

# PROTECTING THE IRISH ENVIRONMENT & LANDSCAPE

itjc

**A Critical Issue For Irish Tourism**  
(Position Paper) - August 2014





**This position paper was prepared for ITIC by CHL Consulting Company Ltd.**



**70b Patrick Street  
Dun Laoghaire  
Co Dublin  
Ph: +353 1 2844760  
Email: [mail@chl.ie](mailto:mail@chl.ie)  
[www.chl.ie](http://www.chl.ie)**

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## **SUMMARY AND CONCLUSIONS**

### **1. Introduction**

The purpose of this paper is to highlight the fundamental importance of the Irish environment and landscape to the people of Ireland and Irish tourism. We identify major threats to the environment and the quality of the landscape and propose a number of measures to address these.

There is an extensive body of research extending over several decades which consistently demonstrates the very high premium that tourists place upon Ireland's natural environment and landscape. This premium has important cultural, social and aesthetic dimensions for both Irish residents and tourists. It also has a real and measurable economic value for Ireland and the Irish tourism industry.

Unlike virtually every other economic activity, tourism is entirely dependent on place. It cannot be outsourced and its long-term prospects as a major employer and export industry are very bright. Few, if any, other industries in Ireland can make that claim. We take great risks with this future if we diminish the industry's prospects by allowing other, possibly transient, economic activities, to take over assets that are vital for tourism. Ireland's natural environment, landscape and scenery are at the top of the list of such assets.

### **2. Threats to the Environment**

The tourism industry has identified the following environmental issues as posing potentially serious threats to tourism and to tourism businesses and their employees. This is not a comprehensive list of all possible threats but an identification of a number which are to the forefront for the industry.

- (i) **Landscape:** this is a vital asset which is exposed to irreparable damage from a variety of potential threats. These include wind turbines, electricity cable pylons and telecommunications masts, when such developments are badly sited, as well as poorly planned and located residential and commercial buildings. Much of the paper is devoted to the issue of landscape management and protection, and our recommendations are summarised in paragraph 3 below.

- (ii) **Water pollution**, including contamination of drinking water supplies and pollution of lakes, rivers and coastal waters, which are issues for urgent attention by Irish Water.
- (iii) **Dereliction in towns and villages**, caused by the recession; consideration might be given to incentivising people to live in smaller towns and villages.
- (iv) **Traffic congestion in the main cities, and inadequate provision of parking for tourist coaches**, which are issues for urgent attention by local authorities.
- (v) **Salmon farming**, where any risks should be minimised through very careful and transparent selection of locations for salmon farms, and a more vigorous enforcement of licence conditions.
- (vi) **Litter and waste, notably littering and fly-tipping**, which should be a subject of an intensified campaign of control, law enforcement and public awareness.

### **3. Landscape Protection**

Our overall conclusion is that insufficient attention has been paid to the significance of the Irish landscape as an asset for the people of Ireland and as the most important physical attractor for visitors to Ireland. Notwithstanding the great economic, social and cultural value of our landscape, other considerations have been accorded a much higher priority in planning policies and decisions.

Realisation of the excellent prospects for tourism in Ireland will depend on our success in nurturing and improving the assets on which tourism is based. The Irish people and our scenic landscape are the two prime assets that consistently attract and satisfy tourists, and we damage or diminish them at our peril.



The current marketing strategies of Tourism Ireland and Fáilte Ireland are responding to a growing appetite in our main markets for unspoilt scenery, especially in coastal areas. Projects such as the Wild Atlantic Way, and touring routes such as the Copper Coast and the Causeway Coast, are seeking to capitalise on this demand, and are to the fore in our



brand imagery. The outlook for tourism in Ireland will be bleak if an essential component of this brand – beautiful and unspoilt scenery – is lost. In the case of landscape change, “*what’s done cannot be undone*”<sup>1</sup>, and there is an urgent need to take action now to manage and protect this asset for future generations. The following are ITIC’s policy recommendations on landscape:

- 1) The draft National Landscape Strategy, published by the Dept. of Arts, Heritage & the Gaeltacht, should be finalised as a matter of urgency and its proposed actions implemented promptly in accordance with a defined and monitored programme.
- 2) Particular emphasis in implementing the National Landscape Strategy should be given to the preparation of a National Landscape Character Assessment.
- 3) Following completion of the National Landscape Character Assessment, new and more prescriptive guidelines on local landscape character assessment should be drawn up with a view to achieving consistency among local authorities and State agencies in their preparation and use of such assessments.
- 4) The designation of Areas of Outstanding Natural Beauty (AONB) should be introduced so that areas of high scenic value can receive formal statutory recognition as landscapes of national importance – this would be consistent with the approach in Northern Ireland where there are 9 AONBs.
- 5) Environmental Impact Assessments and Statements should be prepared on a fully independent basis – while the cost should continue to be borne by the promoters of developments, their preparation should be overseen by the appropriate planning authority to whom the agencies or consultancies carrying out the Assessments should report.

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<sup>1</sup> *William Shakespeare: Macbeth, Act 5, Scene 1*

## **1. INTRODUCTION**

It is, perhaps, a truism of tourism that the appearance of a place – its presentation and scenic qualities – strongly influences how it is perceived by tourists. Research tells us that beautiful scenery is at the top of the list of motivations for overseas tourists when they are thinking of selecting Ireland. At the end of their visit, they again single out beautiful scenery as the prime reason to recommend Ireland to others.

The Irish natural environment and its landscapes and seascapes are at the heart of Ireland's promise to tourists, and critical components of their experience when they visit. Landscape is, of course, much more than a tourism asset: it is '*a precious national asset*',<sup>2</sup> for all residents of Ireland. It defines and represents our sense of place, and it is a cornerstone of our identity at national and local levels. The cultural influence of landscape resonates with both residents and tourists.

It is evident that the tourism industry has a vested interest in the conservation and maintenance of Irish landscapes and the quality of the natural environment. There is a recognition within the industry that tourism can impact negatively on the environment and landscape, and the industry is strongly supportive of measures to mitigate or avoid such impacts. Many initiatives have been taken by the tourism industry with regard to environmental quality, including greatly improved energy efficiencies and waste management control, and these are having a very beneficial impact. However, less attention has been paid to landscape as a national rather than local issue.

This paper now sets forward ITIC's position on environmental and landscape protection. We draw on research to highlight the fundamental importance of the Irish environment and landscape to motivating and satisfying our tourists. Major threats to the environment and to landscape quality are identified and we assess the effectiveness of existing protective measures for the landscape. A number of policy recommendations are included in the Summary and Conclusions at the beginning of this paper.

The paper has been prepared with the assistance of CHL Consulting Company and Doyle + O'Troithigh Landscape Architects.

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<sup>2</sup> Dept. of the Environment & Local Government, '*Landscape and Landscape Assessment: Consultation Draft of Guidelines for Planning Authorities*', June 2000.

## **2. THE IMPORTANCE OF ENVIRONMENT AND LANDSCAPE**

Tourism is all about exploring and experiencing places or destinations away from home. While there are many dimensions to any one destination and there may be a wide range of experiences available, the foundation stones of a destination's appeal are its people and its natural and built heritage. In Ireland's case, the findings of successive surveys of visitors over many years have underlined the fundamental importance of these factors.

