

A National Landscape Strategy for Ireland – UCC Submission

University College Cork welcomes the publication of the Issues Paper and supports the establishment of a National Landscape Strategy for Ireland.

UCC is in a good position to contribute to the establishment of a workable and robust approach to landscape at strategic and local levels in Ireland. The University is developing a strong pedigree in landscape-related teaching, practice and research. Among our long-standing relevant subject areas are cultural and physical geography, archaeological and historical landscapes, remote sensing and geographical Information systems, environmental law, energy and environmental engineering, coastal and marine research, built environment, ecological sciences / biodiversity and many related fields.

These are all complemented by a professionally accredited planning school which includes landscape character assessment, urban design and strategic spatial planning among its areas of interest.

The observations made in these pages are intended to support the Department of Arts, Heritage and the Gaeltacht as it takes the next steps, with others, in finalising the Strategy. It is hoped that this submission, based on the advice and experience of the various fields of expertise within UCC, will - in the coming years – help in rolling out the various actions and policy steps set out in the Strategy.

In this supportive spirit, we suggest that the final document would in particular tease out and address:

- *the need for strong strategic statements to be made about the landscapes of Ireland;*
- *the particular requirements of the planning system and the need for robust decision-making tools in respect of landscape;*
- *the need for high quality research and methodological consistency in baseline studies and landscape assessment work;*
- *the importance of (and opportunities for) cross-disciplinary, training, and teaching at all levels (including CPD and fourth-level education).*

These four main points are developed further in the paragraphs below (pages 2 - 5) and the document concludes with a list of sixteen overall recommendations on pages 6, 7 and 8.

A Strategic focus

UCC would urge the Department to enhance the level of strategic guidance and high level principles contained in the National Landscape Strategy. This would set a solid framework for more fine-grained, nuanced and locally-developed understandings of landscape character to emerge at appropriate scales and in different places in accordance with the approaches set out in the draft.

This would also allow the National Landscape Strategy - from the outset - to be more closely integrated with the growth scenarios of the national spatial strategy, with national energy policy, with the national development plan, with national sustainable development priorities, with the various national commitments under European Directives and with other national policy frameworks (such as tourism, agriculture etc).

- *Special Landscapes*: A good starting point in the draft strategy is the European Landscape Convention principle that all landscapes are important – not just the outstanding or sublime ones – and this allows us to address mundane, everyday and degraded landscapes while seeing the emergence of rich landscape understandings for all sorts of rural and urban places in Ireland. However, for a national strategy, some clear judgements also need to be made in order to manage our landscape assets in a responsible way. While the reluctance to create a hierarchy of landscape importance is understandable, at the very least an indication should be given of those places that need special recognition because of their landscape value at national or regional level (or even international level).

Such an approach, complemented by locally derived landscape character assessments at city and county level, would be consistent with the European Landscape Convention while at the same time creating a degree of synergy with those other national policies which require strategic certainty in decision making.

- *Cities and City regions*: The draft Strategy places a particular emphasis on rural and countryside aspects of landscape and this is quite appropriate as Ireland's assets in this regard are particularly important. However, there is very little mention of the landscape manifestations of *urbanisation* in Ireland: a phenomenon that has been particularly pronounced in recent years. It is felt that the National Landscape Strategy should address this and related issues in a deliberate way.

Specifically, the landscape impacts of an urbanising countryside, sporadic urban sprawl, erosion of Green Belts, the strategic landscape settings of our main city-regions and large towns should be addressed. Within urban areas themselves, the strategy needs to address the very particular landscape importance of urban design, landmarks, cityscapes, streetscapes, and the sustainable re-use of derelict land and brownfield land. For towns, the transition from built up to open areas is a landscape issue as is the physical and cultural relationship between rural villages and their hinterlands.

Landscape and Planning

The intention to implement the Strategy primarily through the planning system is noted and supported: the planning acts and regulations provide a sound framework for decision-making in which there are wide opportunities for public participation and democratic oversight (on what are often contested and complex issues) as well as mechanisms for appeal and judicial review when required.

However, we are also conscious of how certain debates about planning (both here in Ireland and elsewhere) can create special challenges for a subject such as landscape. In finalising the National Landscape Strategy, the Government is well positioned to anticipate and address some of these issues.

