



## **Irish Landscape Institute Consultation Submission**

### **A National Landscape Strategy for Ireland – Strategy Issues Paper**

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## Introduction

This contribution is for and on behalf of the Irish Landscape Institute (ILI), which is the European (EFLA)<sup>1</sup> and internationally (IFLA)<sup>2</sup> recognised professional body representing Landscape Architects in Ireland.

In order to address the macro and micro aspects of the Strategy Issues Paper issued in September 2011, The Irish Landscape Institute;

- organised a workshop for members specifically on the Issues Paper,
- gathered feedback from wider membership,
- held a specific meeting of the ILI Council,
- chaired a multi-disciplinary Urban Forum Colloquium, and
- proposed and contributed to a submission by the Urban Forum.

The outcomes of this participatory process are summarised below. We have also encouraged ILI members in public, private and academic sectors to make individual submissions. We believe that these actions will assist the successful development and implementation of the European Landscape Convention (ELC) in Ireland.

The Irish Landscape Institute will continue to organise or participate in workshops, colloquia or meetings to progress the formulation of a National Landscape Strategy, and assist with many of the actions of the final strategy. The Institute welcomes the beginning of a formal implementation of the ELC which offers a practical, inclusive and creative way of managing change in the landscape.

## Key messages from ILI consultation

- The Issues paper will need to be revised to include evidence-based research about the Irish landscape, evidence of current trends, evidence of forces for change, likely future trends and current legal obligations - in essence to practically and factually, using maps and graphs, state the Issues relating to a Landscape Strategy. Much relevant data exists and merely requires collating.
- The current Issues Paper does not reflect the input of the Steering Group, on which the ILI was represented (2008-present).
- The Issues Paper should be more concise and specific with clear actions and responsibilities and easier to read – the final Strategy document should be accessible to the general public. Many government agencies require documents or forms to meet specific readability levels. A

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<sup>1</sup> European Federation for Landscape Architecture

<sup>2</sup> International Federation of Landscape Architects

standard reading level test is the Flesch-Kincaid test. Using this, the Strategy Issues Paper scores a 37.2 out of 0 (hardest) - 120 (easiest). This puts it at a level requiring a university education and similar to the Harvard Law Review (low 30's index score).

- The ELC portrays landscape as something dynamic that evolves in response to the needs and aspirations of society. The Issues Paper, in general, follows this ELC approach, but could be more overt in highlighting that the key challenge to be addressed is the sustainable management of landscape change.
- The success of this strategy will depend on 'buy-in' from that section of the population that own and manage the resources that make up much of the landscape, i.e. (on the whole) the farming community.
- While leadership and high level direction are essential for Strategy implementation, the specific process to facilitate and integrate bottom-up, or locally generated landscape planning and policy initiatives should be clearly stated.
- A clear Vision for the future of Ireland's landscape should be stated.
- The Strategy should set out how the expertise of Landscape Professionals will be incorporated into the implementation of the National Landscape Strategy at National, Regional and Local level. This should include an analysis of existing resources and identification of gaps, particularly within the bodies proposed for implementation of the Strategy.
- One body should take ownership of the Strategy – the ILI is concerned that the proposed Committee approach will be ineffective in ensuring targets are met decisively.
- As part of the process, the issues that have hampered the implementation of the ELC to date, should be identified and addressed - Lack of a coherent landscape policy nationally costs us money, through ECJ rulings against Ireland, poor planning, long planning processes, lower quality of national health, lack of research investment in Ireland and loss of habitat/species extinction.

## **General Recommendations for the National Landscape Strategy**

- Assign responsibility for driving of the Strategy Actions to a high level Landscape Unit or Network managed by an experienced Landscape Architect – the document, "Recommendations of the Committee of Ministers to member states on the Guidelines for the Implementation of the ELC, 2008", section II.1, states;

*“It is advisable...for landscape matters to receive **specific recognition involving autonomy** both in the allocation of administrative responsibilities and in knowledge-based and operational activities, irrespective of whether or not they are included in larger administrative sectors.”* The document also states that *“the public authorities should devote human and financial resources to landscape policy; such resources can either be specifically earmarked or come from other sectors (for example, the environment, tourism, public works, culture etc.) perhaps with the introduction of landscape considerations into the aforementioned sectoral policies.”*

