



**National Marine Planning Framework – Baseline Report Submission 2018**  
**An Chomhairle Oidhreachta, the Heritage Council**

**14th December 2018**

The Heritage Council (HC) welcomes the development of a national marine planning framework and welcomes the extensive public engagement process. This submission covers several areas relating to the remit of the Heritage Council and is based on the HC advice on previous consultations as well as from experience on various HC initiatives. We would welcome the opportunity to discuss this submission further.

The submission is in four parts –

- Response to the consultation questions (page 2)
- Specific comments on MSFD and Foreshore Bill (page 6)
- Appendix 1 – Cultural heritage: Coastal heritage (Page 8)
- Appendix 2 – Seascapes. (Page 13)

Information on many aspects of Ireland's marine and coastal heritage can be viewed at [heritagemaps.ie](http://heritagemaps.ie)

For further information, please contact Beatrice Kelly Head of Policy and Research



## **A Response to Consultation Questions:**

1. This Baseline Report is intended to capture and summarise all of the sectoral activities that are taking place in Ireland's marine spaces. Thinking about your own knowledge and experience, are there gaps in what is presented in this report and, if so, how can they be addressed?

There are gaps in relation to cultural heritage both on land and off shore, and tangible and intangible. This submission includes further detail on this under Appendix 1 – Cultural heritage, and Appendix 2 – Seascapes. However it is important to note that the lack of attention given to maritime heritage at an official level means we lack an overview, a national perspective, of this asset. This needs to be taken into account when setting up Marine Spatial Planning.

2. Thinking about how we enjoy, protect, or derive economic or social benefits from our seas, what things would you like the marine plan to address?

The Heritage Council (HC) would like to see the NMPF (National Marine Planning Framework) promote a more holistic and integrated approach between the marine, intertidal and coastal fringe, as well as between different sectors. We note the Baseline Report is, understandably, broken into different sectoral areas; the HC would like to see more integration between sectors so that all stakeholders know & understand the goals and responsibilities that is expected from each sector. Achieving Good Environmental Status (GES) is the responsibility of all, especially when dealing with systems which by their nature are fluid and complex.

3. Do the Marine Plan Objectives broadly capture or reflect the things that you want to see in the plan? If not, and in the context of the high-level nature of these overarching objectives, are there additional objectives that should be included, or should the draft objectives be amended?

The HC subscribe to the inclusion of the HOOW (Harnessing Our Ocean Wealth) principles and the stated Goal #2: *“Our goal is to protect, preserve and, where possible, restore our rich biological diversity and ecosystems. We need to proactively manage our living and non-living resources in harmony with those ecosystems, so that they continue to provide essential monetary and non-monetary goods and services (e.g. food, climate, health and well-being). Protection of our marine ecosystems and compliance with environmental legislation are essential components of our ecologically sustainable future and need to be seen as an essential enabler for a thriving maritime economy”*. [Harnessing Our Ocean Wealth - An Integrated Marine Plan for Ireland](#) was published by the Government in 2012.

4. The objectives of a marine plan can be supported or achieved in a number of ways. Some countries have used a policy-based approach to guide the decisions of statutory consent authorities with respect to specific sectoral developments or activities. Others have opted for a more prescriptive zoning approach (similar to on land zoning through County Development Plans in Ireland). Taking account of the extent of Ireland’s marine area and the varying degrees of activity that take place in our waters what do you think would be the most appropriate means of supporting the objectives of Ireland’s marine plan – proscriptive, policy or somewhere in between?

The Heritage Council would advocate for a mixture of the two – to allow for Local Authority governance but given the fluid nature of the marine area, a policy approach would be more applicable to the offshore. It may also be useful to look at the approach being taken with the Waterframework Directive and Marine Strategy Framework Directive and the second iteration of WFD management plan(s).

5. How can the marine plan be best aligned with the NPF?

There has to be policy coherence and consistency between the two plans; it is likely that the NPF will need modification to include specific policies for the coast and inshore along with relevant objectives to assure coherence between the two plans, once the marine plan is at final draft stage.