Although the Irish environment continues to score highly among visitors, it cannot be taken for granted that this will always be the case. Both the natural and built environment have undergone considerable change over recent decades. Threats to the environment have increased rather than diminished and, in the absence of stronger remedial and protective measures, Ireland's primary environmental assets may suffer irredeemable damage.

Residents of a destination can become accustomed to environmental degradation, to the extent that they cease to recognise it as a problem. For visitors, however, it is a once-off experience. If they don't like what they see, they will not return, and will advise others against visiting.

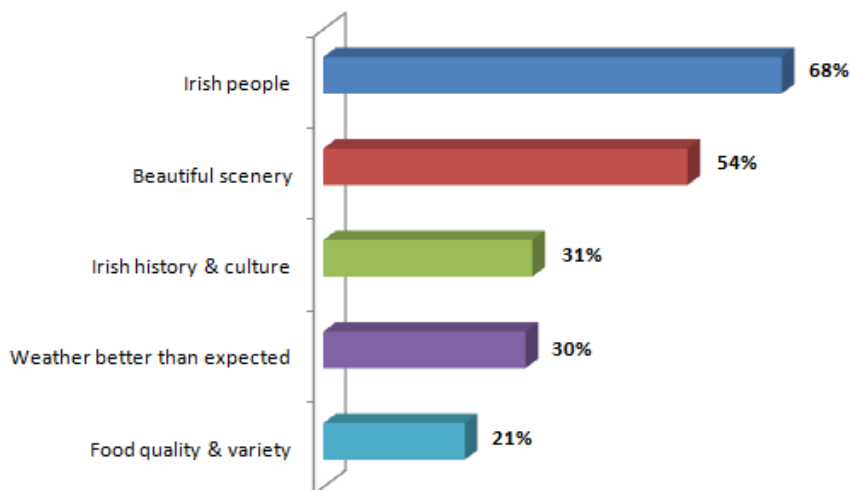
### **2.1 The Tourists' Opinion**

The findings of the latest Visitor Attitudes Survey, which gathered the views of more than 1,500 overseas tourists in 2013, underline the importance of beautiful scenery both in motivating tourists to visit Ireland and in delivering an excellent experience to them. Almost 40% of respondents reported that their experience of Ireland exceeded their expectations, with the remaining 60% stating that their expectations were met. Among those whose holiday exceeded their expectations, beautiful scenery was a leading reason, bettered only by Irish people – see Figure 1 overleaf.

The principal motivating factors for tourists from different markets are listed in Figure 2 overleaf. This shows that environmental factors, notably beautiful scenery, a good range of natural attractions and a natural, unspoilt environment, are indispensable elements of our appeal according to the vast majority of overseas visitors from our main markets.



Figure 1: Reasons why Ireland Exceeded Overseas Tourists' Expectations

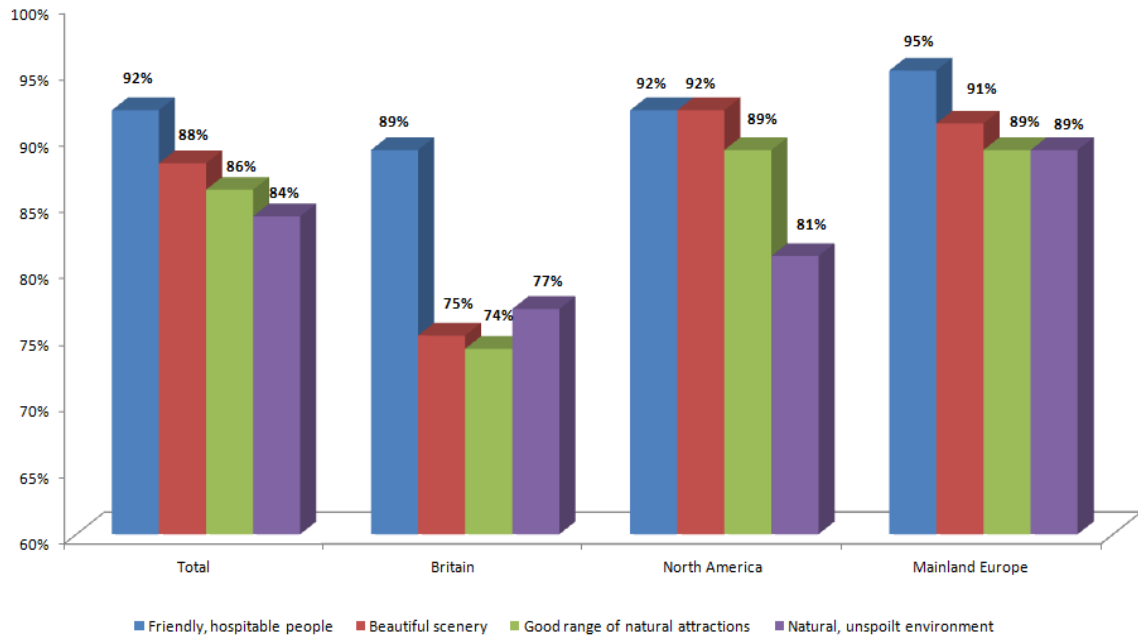


Source: Fáilte Ireland, Visitor Attitudes Survey, Millward Brown, 2013.



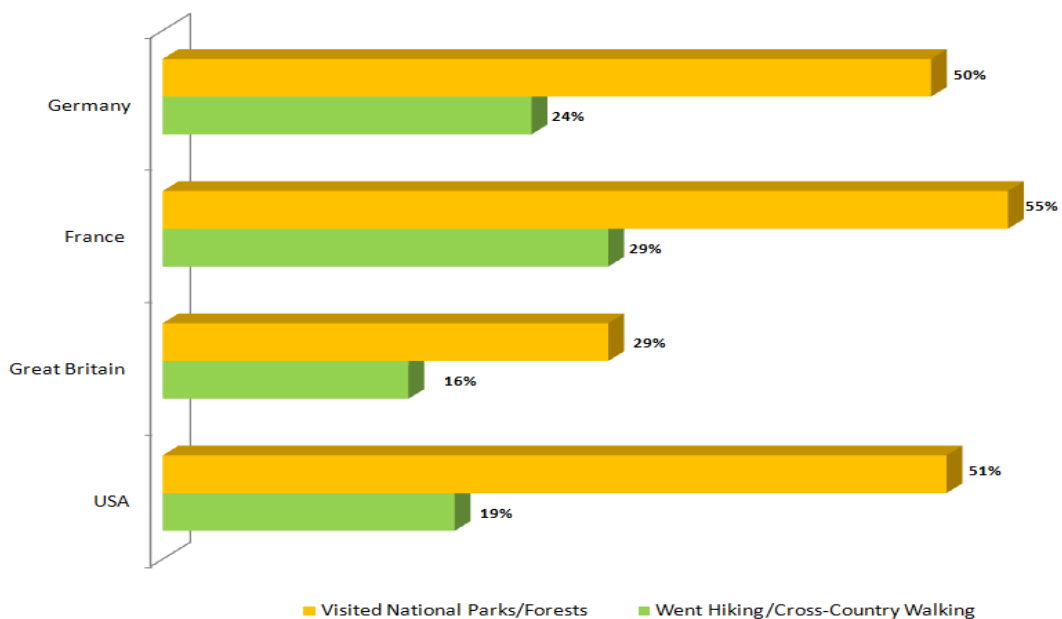
An extensive survey among overseas holidaymakers in 2012 found that, apart from general touring and sightseeing, large proportions engage in activities that are entirely dependent on the quality of the natural environment. Visits to national parks and forests are high on the list of pastimes engaged in by holidaymakers, while hiking and cross-country walking are by far the most popular activities – see Figure 3 overleaf. In 2012, some 578,000 overseas tourists went hiking or cross-country walking; the next most popular activity was golf which attracted 171,000 overseas tourists, less than a third of the number that went walking.