- The Strategy must set out practically and clearly the context in which it will operate; cross-sectoral policy, a revised National Spatial Strategy (as recommended by the Urban Forum), the National Biodiversity Plan, existing implementation mechanisms, planning and environmental law etc.
- List the agencies specifically charged with carrying out fulfillment of actions and specific timelines/ targets.
- Build on the work of proven landscape projects, education, and structures already in place in Ireland e.g. Bantry Bay, and SEMPA Life Projects, Connswater Greenway, Belfast, UCD Landscape Architecture degree course, Heritage Council Landscape Character Assessment CPD Course, emerging “Animator” projects etc.)
- The Strategy should specify and establish networks (which can grow further), community and communication processes, animating and self-perpetuating projects, and means of specialist support for these implementation mechanisms.
- Implementation should be based on agreements, charters, quality labels or contracts between the authorities and relevant stakeholders. These would include common validation of landscape identification and description, the drawing up and approval of quality objectives and medium and long term strategies by the different landscape stakeholders.
- Reference International Best Practice – include an international peer reviewer on the Steering Group.
- Clearly state the All-Island nature of landscape – and include All-Island bodies in strategy development and implementation. Reference All-Island Spatial Strategy.
- Establish and support Community Councils, Rural Forums or similar groups which become self-sustaining

- While the two stage implementation process is positive, the time frame should be shortened.
- The concept of “Landscape Values” or “Landscape Condition” may be more useful than “Landscape Quality”. The determination of *values* encourages community input and *landscape condition* can be objectively described and monitored according to set criteria.
- Require relevant bodies, particularly those named for the Steering Committee to review cross-sectoral national, regional and local policies and strategies as to how they support/hinder the NLS and fit with the intent of the ELC, a process that may be called “landscape proofing” - (useful checklists are available).
- Issue Guidelines by the Landscape Unit for incorporating the intent of the ELC into cross-sectoral policy and strategies at various levels (e.g. “Guidelines for implementing the ELC” by Natural England and Land Use Consultants).
- All new relevant legislation, policy and government guidance should be prepared so as to ensure compliance with the ELC, and monitored by the Landscape Unit.
- The legal definition of ‘landscape’ (p. 9) under the Planning and Development (Amendment) Act (2010) is a starting point for enhanced legislative frameworks for landscape. The Paper should review and include other legal definitions of landscape and terms related to landscape which do exist already in other Irish legislation to provide clarity. This is omitted in the document currently.
- Landscape Professionals should have a statutory function in state bodies. A State Landscape Architect should be appointed.
- Address the statutory status of Ireland’s six National Parks. In the National Biodiversity Plan 2011-2016, the Government has committed to publish such legislation by 2013.
- The National Biodiversity Plan 2011 - 2016 requires a ‘suitably qualified officer designated for natural heritage conservation matters’. A landscape architect should also be appointed - the management of the natural environment is that of a man-made landscape in Ireland.
- Include a landscape context in site resolution plans for unfinished estates and the NAMA land bank. This would include approaching solutions on a landscape scale and not just on a site by site basis. Landscape professional input is required.

## Landscape Architecture and the National Landscape Strategy

- Landscape architecture is the profession with an overarching view on landscape, pulling together the many other disciplines with interest in or impact on the landscape.
- Landscape Architects are specialized to act as generalists and to propose spatial solutions that involve integrated landscape thinking.
- The current lack of Landscape Architects in the public sector in Ireland, and their concentration in urban counties will hamper the implementation of landscape policy and strategies. The particulars of the post of Landscape Architect have existed within the civil service for many years and rest with the Minister of the Environment, Heritage and Local Government. The position is cognate with engineering grades. A job specification is contained in Appendix C.
- It is recommended that the Strategy include specific actions in relation to addressing the current deficit of Landscape Architects in national, regional and local bodies which will be implementing the objectives of National Landscape Strategy. While the Department has cited the multidisciplinary nature of landscape within the ELC, the ELC also requires development of specialism in landscape of each country. The Strategy should explain how this will be done.
- Registration of the professional title of 'Landscape Architect' in Ireland would raise the standard to international best practice, promote professionalism in practice, regulate for high quality landscape design and planning and ensure value for money in implementation of the NLS. The Irish Landscape Institute currently accredits Landscape Architects in Ireland, an accreditation recognized by EFLA (European Foundation for Landscape Architecture).

## Green Infrastructure

- Green Infrastructure approaches are already established in Regional Planning Guidelines (Dublin and Mideast Regional Authority) and in some local authorities (Fingal County Council).
- Advice should be issued on local Green Infrastructure initiatives (e.g. *Local Green Infrastructure*, Landscape Institute, UK, 2011, *Irish Landscape Institute 2009 National Guidance, Creating Green Infrastructure for Ireland*, Comhar, August 2010).
- Progress the development of conservation management plans for individual Natura 2000 sites in accordance with the Habitats Directive and to guide local authorities.

- The term “landscape design” is not specifically mentioned in the ELC even though the definition of landscape planning as “strong forward looking action to enhance, restore or create landscapes” is certainly also appropriate to landscape design.
- The strategy should specify a process for improving the safety of rural walking and cycling, and progress the development of trans-island trails and green routes.
- Identify landscape based solutions to flood risk management, (floodplain management, urban river corridor design, site permeability indices etc.) and water quality in accordance with objectives under the Water Framework Directive
- Suburban, urban and peri-urban landscapes require more attention than currently indicated in the Issues Paper.
- A mandatory planning regulation should be promoted, requiring all regional and Local Authorities to conduct regular Open Space Audits and develop a strategy for their statutory area.
- Carry out analysis of Irish State owned/managed land bank and examine potential for pilot or demonstration landscape initiatives, including NAMA owned lands.