6. How can Ireland’s marine plan be used as part of Ireland’s climate change adaptation measures?

Our seas and oceans cannot be seen in isolation from human activities on land. The HC note the Climate Action and Low Carbon Development Act 2015 provides the statutory basis for the national transition objective laid out in the national policy position. The HC also notes that, in order to pursue and achieve the national transition objective, the Minister for Communications, Climate Action and Environment must make and submit to Government a series of successive National Mitigation Plans (NMPs) and National Adaptation Frameworks (NAFs). An adaptation framework is being drawn up for cultural heritage. Again, the HC would wish to see a holistic approach across all sectors with integrated goals and targets appropriate to their activities.

7. What measures do you think should be put in place to support optimal transboundary (including cross-border with Northern Ireland and with other parts of the UK) cooperation on marine planning?

The HC would expect and support strong emphasis on agreed International Law / treaties to deliver biodiversity outcomes; there are already a number of MPAs selected by the JNCC UK, two of which (SPAs) about the corresponding waters in Ireland. Other species, such as seals and cetaceans, are mobile throughout a range of International waters already and are accommodated, in the main by various governments.

8. What infrastructure investments need to be made in order to maximise the sustainable potential of our ocean resource?

The HC would wish to see significant resources placed to allow for real and proactive interrogation of monitoring in a wide range of marine areas. Competent authorities access to accurate and up-to-date scientific data to allow for determinations on planning issues both in terms of known species and habitats but also the wide gamut of data relating to marine hydrographical systems. At present NPWS are charged with monitoring Natura 2000 marine sites, in general terms, many of these remain unvisited or are monitored from land, due to real Health and Safety considerations. Additional marine expertise is required within competent authorities and extra support is required to ensure best science is available to decision makers, across the State sectors.

9. Environmental Assessment will be an important part of the preparation of Ireland's draft marine plan and the plan itself. What are the relevant significant issues to be addressed by the SEA and AA processes and what environmental objectives should be used?

As with question #8, this system is predicated upon the principles of having the best available, up-to-date information / scientific data and to have persons in place who can interpret and make sound decisions to ensure reasonable outcomes will accrue to deliver GES, balanced against the other HOOW Goals to be taken for the common good, in line with International responsibilities.

10. This document is an important milestone in the development of a single national marine plan for the entirety of Ireland's marine area. Thinking about the delivery of forward planning goals, what do you think would be the appropriate spatial hierarchy for future marine planning; for example, regional marine planning, a coastal zone or bay approach?

We support a regional approach using appropriate coastal units such as bays, rather than trying to apply land based administrative units below the mean High Water Mark. The coastal zone management is a process which takes into account the interactions of the sea, intertidal and land, and the management zone may go several kilometers inland, in particular to include towns which are linked to the coast by trade, culture, industry etc. However detailed coastal management structures may not be required for all stretches of coast line. Rather they should be prioritised for areas under greatest pressure such as Dublin Bay, the Shannon Estuary, Cork Harbour, Waterford Estuary, Galway Bay. In many of these locations, participative structures are already in place e.g., Dublin Bay and Shannon Estuary.

Build upon existing infrastructures and knowledge base and the active encouragement of public participation, will assist in setting up a robust basis for future marine planning.

11. What levers are needed to deliver greater efficiencies in administration and governance, when it comes to implementing and monitoring the NMPF?

It would be useful to look at other structures such as ones in place for the WFD and MSRD both of which have to interplay seamlessly. In terms of ensuring GES and generally best outcomes for marine biodiversity, the HC would wish there to be the appropriate checks and balances developed to ensure that the power balance is set to ensure sustainable goals are met. Clearly defined roles / responsibilities and systems are essential to drive these issues, which are fully resourced to drive a range of actions leading up to the stated date of 2040. Ireland has a wealth of graduates in the marine sector and we should seize the opportunities to make full use of their talents.

12. What are the key indicators for measuring the successful implementation of the NMPF?

The outcomes and their targets are well set out in the Marine Strategy Framework Directive Programme of Measures (POMS) submitted to the EC and they will be the first indicator of success in relation to GES, GES should in turn protect, preserve and, where possible, restore our rich biological diversity and ecosystems.

## **B Specific Comments**

### **B 1 Marine Strategy Framework Directive (MSFD)**

15.4 – The Heritage Council note the requirement to revisit the initial assessment for next phase of MSFD. It would be of great assistance if the designation parameters chosen were listed here to enable the public to understand why particular sites were designated.

