade of this century. There is therefore a strong economic case for creating new settlements that, from the outset, can be located and laid out in accordance with sustainable development principles. There are many examples of successful new towns in Britain, the Netherlands and Scandinavia. In Ireland Adamstown in Dublin and Monard Cork have the potential to become successful new settlements.

The draft NPF does not offer a credible explanation for why new towns are 'off the table' as a development option. One can only speculate that the decision to rule out new towns arises from a history of unsuccessful projects, i.e. the Dublin 'new towns', Shannon town and Craigavon new town. But that history should not detract from the inherent advantages of an integrated approach. The NPF offers the Dublin Docklands as a case study of successful place-making (p42). Key lessons of that case study are that development was enabled by an organization, Dublin Docklands Authority with the necessary powers and resources to implement a plan. A similar type of body could deliver successful new towns.

I also suggest that there is merit in including projects i.e. new towns, which can showcase sustainable development approaches and which encapsulate the ambition and philosophy of the framework plan.

I therefore request that the NPF is revised to omit the negative reference to new towns in the preface and that a national policy objective is included which recognizes the potential contribution that new settlements can make.

3. ICONIC RURAL LANDSCAPES

Three of the five photographs illustrating the preface of the NPF are rural landscapes. The preface on page 20 envisages 'the highest possible quality of life for our people and communities, underpinned by high quality, well managed built and natural environments'. Nowhere in the framework is there an adequate response to that vision as it applies to the country's iconic rural landscapes. These landscapes are in the the Category V class defined by the IUCN, the world body which oversees landscape heritage. A category V landscape is an

Area of land, with coast and sea as appropriate, where the interaction of people and nature over time has produced an area of distinct character with significant aesthetic, ecological/and or cultural value, and often with high biological diversity. Safeguarding the integrity of this traditional interaction is vital to the protection, maintenance and evolution of such an area.²

² Phillips, Adrian, Management Guidelines for IUCN Category V Protected Areas (Gland: International Union for Conservation of Nature, 2002)

In 1977 An Foras Forbartha published an Inventory of Outstanding Landscapes but there was no policy follow up. In 2007 Failte Ireland published a report on scenic landscapes stating that 'it is high time the Irish landscape is afforded the level of attention and concern that it so deserves'.³ Ireland stands out as a European state that does not appear to value its landscape heritage, even though, paradoxically, landscape is a key aspect of national identity⁴. Over the last century landscape conservation appears to have been a natural impulse of European governments but in Ireland there has been a distinct lack of engagement. Large parts of other countries are accorded special landscape status. In Austria and Germany they account for more than 20% of the national territory. In other countries such as the UK, France, Italy, Switzerland and the Czech Republic they are more than 10% of the area.⁵ Among the first actions of the Scottish parliament when it was set up in 1999 was to pass a National Parks Scotland Act and set up of two large parks; Loch Lomond and the Trossachs and the Cairngorms. Other European countries continue to take initiatives at a national policy level but in Ireland the impression remains that, at a national level, outstanding landscapes can look after themselves.

Beautiful landscapes cannot 'look after themselves', nor is it enough, as was once believed, simply to draw a line on map, designate an area, and make rules to control future development. Safeguarding outstanding landscapes and the communities which inhabit them and optimizing their contribution to national life requires proactive and integrated planning and targeted financial support.

The lack of a national landscape policy over the last two decades has probably caused long-term damage. The prospects of an enlightened landscape approach have been damaged by the way the Natura 2000 network in Ireland, which, in the prevailing policy vacuum, has come to be widely regarded as synonymous with rural landscape policy is, and portrayed as a 'top down' planning process, imposed from Brussels.. According to Conor Skehan:-

*The (Irish) landscape is becoming a place to receive and reflect the value systems of an increasingly urbanized European population. These value systems are scientific- ecological designations- and aesthetic- scenic areas and drives, national parks. Control of the countryside is changing hands. Not the ownership, just the control.....'*⁶

But, on the positive side, the lack of policy at national level has encouraged successful initiatives at a local level. I can only speak with confidence about my own local area, the Burren. But the development of the Burren Programme for HNV farming, the setting up of the Burrenbeo Trust and the Burren Ecotourism Network, are all examples of initiatives which have received varying degrees of government support (substantial support in some cases), but whose ongoing dynamism and success is largely due to the work of local people.