Figure 2: Top 4 Very Important Factors in Considering Ireland for a Holiday



Source: Fáilte Ireland, Visitor Attitudes Survey 2013, Millward Brown.

Figure 3: Pastimes and Activities Engaged in by Overseas Tourists  
 Averages 2010-2012



Source: Fáilte Ireland, Holidaymaker Study, 2012.

## 2.2 Fáilte Ireland's View

Fáilte Ireland has long emphasised the importance for tourism of maintaining the quality of the environment. The organisation published an environmental policy and action plan in 2007<sup>3</sup>, and this has guided its work in this area since then. The document notes that: *'The future of Irish tourism is inextricably linked to the quality of the environment. Our scenic landscapes, coastlines, rivers and lakes, and cultural heritage, are the bedrock on which Irish tourism has been built. The economic viability and competitiveness of the Irish tourism industry can only be sustained if the quality of these resources is maintained'*. A number of threats are highlighted, with particular emphasis being given to a decline in water quality, a loss of historic character in our cities and towns, and a decline in the scenic and amenity value of landscapes and seascapes.

In a recent submission to Eirgrid regarding the Grid Link Project, Fáilte Ireland has underlined the vital importance of the quality of Ireland's landscape to tourism:<sup>4</sup>

*'Ireland's landscape has been the cornerstone of international tourism marketing campaigns for decades. International visitors to Ireland consistently rate scenery as an important reason for their trip. Therefore as the Irish landscape is one of the primary reasons for visiting the country, it is essential that the quality, character and distinctiveness of this valuable resource be protected'*.

Brady Shipman Martin, who prepared the supporting report for Fáilte Ireland's submission, state that *'Landscape is the primary asset for tourism in Ireland. (...) Landscape is both a physical and visual resource. It is the location and setting for aspects and features that comprise the core of the region's and indeed Ireland's tourist product including built, cultural and natural heritage, amenity, sporting and recreational facilities, as well as providing for an immediate and direct sense of Ireland, its communities, cultures, history, traditions and people'*.

In this submission, Fáilte Ireland and Brady Shipman Martin are restating an essential fact about Irish tourism: that the superb and diverse selection of landscapes and, indeed, seascapes is the most important aspect of Ireland for the majority of tourists visiting the country. Research among visitors shows that this was at the top of the list of their

<sup>3</sup> Fáilte Ireland: *'Tourism and the Environment: Fáilte Ireland's Environmental Action Plan 2007-2009'*, 2007.

<sup>4</sup> Fáilte Ireland: Submission to Eirgrid re *'The Grid Link Project: Electricity Transmission Scheme linking Leinster and Munster'*, January, 2014.

motivations when selecting Ireland. Moreover, it is the principal reason for recommending Ireland to others following their visit.

In its submission to the Department of Arts, Heritage & the Gaeltacht on a National Landscape Strategy<sup>5</sup>, Fáilte Ireland underlined the significant role that tourism could play in increasing public awareness about landscapes. It also noted the essential need for landowners and other stakeholders to be engaged in policy-making about landscape conservation, and to benefit from such policies. It says in the submission: *'In order for tourism to be a successful means of raising awareness about landscape, benefits must accrue directly to the local community from tourism'*.

The submission selects, as an example, the development of the Great Western Greenway between Westport and Achill which involved agreement on permissive access through the land of over 150 landowners. This project has proved highly successful in generating tourists, incomes, greater access to the environment for locals and visitors, health benefits, and new enterprises and events aimed at the tourist and local markets.

A further example is the Sheep's Head peninsula, Co. Cork, where environmentally-based leisure and activity tourism has become a vital component of the local economy. There is a very strong understanding among the local community and local landowners of the importance of tourism for the local economy, and the importance of landscape and the environment for tourism.

### **2.3 Economic Perspective**

The charts in Section 2.1 are samples of an extensive body of research extending over several decades which consistently demonstrates the very high premium that tourists place upon Ireland's natural environment and landscape. This premium has important cultural, social and aesthetic dimensions for both Irish residents and tourists. It also has a real and measurable economic value for Ireland and the Irish tourism industry.

Elizabeth Becker, in her recent book on the growth of tourism<sup>6</sup>, quotes a French tourism executive as saying *'tourism cannot be outsourced'*, and she describes this statement as being *'so obvious it was startling'*. Unlike virtually every other economic activity, tourism is entirely dependent on place, and its long-term prospects as a major employer and export

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<sup>5</sup> Fáilte Ireland: *'Submission to the Dept. of Arts, Heritage & the Gaeltacht on the Strategy Issues Paper on a National Landscape Strategy for Ireland'*, November, 2011.

<sup>6</sup> Elizabeth Becker: *'Overbooked: the Exploding Business of Travel & Tourism'*, Simon & Schuster, 2013.

industry are very bright. Few, if any, other industries in Ireland can make that claim. We take great risks with this future if we diminish the industry's prospects by allowing other, possibly transient, economic activities, to take over assets that are vital for tourism. Ireland's natural environment, landscape and scenery are at the top of the list of such assets.

## **2.4 Tourism Policy**

Ireland's national tourism policy is currently the subject of a detailed review, led by the Minister for Transport, Tourism & Sport. The consultation phase has been completed and the draft policy was published in July, 2014.<sup>7</sup> The draft policy highlights the importance of the natural environment and its position at the heart of Ireland's tourism product and the experience offered to visitors. It states that effective conservation of key natural and built heritage is essential for continued growth in tourism. The associated policy proposal is as follows:



*'The formulation of policies, strategies and plans by public bodies with a role in relation to natural and built heritage will place tourism as a priority issue, and will ensure that the quality of our natural and built heritage is upheld'.*

The previous major review of national tourism policy took place in 2003.<sup>8</sup> The policy document that emerged - 'New Horizons for Irish Tourism: An Agenda for Action' - highlighted the importance of the environment, stating that: '*Environmental conservation must become a central element of tourism policy and its implementation*'. This point is emphasised throughout the document, and the role of the tourism agencies and local authorities in conserving the environment is underlined in one of the specified policy actions, as follows:

<sup>7</sup> Dept. of Transport, Tourism & Sport: 'A National Tourism Policy for Ireland', Draft Document, July 2014.

<sup>8</sup> Tourism Policy Review Group, Department of Arts, Sport & Tourism, 2003.