## **Awareness raising**

- Promote and support projects which display a healthy relationship between landscape policy, landscape values and landscape management.
- Initiate in-service training programmes for elected representatives, the technical staff of public authorities of all levels and sectors, and professionals in the private and public sectors whose activities affect the landscape.
- Opportunities exist for training, awareness-raising and communication on the NLS with local authority Parks Superintendents and Biodiversity Officers through the Irish Landscape Institute and the Parks Professional Network (PPN). The PPN is an informal, voluntary grouping of professional and technical staff in parks nationally and is well-attended and operational for the past 4 years. PPN links back to the ILI Policy Working Group.
- Hold a regular (annual or bi-annual) National Landscape Conference/Forum

- Build on existing media programming that celebrate and discuss landscape. A seminal documentary series on the development of Ireland's cultural landscape and the role of Ireland's people in shaping the landscape would be beneficial.
- Consider a National Excellence in Landscape Awards to acknowledge achievements in landscape projects and planning initiatives across the public, community and business sectors. The Irish Landscape Institute currently hold biennial awards for landscape design, management and planning
- Online seminars may be useful for certain stakeholders and professionals. For example the initiative by LE:NOTRE "Assessing Everyday Landscapes 2011"  
[http://draco.hfwu.de/~wikienfk5/index.php/Assessing\\_Everyday\\_Landscapes\\_2011](http://draco.hfwu.de/~wikienfk5/index.php/Assessing_Everyday_Landscapes_2011) developed for Master's Level Landscape Architecture Students.
- Establish a "shop front" project such as Belfast's *Place*. <http://www.placeni.org/>
- Consider greater support toward professional institutes that promote awareness of contemporary landscape design and planning issues. Most of these are small in membership and consequently have limited resources.
- The proposed Landscape Atlas should be freely accessible on line and not subject to copyright.
- The Landscape Atlas could be interactive and online allowing members of the public to post their own information available and comment on datasets, mapping and documents.

## Education and Research

- With reference to Article 6B of the European Landscape Convention and particularly 6.B.a. which refers to the education and training for specialists we would make the following specific points.
  - Specialists in this sense are Landscape Architects, as being the discipline most appropriate for detailed landscape appraisal and operations. Short courses or training of other disciplines in landscape awareness is not appropriate in the provision of such specialists.
  - Landscape Architects as specialists undergo a degree programme which conforms to the accreditation guidelines as approved by the International Federation of Landscape Architects (IFLA) and further informed by the European Federation for Landscape Architecture (EFLA) and European Council of Landscape Architecture Schools (ECLAS)
- The multidisciplinary training programmes referred to in Article 6.B.b. may be carried out by a variety of professions but should be designed so as to be:

- prepared and presented by the most appropriate discipline and the areas which involve specialist landscape subjects should be prepared and presented by Landscape Architects.
  - the audience for such presentations would be multidisciplinary and from a variety of professional institutes, sectors and associations.
- The terms 'relevant subjects' referred to in Article 6.B.c. requires to be further defined and such relevant subjects ought to be prepared as a curriculum item prior to incorporation within appropriate courses. In general the content of landscape architectural programmes and the related disciplines of landscape management and planning have the relevant subjects which would be appropriate for incorporation into relevant courses.
- The ILI Education Committee and the School of Landscape Architecture in UCD would be available to prepare the above for inclusion in the curriculum of appropriate courses.
- The EFLA-accredited degree course in Landscape Architecture in the Department of Architecture, Landscape and Civil Engineering, UCD. should be specifically cited. Landscape Architecture is a professional course of study throughout Europe. It is unclear what is meant by a 'landscape module' for Action (2-5c).
- Re-establish the dormant Masters in Landscape Architecture in UCD. There are 140 postgraduate courses in Landscape Architecture worldwide<sup>3</sup>. The course in UCD is the only one available in the island of Ireland. The only route available for postgraduate education in landscape architecture is to emigrate. This is contrary to the ELC.
- Provide state bodies with a means to provide training for graduates in Landscape Architecture, similar to the current programmes for internships in cognate professions of engineering and architecture.
- Build on Landscape Architecture education and research recommendations by IFLA (international federation of Landscape Architects), EFLA (European Federation for Landscape Architecture(EFLA), ECLAS (European Council of Landscape Architecture Schools) and the LE:NOTRE EU Thematic Network in Landscape Architecture, see <http://www.le-notre.org/>
- Collate relevant current research about landscape matters, including that carried out by the Urban Institute Ireland in UCD, The Policy Institute at TCD, The Futures Academy at DIT, the European Environment Agency, the EPA, Comhar etc.
- The proposed Landscape Unit should identify and promote specific funding avenues for landscape research. For example, Ireland did not avail of any of the specific EU landscape

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<sup>3</sup> Source: International Federation of Landscape Architecture

research funding available under INTERREG IVB NWE during 2007-2013 (now closed). Previously, Ireland did not receive any funding for research in the Nature and Heritage topic of INTERREG IIIB during 2000-2006.

