



**Ireland 2040 Our Plan –  
Draft National Planning Framework**

**Response to Public Consultation from Mountaineering Ireland**

**November 2017**

## **1. Mountaineering Ireland's vision for Ireland 2040**

Mountaineering Ireland welcomes the development of the National Planning Framework, particularly its long-term and strategic approach to our country's development.

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 12,500 members, the majority of whom are affiliated through our 185 registered clubs.

Mountaineering Ireland has recently developed its 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.***

This submission sets out key points which Mountaineering Ireland believes should be take into account in the finalisation of the National Planning Framework and the National Investment Plan.

## **2. The need to recognise and safeguard mountains and upland areas**

Mountaineering Ireland is extremely concerned that mountains and upland areas appear not to be recognised at all within the draft National Planning Framework even though comparable major elements of our physical landscape such as coastal and marine areas feature strongly.

Mountains contribute to our sense of place and identity – think of how Dublin is framed by the Dublin Mountains, the distinctive Vee Gap in the Knockmealdown Mountains, or the iconic profile of Croagh Patrick with its tradition of pilgrimage stretching back to pre-Christian times. Mountains provide a stable backdrop to a constantly changing urban or suburban environment.

Despite their prominence in our landscape and psyche, Ireland has relatively little mountain land. 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 mountain environment and landscape is a very scarce resource. Only a portion of this resource 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.

This depletion is recognised in the draft plan, with 'diminishing wild countryside' included as one of a number of key national environmental challenges (p.108). Incidentally this should perhaps be worded as 'a diminishing wild countryside' as currently 'diminishing' reads as a verb in the context of the whole sentence.

The small area of undeveloped upland landscape or wild land which remains in Ireland should be recognised as a ‘nationally important asset’. It is Mountaineering Ireland submission that the National Planning Framework should include an objective to map and safeguard Ireland’s limited stock of undeveloped land in upland areas, as has been done with Scotland’s Wild Land Areas.

The importance of Ireland’s mountains and upland areas should be reflected throughout the plan, but this is especially relevant to Section 8.3 Protecting Conserving and Enhancing our Natural Capital.

Mountaineering Ireland advocates that the many ways in which every person living in Ireland gains benefits from Ireland’s upland areas should be acknowledged and protected within the National Planning Framework. A summary of these benefits is provided below.

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 (DECLG, 2012);
- 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 ecosystems services approach included in National Policy Objective 59 could be instrumental in maintaining the benefits identified above and in achieving the sustainable management of these significant natural resources.

Crucially, it must be acknowledged too that the management needs of upland areas are different to other areas, due to factors such as the character of the land, remoteness, extensive shared land ownership and lower agricultural productivity, yet higher ecological value.

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.

### **3. Importance of natural environment not reflected in key statements**

The ‘Key elements of Ireland 2040’ (pp8-9) make no mention of the natural environment and natural resources, the whole emphasis is on growth without consideration of the environment which would be required to facilitate and receive this growth.

#### High-level Objectives

The first High-level Objective on page 26 refers to continuing on ‘a path of economic, environmental and social progress’, yet the EPA’s 2016 report on the State of Ireland’s Environment, which is summarised in the Environmental Report for Ireland 2040 (Table 5.2), notes that many of Ireland’s persistent environmental problems are ‘rooted in unsustainable consumption and production patterns’.

The second High-level Objective includes improving environmental performance, yet this is positioned secondary to capitalising on our unique assets and improving economic output. There is significant need to improve environmental performance in areas such as biodiversity and habitat condition, how we deal with our waste, reducing greenhouse gas emissions, improving water quality, better management of our soils and protection of our landscape. This is clear from Table 5.2 referred to above.

The fourth and final High-level Objective is to ‘Put in place a strategy for the sustainable development of places in Ireland’. This has the potential to embed wise use of natural resources at a high level in the National Planning Framework, but as currently worded it is simply too vague. It should explicitly refer to Ireland’s physical, social, economic and environmental resources.

#### Ireland 2040 Vision

The Ireland 2040 Vision includes many welcome statements, such as the ‘The highest possible quality of life for our people and communities, underpinned by high quality, well managed built and natural environments.’ And ‘To be the most successful, advanced, competitive and environmentally sustainable economy and society in Europe.’

However achievement of the Vision is contingent on addressing the key environmental challenges identified by the EPA listed on page 7 of the Environmental Report. To these Mountaineering Ireland would add ‘The protection of Ireland’s cherished natural landscapes’.