*'Working closely with the Planning Authorities: in order to support the sensible conservation of the natural and built environment which is a fundamental foundation of Ireland's tourism industry, the Tourism State Agencies should work more closely with county, city and urban planning authorities in the preparation and implementation of their development and litter abatement plans and in the operation of planning control, particularly in areas of visual amenity and historical importance. In doing so, the Agencies would renew a role they previously undertook with significant benefits to the tourism industry but which has been less strongly pursued by them in recent years'.*

**Product Development Policy Action (No.10)**



### 3. THREATS TO THE ENVIRONMENT

Significant threats to the environment and, by extension, to tourism are identified in this Section. Our objective is to draw attention to these issues, and their potential negative impact on tourism, rather than to engage in a detailed analysis of causes and effects which would be beyond the scope of this paper. However, one particular issue – that of the decline in the scenic and amenity value of landscapes – is of grave concern to the tourism industry and is the subject of further discussion in Sections 4, 5 and 6.

The tourism industry has identified the following environmental issues as posing potentially serious threats to tourism and to tourism businesses and their employees. This is not a comprehensive list of all possible threats but an identification of a number which are to the forefront for the industry.

- i) **Water Quality:** there is a natural expectation among tourists visiting Ireland that there will be an ample supply of fresh, clean water for drinking and cooking. However, in recent years, numerous boil water notices have been issued by local authorities in different parts of the country, and with particular frequency in Co. Roscommon. The water supply in Galway City and parts of County Galway has been contaminated by the toxic cryptosporidium organism in recent years. **Pollution of drinking water is a matter for urgent attention by Irish Water.**

There are also problems with pollution in lakes, rivers and coastal waters. For example, a recent report on water quality in the South-East, published by the Environmental Protection Agency, found that 45% of transitional and coastal waters and 0% of lakes in the region meet the 'good' or 'better' status required by the Water Framework Directive<sup>9</sup>. **Water-based recreational and sporting activities are an increasingly important component of Ireland's tourism product, and continuing water pollution is a major issue for the industry. Compliance with the provisions of the Water Framework Directive is a critical goal.**

- ii) **Dereliction in Towns and Villages:** neglect of the urban fabric is apparent in many towns and villages throughout Ireland, where shops and houses are boarded up, and housing developments left uncompleted. They present a depressing picture of

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<sup>9</sup> Environmental Protection Agency: 'Integrated Water Quality Report 2012 – South East Ireland', EPA, August 2013.

abandonment and dereliction, which is deeply discouraging for all who visit or pass through these settlements.

Progress has been made in addressing the issue of unfinished housing developments, and the number of such developments has been reduced from a peak of almost 3,000 to a figure of 1,258 at the time of the 2013 National Housing Development Survey.<sup>10</sup> However, the economic impact of the recession on retail and other sectors is evident in the very large number of vacant premises along the main streets of many towns. **There is a need to revisit the now-scraped National Spatial Strategy, and to develop a new strategy for the future that will provide a robust basis for effective regional development. Consideration might also be given to introducing some form of incentive to encourage people to live in smaller towns and villages.**

- iii) **Congestion and Coach Parking:** all of Ireland's main cities experience a certain level of traffic congestion, but none more so than Dublin where the problem is particularly severe. A new report published by TomTom, the satellite navigation system manufacturers, compared the level of traffic congestion experienced by drivers in major European cities.<sup>11</sup> Of 60 cities in Europe, Dublin was ranked as the 6<sup>th</sup> most congested in 2013. Residents suffer more than tourists, as it is part of daily life, year round for them. However, tourists are also affected, particularly in relation to coach movement and parking, both of which are increasingly problematic. **There is a need to increase the level of priority given to pedestrians, cyclists and public service vehicles, and to reduce the amount of private car traffic in city centres.**

A significant number of tourists visiting Ireland – probably in excess of 750,000 in 2013 – travel by coach on tours and day trips. Negotiating city traffic is only part of the problem; a much bigger issue is the difficulty of obtaining safe and secure coach parking in suitable locations. **Coach touring is a growing part of the tourism business, and the parking problem will intensify in the absence of an active, positive response by local authorities. They need to make the necessary provision by allocating parking areas specifically dedicated to coaches.**

- iv) **Salmon Farming:** is a contentious subject and detailed scientific arguments have been put forward by both sides of the debate. International and Irish experience on

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<sup>10</sup> Dept. of the Environment, Community & Local Government and the Housing Agency: 'Annual Progress Report on Actions to Address Unfinished Housing Developments', November 2013.

<sup>11</sup> TomTom International BV: 'TomTom European Traffic Index 2013', June 2014.



the ground shows, however, that badly sited and managed salmon farms can have severe negative consequences for wild salmon and sea trout which are important elements in the Irish angling tourism product on which so many depend for their livelihood. **It is important, therefore, that a precautionary approach is taken to the siting of farms to ensure that the risks (including those to employment in the tourism sector) are minimised and a more vigorous approach is taken to the enforcement of licence conditions. Greater transparency is also needed in the process by which sites are identified and approved.** Proposals for large-scale, deep-sea salmon farms in off-shore locations should also be assessed very carefully, and a phased approach taken to their development, should they proceed to allow impacts to be measured and safeguards put in place to protect wild salmonid species.

- v) **Litter and Waste:** there is now a considerable volume of legislation with respect to waste management, and there are severe penalties for littering and fly-tipping. However, enforcement is difficult and there are serious problems with litter. The tourism industry is very active in its support for waste management initiatives, and large numbers of tourism businesses throughout the country are involved in the Tidy Towns competition, the Tourism Town Awards, Repak recycling, Irish Business Against Litter and the Green Hospitality Awards. These are very productive initiatives, and have made a significant contribution to environmental improvement. **They must be complemented by a more robust campaign against littering and fly-tipping – including control, law enforcement and public awareness - which will require greater resourcing to make significant advances.**



## **4. THREATS TO LANDSCAPE QUALITY**

Landscape can be considered a dynamic rather than static asset. It is constantly changing, and its changes are driven by nature itself, by direct human intervention, and indirectly through the consequences of human activity, notably climate change. All physical development undertaken by humans impacts on the landscape. At the same time, human activity, especially farming, does much to maintain the landscape.

The goal of protecting the landscape in the interests of tourism, and of Irish people, is not inconsistent with development. The threats identified in this section for the most part represent developments that are necessary and/or desirable in themselves – for example, wind turbines and mobile phone masts. ITIC is not opposed to such developments in themselves and, indeed, the tourism industry supports and avails of renewable energy sources and communications technology. The key to protection lies in an explicit recognition of the importance and value of landscape in the planning and regulation of development. We return to this point in Section 5.

It would be impossible in the context of a short paper to attempt to identify all possible threats to the landscape. In this Section, therefore, we highlight a small number of examples, notably those that are the subject of much debate and controversy. It should not be inferred that these examples are the only sources of potential damage to the landscape, but they serve to illustrate the challenges and potential conflicts between development and protection of valuable natural assets.

### **4.1 Wind Turbines**

In recent years, there has been a rapid increase in the number of wind turbines and, if anything, this trend is expected to accelerate. There is a growing debate about the impact of wind turbines, especially as the turbines have grown larger and proposals for very large farms in Ireland have been tabled.