**MSFD Programme of Measures (POMS) submitted to EC in 2016 regarding a strategy for achieving Good Environmental Status (GES):** these rely heavily on the Natura 2000 sites and the Heritage Council would like to see more emphasis given to areas outside of these designated areas as these also support a rich variety of species and habitats. For example, the HC also consider many of the smaller reefs (which may also be formed from shipwrecks) to be ecological “hot-spots”, many of which may support rich marine diversity and thus worthy of designation, perhaps along the lines of NHA status, which could afford them protection.

**B 2 Marine Protected Areas (MPAs) ( page 67)Consideration of the creation of Marine**

**National Parks:** Ireland’s rich and diverse marine resource has received much international and national acclaim, the HC would like to see the investigation into the designation of a small number of representative Marine National Parks, more likely based on the IUCN (International Union for Conservation of Nature) Category VI: Protected area with sustainable use of natural resources. The stated primary objective of this category: *“To protect natural ecosystems and use natural resources sustainably, when conservation and sustainable use can be mutually beneficial”*, would seem to be mutually beneficial fit for all stakeholders, while adhering to the aims and objectives of the National Marine Planning Framework.

**B 3 Maritime Area and Foreshore (Amendment) Bill, (p41)HOOW** identified the need for an integrated marine plan underpinned by an efficient and robust marine consent process; the HC would like to echo this important requirement. The Maritime Area and Foreshore (Amendment) Bill intends to streamline the marine consent process through aligning the foreshore consent system with the planning system and providing for a single Environmental Impact Assessment for projects. It will also provide a coherent mechanism to facilitate and manage development in the EEZ and on the continental shelf. To achieve this the HC would again foresee the need to have the necessary human and financial resources within all relevant agencies in place to ensure its effective implementation.

## **Appendix 1 – Cultural heritage**

### **Coastal heritage – what could be considered under Cultural Heritage**

Ireland's coastal heritage reflects the interaction of humans and the coast from historic uses to contemporary activities. Historic uses of coastal areas include exploration, transport, trade and commerce, military and naval activity, exploitation of natural resources such as fish, seaweed, aquaculture, or recovery of flotsam and jetsam. The Irish coast has distinctive features – archaeological monuments from prehistory and early medieval times, drowned prehistoric landscapes with Palaeoenvironmental deposits, a host of later medieval tower houses as well as Martello towers, small 19th piers and harbours, distinctive types of boat, majestic coastal views and landscapes in remote areas, ribbon development around Galway bay and Donegal bay and We also have our current uses of the coast such as shipping, recreation and well-being/ health, tourism, fishing, along with natural, or ecosystem services, by which we mean those functions that natural systems such as dunes, or estuaries provide e.g water purification, coastal protection, along with natural landforms which create our coastal landscapes, or seascapes. All these elements and the interactions between same, including music, and stories, place lore, and skills make up Ireland's coastal heritage.

Where do we find coastal heritage? both on the land and seaward side of the high tide line, on land, on the water and under water. Seascapes, or coastal landscapes, biodiversity, fisheries, built structures and wrecks and underwater archaeology, boats and the skills to make and sail them, placelore and traditions new and old.

Much of our coastal heritage is under pressure from land side development, urban sprawl, port expansion, demand for increased tourism facilities, new extractive and harvesting industries from aquaculture, declining water quality, declining fish stocks, changes to traditional industries and ways of life; the impacts of climate change such as sea level rise, increased storminess and coastal erosion.

The scope of Irish heritage is identified in the Heritage Act 1995 and includes built, nature and cultural heritage, an indicative definition into which maritime heritage can fit: seascapes and wrecks are specified. Intangible aspects of heritage such as placelore are not listed in the Heritage Act 1995, however they have been well accepted in heritage practice here.

Historically Ireland has not paid much attention to its maritime industries and maritime heritage<sup>1</sup>. Despite this, around the island, individuals and voluntary groups are working on their own or with local authorities and other organisations on many aspects of maritime heritage, recognising its significance or value for reasons relating to historic rarity, job creation, or as part of what makes that area distinctive. Many groups carry out exemplary work to protect, preserve and enhance their local coastal heritage. These initiatives have the potential to form the basis of or could inform larger coastal management programme. The state-funded Discovery Programme archaeological research institute is currently a partner in an Ireland-Wales INTERREG project called CHERISH which examines the impact of climate change of coastal heritage, in particular on Ireland's eastern and southern coasts.