Although the Sustainable Management of Water and other Environmental Resources is included as one of the targeted national strategic outcomes (p.125), it is followed by ‘Ireland has abundant natural and environmental resources’. This statement should be amended to reflect the fact that Ireland’s natural and environmental resources are not in infinite supply, that they are subject to increasing pressure and that many of these resources are irreplaceable. In addition to water other natural resources and Natural Capital should be included here. It is Mountaineering Ireland’s position that the Sustainable Management of Water and other Environmental Resources is critical and that other aspects of the plan should be focused towards this key outcome.

Mountaineering Ireland’s concern is that the Key elements of Ireland 2040, the High-level Objectives and the Vision statements all fail to accept that our well-being and prosperity are entirely dependent on Ireland’s natural environment. While there are many positive statements in the draft plan,

without clear objectives and measurable targets these aspirations will be over-ridden by the drive for growth.

#### **4. The role of outdoor recreation**

Mountaineering Ireland welcomes the reference (p.71) to ‘The maintenance of access to our landscapes and the creation of new accesses’. This is vital not just for tourism for but also for the health and well-being of Irish citizens.

Mountaineering Ireland acknowledges and respects the fact that there is no legal right of entry to land in Ireland for recreation, and that the majority of landowners have traditionally allowed access, particularly in upland areas. However, 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.

Although the current government has significantly increased capital investment in infrastructure to support activity tourism and recreation, there is no current national outdoor recreation strategy to guide this investment. With an integrated approach and strategic investment, the outdoor recreation sector has potential to deliver improvements to health and well-being, while also protecting the natural resource base that all of this activity is dependent upon. The development of an Outdoor Recreation Strategy should be included as an action within the National Planning Framework.

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.

National Policy Objective 21, which deals with development of the agri-food sector, is qualified by the phrase ‘while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage which are vital to rural tourism’, it is Mountaineering Ireland’s assertion that this commitment should be much stronger, with the wording changed to *‘emphasising the necessity of maintaining and protecting the natural landscape and built heritage which are vital to outdoor recreation and rural tourism’*

Mountaineering Ireland welcomes the acknowledgement of how natural assets and landscapes such as the uplands (and lakelands) stretch along the border, contributing to Ireland and Northern Ireland’s shared heritage (p.105). The scope for cross-Border trail linkages is rightly identified; Mountaineering Ireland draws attention to the International Appalachian Trail, and its potential to contribute to National Policy Objective 51 (the coordination and promotion of all-island tourism initiatives).

However there is also need to be mindful of the management challenges currently being experienced on Cuilcagh Mountain, the high point of the border between Counties Cavan and Fermanagh. Investment in recreation infrastructure should be decided based on strategic need, underpinned by national standards, with maintenance arrangements and a management plan in place, and crucially trails must be appropriately sited. This links back into the need for a new National Outdoor Recreation Strategy to guide the development of this important sector.

Mountaineering Ireland welcomes the ‘review of the overall management of the development potential of State lands to support implementation of Ireland 2040’ (Key Element 5). While Coillte and the National Parks & Wildlife Service operate an open access policy for pedestrian users, there is no legal right of access to State-owned land for sport and recreation, other than on land owned by Waterways Ireland. In the matter of public access to land, the State should show leadership by enshrining a right of public access to publicly-owned land for responsible recreation. This is an important dimension of the access issue and a policy issue which Mountaineering Ireland believes should be addressed in the review of the management of State lands.

## **5. Landscape protection**

Mountaineering Ireland welcomes National Policy Objective 13 which shows a clear commitment to protecting Ireland’s landscapes (‘Protect and promote the quality, character and distinctiveness of the Irish landscape, the sense of place and culture that make Ireland’s rural areas authentic and attractive as places to live, work and visit’) and the strong statement on page 118 about the value of Ireland’s landscapes and the duty to future generations to use these assets responsibly.

The sustainable management of Ireland’s natural resources, and the protection of our landscapes, necessitate a better balance between individual interest and the common good. This does not appear to be embraced in the draft National Planning Framework.

The commitment to protect Ireland’s landscapes would be enhanced by adding an ancillary objective to National Policy Objective 59, to do with the National Landscape Character Assessment (which Mountaineering Ireland understands to be imminent) and the further implementation of the National Landscape Strategy.