The emphasis in Government policy on a large expansion of the share of renewable energy sources in Ireland's total energy supply is a major driver of wind farm development, as is the possibility of harvesting wind energy in Ireland for export to Britain. It is beyond the scope of this paper to review this policy but, in general, it is fair to say that climate change and the finite supply of carbon fuels mean that it makes sense to develop renewable sources. The tourism industry is supportive of this policy. The questions that

arise in the context of this paper, therefore, are less to do with whether or not wind energy is a good thing, but more to do with the siting and scale of wind farms.

Research to date on the impact of wind farms on tourism has tended to concentrate on impacts at national level, and on tourists' perceptions of the extent to which their appreciation of landscape scenery is affected by the presence of wind farms. A survey commissioned by Fáilte Ireland in 2012 found that a majority of tourists did not find that either



their experience of Ireland or their sightseeing was negatively affected by the presence of wind farms<sup>12</sup>. This broad finding confirmed the findings of a similar survey conducted in 2007<sup>13</sup>. However, the survey results also showed that:

- The majority of respondents to the 2012 survey who saw a wind farm (84% of the sample of 913) saw it from their car and in more than 50% of these cases, the wind farm was on the horizon.
- Growing support for renewable energy sources has increased the proportion of visitors who stated that wind farms have a positive impact on the landscape – 47% in 2012 compared to 32% in 2007. However, this has been offset to some extent by a significant increase in the proportion who feel that wind farms have a negative impact (30% in 2012 compared to 18% in 2007).
- Mobile phone masts and pylons attracted much higher negative responses – 63% of respondents perceive mobile phone masts as having a negative impact on the landscape, while 80% dislike electricity pylons.
- The negative impact of wind farms on tourists' perceptions is greatest with respect to coastal locations (36% opposed) and views from accommodation (38% opposed).
- The proportion of respondents rating the impact of wind farms as negative increased with the perceived beauty of the location. Thus, there was greater negativity expressed about potential wind farms on coastal landscapes (40%), mountains (35%)

<sup>12</sup> Fáilte Ireland: 'Visitor Attitudes on the Environment - Wind Farms', 2008.

<sup>13</sup> Millward Brown: 'Attitudes to Wind Farms in the Republic of Ireland: A Survey of Domestic & Overseas Visitors', Fáilte Ireland, 2012.

and fertile farmland (37%); on the other hand, just 24% were negatively disposed to wind farms on bogland.

The Fáilte Ireland research presents a broad brush view of the impact of wind farms on landscapes and scenery. It does not address the issue of how wind farms impact on the operators of specific tourism products, in particular on accommodation, if wind turbines are erected in close proximity to them.

A frequently quoted report on the tourism impact of wind farms is a detailed study conducted by Glasgow Caledonian University for the Scottish Government<sup>14</sup>. This study concluded that the overall economic impact of wind farms on Scottish tourism at national level was small, and that *'provided planning and marketing are carried out effectively, there is no reason why the two are incompatible'*. This conclusion must be interpreted carefully.



The survey of tourists underpinning the findings found that a majority (63%) of respondents preferred a landscape view without a wind farm. It may be noted that the imagery of wind farms in the pictorial views from hotel bedrooms presented to survey respondents showed wind turbines on the horizon, a considerable distance from the viewing point. The study made no assessment of the potential impact of locating wind farms very close to tourist accommodation.

As in Ireland, there has been a considerable expansion of wind power generating capacity in Scotland in recent years, from 1,150 MW in 2007 (the year of the survey referenced above) to 4,698 MW in 2013.<sup>15</sup> The large increase in the number of wind turbines is generating more debate on issues of location and scale. The Mountaineering Council of Scotland conducted a survey among almost 1,000 mountaineers and hill-walkers and found that 68% of respondents considered that there are places in Scotland that are now less appealing for walking and climbing due to the presence of wind farms.<sup>16</sup>

A similar proportion considered that Scotland is becoming less appealing to walking and climbing tourists.

<sup>14</sup> Glasgow Caledonian University, Moffat Centre and Cogentsi: *'The Economic Impacts of Wind Farms on Scottish Tourism'*, A Report for the Scottish Government, March 2008.

<sup>15</sup> Ibid.

<sup>16</sup> Mountaineering Council of Ireland: *'Wind Farms and Changing Mountaineering Behaviour in Scotland'*, March, 2014.

Given the importance of landscape and environmental quality for tourism, there is an evident need for careful consideration of the impact of proposed wind farm developments on tourism by developers and Local Authorities. The Planning Guidelines on Wind Energy Development, issued by the Department of the Environment, Heritage and



Local Government, require developers to assess the effect of wind energy development on tourism and recreation activities and to consult with Fáilte Ireland (the 'relevant regional tourist authorities') as part of the planning process. The Guidelines state that '*in many areas in Ireland, tourism and recreation underpin the local economy and can depend to varying degrees on the quality of the environment. Wind energy developments are not incompatible with tourism and leisure interests, but care needs to be taken to ensure that insensitively sited wind energy developments do not impact negatively on tourism potential*'.<sup>17</sup>

Current projections indicate that installed wind energy generating capacity will need to reach around twice the current level to meet the Government's target of 40% of electricity production from renewable sources by 2020.<sup>18</sup> This outlook heightens the need for very careful assessment of the scale and location of proposed wind farms.

#### 4.2 Electricity Cable Pylons

The impact of overhead high voltage electricity cables and the large pylons that support them, have long been the subject of debate. This debate has intensified in the light of Eirgrid's plans to develop the State's electricity transmission network under its Grid 25



programme. This programme involves the construction of 800kms of new power lines and the upgrading of 2,000kms of existing lines. The plans include three major new lines: Grid Link, which runs from Cork to Kildare via Wexford; Grid West, which runs from Mayo to Roscommon; and a North-South interconnector running from Tyrone to Meath.

<sup>17</sup> Department of the Environment, Heritage and Local Government (2006), Planning Guidelines on Wind Energy Development, Dublin, p.15

<sup>18</sup> Eirgrid and SONI: 'All-Island Generation Capacity Statement, 2013-2022', 2012.

Considerable opposition to these lines has emerged among residents living on or close to the proposed routes for the lines. Health, environment, agriculture, property values, and heritage issues are being highlighted by opponents of the pylon-supported lines, in addition to landscape and tourism impacts. The solution preferred by groups opposing the pylons is to place the lines underground. In response to public concerns, the then Minister for Communications, Energy and Natural Resources, Mr. Pat Rabbitte T.D., established an expert panel in January 2014 to oversee the preparation of reports on placing the Grid Link and Grid West lines underground. This panel is due to report in 2015.



There is no doubt that a line of pylons represents a very significant visual intrusion on the landscape. The pylons themselves are unattractive, industrial structures, and there is little or no possibility of hiding, disguising or beautifying them. The survey of tourists by Millward Brown in 2012, referenced in Section 4.1, found that 80% of 913 respondents believe that pylons have a negative impact on the landscape. However, the extent to which their visual impact has been examined in the planning of pylon routes is unclear. In their review of the Grid Link project on behalf of Fáilte Ireland, Brady Shipman Martin refer to the use of guidelines known as the 'Holford Rules' for the consideration of overhead line routing including landscape aspects. However, BSM point out that the use of the Holford Rules in the Grid Link study:

*'is notable for the omission of landscape aspects amongst the highest rated criteria. The effect of this approach is to underestimate the significance of landscape and visual factors in early constraints review, and thereafter, these landscape (and tourism) factors have not been appropriately integrated or valued within the corridor selection process'.*

It is very important that the independent reviews of the Grid Link and Grid West lines give full consideration to the visual impacts of the lines, and recognise that there is a real economic value to landscape and scenery. The option of placing stretches of the line underground in sensitive areas must be considered, with the value of landscape and tourism being taken fully into account in any cost-benefit assessment. The possibility of taking a similar approach with the proposed new North-South interconnector should also be examined.