That much of Ireland's coastal heritage is not better known or appreciated is due to many reasons, stemming from a lack of identification as coastal areas have been historically under-surveyed due to inaccessibility and perceived lack of productivity<sup>2</sup>. Areas formerly associated with activities such as fish processing, seaweed harvesting, salt panning were perhaps not regarded as part of the mainstream aspects of heritage such as archaeology or architecture, and have also rarely been the subject of research. This may be due in part from its peripheral nature that much of it is inaccessible or underwater. For this reason placenames are often the only surviving evidence of previous events and productive activities that formerly took place along the coast. They also can also link to folklore, wildlife and the rhythms of daily life in the past.

The lack of attention given to maritime heritage at an official level means we lack an overview, a national perspective, of this asset. This needs to be taken into account when setting up marine spatial planning in Ireland. If a section of the coast seems empty of heritage – this should be a stimulus to survey and examine that stretch of coast, rather than assuming it is devoid of heritage interest.

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<sup>1</sup> Explanations have been well expressed by John De Courcy Ireland, a pioneering figure in the identification, research and promotion of the richness Ireland's maritime heritage (REF).

<sup>2</sup> This is being rectified from a sea-ward perspective by the INFORMAR seabed mapping programme (DATE)

Lack of appreciation of the value of maritime heritage threatens its continued existence. Land-based or intertidal sites and habitats are under pressure from the myriad pressures facing our coasts: port expansion, tourism and recreational activities, and urban /suburban development, intensification of agriculture and aquaculture, impacts of climate change all have the potential to impact negatively on an unknown resource. With a higher level of knowledge and appreciation, the maritime heritage resource can be managed sustainably as part of future coastal developments, and indeed provide a stimulus for interesting, forward thinking initiatives along our shores. The cultural heritage of Ireland's coast reveals the dynamic interaction between people and their coastal environment. Over thousands of years, inhabitants of the Irish coast have harvested fish, shellfish, and seaweed, collected stone, sand and other materials from the coast; they have explored, traded, invaded, defended, prayed and played along the coast too. Physical reminders of these activities are to be found throughout the length of the Irish coast such as lighthouses and navigation markers, ports and seaside towns, harbours sheltering boats designed for many different uses and varying conditions of coast and sea. Documents, memorabilia, and equipment associated with coastal and seagoing activity can be seen in museums, collections and archives around the island. Many events and activities have, however, left no physical trace over the centuries; instead we must decipher the past through clues in coastal placenames, stories and music.

The coast is home to many diverse habitats and species of bird, marine mammals and plants. Many natural habitats have been modified or even created by human activity; for example the construction of piers and harbours has affected sediment distribution along stretches of coastline, while land reclamation has impacted on natural patterns of erosion and deposition elsewhere.

Ireland's coastal landscapes, often referred to as "seascapes," are moulded by the landforms, habitats, cultural associations and uses, (past and current). Seascapes are now valued for many reasons: their contribution to community or personal identity as well as the benefits such as recreational use that people gain from them. In the past, seascape features like headlands were put to practical usage: as strategic vantage points for navigation, defence, fishing and religious purposes, as we can see from the location of beacons, signal towers, military batteries and early Christian oratories. Nowadays, seascapes often provide the main attraction and backdrop for many recreational and tourism activities around the Irish coasts.

**Collections** A significant array of objects and documents associated with coastal and maritime history and heritage has survived and is held in public and private collections around the country. 160 maritime collections were identified in a study carried out for the Heritage Council in 2005 of which only c. 10% are owned by local authorities or a statutory body. The vast majority are run by community-based and voluntary organisations.<sup>3</sup> Many of these collections contribute to local distinctiveness and as a result are central to local tourism. These collections are identified on [Heritagemaps.ie](http://Heritagemaps.ie)