## **6. Meeting future energy needs**

In general the draft National Framework Plan seems overly focused on energy generation, with little emphasis on reducing energy consumption, increasing energy usage awareness and improving energy efficiency. For example, there is reference in Key Element 4 to ‘our country’s prodigious renewable energy potential’(p.9). All renewable energy generation comes at a cost. As highlighted by Professor Anthony Trewavas in Scotland, the renewable energy sector draws heavily on non-renewable natural resources and ultimately comes at a high cost with benefits to very few people (Trewavas, 2015).

Key Element 4 also refers to electrification of our mobility systems, yet no there is reference to improving public transport, which would reduce our high dependence on private transport.

Mountaineering Ireland believes that a national focus on reducing energy consumption, coupled with a diversity of renewable sources, particularly solar electricity, tidal energy, off-shore windfarms and supported, community-scale schemes that deliver power directly, provide a more effective approach to meeting future energy needs. Grid developments, improved electricity storage, electric vehicles and other technological developments will all allow greater benefit to be harvested from Ireland's existing energy infrastructure.

Page 113 mentions that the development of the Wind Energy Guidelines and the Renewable Electricity Plan will be prioritised to facilitate informed decision-making in onshore renewable infrastructure, yet there is no timeline for delivery of these overdue policies. These are essential to determining what are 'appropriate locations' for renewable energy generation as required under National Policy Objective 57.

## **7. Addressing rural decline**

Mountaineering Ireland welcomes the commitment in the draft National Planning Framework to addressing rural decline, preventing sprawl and using under-utilised land in small towns and villages.

It is also welcome to see reference to the essential role of broadband in affording rural communities equality of opportunity with towns and cities. The inclusion of a timeline for delivery of the National Broadband Plan would strengthen this commitment.

Research by the Irish Uplands Forum amongst upland community groups found a great commitment to addressing local challenges and a capacity to develop innovative solutions. Local distinctiveness is also an advantage (Hill, 2016). With appropriate support measure these attributes provide opportunities for continued vitality within upland communities.

## **8. Legislative status**

Mountaineering Ireland welcomes both the fact that the National Planning Framework will have legislative support (unlike the National Spatial Strategy), and the creation of the Office of Planning Regulator, however the Regulator must have enforcement powers, not just responsibility for monitoring.

## **9. Timing**

Mountaineering Ireland is concerned that the timeline of December 2017 for finalisation of the National Planning Framework (shown in the Governance Roadmap on pages 10-11) is unrealistically tight and will not allow for proper consideration of the responses to this consultation process. This should be extended into early 2018.

## **10. Conclusions**

Mountaineering Ireland's primary concern is that Ireland's mountains and upland areas, which are defining features in our landscape and vital natural assets, are not recognised in the draft National Planning Framework. This significant omission must be addressed.

Mountaineering Ireland is also concerned is that the Key elements of Ireland 2040, the High-level Objectives and the Vision statements all fail to accept that our well-being and prosperity are entirely dependent on Ireland's natural environment. The continued depletion of Ireland's finite stock of natural capital will undermine the opportunities and quality of life of future generations.

While there are very many positive statements in the draft plan, without more clear objectives and measurable targets these aspirations will be over-ridden in the drive for growth.

Mountaineering Ireland trusts that you will take these views into consideration in the finalisation of the National Planning Framework.

## **11. 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.

[REDACTED]

[REDACTED]

Website: [www.mountaineering.ie](http://www.mountaineering.ie)

10<sup>th</sup> November 2017

## **12. References**

DECLG (2012) *Reform of the water sector in Ireland - Position Paper*, published January 2012 by the department of Environment, Community & Local Government, available online:

<http://www.housing.gov.ie/sites/default/files/migrated-files/en/Publications/Environment/Water/FileDownLoad%2C29192%2Cen.pdf>.

Egan, P. (2014) Figures based on GIS analysis for the island of Ireland (unpublished)

Hill, A. (May 2016) *Upland Communities Study*, published by the Irish Uplands Forum, available online: <http://irishuplandsforum.org/wp-content/uploads/2016/10/Irish-Uplands-Communities-Study-2016-FINAL.pdf>

Trewavas, Anthony, *Renewables Drain Our Resources*, published 13<sup>th</sup> January 2015 in The Scotsman <http://www.scotsman.com/news/comment-renewables-drain-our-resources-1-3659067>.