### 4.3 Telecommunications Masts

Irish people are Europe's most enthusiastic users of mobile phones – according to Comreg, if machine to machine subscriptions are excluded, there were 5.25 million active mobile phone subscriptions for a population of 4.6 million, representing a penetration rate of 114%<sup>19</sup>. This high level of usage of mobile phones requires the support of a substantial network of masts and antennae which, along with wind turbines and electricity pylons, contribute to an industrialisation of the landscape.

Despite our heavy use of mobile phone technology, many people are opposed to the masts. The objections tend to arise from concerns about the long-term health effects of radiation stemming from the masts, and also from the impact on the value of properties located very close to masts. In general, the objectors would prefer if the masts were located remotely from dwellings, schools, hospitals and other structures where there is human occupancy. Protection of the landscape receives less prominent coverage, although environmental groups have regularly opposed the siting of masts in scenic and high amenity areas.



The then Department of the Environment & Local Government issued guidelines to planning authorities in 1996 with respect to the consideration of planning applications for telecommunications masts<sup>20</sup>. The Guidelines note an expectation that there would eventually be 600 – 700 cell base stations/masts. This expectation has proved to be far too low as Comreg now lists 7,923 masts on its website.

<sup>19</sup> Comreg: 'Quarterly Report Q4 2013', March 2014

<sup>20</sup> Dept. of the Environment & Local Government: 'Telecommunications Antennae and Support Structures', July 1996.

At issue from the tourism perspective is the extent to which the landscape is taken into account when planning applications for telecommunications masts are being considered. The 1996 Guidelines state that particular attention should be given to the visual impact of a proposed structure: *“Areas legally designated for environmental conservation must be given the required protection when considering planning applications for mobile telephony infrastructure. Accordingly, fragile landscapes have to be treated sensitively, scenic views preserved, archaeological/geological sites and monuments and buildings of historical and architectural interest protected and sacred areas respected”*<sup>21</sup>.

The intent of these Guidelines has influenced decisions on planning applications. In 2007, An Bord Pleanála ruled against an application to erect a 27-metre telecommunications mast on Looscaunagh Hill in the Black Valley, County Kerry, stating that the proposed location of the mast *“on this elevated and exposed site in a uniquely beautiful countryside, which is in an Area of Prime Special Amenity and within a National Park, would seriously injure the amenities of the area, by reason of its obtrusiveness and incongruity in the landscape, and would interfere with the character of the landscape and natural beauty of the area, which it is necessary to preserve.”*<sup>22</sup>



Another application for a telecommunications mast at Glenree, County Wicklow was also refused by An Bord Pleanála in 2008 on the basis that the mast would be located in an area of outstanding natural beauty. However, in 2012, the Minister for the Environment, Community and Local Government issued a circular updating the 1996 Guidelines further to the Government’s commitment to an ambitious roll-out of next generation high-speed broadband. Among the updates is a requirement for local authorities not to set minimum separation distances between telecommunications structures and houses and schools. The impact of this change was reflected in a decision by An Bord Pleanála in 2014 on an

<sup>21</sup> Dept. of the Environment and Local Government, Op. Cit., Section 1.2

<sup>22</sup> An Bord Pleanála, Reference No. PL 08.220466, 17<sup>th</sup> May, 2007



application for retention of two masts at the highly scenic Molls Gap, County Kerry. There the local authority had refused permission on the grounds that the masts were within 1 kilometre of a structure where there is human occupation for residential or daily work purposes, which contravened the provisions of the County Development Plan. This was overruled by An Bord Pleanála who had regard to, inter alia, the national strategy for the improvement of telecommunications, and the fact that the masts had been in place for a number of years and therefore “...would not seriously injure the amenities of the area...”<sup>23</sup>

The present position regarding the visual impact of telecommunications masts appears to be uncertain, and the prioritisation of scenic landscapes may be in danger of relegation to a lesser consideration in the face of economic priorities. This is a matter of some concern, and we would urge that close attention be paid to visual impact, especially in areas of great scenic beauty. There may also be possibilities for action by the mobile phone companies to avoid or reduce the negative impacts of masts by increasing the level of sharing of structures between companies, and by exploiting new developments such as small cell technology.



#### **4.4 Inappropriate Housing and Commercial Development**

Over the past 50 years, perhaps the greatest changes to the Irish landscape have been caused by the growth of urban settlements and the construction of buildings in rural areas. The expansion in residential capacity, and accommodation for commercial enterprise and public services, has been a necessary enabler of, and response to, a 60% increase in population and a large expansion of the economy during this period. However, the question arises as to whether the planning and delivery of all this building work has been as good as it could have been, given the considerable consequences for the natural environment and landscape.

The famous book of house designs, *Bungalow Bliss*, was first published in 1971. Commenting on the book, Stephen Quilley wrote: “*Frank Fitzsimons’ book, with its alliterative title and eighty standard plans pre-approved for housing grants by the then Department of Local Government, captured the public imagination.*”<sup>24</sup> The book heralded

<sup>23</sup> An Bord Pleanála, Reference No. PL 08.242640, , 28<sup>th</sup> February, 2014

<sup>24</sup> Mary P. Corcoran & Michael Peillon (eds); “*Ireland Unbound: A Turn of the Century Chronicle*”, IPA, 2002

the era of steady proliferation of one-off houses throughout rural Ireland, characterised by the journalist, Frank McDonald, as “bungalow blight”. This scattered approach to development was accompanied by very extensive ribbon development along the roads radiating from towns and villages, and both have had a major and irreversible impact on Ireland’s landscape.

During the 1990s, and into the peak boom years of the Celtic Tiger from 2000 – 2007, there was a massive increase in the pace of development. From a tourism perspective, this was particularly evident in small towns and villages in rural and coastal areas. In many instances, the developments were encouraged by tax-based investment incentives which were over-extended in duration and over-generous in their scope of application.



Overall, it appears that there has been little recognition of the economic value of the landscape, whatever about its social and cultural value. The recession has brought about a period of respite from development, and perhaps an opportunity to reflect on priorities. The signs are that this period may be coming to an end and that there will be a pick-up in the economy and in construction in the coming years. It is very important for the future of tourism, and the many people employed in the industry, that the planning authorities at national and local levels examine carefully the experience of the past 25-50 years, and determine how a better balance can be achieved between the promotion of development and conservation of the environment and landscape.

## 5. CURRENT LANDSCAPE PROTECTION MEASURES

This section contains an outline of the principal landscape protection measures at national and local level. It also takes the new Draft National Landscape Strategy into account.

