



**An Roinn**  
**Ealaíon, Oidhreachta agus Gaeltachta**  

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**Department of**  
**Arts, Heritage and the Gaeltacht**

Our Ref: **G Pre00364/2014**  
(Please quote in all related correspondence)

14 October 2014

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**Re: Draft Forestry Programme 2014-2020**

A chara

On behalf of the Department of Arts, Heritage and the Gaeltacht, I refer to your recent consultation on the above.

Outlined below are heritage-related observations from this Department in relation to nature conservation and archaeology.

**Nature Conservation**

The Department notes that the Department of Agriculture, Food and the Marine has identified the following four needs in relation to Ireland's forest sector:

- Increase on a permanent basis, Ireland's forest cover to capture carbon, produce wood and help mitigation
- Increase and sustain the production of forest-based biomass to meet renewable energy targets
- Support forest holders to actively manage their plantations
- Optimise the environmental and social benefits of new and existing forests.

The Department also notes the statement within the Programme that some of the proposed measures are in response to the recent review of Irish Forest Policy (*Forests Products and People-Ireland's Forest Policy- a renewed vision*) for which an environmental assessment, rather than an appropriate assessment was undertaken. Thus, this is the first level of programme development at which an appropriate assessment is being undertaken for any of the proposed policies that are reflected within this Programme.

**Issues of Primary Significance:**

The Department has reviewed the Programme documents in relation to nature conservation and has the following comments to make. It is noted that, as set out in Appendix A of the Natura Impact Statement, some of the comments previously made by the Department at the earlier consultation stage have been taken on board. However, a number of important areas are still outstanding, and others arising, and these are also set out below. These observations should also be read in conjunction with previous submissions on the Programme. It is the Department's general view that further assessment and analysis is required to support the conclusions that the Programme will not affect the integrity of European sites, or have a significant effect on the environment. This further analysis will also help to ensure that clarity is provided to those involved in the development of this

sector, with respect to the constraints that may apply. The Department hopes these comments will prove useful in the finalisation of the Programme and the associated assessments, and would be happy to discuss them in more detail.

The comments cover the following general areas:

1. **Clarification on the Competent Authority (DAFM) for the Appropriate Assessment of the Forestry Programme 2014-2020.**
2. **Conclusions of and revisions to the Natura Impact Statement, including to the impact assessment, methodology, cumulative effects, and mitigation (including the Freshwater Pearl Mussel Catchment Management Plans)**
3. **Data, Information Gaps, the Evidence-Base and Research and Development**
4. **Areas of high nature value outside designated sites**
5. **The draft National Peatlands Strategy and Climate Change**
6. **Invasive Species**
7. **Observations in relation to the SEA Biodiversity Objectives**

1. **Clarification on the Competent Authority (DAFM) for the Appropriate Assessment of the Forestry Programme 2014-2020.**

DAFM is advised that Section 2.6.1 of the AA Screening states that this Department is the competent authority for the AA Screening “*A Screening Statement... was produced in May 2014 and sent to the DAHG as the competent authority*”. As previously advised, DAFM (not DAHG) is the competent authority for the appropriate assessment for the Forestry Programme 2014-2020, pursuant to Regulation 42 of the European Communities (Birds and Natural Habitats) Regulations 2011. As such, DAFM is responsible for concluding the appropriate assessment, and must adopt the Programme only after concluding that the Programme will not adversely affect the integrity of European sites. DAFM is also advised that under Regulation 61, records of appropriate assessments are to be kept for at least 12 years.

## **2. Conclusions of and revisions to the Natura Impact Statement**

The Department previously advised that more consideration needs to be given to the implications of the Programme for the conservation objectives of European sites, including at the screening stage, but now most importantly, in the undertaking of the appropriate assessment. Reference is made to the information on which the screening is based having been obtained “*from the Forest Service, the Prioritised Action Framework (PAF) for Natura 2000 report (DAHG, 2013) and the Status of EU Protected Habitats and Species in Ireland reports (NPWS, 2013)*”. On the basis of this, and on review of the NIS submitted, the Department is concerned that insufficient consideration has been given to the impacts of the Forestry Programme on the conservation objectives for European sites, and that insufficient analysis has been undertaken to robustly demonstrate that the mitigation proposed is sufficient to ensure no adverse effects on site integrity will arise.