Another important aspect of the landscape policy context for the NPF is that Ireland is a signatory to the European Landscape Convention⁷ which led to adoption of a National Landscape Strategy (NLS) in 2015. The scope of the convention includes outstanding landscapes as well as everyday and degraded landscapes. The underlying philosophy of the convention, and therefore the NLS, is that 'landscape' is

³ Failte Ireland, Feasibility Study to Identify Scenic Landscapes in Ireland (Failte Ireland: Dublin, 2007), p3

⁴ For up-to-date critique, see P. Fogarty, Whittled Away: Irelands Vanishing Nature (Collins Press: Cork, 2017)

⁵ Adrian Philips,op.cit., p9

⁶ Conor Skehan, Burren Law School lecture, 2004

⁷ European Landscape Convention, Florence, 20th October 2000

everywhere and that all landscapes have an important impact on quality of life. This is obviously true and merits an appropriate policy response. But it is important to recognize that most West European countries, unlike Ireland, already had a national framework in place to safeguard their outstanding landscapes. Therefore, while the reference in the NPF (page 118) to the National Landscape Strategy and intended national landscape character assessment is noteworthy, it does not address the historic policy deficit that is outlined above.

There is a common misconception that outstanding landscapes already get the attention they deserve. There are, after all, national parks in North Donegal, Connemara, North Mayo, The Burren, Wicklow Mountains and the Iveragh peninsula in Kerry, but these state-owned parks only cover a small part of the landscapes where they are located. The Burren National Park, for instance, is less than 3% of the Burren. Furthermore, the park management priorities of NPWS are nature conservation and visitor management rather than the much broader socio-economic issues of the wider area.

Outstanding landscapes are national assets that need managing at a national level and I believe that the appropriate place to set out that management framework is the NPF. Ireland possesses many beautiful places all of which should be conserved and managed in the interests of the common good. Within the planning hierarchy outlined in the NPF, most of these areas can be looked after at the regional and local planning levels. However, a dozen or more areas are of national and international importance and should be part of the NPF, although their detailed spatial delineation would be a matter for political decision-making, guided by the national landscape characterization report described in the NLS.

‘National landscapes’ fall into two categories; heritage landscapes which have been celebrated for the exceptional character over a long period of time, and landscapes which are restorations or imaginative reconstructions of landscapes of the recent and distant past. Tables 1 and 2 are indicative lists of these two categories. The lists are not definitive but included to indicate the number and types of area envisaged.

Table 1. National Heritage Landscapes

Heritage Landscape		Heritage Landscape	
1	West Cork	7	North Donegal
2	Iveragh peninsula (Ring of Kerry)	8	West Donegal
3	Dingle peninsula	9	Wicklow Mountains
4	The Burren	10	West Mayo
5	Connemara	11	North Mayo
6	Aran Islands	12	Suir-Barrow-Nore valleys

Table 2. New Heritage Landscapes

New Heritage Landscape	
1	North Mayo wilderness
2	A national broadleaf forest
3	Lough Boora Parklands

I put forward the following reasons for including a strategy for outstanding rural landscapes in the NPF.

- It would provide a fuller picture of the natural and cultural capital of the state,
- It would give a better balance to the NPF which has spatially specific policies for urban areas but only generalized policy for rural Ireland,
- Outstanding landscapes are as spatially distinctive as towns and cities; they are ‘natural’ national planning units,
- It would provide a framework for projects to demonstrate, at appropriate spatial scales, holistic, integrated approaches to rural planning, as envisaged by the objectives of the NPF⁸, and
- It would bring to prominence visionary projects which would enliven the NPF to the benefit of the NPF as a whole.

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⁸ In particular National Policy Objectives 13,15, 20,21,23,24,25,41,43a and 59