**Traditional boats and boat festivals** are amongst the most popular areas of coastal heritage. As a result of its history and variety of its coastline Ireland is fortunate to have a wide range of boat types. Steps have been taken by many individuals and voluntary groups around the coast to protect and promote their local boating heritage by repairing boats, building replicas, and collecting lore and skills from the surviving boat builders as well as hosting festivals and regattas. This work is of great significance as traditional boats and surviving nineteenth century boats afloat are not protected by legislation unless they are classified as a wreck.<sup>4</sup> Many regional and local boats are now redundant as their original uses for fishing, trade and transport have been superseded, e.g., the sand boats of Ballydehob, Achill sailing yawls, Waterford estuary prongs. Certain types of boat have been sustained through the dedication of associations such as the Galway Hooker and *Huiceirí na Gaillimhe*, while others have continued to evolve as their builders incorporate modern materials such as fibreglass and outboard engines: the GRP currach of the Galway coast is a case in point.<sup>5</sup> However many boats have been broken up or simply rotted away. Despite the general decline in the use of traditional boats, a county-wide surveys of boats in Co Galway found that that South Connemara in particular has one of the most vibrant boat cultures in Europe.<sup>6</sup>

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<sup>3</sup> Tully, 2008. This survey was repeated in 2013. The data sets are available at [www.heritagecouncil.ie](http://www.heritagecouncil.ie)

<sup>4</sup> National Monuments (Amendment) Act 1987 Section 1(1).

<sup>5</sup> Lynch *et al.*, 2011, p.20. GRP = Glass Reinforced Plastic.

<sup>6</sup> Lynch *et al.*, 2011, p.114.

**Built heritage** Irish seascapes are dotted with numerous buildings and structures, evidence of past coastal activities and livelihoods e.g. boatyards, warehouses, lighthouses, coast guard and fishermen's cottages, many of which are now abandoned and neglected. Increasingly they are being valued as an important part of local heritage and identity as well as an alternative source of employment and revenue. Many of these buildings now form a key part of Ireland's heritage tourism as holiday accommodation and exhibition spaces, providing opportunities in the immediate locality for employment and a focus of local interest and pride. This change reflects the changing role of heritage and the acknowledgement of its role at the core of Irish tourism. e.g the Wild Atlantic Way as well as its potential to help build social cohesion. Management of heritage has shifted from being solely the domain of experts to placing emphasis on the involvement local communities and voluntary groups<sup>7</sup>. In many cases management of coastal heritage sites is dependant entirely on the hands-on experience of community groups who put heritage at the centre of local initiatives.

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<sup>7</sup> This shift is expressed clearly in The Framework Convention on the Value of Cultural Heritage for Society (Faro Convention, 2005) from the Council of Europe.

## **Appendix 2 Seascapes**

### **The European Landscape Convention (ELC)**

Ireland signed and ratified the ELC in March 2002 and the ELC was formally enacted in Ireland in March 2004. The ELC aims to *'promote landscape protection, management and planning, and to organise European co-operation on landscape issues'*.

Article 2 – Scope of the ELC Explanatory Note makes the following provision:

*'This article states that the Convention applies to the Parties' entire territory and covers natural, rural, urban and peri-urban areas. **It covers both land areas and water areas and applies both to inland waters (such as lakes and areas of brackish water) and marine areas (coastal waters and the territorial sea)**'.*

The National Landscape Strategy 2015-25 will be used to ensure compliance with the ELC and to establish principles for protecting and enhancing it while positively managing its change.

### **Maritime Heritage and Significance of Irish Seascape**

The Irish seascape is of enormous significance to both Irish citizens and the Irish diaspora in terms of its contribution to an overall national 'sense of identity, belonging and well-being', including but not limited to traditions, myth and folklore. Due to our strong maritime heritage the Irish coastline is also the primary location and setting of many of our historic villages, towns and cities.

With the development of the Wild Atlantic Way, the international significance of the Irish seascape has grown enormously in terms of its world-renowned image and reputation, as a 'trigger' for attracting overseas visitors to Ireland, and its overall contribution to the tourism industry and balance of payments. For example, a number of the top 10 visitor attractions in Ireland are located along the coast – Cliffs of Moher, Skellig Michael, Giant's Causeway etc.

