



**IRISH LANDSCAPE INSTITUTE**  
INSTITIÚID TÍRDHREACHA NA hÉIREANN

**Submission**

**On**

**Renewable Energy Export Policy and Development Framework**

**To**

**Department of Communications, Energy and Natural Resources**





The Irish Landscape Institute (ILI) was formed in 1992. The Institute, as the professional body representing landscape architects in Ireland, has a Constitution and a Code of Professional Conduct. ILI is a member of the International Federation of Landscape Architects (IFLA) and in particular of the European region as represented by IFLA Europe. Landscape Architecture is a recognised professional service by the European Union in procurement legislation. The Institute has a membership of 160, made up of full members, graduate members, student members, and well as honorary members and Fellows.

The ILI aims to:

- Set standards of excellence in the fields of landscape planning, landscape architecture and landscape management.
- Encourage and facilitate the Continued Professional Development of its members.
- Increase public awareness of landscape professionals and their work.
- Support the interaction of landscape architecture with related disciplines such as engineering, architecture and planning.
- Support the development of landscape education at all levels in Ireland, including accreditation of a degree course at NUI on behalf of EFLA.

The Irish Landscape Institute (ILI) is pleased with the opportunity to respond to the invitation for submissions in response to the public consultation on 'Renewable Energy Export Policy and Development'.

Please note that our comments relate to renewable energy production for both domestic consumption and for export.

We wholeheartedly support a strategy which addresses climate change resilience.

Ireland needs a *National Landscape Strategy* (NLS) to include the coastal areas and seascapes, and requires a *National/Regional Landscape and Seascape Character Assessment* as a basis for a Renewable Energy Export Policy and Development Framework. Such a strategy must be developed with due cognisance of spatial planning and the planned National Spatial Strategy.

The development of National Landscape Strategy forms part of Ireland's responsibilities as signatories to the European Landscape Convention. The only National Guidance on Landscape Assessment is in draft format since 2000, and this, along with much of the legislation concerning landscape, is out of date and no longer 'fit for purpose'.

In the absence of a national framework, each county has taken a different approach to Landscape and Seascape Characterisation and judgements on landscape capacity, which has led to inconsistency and confusion.

We would suggest that the preparation of a National Landscape Character Assessment (NLCA) be undertaken in order to inform the Renewable Energy Export Policy and Development Framework (REEPDF), and the character assessment would be best prepared in advance of the completion of the REEPDF. In the absence of such a study of the landscape, the framework



would lack any meaningful reference to landscape impact assessment. The NLCA must be led by suitably qualified landscape architects and its preparation is best undertaken in a multidisciplinary manner.

A National Landscape Strategy provides a context for and support to a NLCA. A NLS would also contain strategies for land stewardship approaches, awareness raising and other progressive and practical approaches to forming consensus around landscape, community and infrastructure.

The current draft of the National Landscape Strategy with the Department of Arts, Heritage and the Gaeltacht requires additional work to complete. The Irish Landscape Institute is currently on the National Steering Committee and awaiting further contact from the department in this regard.

In particular we would have comments on the following sections

### **Strategic Environmental Assessment and Habitats Directive Assessment**

The Government through the Dept. of Communications, Energy and Natural Resources should set out clearly in a mandatory protocol the processes and practices that shall apply to ensuring protection of the natural, built and cultural environment. Such protocols must include clear guidance for professional services (planning, engineering, landscape architectural, ecological) that should be engaged in framing infrastructure project for renewal energy. The protocol shall clear state the environmental impact assessment and landscape character requirements in respect of such projects.

### **Assessment of Natura Sites**

A specific Natura Impact Assessment is welcome but insufficient in that it would exclude locally and regionally significant, non-designated wildlife reserves and sites of ecological, environmental and cultural important: a separate Impact Assessment should be prepared for such sites. The identification of such sites may be highlighted during the suggested NLCA as above.

### **Table 1: Community Gain**

Community benefits should include the provision of environmental improvements such as Green Infrastructure (G.I) where possible to meet the goals of local and regional G.I Strategies. For example community gain may take the form of Community Woodland/Forest projects, wildlife parks, tourism: walking and hiking Green Routes, and local and regional energy projects (biomass production, insulation, district heating etc.).

See Comhar (National Sustainability Council) document, 'Creating green infrastructure for Ireland. Enhancing natural Capital for human well-being'. August 2010

Community gain projects should feature supports for micro-renewables projects, sustainable transport (local electric/biofuel buses, greenways), local food production/consumption, building energy efficiencies, collaborative economy supports and training/capacity building.

In summary,



The provision of renewable energy infrastructure whether based in the landscape or seascape must be assessed for both its benefits and its potential negative impacts. It is accepted practice for such assessment to be carried out by Landscape Architects as the profession most suitable for the analysis involved.

In addition both Environmental Impact Assessment and the preparation of Environmental Impact Statements must be thorough in both scope and analysis. Due to the possible provision of infrastructure at a regional scale and as a series of separate projects, Strategic Environmental Assessment must also be carried out according to accepted guidelines.

Please note that this submission is preliminary based on the information provided by the Department of Communications, Energy and Natural Resources and we would anticipate further submissions as part of the development and provision of renewable energy in Ireland.

On behalf of the Irish Landscape Institute Policy Working Group

Yours sincerely

A handwritten signature in black ink on a light yellow background, reading 'Tony Williams'.

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Tony Williams

President  
Irish Landscape Institute

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