### 5.1 Current National Policy

To date, the national policy for the protection of the landscape has been informed by the following initiatives:

- In 1932 **Killarney National Park** was established; which was Ireland's first national park. There are now six National Parks within the Republic of Ireland. In 1981, the Killarney National Park became a UNESCO Biosphere Reserve.
- In 1963 the **Local Government Planning Act** indicated that all Planning Authorities make a plan to indicate development objectives of their lands, including amenity lands.
- In 1977 An Foras Forbartha commissioned an **Inventory of Outstanding Landscapes**, which located areas of outstanding natural beauty in Ireland - see Figure 4 overleaf. This document was commissioned by the International Union for the Conservation of Nature and Natural Resources.
- In 1994 Fáilte Ireland prepared a report on '**Developing Sustainable Tourism**' which identified 24 '*national scenic landscapes*' – see Figure 5 overleaf. These landscapes were identified as being important areas of natural beauty which required specific management principles.
- **The European Landscape Convention (ELC), 2000**, also known as the Florence Convention, was the first international convention to focus on the protection, management and planning of European Landscapes. The Florence Convention applies to all landscapes whether they be urban or rural, and from outstanding to degraded landscapes. The Convention defined landscape '*as an area perceived by people, whose character is the result of the action and interaction of natural and/or human factors*'. The provisions of this Convention are only now approaching implementation in Ireland in the National Landscape Strategy, which is at draft stage (see Section 5.3).

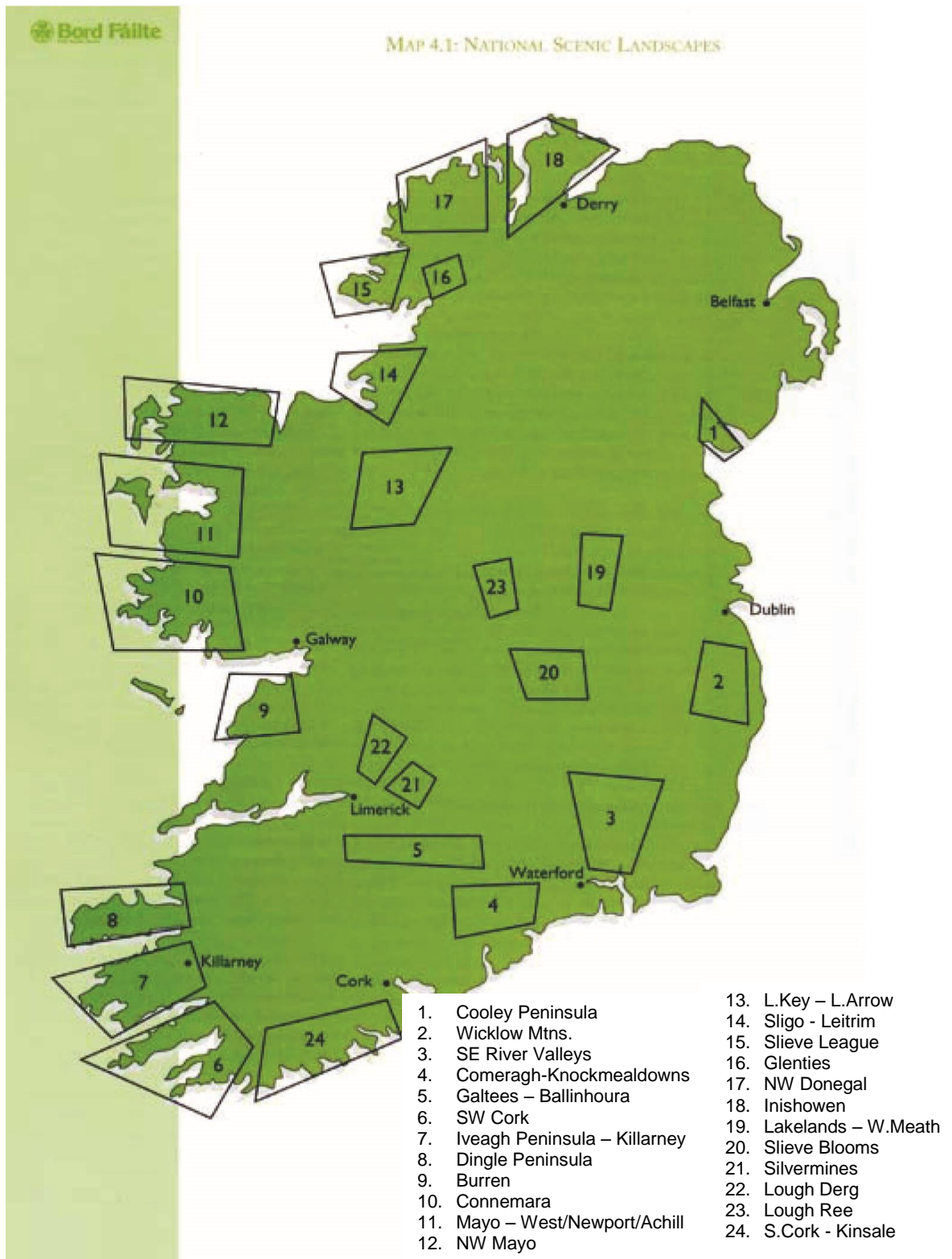


Figure 4: An Foras Forbartha – Areas of Outstanding Natural Beauty, 1977



Source: An Foras Forbartha

Figure 5: National Scenic Landscape Map



Source: Fáilte Ireland (Bord Fáilte, 1994)

The UK and Ireland ratified the Treaty and it became binding on the 1<sup>st</sup> of March, 2007. The Landscape Character Assessment (LCA) concept developed from the European Landscape Convention. This is basically a tool for identifying *“the distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse – is therefore the first and most important tool for landscape planning and management”*.<sup>25</sup>

In principal the LCA is a working mechanism with which to assist in;

- the protection of the landscape,
- the creation of sustainable developments,
- the highlighting and protection of biodiversity area,
- the securing of habitats and habitat expansion and creation.

In March 2006 the Heritage Council published an Audit and Evaluation of the 19 Landscape Character Assessments which had been prepared up to that point. It was evident that, until a National Landscape Character Assessment has been undertaken on a national level and updated on a regular basis to take account of our changing environment, the LCA concept is not as effective or as informative as its potential suggests.

- **The Irish Planning and Development Act, 2000** focused on the preservation of landscape characters and made statutory provisions for landscape conservation areas and areas of special amenity. Draft National Landscape and Landscape Assessment Guidelines were issued by the Department of the Environment, Heritage & Local Government (DoEHLG) in 2000. The aim of these Guidelines was to *‘heighten awareness of the importance of landscape in all aspects of physical planning, to provide guidance to planners and to others as to how landscape considerations should be dealt with and to indicate specific requirements for Development Plans and for development control.’* The Guidelines set out the parameters within which to assess the character, value and sensitivity of the landscape. The guidelines note that, to prepare a spatial framework and policy for



<sup>25</sup> Julie Martin Associates in association with Alison Farmer Associates: *‘Landscape Character Assessment in Ireland: Baseline Audit and Evaluation’*, Irish Heritage Council, 2007

landscape, the landscape character assessment should be the primary tool used in the development and preparation of such a policy. Some may view the objectives as set out in Section 10 2(e) of the Planning and Development Act 2000 on the **preservation of views and prospects and the amenities of place and features of natural beauty** as overly stifling on development, and the provisions of this part of the Act seem to have had little impact.