According to the Countryside Council for Wales, BSM and UCD Report (March 2001),

*'Seascape is a crucial element in any maritime nation's sense of identity and culture. It has played an important part in the history and development of Ireland [and Wales]. The coast and the sea is a primary holiday and leisure location and is a significant asset in a nation's recreational resource. The coast and related seascape is a finite resource under almost continual pressure for development'*.

*[Parentheses by author]*

### ***Seascape Assessment: Need to recognise Seascape Values***

The Heritage Council submits that it is important that seascape value be considered as a separate and distinct exercise during the seascape assessment process. Seascape value often arises through a close cultural association with the sea and land and seascapes may also be highly valued by many other non-local stakeholders for many other reasons, for example, as being high in spiritual, tourism, cultural and/or recreational values. As such, seascape value should be fully reflected in Figure A.1 and within the adopted methodology. Recognising and enhancing the 'value' of landscapes is a core tenet of the European Landscape Convention. In accordance with Article 5C of the ELC and as recommended in the Guide to Best Practice Seascape Assessment (2001), the seascape consultants should include a judgement of value based upon:

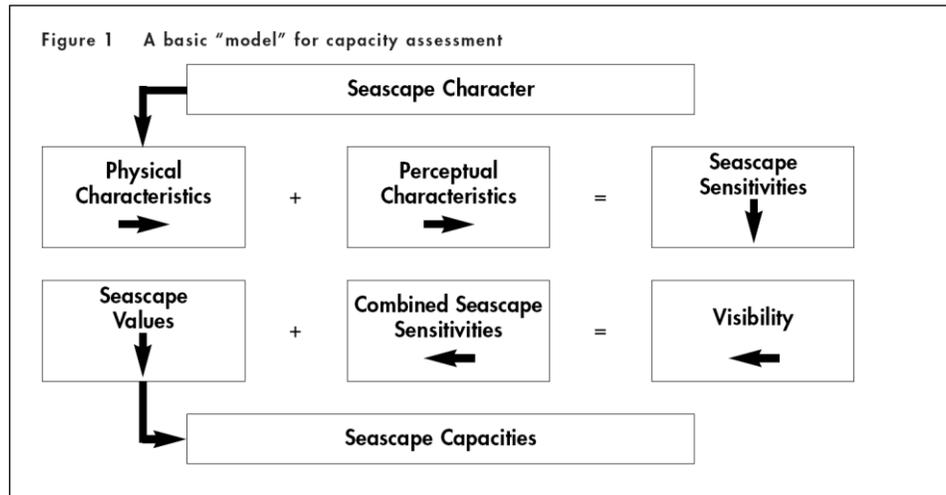
- Asking for the opinions of those with an interest in seascape;
- Research into public preferences, trends and consensus;
- Research into historical and cultural traditions and associations of the area; and
- Professional experience.

It is submitted that Ireland's unique cultural heritage necessitates that historic gardens and designed landscapes be included in the overall seascape assessment. For example, County Wicklow is promoted internationally as the 'Garden of Ireland' yet its major heritage and historic garden attractions are currently excluded from the seascape assessment.

The Heritage Council recommends that the location of historic gardens and designed landscapes should be identified on the landward zone of any seascape assessment, e.g. 10km, to ensure that the impact on these landscape and cultural features can be assessed and managed within the overall marine planning process.

In addition, the Heritage Council recommends that the seascape assessment should be informed by the seminal study by An Foras Forbartha entitled Inventory of Outstanding Landscapes (1977), by Bord Fáilte's National Scenic Landscapes Map (1994) and by Fáilte Ireland's Feasibility Study to Identify Scenic Landscapes in Ireland (Fáilte Ireland, 2006).

## Seascape Assessment: Need to Include Seascape Capacity



(Source: Scottish Natural Heritage, Report No. 103, 2005, page 4.)

### Visual and Cumulative Impacts

The Heritage Council would submit that tourism activities such as whale watching, kayaking, surfing and the developing cruise ship industry in Ireland should be considered as part of the overall seascape assessment. Whale watching is one of the fastest growing tourism industries in the world and the potential in Ireland is considered under-developed, with 24 species of cetacean identified in Irish waters (Irish Whale and Dolphin Group website). Visiting cruise ships, which provide a considerable source of income from passengers and crew expenditure – estimated at seven times the average foreign tourist visitor spend (Maloney, 2003)- should be considered as both a marine-based and land-based receptor (for the period they are docked/anchored).

