Dear Sir/Madam,

The Irish Peatland Conservation Council (IPCC) would like to welcome the creation of the Draft National Landscape Strategy. IPCC would like to make a number of observations relevant to the strategy in follow up to our previous submission of the 17th November 2011.

The importance of Peatlands within the Irish Landscape

Peatlands currently cover 268,385 hectares (ha) of Irish land (Malone & O’Connell 2009) and the bog and fen landscapes are synonymous with the traditional image of Ireland.

Given peat soils cover 20.6% of the national land area (Renou-Wilson et al. 2011) our bogs and fens must be viewed as a key component in the make up of the Irish landscape. Note however that peatland habitat once covered approximately 1.2 million ha of our countryside (Hammond 1979). Widespread exploitation through peat extraction, afforestation, agricultural reclamation and development has left us with only 22% of our original peatlands remaining.

We are at a critical stage of peatland conservation and this new strategy must incorporate means of ensuring that this rare habitat remains as a distinctive part of our heritage.

Ecosystem Services

Peatlands are a unique landscape and support a unique biodiversity. They also provide us with a wide range of ecosystem services. These must be highlighted to encourage national pride in what is a traditionally Irish landscape.

**Habitat Biodiversity:** Ireland contains over 50% of all raised bog habitat remaining in Western Europe. Internationally the blanket bogs of Ireland and the UK form the single largest contribution (10-15%) of this habitat in the world.

**Species Biodiversity:** 49% of all endangered birds in Ireland occur on peatlands, most as breeding species. 23% of all endangered plants are peatland species and 26% of our mammals depend on peatlands in some phase of their lifecycle.

**Social and Economic:** Peatlands have played an important role in the economies and identity of rural areas. Peatlands support many functions and activities such as agriculture and tourism and they are used as a source of fuel and horticultural peat.

**Tourism:** Peatland landscapes offer one of the few remaining areas of wilderness experience in Ireland today. Five of our six National Parks are made up principally of peatland while a large number of peatland sites boast walking/hiking routes that attract visitors from home and abroad.

**Archaeology:** Peatlands are one of the key gateways into Ireland’s past. Because of the anaerobic conditions within peatland systems they have preserved artifacts and information on past environments and offer a gateway to explore the changing landscape of the country. To date 3,893 archaeological sites have been recorded within peatlands and the National Museum has over 3,000 artifacts catalogued in their collection, which were found on peatlands.

Additionally peatlands provide ecosystem services through water regulation, carbon storage and as a research and education resource.

8th August 2014
The need for adequate stakeholder involvement

In our previous submission IPCC highlighted the need for joined up thinking between the various stakeholders in Irish Government. We would commend the set up of the National Landscape Steering Group. IPCC would urge that this work be continued into the future by the set up of a National Landscape Implementation Group. This could work in a similar way to the proposed Peatland Strategy Implementation Group that was set up by your own Department. IPCC would like to see the addition of the Department of Communications, Energy and Natural Resources to such a group as they are omitted from the Steering Group. As you are probably aware the DCENR are currently putting together a National Policy on Renewable Energy and IPCC are looking at adopting a landscape based approach to some of the zoning of land. In addition to the fact that they closely work with Coillte and Bord na Móna, 2 significant landowners, would lead us to urge for their inclusion. I also note the absence of any NGO on the Steering Group with the exception of An Taisce. IPCC would request that the environmental sector be given more of a say in the implementation of the plan going forward. This could be done either through inviting individual organisations to be on the group or by allocating a place to the Irish Environmental Network or the Environmental Pillar.

Key Peatland Landowners

NPWS sites

NPWS are currently in ownership of 41,339 ha of peatlands across Ireland. The majority of these make up parts of sites, which have been designated Special Areas of Conservation (SACs) or Natural Heritage Areas (NHAs). There is a need for these sites to be properly managed in order to ensure their longevity within the Irish landscape. This can be achieved through the production of management plans. While these are needed on an individual site basis the National Landscape Strategy has the potential to set out a broad overview of what is required over the coming years, ideally the restoration and conservation of these protected sites, as well as act as a driver behind getting the production of such management plans underway.

Bord na Móna Sites

Bord na Móna own in total 86,878 hectares of peatlands. Of this 5,302 ha is Raised Bog, 7,383 ha is blanket bog and 74,193ha is industrial cutaway. Overall this equates to just over 1.2% of the total area of Ireland and 8% of peatlands that are owned by one company. The future of this significant portion of land must be factored into the National Landscape Strategy as we are coming to an end of peat production in the country in the next 20 years and decisions must be made on the future of these landscapes. In this regard I would urge for liaison with Bord na Móna as a key part of the development of this strategy. Two recent publications are key in this regard; The Bord na Móna Biodiversity Action Plan and the Strategic Framework for the Future Use of Peatlands, both of which deal with future prospects for Bord na Móna sites. These range from tourism to wind farms to the creation of biodiversity areas. Potential uses for these sites must be taken in the context of the wider landscape and the influence that any development might have on the amenity value of the area taken into account.