- Funding in Ireland, through the EU LIFE Programme has been more successful. Between 1992 and 2008, the LIFE Environment component (now called Environment Policy and Governance) co-financed 36 projects in Ireland. These projects represented a total investment of €64.1 million of which €20.0 million was contributed by the European Union. These projects mainly targeted integrated environmental management, clean technologies, sensitive area management (coastal areas) and urban design. Local authorities and SMEs were common project beneficiaries and the projects had duration of 24 to 63 months.
- To date there are no projects selected under the LIFE+ Environmental Policy and Governance component in Ireland. Between 1992 and 2008, the LIFE Nature component (now called Nature and Biodiversity) co-financed 14 projects in Ireland. These projects represented a total investment of €32.2 million of which €19.6 million was contributed by the European Union. Two projects have started since 2009 under the LIFE+ Nature and Biodiversity component, representing a total budget of €3.2 million of which the European Union will contribute €1.6 million. Both will be implemented by semi-state fishery organizations.
- Research should be directed as “action research”, whereby there is a close relationship between fundamental research and public action.
- There is great interest in the promotion of Continuing Professional Development opportunities for many of the relevant professional institutes and the NLS should utilize this channel of education of professionals.

## **Landscape Character Assessment (LCA)**

- Many local authorities have expended considerable resources on the collection of landscape data in the absence of a national data system – this can be utilized.
- The document focuses too much on LCA as a tool. LCA is a classification procedure rather than a mechanism for implementing policy as implied in the current Issues Paper.
- LCA is most useful when used as both a classification tool and a method of engaging communities to elicit landscape values.

- LCA is not a static or once off study, but instead establishes a process for updating and review. It is unclear who will maintain the proposed national LCA and promote its use. It should be free from copyright and accessible. Digital formats may include spoken word and oral history.
- LCA is useful when used in conjunction with Green Infrastructure evidence-based planning approaches and mechanisms.
- The language contained in many parts of the Issues Paper is still grounded in the activity of protection and uses subjective and value-laden terms such “scenery”. This does not follow the approach of the European Landscape Convention.

### **What will be different after the instigation of a National Landscape Strategy?**

- The “Landscape Approach” will offer an additional decision making framework in many matters of policy
- A national debate will drive consensus building to determine an agreed vision for future landscape policy
- The NLS will provide a forum for ideas - no one is dominant, all are heard, landscape effectively brings different disciplines together
- The landscape approach is proactive and forward looking; providing an overarching view and enabling positive change.
- Planning will be a more engaging and straightforward process.
- The processes initiated to implement landscape policy will be widely embraced by land owners and landscape users – the Strategy inspires bottom-up, win-win initiatives.
- Processes will ensure conflict resolution happens before parties become entrenched.
- The National Landscape Strategy will, as our new President Michael D Higgins puts it - enable communities and individuals to be “the arrow and not the target”.

## APPENDIX A

### The Irish Landscape Institute

The Irish Landscape Institute, as the professional body representing landscape architects in Ireland has a Constitution and a Code of Professional Conduct. The Institute has a membership of 160 made up of full members, graduate members, student members as well as honorary members and Fellows. The ILI is a registered member of both EFLA (European Federation for Landscape Architecture) and IFLA (International Federation of Landscape Architects).

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 (the ILI and EFLA are the accrediting bodies for the Landscape Architecture courses in UCD)

The ILI runs annual professional examinations and monitors post graduate experience as graduates train to become full members (Chartered). Conferences take place biennially as do the ILI awards which honour excellence in the fields of landscape planning, landscape design and landscape management. The ILI manages a CPD programme for its members.

#### **Integration of policy on the built environment**

The Irish Landscape Institute is one of the 5 professional institutes of the Urban Forum, representing professions involved in the design and planning of the built environment. In 2009, the ILI organized a colloquium on Green Infrastructure for the Forum, and we are currently establishing a working group within the Forum as an outcome. We also participated and chaired discussion at the Urban Forum's training course in Urban Design in 2008.

