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Ms Liz Pope
Acting Chief Executive Officer/Head of Registration
Tailte Éireann
Chancery Street,
Dublin 7
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Our ref: EPAC-0823

16 June 2023

Re: Public Consultation on the Tailte Éireann Statement of Strategy 2023–2026

Dear Ms Pope

We acknowledge your correspondence dated 19 May 2023 in relation to the preparation of Tailte Éireann's first Statement of Strategy, covering the period 2023–2026.

The Environmental Protection Agency (EPA) welcomes the opportunity to submit our views on your new Statement of Strategy as part of the ongoing public consultation process, specifically in relation to maximising the advantages of integrated land data nationally for enhancing environmental protection.

In our most recent State of the Environment Report ([Ireland's Environment – An Integrated Assessment 2020](#)), we noted that:

*“A progressive approach to land cover, land use and land management is required to promote land practices that are sustainable and right for our environment and our people. Implementing such an approach will help coordinate, prioritise and measure Ireland's response to significant environmental issues such as climate change and the decline in nature across multiple sectors. **An integrated national approach to land mapping** will be needed to support this work”.*

In this context, we welcome the establishment of Tailte Éireann and your stated commitment to facilitating easy access to land information and to being a leading provider of digital-first services, achieved through innovative service delivery, data integration and management.

This letter includes EPA comments and observations on a number of areas, which should be considered as relevant and appropriate in developing the new Strategy: (i) Tailte Éireann's role in the National Land Use Review; (ii) datasets of national importance (including landcover mapping and

change detection, hydrological networks mapping, LiDAR mapping, national aerial orthophotography) and (iii) the future development of the National Mapping Agreement.

1. National Land Use Review

The National Land Use Review is a commitment of the current Programme for Government, with the aim of ensuring that optimal land use options inform all relevant Government decisions. Phase I of the Land Use Review, led by the EPA, collated an evidence base to determine the environmental, ecological and socio-economic characteristics of land types across Ireland. It was published by Government in March 2023 (<https://www.gov.ie/en/publication/f272c-land-use-review-phase-1/>). We acknowledge and welcome Tailte Éireann's active involvement in the EPA-led Expert Group on National Land Information, which made an important contribution to Phase 1 of the Land Use Review.

Comprehensive land mapping is a critical success factor in the development and implementation of a national land use strategy or policy. Reflecting this, many of the nineteen recommendations made at the end of Phase 1 of the LUR relate to land mapping. To ensure that this is important agenda is advanced and current data gaps are resolved, we would welcome a strong commitment by Tailte Éireann in your Strategy to the continued development and expansion of land mapping capacity.

Of particulate note:

- Recommendations 7 and 19 of the LUR refer to the development of national land use maps. The recently published national landcover map, developed by Ordnance Survey Ireland / Tailte Éireann in partnership with the EPA, is an important precursor to the development of national land use maps. The continued and likely expanding role of Tailte Éireann in both landcover and land use mapping going forward, should be clearly recognised and elaborated in the new Statement of Strategy.
- Recommendation 8 calls for the use of spatial data to identify national indicative maps to identify areas that are suitable, or not suitable, for certain land uses at a strategic level. Tailte Éireann's data on landcover, elevation, hydrography and buildings will be essential datasets in this regard. The important and strategic role of Tailte Éireann in this kind of national suitability mapping could be elaborated in the Strategy Statement.
- Recommendations 17 and 18 of the LUR highlight the importance of continued investment in land, soil and ecosystem mapping capacity in Ireland. This echoes the EPA's recommendation in our State of Environment Report regarding the need for an integrated national approach to land mapping.
- Phase 1 of the LUR analysed land ownership in Ireland (Phase 1 Document 03: Land Ownership Analysis). It emerged that a complete national ownership profile is not currently possible due to data deficits. Given the critical importance of land ownership in the design and implementation of land use strategies and plans, there are significant opportunities for Tailte Éireann to assist in resolving existing land ownership data gaps and to make land ownership spatial data more readily available to land use policymakers and planners.
- Land use, landcover, land ownership and other environmental analysis would benefit from a reliable and consistent National Terrestrial Boundary. There are known inconsistencies within the national boundary, meaning that it is difficult to define a consistent national area for analysis and change monitoring purposes.

2. Datasets of National importance

Tailte Éireann's data makes a valuable contribution to our understanding of Ireland's environment. We offer below some recommendations regarding specific data themes of national importance, which may inform future opportunities for Tailte Éireann's data development, namely:

(i) Landcover mapping and change detection

There is significant, widespread interest in the newly published national landcover map, which is welcome and reflects the importance and value of this new resource. However, there is currently a lack of clarity about future updates to the landcover data. In the interests of public information and transparency, we would welcome clarification on Tailte Éireann's overall strategy for landcover mapping, including formal update cycles for the data and how mapping landcover change over time will be managed.

PRIME 2 data plays an important role in this change detection: provision of clear information on changes that occur in Tailte Éireann mapping products would be of significant benefit to environment stakeholders, specifically to be able to differentiate between a change that related to data quality improvement versus a change that reflects a modification on the ground.

In developing and in implementing Tailte Éireann's new Strategy, there is an opportunity to consider 3-dimensional and dynamic spatial data output. This would allow for more complex land modelling (for example, the capture of rivers flowing under transport infrastructure and trees/hedgerows overhanging roadways).

(ii) Hydrological networks mapping

Spatial data on water features is essential in designing and implementing measures to protect and improve water quality. Information on connectivity of water features is important to enable detailed assessment of pollutant movements through our hydrographic networks.

While PRIME 2 data provides detailed mapping, there is a strategic opportunity to provide national detailed hydrographic networks, both for environmental and flooding modelling but also for private sector applications.

(iii) LIDAR Mapping

The EPA-led Expert Group on National Land Information has identified that access to a complete National LIDAR survey would be very beneficial. There is an opportunity for Tailte Éireann to consider whether the new Strategy may include delivery of LIDAR as a service to national stakeholders.

(iv) National aerial orthophotography

Tailte Éireann's ortho imagery is very important for environmental assessment. A statement about the ongoing strategy for delivery of national orthophotos, including delivery schedules and clarity of the available resolution, would be welcome in the Strategy.

3. The National Mapping Agreement

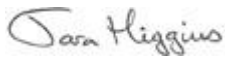
The development of Tailte Éireann's new Strategy offers a valuable opportunity to outline the future development of the National Mapping Agreement (NMA).

A defined catalogue of the data covered by the NMA would be beneficial, including a roadmap for data that will become available under the NMA in the future and data that is under the NMA that will become available as Open Data.

The elaboration of future plans for the NMA is an opportunity for Tailte Éireann to also outline plans for Open Data delivery and implementation of the Open Data Directive. The development of the NMA could also include plans for the provision of data accuracy assessments for data under the NMA, similar to the accuracy assessments carried out on the national landcover map.

The EPA acknowledges the important role that Tailte Éireann plays in the delivery of trusted national land mapping services and we look forward to continuing to collaborate with you on this important national agenda. If you have any queries on this submission, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in dark ink, reading "Tara Higgins". The signature is written in a cursive, flowing style.

Dr Tara Higgins

Programme Manager, Office of Evidence and Assessment