



Ireland's Forestry Programme 2014 – 2020: Strategic Environmental Assessment (SEA) - Comments from the Heritage Council

Introduction

The Heritage Council welcomes the opportunity to comment on the Strategic Environmental Assessment for the Forestry Programme 2014 – 2020. Council has taken a long interest in the development of forestry policy in Ireland and since 1999 has undertaken a number of policy reviews and proposals. Council's ongoing funding support for Woodlands of Ireland (Wol) adds to our involvement in forestry matters.

Native Woodland Scheme

Through our role with the Woodlands of Ireland, the Heritage Council Wol has been involved with implementation of the Native Woodland Scheme (NWS). We concur with Wol that a target of between 400 and 500 ha/yr should be set for NWS Element 1 – Conservation, which addresses the management of existing native woodlands.

While the Draft Forestry Programme places considerable emphasis on positive environmental impacts, it is disappointing that the programme falls short of its promises, particularly with regard to the NWS. The target area for NWS El. 1 was reduced from 360ha/yr to 30 ha/yr in the Forestry Programme by the Forest Service after the SEA was completed. If implemented, this reduction will render this part of the NWS redundant with serious implications for the Scheme, the forest industry, native woodlands, conservation, heritage and forestry policy.

The Heritage Council endorses

- the view of Wol that at a minimum the original target area of 360ha/year for NWS El. 1 throughout the Forestry Programme should be reinstated and further increased to 450 ha/yr.

Cultural Heritage and Landscape

The impact of forestry on cultural heritage can include implications for archaeological monuments, historic buildings, and designed landscapes but also the broader historic character of the landscape. Significantly, impacts can include both the direct physical impact of developments and any indirect impacts such as the setting of monuments. The SEA considers the direct and indirect impacts of forestry on cultural heritage yet it is suggested here that the mitigation and monitoring proposals could be more effective. This submission from the Heritage Council makes a number of proposals as to how the mitigation and monitoring could be made more robust.

Archaeological monuments in Ireland are protected under the National Monuments Act 1930-2004. A new bill to update and consolidate this Act is due for publication in 2014-15. Under the existing legislation, known archaeological monuments in Ireland are recorded on the Record of Monuments and Places (RMP) which is maintained by the Archaeological Survey of Ireland (see www.archaeology.ie for further details).

Forestry and cultural heritage

We note the statement on p133 of the SEA about the likely location of new forestry: *'It is envisaged that the areas which will be afforested over the period of the FP 2014-2020 will, in the main, comprise wet mineral soils (generally land with poor drainage and varying cover of rush species, which are currently or were formerly enclosed for agriculture).'*

Such marginal and upland landscapes have considerable cultural and natural value and possess a long legacy of human settlement. In earlier times these areas were extensively farmed and were also exploited for their mineral wealth and woodland resources. This has created a rich legacy of monuments such as hilltop cairns, ancient field systems, hut sites and enclosures as well as particular types of vernacular architecture. To date the State's programmes of archaeological mapping and recording have not sufficiently surveyed upland areas and more intensive surveys are only beginning to understand and reveal the scale of this resource.

Survey work in upland/marginal areas of Leitrim, west Cork, Kerry and Carlow has consistently found that the numbers of monuments shown on the statutory Record of Monuments and Places are an under estimate.¹ This has led one researcher to comment that *'large areas of upland, including many mountain ranges from Donegal to Tipperary, have surprisingly few recorded ancient field patterns...As a consequence the current Sites and Monuments Record, must be seen as seriously deficient in respect of upland archaeology and the areas of marginal lands which the forestry programme will potentially develop'*².

More recently survey in the area of the Blackstairs, Co Carlow found that an *'increase of 70 new features recognised on Dranagh Mountain [which] suggests that the current SMR record is merely the tip of the iceberg when it comes to the true number of surviving features in the Blackstairs as a whole'*³.

As pointed out in the SEA, forestry plantations require ancillary elements such as access roads. Where project design and construction take place without experienced archaeological input and/or fieldwork, these interventions have the potential to disturb archaeological deposits and structures directly.

¹ See W. O'Brien 2009. *Local Worlds: Early settlement landscapes and upland farming in south-west Ireland*, Galway, pp360-65.

² *Ibid.*, p363.

³ Also S. Ó Murchú 2012 'Archaeology Among the blackthorns' in *Journal of Irish Archaeology* XXI, 35-56. (quote from p53, see also comments on p42-3).

The SEA acknowledges (p169) the existing practice whereby the presence of a Recorded Monument triggers an archaeological assessment. The SEA also recognizes that there is a need for *'a commitment to also resource and maintain screening and assessment regime to consider undesignated sites and monuments'* (p136). It is contended here that the existing practice of the presence of a Recorded Monument triggering such an assessment is insufficient and we contend that a risk based approach based upon the experienced assessment of archaeological staff in the DAFF liaising with colleagues in the DAHG is required. In such a scenario, preliminary desk based assessment and knowledge by the DAFF staff based on the type of landscape, level of RMP survey previously carried out and the likelihood of unrecorded archaeological remains being present should trigger field based assessment. This may well be what is stated as the mitigation in point 7.2.12 (p151 and on p169) but a commitment to measures to protect unrecorded archaeological remains and a related monitoring indicator would be beneficial.