#### **Ensuring incorporation of landscape design issues in national, regional and local policy**

The ILI is active in its representation of the profession of landscape architecture and design at national policy level, including:

- National Landscape Strategy Working Group and National Landscape Character Working Group of the Heritage Council
- National Standards Association of Ireland
- Regional Planning Guidelines with various regional authorities
- Strategic Policy Committees within local authorities
- National Landscape Strategy Steering Group
- Heritage Council Multi-Disciplinary CPD Training on Landscape Character Assessment

### **Education, training and raising standards**

For the past decade, the ILI has worked to establish a European accredited course in landscape architecture at University College Dublin. This has successfully resulted in the Bachelor's in Landscape Architecture with accreditation by the European Federation for Landscape Architecture (EFLA). Previously, Irish students had to go to the UK or US to pursue degrees in the subject. The ILI continues to provide support for the course through its Education Committee, providing members for the Accreditation Panel and for professional input in directing, teaching and critiques of student work and by employing students and graduates of the course. Students and Graduates are members of the ILI and can proceed to full membership after successfully completing postgraduate apprenticeship, a professional practice examination and interview with the ILI Professional Practice Committee.

The ILI has established a CPD programme for members in landscape architecture, following agreement by members in 2009 at the AGM. This will be an important step for the ILI in meeting its objective of licensing of the title, 'landscape architect', in Ireland. It will also serve to ensure continued high standards of professional training and education in landscape design in both public and private sectors. For public sector landscape professionals, the ILI CPD programme will complement PMDS programmes within local authorities. Many of the ILI CPD events so far have been attended by members of other professions and the public, including public lecture series on topics of landscape design.

### **Increasing public awareness of landscape architecture and design**

The ILI has hosted a series of events in recent years to raise general awareness in Ireland of landscape architecture and design including:

- Launch by Minister Gormley in April 2008 of a nation-wide exhibition of contemporary landscape design projects undertaken by ILI members, 'What is Landscape Architecture?' as part of World Landscape Architecture Month
- Hosting public lecture series with internationally-renowned landscape architects at public libraries
- Organization of and acting as jury members for international public design competitions
- Publication of a magazine devoted to issues in landscape design
- Dissemination of information through the ILI website ([www.landscapeinstitute.com](http://www.landscapeinstitute.com))
- Organization of National Awards in landscape design
- Organization and hosting of the International Federation of Parks and Recreational Administration World Conference in Dublin

- Hosting of site visits and guided tours of designed landscapes by ILI members for professionals within the ILI and other institutes and the public

## **Research**

The ILI and its members have contributed to research studies in landscape planning and design in Ireland in topics such as: historic landscapes and their management, public realm studies, sustainable urban drainage systems, ecological and habitat management plans for designated areas, environmental assessment, development of tree management policy systems, landscape character assessment methods and many other topics. These studies have directly supported national initiatives and publications to which our members contributed, such as the 'Green City Guidelines'. ILI members have promoted research in the public sector in topics related to management of public open spaces in terms of sustainability, biodiversity and coastal zone management, measuring users' needs for recreation, audits of accessibility of public spaces and development of strategies for parks and open spaces including audits.

## **Representation of ILI members in governmental bodies**

The ILI is represented primarily at local authority level by professionals employed as parks superintendents and landscape architects, of which there are 62, with an additional 8 professionals at national level. Not all of these professionals are members of the ILI, although probably all are eligible for some form of membership. It is evident that representation of the profession is limited to urban local authorities, and non-existent at regional level and most national bodies including, surprisingly, the Department of Environment and Local Government. This has been reflected in the manner of landscape policy implementation, which is local and non-consistent.

Lack of career advancement prospects for landscape professionals in the public sector is a disincentive to energizing the profession. However, the ILI has been supportive of the Parks Professional Network, a national informal network for exchange on best practice and policy and management for public landscapes by the Parks Superintendents and Biodiversity Officers at local and national level. This group organizes seminars and training workshops at various venues around the country on a regular quarterly basis and has its own newsletter and representative to the ILI. The PPN group has attempted to fill the void at national level on landscape policy by agreeing amongst its members a common approach to some of the matters concerning landscape policy and research. It is a grass-roots approach which feeds into the activities of the ILI directly and indirectly.

[www.irishlandscapeinstitute.com](http://www.irishlandscapeinstitute.com)

## APPENDIX B

### **Proposal to Government for Strategic Landscape Policy Review by the Irish Landscape Institute, 2009**

The following text was presented to Government by the ILI Policy Working Group:

A review and revision of planning legislation and policy governing public and private/semiprivate open spaces, parks and trees is required as a matter of urgency. The existing policy is Department of the Environment (1987) publication, 'A Policy for the Provision and Maintenance of Parks, Open Spaces and Outdoor Recreation Areas by Local Authorities'. This was authored by the then Senior Parks Superintendent of Dublin County Council, Michael Lynch, FILI. The ILI members, public and private sectors alike, want a document relevant to contemporary landscape design issues which takes into account factors which affect their work currently, including:

- Increasing urbanisation and high-density planning in towns and cities
- Demand for high quality public open space as part of quality of life and competitiveness of Irish cities in attracting investment
- Changes in recreational trends over the past twenty years
- Rapid increase in birth rate and demands on recreational facilities current and predicted
- Trends in health, including obesity rates, and the contribution of recreational facilities to community gain
- Trends in immigrant populations and how different cultures rely on public open space for social and cultural events and identity of new communities in urban areas
- Developments through village renewal and how public open space can conserve regional identity and visual character
- The influence of high quality public open spaces and streetscapes on property values and development potential
- The increasing importance of environmental quality, not just quantity, of public open space and promotion of biodiversity
- The definition of public open spaces as habitats and green corridors to link designated and non-designated landscapes of ecological importance
- The role of public open space in countering the impacts of development on the urban landscape, particularly in relation to flood risk mitigation and sustainable urban drainage
- The need for connectivity of public open spaces in enhancing amenity and biodiversity value of them

A major concern of the ILI, which has been articulated to Government for a number of years, is the lack of any presence of landscape professionals in national and regional bodies. We propose that a landscape professional be provided in each of the Regional Authorities to work with the planners. Currently, the green infrastructure policies in the Regional Planning Guidelines are being drafted by

planners with no landscape expert input. To assist in this process, in the public interest, the ILI has held meetings with the Dublin and Mideast Regional Authorities and provided written submissions on the new RPGs. We are concerned that major planning bodies for the built environment, such as the Department of the Environment, the Dublin Docklands Authority, An Bord Pleanála and all the Regional Authorities do not employ members of our profession. This is contrary to practice in other European countries and results in a piecemeal approach to landscape policy. For example, the Regional Planning Guidelines for the seven local authorities with Dublin and Mideast Regions don't even mention the word 'parks' once. Without any direction, the provision and quality of public open space in the most densely-populated region of the country is ill-defined. Many of the current policy recommendations in the RPGs cannot be implemented, and are unworkable. The non-statutory basis for green infrastructure, such as public parks and open spaces, by local authorities is a significant challenge which needs to be overcome by new legislation in planning and development.

Colleagues in allied professions in the built environment are in agreement with the ILI on the need for provision of landscape expertise at the national regional level, at the very least, if resources don't permit it at local level. As members of the Urban Forum, the ILI has collaborated with planners, engineers, quantity surveyors and architects in calling on Government to ensure high standards for the built environment by providing regional teams of professionals to advise local authorities on the setting and enforcement of planning conditions. ILI members have direct experience of landscape conditions being unenforceable, inconsistent and too weak. They also have articulated that both private and public sector landscape professionals are involved in the planning process at stages when it is too late to ensure that landscape concerns are addressed adequately. Landscape design is treated as an afterthought, resulting in mistakes in site planning. Public projects have also treated the environment and the site as an afterthought, with landscape planning and maintenance budgets severely underestimated, even during the boom. ILI members find they are fighting to maintain quality of the landscape on project teams.

The tools available for planning and assessment of landscape need to be strengthened. Landscape architects and planners are in agreement that the lack of national legislation is a hindrance to ensuring standards are met, and have direct experience of courts and planning bodies rejecting measures for the public interest due to lack of defined policy and legislation. Both the ILI and the IPI, through the Urban Forum, have called for policies which are mandatory, not guidelines.

The Tree Preservation Order legislation under Section 205 of the 2000 Planning and Development Act is a limited tool for protection of trees, requiring an expensive process which discourages local authorities. It requires the local authority to provide financial assistance to the landowner for the maintenance of the trees (Paragraph 2b). The Order will only succeed on amenity grounds. Therefore, the other qualities of trees in urban landscapes – their cultural heritage value, their biodiversity/ecological importance, their habitat as woodland, their role in alleviating flood risk in riparian zones – are irrelevant under the legislation. The assessment of amenity value is required (Paragraph 1) of the local authority, but there is no provision for any national methodology of assessment or valuation of trees in Ireland, nor is there provision for staffing or training in many local authorities for Arboriculturists or Parks Superintendents. The legislation requires the local authority to predict that trees may be cut

down and act to make an Order in advance, because of the minimum 6 week notice period (Paragraph 4b). This is entirely unrealistic, and many landowners have simply felled trees before the local authority could act. Local authorities are not given any specific resources to manage trees or to develop databases to monitor trees in their area. This could be done using GIS if there was a national standard. Some individual local authorities have allocated resources for this, but it is completely unavailable for most of the country.

Most TPOs in Ireland don't result from any strategic planning by local authorities to protect trees, but rather a reaction of development control when the Department of Agriculture notifies a local authority of an application for a felling licence. The law regarding felling of trees dates from 1946 under the Forestry Act, which is heavily biased toward the agricultural landowner and, again, makes no reference to environmental issues. It of course predates the Wildlife Act by several decades, so trees as habitat is not consideration. In fact, trees which are of greatest biodiversity potential, those that are dead or dying, are specifically exempt, as are those with no commercial or ornamental value. Ordinary native trees have limited protection. The Act empowers the Minister for Agriculture, not the planning authority, to determine whether or not trees can be felled. Major exemptions for landowners allow for unregulated felling of trees in most instances. Any tree within 100 feet of a building can be felled without a licence. Crucially, trees in urban districts can be felled without a licence, even if they are in woodlands or hedgerows of habitat and recreational importance. For example, lines of mature trees along river corridors in urban areas are regularly cut down by landowners without any permission or sanction, despite this being contrary to the Development Plan objectives for riverine habitats. The only measure available to the local authority is to seek a TPO, on grounds of amenity value, on the basis of an assessment which can easily be refuted by a developer producing a tree survey claiming that a healthy tree is dying or diseased. Developers are not even required by all planning authorities to survey their sites prior to drafting proposals for existing trees, or to plan their schemes with regard to them.