For example:

- *'Localism'*. Inputs from local people and local interests are crucial to landscape policy, not least in terms of the knowledge base, the values of landscape, and the practical validation of policy / research findings. However, experience has shown that if too much emphasis is placed on local decision-making and policy development, then some unintended consequences and conflicts could emerge (driven perhaps by NIMBY-ism at one end of the scale and unfettered permissiveness on the other).

Added to this are the phenomenon of 'consultation fatigue', and the often unsatisfactory influences of 'clientelism' and 'brokerage' in decision-making which have already slowed down the integration of landscape character assessment with statutory development plans in some counties. Also, experience with ideologically-driven moves towards localism in planning (e.g. in Britain at the present time) is proving divisive and at odds with the more joined-up approaches of Irish Government policy in recent years.

Note: The definition of landscape from the European Landscape Convention (as enshrined in the Planning and Development (Amendment) Act 2010) is misquoted on page 4 of the draft with the insertion of the word 'local' in the term: "A landscape is an area, as perceived by local people..".

This formulation, it is felt, together with some of the other wording of the draft document may place an unintended - though inappropriate - burden on communities. These in turn could lead to various planning conflicts and difficulties at the local scale which could certainly be offset to a large degree by the way the final Landscape Strategy is worded.

- *'Planning at the Landscape Scale'*. In many cases the functional areas of planning authorities and their boundaries are not the most appropriate ones for bringing forward robust landscape policies. For example, even though the dynamics and the integrated planning requirements of coastal zones (ICZM), major river basins (WFD) and estuaries have been well understood for more than two decades now, there is as yet little evidence of true integration in decision-making, evidence gathering and policy development in Ireland. Similar issues arise in areas with extensive uplands, habitats, or city-regions that straddle

various jurisdictional boundaries and the emerging field of marine spatial planning (MSP) adds further layers of complexity. Landscape considerations at these levels can be crucial ones (e.g. in cases of near-offshore wind energy projects, aquaculture, large scale afforestation or in the management of urban sprawl) and the emerging landscape Strategy is well placed to address them strategically. Cross boundary co-operation of this kind may develop over time in a natural way, but it is felt that Government should identify the most important of these collaborations from the outset (as it did in terms of joint retail strategies for example).

- Decisions about proper planning and sustainable development. The draft document, quite rightly, highlights the importance of developing more sophisticated understandings of landscape in order to make more well-informed and creative decisions about landscape change. Whilst in many circumstances, these new understandings may lead to a less cautious interpretation of the carrying capacity of certain landscapes to accommodate development and change (the overall visual impact of new houses in a particular rural area, for example) there may well be other circumstances in which that carrying capacity has already been reached or exceeded. For the Strategy to be implemented successfully through the planning system then, decision-makers (at planning authority level or An Bord Pleanála level) should be free to take either a permissive approach - or a restrictive one - in any particular case depending on best practice, a sound research base and proper assessment of landscape character and sensitivity.

In this context it is felt that the apparent presumption against the “extension of... planning control into areas outside the remit of existing legislation” (page 5) seems to prejudge the outcome of the proposed processes, suggesting (perhaps unintentionally) that changes to landscape policy will favour only the relaxation of restrictions.

- Views and Prospects / Areas of natural Beauty. Planning Authorities are already charged with certain statutory obligations in relation to landscape including the development of policy objectives for the ‘preservation of views and prospects’ and the ‘preservation... of the amenities of places and features of natural beauty or interest’. This in particular places a very high weighting on visual / aesthetic considerations which can often become divisive landscape issues in planning appeals and in the development of policy. The skills that are required to make judgements of this kind can be complicated and – as with many areas of planning practice – they are often subject to political pressure of various kinds.

It is felt that the Landscape Strategy should recognise more explicitly the importance of visual issues, especially as they are the ones most often characterised as ‘softer’ and more ‘subjective’ ones. Also, many of the non-visual landscape issues (such as the protection of habitats, the management of national monuments, water quality and environmental emissions etc) already have much stronger legal instruments to support planning and management. It is also important to include clear definitions of the terms ‘preservation’, ‘protection’ and ‘conservation’ so as to give some certainty for communities and others about the effects of the different policies as they emerge through the National Landscape Strategy.