- **The Planning and Development (Amendment) Act 2010** addresses the European Landscape Convention definition of 'landscape' where it notes that *'landscape, in accordance with relevant policies or objectives for the time being of the Government or any Minister of the Government relating to providing a framework for identification, assessment, protection, management and planning of landscapes and developed having regard to the European Landscape Convention done at Florence on 20 October 2000.'*

In 2007, Fáilte Ireland commissioned a feasibility study *'To Identify Scenic Landscapes in Ireland'*. The main aim of this report was to develop 'a sound, practical and well researched framework for the development of a national scenic landscapes map for Ireland'.

- In addition to the above policy documents in 2011, the Department of Arts, Heritage and the Gaeltacht issued a strategic issues paper for consultation with regard to preparing a **'National Landscape Strategy for Ireland'**. This document notes that *'as stressed by the European Landscape Convention, there is a need to seek the right balance between management, planning and protection of a landscape. The National Landscape Strategy will be the framework to achieve this balance. It will*
  - *Recognise the importance of all landscapes in Ireland*
  - *Implement the European Landscape Convention in Ireland*
  - *Promote sustainable development*
  - *Enhance and protect the environment.'*

The National Landscape Strategy was published in draft form in July 2014, and is discussed in Section 5.3 below. Until it is finalised and its policy actions implemented, decisions relating to landscape protection will be governed by the provisions of the Planning and Development Acts 2000-2012. Furthermore, Local Area Plans, Guidelines for Local Authorities 2013, and Local Area Plans Manual 2013, assist the local authorities in their assessment of the landscape.

## **5.2 Local Policy – Landscape Protection**

In general, there is a section in county development plans specifically related to Landscape Character Assessment in which the landscape is broken down into character areas and the sensitivity of these character areas is detailed to indicate acceptable development typologies within these landscape areas.

The county development plans will also indicate clearly the information contained in the National Parks and Wildlife website ([www.npws.ie](http://www.npws.ie)), and will note the location of all protected sites under the following categories:<sup>26</sup>

- 1) **NHA, National Heritage Areas:** this is an area considered important for the habitats present or which holds species of plants and animals whose habitat needs protection.
- 2) **SAC, Special Areas of Conservation:** these are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level.
- 3) **SPA, Special Protection Areas:** Special Protection Areas are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive, which came into force in April 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species.
- 4) **Nature Reserves:** a Nature Reserve is an area of importance to wildlife, which is protected under Ministerial order.
- 5) **National Parks:** in 1969, the International Union for the Conservation of Nature (IUCN) recommended that all governments agree to reserve the term 'National Park' for areas sharing the following characteristics:
  - Where one or several ecosystems are not materially altered by human exploitation and occupation; where plant and animal species, geomorphological sites and habitats are of special scientific, educational and recreational interest or which contain a natural landscape of great beauty.
  - Where the highest competent authority of the country has taken steps to prevent or eliminate as soon as possible exploitation or occupation in the whole area and to enforce effectively the respect of ecological, geomorphological or aesthetic features which have led to its establishment.

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<sup>26</sup> National Parks and Wildlife Service



- Where visitors are allowed to enter, under special conditions, for inspirational, educational, cultural and recreational purposes.

Further to these designations a county development plan will also note all scenic views and routes in the county along with trees scheduled for retention in the form of TPO's (Tree Preservation Orders).

County development plans place a zoning on all the lands throughout the county. This zoning is an indication of the typology of development which is broadly acceptable within a given area. The conditions of zoning will take account of the landscape character and associated landscape sensitivities.

### **5.3 Draft National Landscape Strategy**

In July 2014, the Department of Arts, Heritage & the Gaeltacht published 'A Draft National Landscape Strategy for Ireland 2014-2024'. The Strategy has been in preparation for some years and has been drafted with specific regard to meeting Ireland's obligations under the European Landscape Convention of 2000 which came into force in 2004. The draft Strategy puts forward a vision to underpin the development and implementation of landscape policies, as follows:

#### **Landscape Strategy Vision**

*'Our landscape reflects and embodies our cultural values and our shared natural heritage and contributes to the well-being of our society, environment and economy. We have an obligation to ourselves and to future generations to promote its sustainable protection, management and planning'.*

The draft Strategy is a 'policy framework which will put in place measures at national, sectoral – including agriculture, tourism, energy and marine – and local level, together with civil society, to manage, protect and properly plan through high quality design for the sustainable stewardship of our landscape'. As a framework, it identifies the actions to be taken in implementing the strategy but is not prescriptive about the nature or priorities of those actions. The proposed actions are gathered under six key objectives which are directly related to those of the European Landscape Convention. They are:

- Recognise landscapes in law
- Develop a National Landscape Character Assessment
- Develop landscape policies
- Increase landscape awareness
- Identify education, research and training needs
- Strengthen public participation.

We warmly welcome the publication of the draft National Landscape Strategy and look forward to its finalisation at an early date. We endorse the objectives of the strategy and the proposed actions. However, much depends on how these actions are implemented and, in particular, on the content of landscape policies that are to be prepared for the management, protection and sustainable planning of the landscape.

#### **5.4 Conclusion**

Both National and Local policy emphasises the preservation and protection of the landscape, and provides parameters and boundaries to which all developments should adhere. However, local authorities who control the majority of developments in their areas, have considerable discretion in their interpretation and application.<sup>27</sup>



Currently, protection is more often afforded to wildlife and habitats associated with the landscape, rather than the landscape itself; the latter is afforded a retrospective protection given the presence of specific wildlife or plant species rather than relating to landscape value. These lands are covered under the designations of NHA, SPA, SAC, National Parks and Nature Reserves, as explained in Section 5.2 above. There are key areas of landscape, noted for their scenic beauty as tourist attractors, which are not afforded protected status of protection due to the absence of rare or threatened species of wildlife and fauna. It is within these areas that a national landscape policy should afford greater levels of protection.

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<sup>27</sup> SID (Strategic Infrastructure Development) applications are not submitted to the local authority in which they stand but to An Bord Pleanála. These applications included gas mains electricity pylons and large scale wind farms. The Planning and Development (Strategic Infrastructure) Act 2006 provides a detailed policy for these applications to An Bord Pleanála.

The building blocks for the protection and preservation of our most valued national treasure, our landscape, have been established over a number of years but remain oddly disparate and of limited impact. The protection of the landscape has resulted in a varying collection of documents and policies which are aimed at protecting, preserving and enhancing the landscape.



A more robust overarching national policy on the management and protection of the Irish landscape is required. The draft National Landscape Strategy puts forward a framework for achievement of that goal. This should now be finalised as a matter of urgency and implemented promptly in accordance with a defined and monitored programme.

**itic**

**Irish Tourist Industry Confederation**  
**Ground Floor**  
**Unit 5**  
**Sandyford Office Park**  
**Dublin 18**

**Tel: +353 1 2934950**

**Fax: +353 1 2934991**

**Email: [itic@eircom.net](mailto:itic@eircom.net)**

**Web: [www.itic.ie](http://www.itic.ie)**