The only policy issued by the Department of Environment and Local Government on a methodology for Landscape and Landscape Assessment (2000) remains in draft form. This document, while appearing promising at the time to landscape architects and planners in making progress on matters such as visual impact assessment for planning applications and landscape character assessment, was never finalised. It remains a working document and, as guidelines, cannot be readily enforced by planning authorities. The Guidelines set out to 'heighten awareness of the importance of landscape in all aspects of physical planning', but this was severely constrained, as landscape protection and proper planning was deemed too threatening to developers' interests and profits. The ILI echoes the assertion of the Department in the document that 'the planning and management of development requires a thorough and systematic approach to landscape', and we are still hopeful, nine years later, that this will emerge.

## **APPENDIX C**

### **Job Specification for the officially sanctioned post of Senior Executive Landscape Architect (2007)**



**Office of the Civil Service and  
Local Appointments Commissioners**



**INFORMATION BOOKLET**

**PLEASE READ CAREFULLY**

*Senior Executive Landscape Architect  
Dublin City Council*

**This information booklet is not a statutory instrument and does not purport to be a legal interpretation of the statutory Regulations and Qualifications for this competition. Copies of the Regulations/Qualifications may be obtained (free of charge) on request, from the Office of the Civil Service and Local Appointments Commissioners.**

Áras na Caibidle  
26-30 Sráid na Mainistrach Uach.  
Baile Átha Cliath 1.

Chapter House  
26-30 Abbey Street Upr.  
Dublin 1.

Telephone Number 353 1 858 7400  
Lo-Call 1890-449999

## Senior Executive Landscape Architect

### Essential Requirements & Qualifications

1. **Character:** You must be of good character.
2. **Health:** You must be in a state of health such as would indicate a reasonable prospect of ability to render regular and efficient service.
3. **Education, Experience etc.:**

On the latest date for receipt of completed application forms you must:

- (a) hold a university Degree in Agricultural Science (taken in Landscape Horticulture) or Master of Horticulture of the Royal Horticultural Society (London) or hold a University Degree in Landscape Architecture or have successfully completed Part IV of the Landscape Institute (UK) exams or an equivalent qualification, and
- (b) relevant experience of Landscape Architecture including public park design, urban/civic design, landscape planning, landscape design, landscape ecology and the design/development of public housing open spaces, and
- (c) have satisfactory knowledge of plant materials, arboriculture and horticulture, and
- (d) have satisfactory design, communication and administrative skills with ability to lead or work with multidisciplinary teams and satisfactory project management skills.

### Principal Conditions of Service

The position is wholetime, permanent and pensionable. Retirement is compulsory at 65 years of age.

**SALARY SCALE:** €46,337.82, €47,801.83, €49,265.84, €50,731.12, €52,198.93, €53,660.40  
€55,134.57 (maximum)  
€56,984.58 after 3 years satisfactory service at maximum  
€58,830.77 after 6 years satisfactory service at maximum

### Format of the Competition

Applications shall be made on the official application form. Completed application forms should be forwarded so as to reach the Office of the Civil Service and Local Appointments Commissioners not later than 5.30 p.m. on the date specified in the published advertisement.

Where, by reason of the number of persons seeking admission to the competition and the standard of knowledge, training or experience in general of such persons, the Commissioners consider that it would be reasonable not to admit all the persons to the competition, they may admit to the competition only persons who appear likely to them to attain in the competition a standard sufficient for selection and recommendation for appointment.

The admission of a person to a competition is not to be taken as implying that the Commissioners are satisfied that such person fulfils the essential requirements/qualifications specified for this competition or is not disqualified by law from holding the position.

Each competition shall consist of:

- (i) a competitive interview; and
- (ii) an optional language test.

The Commissioners may at their discretion require candidates to attend a preliminary interview in which case admission to the competitive interview would be conditional on candidates reaching such a standard as the Commissioners considered appropriate in the preliminary interview.

Interviews shall be conducted by Board(s) set up by the Commissioners. The Board(s) will assess the merits of candidates (except insofar as they are assessed otherwise) in respect of the matters referred to in the essential requirements/qualifications specified for this competition and any other relevant matters.

Before making its final assessment a Board may recall a candidate for further questioning. Any such further attendance shall be regarded as part of the interview.

Only candidates who reach such a standard as the Commissioners consider satisfactory in the competitive interview shall be considered for selection.

