
BirdWatch Ireland welcomes the opportunity to comment on the Draft Landscape Strategy. Ireland’s biodiversity is facing substantial threats, as evidenced by declining populations of many bird species and the loss in extent and quality of many habitats in Ireland’s landscapes. The Overall Target of Ireland’s National Biodiversity Plan is “that biodiversity loss and degradation of ecosystems are reduced by 2016 and progress is made towards substantial recovery by 2020”.

Section 1: Dealing with the importance of landscape from BWI’s perspective.

Birds are often our most familiar link to the natural world and provide a lot of enjoyment. Birds come in many forms but are instantly recognisable and relatively easy to see, adding to their appeal. Irish culture is full of bird references and many of the Irish names for birds hark back to our historically strong link to the environment. These grounds alone should be reason enough to protect Irish birds but birds are also important indicator species. They are utilised in this role in many countries throughout the world to provide an indication of the health of ecosystems, habitats, species and biodiversity (the canary in the coalmine!). They can signal changes in landscapes and seascapes and highlight the impacts that different pressures have on the environment we live in. From an economic point of view, birds can be utilised as early warning systems for the degradation or loss of ecosystem services. These ecosystem services make a significant contribution to the national economy and are vitally important for our health and well being.

BirdWatch Ireland has a vested interest in the protection of Ireland's landscape and to this end has produced a series Group Action Plans (GAPs) to allow for a coordinated approach to protecting many species at once and complement an ecosystem approach to conservation. These Group Action Plans cover most aspects of Ireland's landscape with action plans produced for the following:

- Upland Birds in Ireland
- Dune and Machair Birds
- Lake Fen and Turlough Birds
- Urban and Suburban Birds
- Shore and lagoon Birds
- Woodland and Scrub Birds
- Lowland Farmland Birds
- Riparian Birds
- Raised bog Birds
- Marine and Sea Cliff Birds

The Landscape Strategy 2014 offers an opportunity to address many issues threatening biodiversity in the wider Irish countryside. It is essential that Ireland maximises this opportunity to deliver on national and international commitments to halt the loss of biodiversity. We have endeavoured to follow the format of the Strategy in addressing some of our concerns.

Section 2: Addressing specific issues within the strategy

Strategy aims

The Draft Strategy recognises the Irish landscape, "from city and town centres, to countryside, islands and territorial waters, with its many dimensions, multiple uses and ever-changing dynamics." As a consequence BirdWatch Ireland is concerned at the lack of inclusion of the Marine Institute in the list of Stakeholders as they, along with the Department of Agriculture, Food and Marine, should be involved in the mapping and characterisation of the seabed as a marine underwater landscape.

Fishing activities, such as bottom dredging and trawling, are recognised as to causing significant negative impacts on the marine environment (Jackson et al. 2001). As seafloor landscapes physically and structurally contributing to marine productivity and natural functionality, effective conservation measures (include creation of Marine Protected Areas) are needed and will ensure the long-term viability of marine ecosystems. All relevant stakeholders should be involved. The contribution of our marine landscape goes well beyond sustaining fishing, with populations of seabirds, seals, cetaceans and other marine life also dependant on a healthy and functioning marine ecosystem. Landscape characterisation of the seabed would go hand in hand with current monitoring projects and proposed measures such as an ecologically coherent network of Marine Protected Areas. MPAs should be a priority as part of a wider programme of measures to help preserve seabed habitats and protect the integrity of marine ecosystems in the long-term. Furthermore, this strategy should be link with measures currently being implemented under both the Common Fisheries Policy (CFP) and the Marine Strategy Framework Directive (MSFD) to ensure the long-term preservation and

conservation of Ireland’s marine intertidal and subtidal landscapes. These in turn would support our "green image", which is of particular importance to our tourism sector, as a destination for sporting activities such as scuba-diving sailing and birdwatching etc.

We believe there should be some additional terrestrial biodiversity representation on the Steering Committee to take into account the huge variety of habitats that form our landscape.

**Landscape policy statement**

The third objective of the draft National Landscape Strategy in relation to providing a policy framework does not list "transport" under the examples of sectoral areas. Although this may be felt to be implicit, BirdWatch Ireland feels it should be stated. Funding for implementation of the strategy has yet to be identified yet funding is readily available and is being used for developing national infrastructure projects which includes transport, energy etc.

**Context and Overview of Strategy**

There is some confusion in relation to the term "Information directives" on P5 last paragraph. Perhaps this could be rephrased?

1. **Recognise Landscape in Law.**

A thorough assessment of landscape protection requirements, both currently and in to the future, should form part of this stage.

2. **Develop a National Landscape Character Assessment.**

**Action 2** - Article 5 of the EU Biodiversity Strategy calls on all member states to map and assess the state of ecosystems and their services (MAES) in their national territory by 2014. Further information on this ongoing process and how it will feed in to the Landscape Strategy should be included. For example Wales has completed this work.

The North Western Waters Atlas produced by the Marine Institute is an excellent source of information and knowledge of the subtidal habitats around Ireland, although the outputs of some of this mapping will need to be ground-truthed. This work should be used to help inform spatial planning and decisions for the siting of coastal development including aquaculture and renewables and making the connection between the management of the sea and the land ever more effective.

We would like to highlight the benefit of an integrated online web-based platform that will include this map, along with maps detailing other key biodiversity features, such as BirdWatch Ireland’s Bird Sensitivity mapping tool for wind energy developments.

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3. Develop Landscape policies

We strongly believe there should be more reference within the document to landscape design and planning. This is important in the context of large-scale land management both within state holdings (e.g. Coillte or Bord na Mona) and also privately-owned land. Both these could be very important not just for landscape, but also for biodiversity (e.g. Curlew).

We have concerns with lack of specific comments on issues such as;

- Roll out of renewables
- Turf-cutting
- Forestry

**Action 5** - Will the each government department’s specific landscape policy plans be open for public consultation?

**Action 6** - Will the ‘State of the Landscape’ reports include changes in habitats and land ownership? How often will these reports be issued? The current draft plan refers to "Periodic reports" but we believe that a specific number or frequency should be required.

4. Increase Awareness

Increased public awareness should be generated of the activities that affect our landscape and biodiversity e.g. land drainage and removal of landscape features e.g. scrub; unsustainable intensification of grasslands; new roads and buildings, farmland and fragmenting landscapes; cables, overhead wires and other structures posing risks of collision for birds, etc.

5. Identify education, research and training needs.

The identification of best practises should not be restricted to the EU, as there may be better examples in other parts of world.

6. Co-ordination of Actions

The Draft Strategy covers a ten year period from 2014-2024, however, no timescales are provided for implementation of the 19 key actions. It would be preferable to see proposed timescale in the final document.

There should be a strong emphasis on co-ordination with other government policies (e.g. National Biodiversity strategy) or local policy (e.g. Country Development, Heritage or Biodiversity Plans).