The broad cumulative effects of potential wind farms on visibility (taking into account human perception) along major shipping routes and along the coastal landward zone should also be considered in terms of whether potential windfarms (size dependent) might be intervisible, simultaneously visible or sequentially visible. For example, frequent or repeated sequential visibility can lead to a perception of a wind energy seascape, where the wind turbines become the defining characteristic of that seascape (Scottish Natural Heritage, 2005).

The Heritage Council also recommends that the cumulative impact of proposed off-shore windfarms along with on-shore windfarms along the coast (size of landward zone to be determined, e.g. 10km) should be considered. In addition, the cumulative impact of existing and potential developments in aquaculture and oil and gas exploration need to be fully considered as part of the cumulative change that can impact on the character of a seascape.

### **Forces for Change and Effects on Ireland's Seascapes**

As our seascapes are a dynamic environmental resource, it is essential that the likely key forces for change during the plan period are identified and addresses any implications for current and future capacity for offshore windfarms.

Major new infrastructure including: new motorways/motorway bridges, extensions to existing ports and airports and proposed new ports (and resulting impact on shipping lines both commercial and leisure), will all impact on seascapes as will any changes to existing coastal rail lines, e.g. Dublin to Belfast line at Malahide/Donabate or on the Dublin to Rosslare line around Bray Head. Other general forces for change include:

- Settlement patterns;
- Fisheries;
- Coastal aquaculture;
- Recreation/tourism/heritage proposals;
- Climate change/sea rise and coastal protection;
- Mineral extraction, e.g. coastal super-quarries;
- Oil and gas exploration;
- Land claim; and
- Marine and coastal policy.

It is important that the likely forces for change, including changes due to climate change adaptation strategies, are identified for the designated areas of assessment.

## **Seascape Monitoring and Reporting**

It is important that objectives are fit for purpose, indicators are measurable, i.e. quantitative, and that targets are realistic. The definition of landscape quality objectives (including marine areas) in parallel with public participation and consultation is also required under the provisions of Article 6D of the European Landscape Convention (ELC).

### **1. Best Practice Evidence-Based Baseline in relation to Seascape Assessment**

Given the significant gaps in the baseline in relation to seascape assessment, the Heritage Council would submit that a comprehensive and reliable series of regional landscape assessments including historic landscape characterisation (HLC) be prepared as soon as possible, preferably in partnership with Northern Ireland.

This assessment would identify 'regional seascape areas' and 'regional seascape units' (incorporating the 24km/12nm zone off-shore (along with 15km and 2km) along with a designated on-shore/landward zone – normally 10km for a regional seascape assessment) and would be formulated using evidence-based seascape types that have been ground truthed by recognised experts. Forces for change in each regional seascape area and unit would also be considered as part of the assessment process along with an assessment of seascape values and seascape capacity. The Heritage Council would provide any necessary support in this regard to inform the (all-island) regional seascape assessment in order to ensure that the project is being carried out in accordance with the provisions of the SEA Directive, the European Landscape Convention and the Planning and Development Acts 2000-2010.

The Heritage Council recommends that the location of historic gardens and designed landscapes should be identified on the landward zone of any seascape assessment, e.g. 10km, to ensure that the impact on these landscape and cultural features can be assessed and managed within the overall SEA.

In addition, the Heritage Council recommends that the seascape assessment (regional or otherwise) should be informed by the seminal study by An Foras Forbartha entitled Inventory of Outstanding Landscapes (1977), by Bord Fáilte's National Scenic Landscapes Map (1994) and by Fáilte Ireland's Feasibility Study to Identify Scenic Landscapes in Ireland (2006).

### **2. Cumulative Impacts**

The broad cumulative effects of potential wind farms and other offshore energy generation on visibility (taking into account human perception) along major shipping routes and along the coastal landward zone should also be considered within the overall assessment, in terms of whether potential windfarms (size dependent) might be *intervisible*, *simultaneously visible* or *sequentially visible*.

**3. *Best Practice Seascape Indicators***

Finally, the Heritage Council would strongly recommend that quality seascape objectives, indicators and targets are built into the overall seascape assessment, as required under the SEA process and the European Landscape Convention.

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