Before being recommended for appointment candidates shall satisfy the Commissioners that they possess the requisite knowledge and ability (including a high standard of suitability and where administrative experience is a requirement a high standard of administrative capacity) for the proper discharge of the duties of the position.

The Commissioners may, at their discretion, select and recommend another person(s) for appointment on the results of this competition if the person recommended for appointment does not accept the appointment or, having accepted it, relinquishes it or if an additional vacancy arises.

Any candidate who reaches the age of 65 years prior to appointment will cease to be eligible for appointment on the results of this competition.

**Optional  
Language  
Test**

You may have your ability to communicate effectively in Irish and English assessed. Your ability in the language in which the interview is conducted will be assessed at the interview itself and in the other language by a separate language test. This test will comprise conversation on ordinary topics. Candidates who satisfy the Commissioners that they are proficient in Irish and English will be awarded marks in respect of such proficiency.

**Completing  
the  
Application  
Form**

Applications must be made on the official application form.

When completing the application form **accuracy is essential** as

- (i) it will be used as a computer input document; and
- (ii) you may be shortlisted on the basis of information supplied.

Any inaccuracy in completing the form may result in rejection. Therefore **it is in your own interest to ensure that the information supplied is correct.**

**In order to expedite the holding of the competition, the Commissioners would be grateful if you would forward the original plus five copies of your completed application form when applying for the post.** The copies of your application form, which have been supplied by you, will be given to the interview board and therefore it is imperative that you type/write clearly using **BLACK** ink. If the space provided on the application form is not sufficient please supply **SIX** copies of any additional sheets you may wish to add. If you choose to forward a Curriculum Vitae please also supply **SIX** copies. (*Applicable only to application forms submitted by post.*)

**Closing Date**

**Your completed application form must be forwarded so as to reach the Office of the Civil Service and Local Appointments Commissioners, Chapter House, 26-30 Abbey Street Upr. Dublin 1, not later than 5.30 p.m. on the date specified in the published advertisement. An application form sent by post should be posted in sufficient time to ensure delivery by this deadline. Receipt of your application form will be acknowledged. Allegations of loss or delay will not be considered unless supported by a Certificate of Posting. The cost of postage must be borne by the applicant. Change of address should be notified to us immediately in writing.**

THE CIVIL SERVICE AND LOCAL APPOINTMENTS COMMISSIONERS ARE COMMITTED TO A POLICY OF EQUAL OPPORTUNITY.

**Confidentiality** Subject to the provisions of the Freedom of Information Act, 1997 applications will be treated in strict confidence.

**Canvassing** Canvassing will disqualify.

**General Information** The Commissioners will not be responsible for any expense, including travelling expenses, candidates may incur in connection with their candidature.

Candidates shall undergo such medical examinations (which include X-Ray and/or other special tests) as the Commissioners consider necessary. Medical Examiners will be nominated by the Commissioners. Candidates will not be required to pay the fee for any general medical examination or, unless the Commissioners determine otherwise, the fee for any examination by a medical specialist or for any X-Ray or special test. Candidates must comply, at their own expense, with such remedial requirements as the Commissioners consider necessary.

**Deeming of Candidature to be withdrawn** Candidates who do not attend for interview or other test when and where required by the Commissioners, or who do not, when requested, furnish such evidence as the Commissioners require in regard to any matter relevant to their candidature, will have no further claim to consideration

**Complaints and Requests for Review** The Local Authorities (Officers and Employees) Acts, 1926 – 1983 do not provide for a statutory appeals mechanism in relation to decisions taken by the Local Appointments Commissioners.

However, the Commissioners will consider complaints or requests for review in relation to the selection process. Such requests must, however, be made within **seven days** of receipt of the notification of the decision.

The decisions of the Commissioners in relation to these matters are final.

**Data Protection Act, 1988** When your application form is received, we create a computer record in your name which contains much of the personal information you have supplied. This personal record is used solely in processing your candidature.

Such information held on computer is subject to the rights and obligations set out in the Data Protection Act, 1988. You are entitled under this Act to obtain, at any time, a copy of information about you which is kept on computer. The Commissioners charge a fee of €6.35 for each request. You should enclose a cheque or postal order payable to the Office of the Civil Service and Local Appointments Commissioners and address your request to:

THE DATA PROTECTION CO-ORDINATOR  
OFFICE OF THE CIVIL SERVICE & LOCAL APPOINTMENTS COMMISSIONERS  
CHAPTER HOUSE  
26-30 ABBEY STREET UPPER  
DUBLIN 1

Certain items of information, not specific to any individual, are extracted from computer records for general statistical purposes.

**THE LOCAL APPOINTMENTS COMMISSIONERS ARE AN INDEPENDENT STATUTORY BODY WITH A REMIT FOR OPEN COMPETITION AND A COMMITMENT TO A POLICY OF EQUAL OPPORTUNITY.**