Coillte Sites

A number of key decisions will also revolve around what is down with land in the ownership of Coillte. According to the Department of Agriculture, Fisheries and Food in 2010* Coillte managed 442,481 hectares of land or circa 7% of the land of Ireland. Of this over half, 232,509ha, are peatlands (Renou-Wilson et al. 2011). Of this 31,725ha is raised bog habitat, 188,334ha is blanket bog and 12,450ha is industrial cutaway. Clearly Coillte have a significant role to play in shaping the future landscape of the country. This document provides a good opportunity to create guidelines for what this land should be used for going forward.

IPCC would commend the work that is being done by Coillte in restoring bog habitat under their novel EU Life+ projects. From 2002 work was carried out on 14 blanket bog SACs covering 1212.3ha (Project ref:LIFE02 NAT/IRL/8490) and from 2004 on 14 raised bogs SACs covering 571ha (Ref:LIFE04 NAT/IE/000121). Between January 2011 and December 2015 work will be carried out on a further 17 raised bog SACs/NHAs around the country (Ref:LIFE09 NAT/IE/000222).

IPCC feel that the National Landscape Strategy should acknowledge the good work being done here in order to raise awareness of the need for peatland restoration and to encourage these practices going forward. The strategy must set out goals that will be key in modeling the landscapes that are to come from future uses.


BOGLAND Report

IPCC would also urge you to incorporate the findings of the BOGLAND project, which was published in May 2011 into the National Landscape Strategy.

BOGLAND is a three-year project (2006 – 2009) carried out by researchers in UCD and financed by the EPA. It is a multi-disciplinary project dealing with peatland mapping, ecology, carbon dynamics, hydrology, peatland threats (extraction, agriculture and forestry), peatland management options and socio-economics. Its main objective is the promotion of the sustainable management of peatlands in Ireland, applying the principal of Sustainable Development. This project will provide a
blueprint for a national peatland policy. See [www.ucd.ie/bogland](http://www.ucd.ie/bogland) for further information and to download the report.

**How do you identify a landscape?**

The National Landscape Strategy must set out a holistic approach to management in order to ensure a sustainable future for Irish Landscapes. This should be led by the Landscape Character Assessment in Ireland, which was carried out by the Heritage Council in 2006. Firstly a classification of the various landscapes of Ireland must be provided. A detailed breakdown of each of these should then be provided. This should include maps as well as descriptions of the natural, cultural and social aspects of each of the areas. For Peatlands this could be broken up into the various Fens, Raised Bogs, Atlantic Blanket Bog, Mountain Blanket Bog, Bog Woodland, and Wet Heath. Collating maps from various sources such as the BOGLAND project, NPWS surveys, Bord na Móna and Coillte would lead to the production of a comprehensive map of the entire country could be drawn up which would prove invaluable for future management.

It must be taken into account however that this would represent natural systems only. To be inclusive the new strategy must incorporate all elements of heritage and give them equal relevance throughout the plan. For example with bogs the natural environment must be coupled with the industrial heritage, turf cutting, habitation, archaeological finds and the social and economic resources of the area. Take for example the Bog of Allen which is the largest complex of raised bog in Ireland, covering 115,080 hectares. The area is synonymous with peatlands and specifically iconic raised bog habitat. While our concentration is on the biodiversity of this area the bogs here are closely linked with employment, culture and the overall mould of the landscape. Such areas need to be preserved and this links encouraged. For example the recent plan to build 660 turbines in this area (currently shelved but not gone) was set to dramatically alter this landscape and IPCC feel that in developing such a landscape the aesthetic, social and cultural ideals of our peatlands were being forgotten. The National Landscape Strategy must realise such issues and address them in the short and long term by outlining a vision for the entire country. It would be ideal to divide the country into similar landscape areas that could be classified according to habitats present. Detailed descriptions on character areas should then be produced providing information on natural, social and economic resources of the area. These should then create a spatial framework against which decisions relating to land management and sustainable development can be made.

**Proposed Actions**

IPCC would welcome the stating of a number of actions that will be used to achieve the goals of the National Landscape Plan. While the actions are admirable IPCC are disappointed to see that there are no timeframes put in place for same. The Plan is due to run from 2014-2024 yet there is no timescale on this. The Plan needs to put this in place to ensure that this actions are realised as opposed to remaining aspirational. We would also like to see a list of those responsible for implementing the actions highlighted adjacent.

**Conclusion**

There is a need for the National Landscape Strategy to promote the protection of biodiversity to ensure the preservation of all of Ireland’s rare habitats which make up our unique landscape. A properly constructed and implemented National Landscape Strategy has the potential to lead to higher tourism value, more sustainable farming, greater levels of water retention and increased appreciation of the carbon storage value of habitats. We need to begin to appreciate our living landscapes in order to ensure their future.

The National Landscape Strategy must shape a vision of a connected, functioning sustainable landscape for people and wildlife.

IPCC welcome the production of the National Landscape Strategy and feel that this is an opportunity to greatly enhance Ireland’s attitude in relation to the importance of our rare habitats, and to put us on track to successfully ensuring their future within our living landscape.

A landscape rich in wildlife is a living landscape.

Is mise le meas,

Tadhg Ó Corcora
Conservation Officer, IPCC