An emphasis on quality

The emphasis on research and the development of robust data from a wide variety of sources is welcome. The various specialist layers of information, including the Landscape Observatory, that contribute to a thorough understanding of landscapes will form the basis for better informed decision making. Methodologies for gathering, capturing, recording and sharing of this information should be consistent, objective and based on the best available technologies and international best practice. The universities can play an important, independent role in ensuring high levels of quality control of this work.

This becomes especially important where landscape character assessments are carried out by many different companies and consultants on behalf of different authorities, especially when the issues such as landscape values are being articulated and where the sensitivities of different places to change is being assessed. Strong mechanisms for oversight and quality control are recommended to ensure the consistency and finely-judged level assessment that our landscapes require.

Research, raising awareness and Education

Landscape offers a particularly important platform for cross disciplinary research, teaching and training. It is by stepping out of traditional disciplinary boundaries that more meaningful understandings can emerge. For example, researchers and specialists investigating historic place names, biodiversity, renewable energy, food security, environmental legislation, coastal processes or community understandings of place and heritage may not often collaborate in their day to day work. The National Landscape Strategy though, and its implementation through the planning system, offers powerful outlets for their work so that it can have a genuine impacts on public policy and imaginative decision-making.

The universities, especially those with planning schools, can play a particularly useful role in co-ordinating this research effort and in providing the training and education required to support the strategy. In our recommendations we highlight the particular need for councillor education which can be provided perhaps at provincial level.

Also, in regard to the cross disciplinary research needed to support the National Landscape Strategy, the priorities of the Research Councils – especially IRCHSS and IRCSET – should be aligned to those of the Strategy with an emphasis on how evidence and research from different specialist areas feeds into our decision-making arenas.

RECOMMENDATIONS

Based on the points raised above, the following recommendations for the National Landscape Strategy (NLS) are offered:

- 1. The National Landscape Strategy should specify a range of special landscapes that in strategic terms are highly valued at International, National and Regional level. For more mundane and everyday landscapes, appropriate management and planning requirements should be derived from landscape character assessment –including local consultation - at city and county level. This is consistent with the principles of the European Landscape Convention and ensures that all landscapes are included at the appropriate strategic level.*
- 2. The National Landscape Strategy should address the existing challenges posed by territorial and jurisdictional overlaps (between city councils, town councils, county councils, and state authorities dealing with the foreshore, emissions to air and water etc.) especially in relation to coastal zones, major river basins, upland masses, national monuments and marine environments. It is felt that landscape is particularly vulnerable to uncertainty or lack of integration in this regard; the Strategy is well placed to anticipate these difficulties.*
- 3. The National Landscape Strategy should specify those planning authorities which should work collaboratively on landscape character assessment with a clear statement in each case about which cross-boundary landscape issues need to be addressed. (Example: Clare County Council and Galway County Council to produce a joint landscape character assessment which would include cross boundary issues, inter-visibility issues and coastal zone issues associated with Galway Bay and the Aran Islands).*
- 4. The National Landscape Strategy should incorporate strong and clear statements of principle about urban and suburban landscapes as well as their character. These statements should go beyond issues of urban green space and water quality (as mentioned in the draft). They should address urbanisation pressures on the countryside, the character of the urban/ rural fringe , urban design principles, characteristic cityscapes and streetscapes, urban legibility, , and the re-use / improvement of brown field and derelict urban land as specific landscape objectives at national level.*
- 5. The National Landscape Strategy should specify which cities, large towns and metropolitan areas require a specific landscape character assessment that would address urban sprawl, the retention of urban green belts, and the maintenance of a character distinction between built up areas and the countryside. (Example: Cork City and County councils to prepare a joint landscape character assessment of Metropolitan Cork addressing the city-region landscape, the harbour and its landscape setting, and the metropolitan green belt). The Strategy should acknowledge the role that a vibrant network of cities, towns and villages complemented by a thriving and productive countryside plays in maintaining and cherishing our urban and rural landscape resources.*
- 6. The National Landscape Strategy should specify those planning authorities which, by reason of their size and location, are not required to carry out an independent landscape character assessment but which, instead, in carrying out their planning functions are required to be*

consistent with the landscape policies of the relevant county or regional authority. This recommendation relates primarily to Town Council areas (for example, planning practice in the Castleblayney Town Council area would be governed by the County Monaghan landscape policy) and ensures consistency and clarity at the county level.