An additional issue here is the likely variation in practice involving cultural heritage impact assessments. The generality of current archaeological forestry guidance allows for a wide variation in practice. Most practitioners carrying out archaeological assessments, not just restricted to forestry, refer to the Framework and Principles document dating from 1999.⁴ However, far greater aerial imagery is now available, some of which is historic, and modern methods of aerial remote sensing are now available for archaeological assessment. However, the experience of practitioners in interrogating such resources is variable. A key development in recent years has been that of Geographic Information Systems (GIS) and the cheaper availability of Lidar data and imagery, in particular from Ordnance Survey Ireland (OSi). While it would be expected that the use of such resources to identify previously unknown monuments and to determine view shed analysis would be a key way to measure impact and, as such manage risk, the uptake in this techniques is highly varied and cultural assessments in many cases remain restricted to a list of Recorded Monuments accompanied by rapid field survey and documentary research. It is argued here that greater guidance on archaeological assessments would be highly beneficial to improving practice in this regard. To this end, the revision of the Forest Service (2000) guidelines on forestry and archaeology would be beneficial.

In summary, gaps in surveys of archaeological monuments, in particular in marginal and upland areas, coupled with variation in the practice of cultural heritage/archaeological assessments is placing the preservation of archaeological monuments in doubt. As such we suggest the following:

- The revision of the Forest Service (2000) guidelines on forestry and archaeology would be beneficial, in particular to set a baseline of what forestry related

⁴ Department of Arts, Heritage, Gaeltacht and the Islands (1999), *Framework and Principles for the Protection of the Archaeological Heritage*.

assessments should contain. While this action should be undertaken primarily with the DAHG, the Heritage Council is willing to contribute

- In relation to the monitoring measures of the SEA, a measure for the numbers of DAFF RMP checks, field based surveys and rate of discovery of unrecorded monuments would be beneficial.
- The measure to monitor the condition of '*known historical environment features where FP related work takes place*' (p169) is welcomed. A monitoring measure for the number of condition surveys would be useful here as well as a reporting mechanism on the results of such monitoring
- Looking beyond monitoring, a commitment to measures to maintain such sites (e.g. clear scrub, interpretation measures etc) would be expected in a forest management plan in particular where sites may be publicly accessible
- Finally, the commitments to Knowledge Transfer, Targeted Training and CPD are to be welcomed. The inclusion of cultural heritage topics in these areas is essential

Setting and indirect impact

Indirect impacts are caused when forestry changes the setting of historic sites and monuments. This can diminish the visual amenity of the landscape and its historic character. While in some cases, the issue of setting for relatively low visibility monuments such as fulachta fiadh or field systems may not be as strong an issue, there are cases where historic assets were deliberately intended to have a strong landscape context, such as hill-top cairns, passage tombs, hillforts, megalithic tombs, designed landscapes with deliberate sight lines etc. The understanding of the landscape context of such places is crucial and is an issue of growing appreciation in recent years.

The commitment in section 7.3.12 (p156) to consider the setting as well as the individual heritage features is welcomed, yet a commitment to produce an advisory note or guidance on this would be welcome. The Heritage Council is willing to collaborate on the drafting of such content.

As such we suggest:

- Draft criteria on the setting of archaeological monuments and forestry

Forestry and cultural heritage as a resource

The preservation of upstanding archaeological monuments within forestry offers the potential to create environmental amenities for the general public. This is touched upon in the various sections relating to Green Infrastructure. While this is admirable as a framework it is not followed through to its potential, for example the opportunity to present archaeological monuments to the public within forestry is not highlighted. Given the scale of public monies to be invested in the Forestry Programme the identification of a measure to encourage public

accessibility would be beneficial and in accordance with the notion of creating public value. A measure for this would be essential.

As such we suggest:

- A measure to encourage and report on public accessibility would be beneficial

Landscape

The reference to the draft National Landscape Strategy is to be welcomed. Amongst other issues, this proposes that a robust system of Landscape Character Assessment and classification will be developed. As presently formulated the SEA makes no reference to existing landscape character assessments and their recommendations or otherwise on suitability for forestry. The impact of forestry on the landscape has a recommended mitigation/enhancement measure of prevention of planting in sensitive areas of National Parks (p170). Given the small scale coverage of National Parks in Ireland, the focus of this on National Parks does seem rather narrow. A range of local authority landscape designations also apply but are not acknowledged.

We suggest:

- Allowing for the small scale coverage of National Parks in Ireland, the focus of mitigation on just National Parks seems restrictive. Consideration of acknowledging the range of local authority landscape designations is warranted.

Feedback and monitoring

Section 8.2 briefly sets out how the Forestry Programme will change in response to feedback from monitoring. The commitment to a feedback loop (i.e. from implementation through to monitoring through to revisions in the ongoing programme) is welcomed. However further details (structures, reporting intervals, responsibilities, relationship with stakeholders etc) on this are absent from the SEA and the Forestry Plan.