- 7. The National Landscape Strategy should give an enhanced and more clearly stated priority to the visual and aesthetic aspects of landscape. It should recognise in particular that many other elements of landscape are governed by existing legislative frameworks that are already quite robust (e.g. the protection of habitats, the preservation of national monuments, the quality of emissions to air and water etc.) while as a result the visual and cultural components are relatively unsupported by legal instruments. The Strategy should formally address this imbalance.*
- 8. The National Landscape Strategy should avoid placing undue burdens and expectations on local communities to develop landscape policy and to resolve planning conflicts relating to landscape in their local areas. While continuing to recognise the value of local participation, consultation and validation in the assessment of landscape character, the Strategy should instead promote clear, strategic decision-making on landscape issues based on consistent principles developed at wider national, regional and sub-regional levels.*
- 9. The National Landscape Strategy should promote - and in turn be supported by – IRCHSS, IRCSET and other government research initiatives specifically set up to address landscape, landscape character assessment and the integration of landscape with planning practice in the public domain. This is consistent with a number of government priorities not least the recent commitments to evidence-based policy in planning and other public sector fields.*
- 10. The National Landscape Strategy should facilitate balanced and appropriate decisions to be made on landscape issues in individual policy and development management cases. Planning Authorities and An Bord Pleanála should be free to advocate either a more relaxed approach to planning controls or a more strict one depending on the particular circumstances, taking into account the enhanced baseline research data and the richer levels of understanding about sensitivity and carrying capacity that will emerge from the new policy framework. The implied presumption against stronger planning controls in all cases (page 5 of the draft) is not recommended.*
- 11. The National Landscape Strategy, in entrusting its implementation primarily to the statutory planning process, should recognise in more clear terms the existing obligations of planning authorities in relation to landscape. This includes the statutory requirement to develop objectives for the ‘preservation of views and prospects’ and the ‘preservation... of the amenities of places and features of natural beauty or interest’. Clarity is required about how this complements the approaches to landscape character advocated in the Strategy. In this regard, it is also recommended that clear and binding definitions of the terms ‘preservation’, ‘protection’ and ‘conservation’ - all based on best-practice understandings – be included in the Strategy.*

12. *The National Landscape Strategy should continue to advocate education, skills transfer, CPD, and training in respect of landscape among a wide range of participants and stakeholders; there is a substantial capacity within the University sector to deliver this at regional or provincial level. The issue of councillor education is also particularly relevant as policy making (including the statutory adoption of landscape strategies as part of development plans) remains a reserved function of elected local representatives. Support for cross-disciplinary masters education in the subject of landscape is also recommended.*
13. *The National Landscape Strategy should recognise that the articulation of landscape values and the sensitivity of landscapes to different kinds of potential change involve the exercising of high level skills and finely-tuned judgement. Inconsistencies could emerge when this work is assigned to different consultancies and individuals in different places. Therefore the Strategy should include provisions for ensuring integrity in this work across the country. There is a special role for independent agencies such as the university sector to support this oversight and quality control requirement.*
14. *The National Landscape Strategy should continue to advocate the gathering of a wide range of data, in accordance with the highest methodological standards to be recorded in consistent depositories and formats and available widely for analysis, verification and modelling through appropriate methods. Appropriate provision should be made at national level to support this systematic work in communities, public authorities and research bodies. This will contribute to more robust decision making and the development of more transparent policy frameworks.*
15. *The National Landscape Strategy should make some strategic statements about the landscape context of the entire island of Ireland, its coastal areas, its natural harbours and its territorial seas. In this regard the recent attempts at integration between the National Spatial Strategy and the Northern Ireland Regional Development Framework are a useful precedent for such an approach and strategic landscape policy should follow a similar approach. The landscape implications of Marine Spatial Planning (MSP) as an emerging policy field at European level should also be taken account.*
16. *The National Landscape Strategy should recognise the capacity of the university sector – particularly those with the appropriate mix of disciplinary specialisms – to support the development of the National Landscape Strategy and to guide its implementation. They offer valuable and unique settings for cross disciplinary insights into landscape research and scholarship to emerge. The National Landscape Strategy and its implementation through our statutory planning system is an important real-world and practical outlet for this rich resource of expertise to play its part.*