It is also noted that Table 2.1 indicates that the Neighbourhood Scheme has been screened out, but later text suggests that it has been further considered in the NIS, as it has the potential to affect European sites. As previously expressed, the Department is of the view that the whole Programme should be considered in the Appropriate Assessment, to ensure its full effects are considered and addressed.

### **Impacts Arising from Forestry:**

The identification of potential Direct and Indirect Impacts does not appear to have been established systematically for all Annexed habitats and species, and reference in the text is made to only a subsection of those species and habitats that may be affected, in Table 4.1 of the NIS. The reasons for excluding other habitats and species are not provided. Indirect impacts that do not appear to have been considered include habitat fragmentation, acidification of soil from nearby/adjacent forestry, risks of changes to watercourse hydromorphology as a result of increases in drainage, increased run-off from forest roads etc. These may all affect European sites a significant distance downstream, as well as those immediately adjacent.

Furthermore, no reference is made within the NIS to the current status of these Annexed habitats and species (it is referenced briefly in the SEA) and while acknowledging the sensitivity of the

Freshwater Pearl Mussel and the hen harrier to forestry activities, very little attention is paid to the other Annex I species of the Birds Directive that may be affected, or to other Habitats Directive Annexed species.

### **Mitigation (Section 6 of NIS):**

The proposed programme measures and associated mitigation are not demonstrated to be sufficient to address the effects that may occur to sites, particularly when considered in combination with the existing forestry estate and its management. Emphasis should be placed on supporting the design of the measures and the mitigation (such as extent of buffer zones) with scientific data and information, particularly in view of the noted concerns about their efficacy in ameliorating potential effects.

The Department notes that in Section 6.1.2 of the NIS, a key mitigation for the FWPM is adherence to the as yet unpublished draft Forest Management Plan for Priority Freshwater Pearl Mussel Catchments. Currently the detail of the Plan is not yet known to this Department, though it is understood that it is not planned to permit any further afforestation in the "Top 8" FWPM catchments, except for Native Woodland, but that reforestation may be considered for its appropriateness. The Department welcomes the imminent publication of the draft Plan, but in the absence of further detail and assessment, is of the view that it is premature to conclude that the Plan will fully mitigate the potential effects of the Forestry Programme on FWPM in European sites. Section 6.1.3 of the NIS includes a commitment that a range of Annexed habitats shall be avoided by afforestation projects, with the caveat that *"identification of these habitats is required to ensure that afforestation is avoided and adequate buffer zones should be applied to avoid ex-situ impacts where afforestation occurs outside these areas"*. It is unclear how or whether this information gap will be addressed before the commencement of the new Programme, and whether sufficient scientific information is currently available to adequately identify the size of the buffer zones required.

Mitigation set out in Section 6.1.4 states that *"The locations of breeding Annex I bird species within Natura sites are likely to be well known and these too should be avoided by afforestation programmes."* It is unfortunately not the case that such breeding sites are well known and current available data from this Department should not be considered to be a sufficient evidence-base for the identification of all such breeding sites. It is expected that further research and survey work would be required to ensure all such sites are avoided, rather than solely "advice" or the existing data-sets of this Department.

In Section 6.1.5, a reliance on standard sedimentation controls is expressed, without any presentation of scientific evidence or data of their effectiveness or reliability, which is a particular concern in light of recent research by the Hydrofor project, which would call their effectiveness into question.

In the following sections, there appears to be a reliance on existing data or available advice (as opposed to be research and survey work) to be sufficient to identify whether Annexed habitats and species may be present and affected by the Forestry Programme. It is this Department's view that such data and information gaps should be reviewed more strategically and greater consideration given to the role the Forestry Programme should in filling those gaps, to inform its sectoral development and in researching, designing and developing the necessary mitigation. The ongoing enhancement of in-house capacity should also be considered.

With regard to hen harrier, a commitment to the integration of the Hen Harrier Threat Response Plan within the Programme on its completion (expected June 2015), would also be welcomed.

Without a more considered and scientifically robust assessment of the interactions between forestry and the Annexed habitats and species and commitment to its delivery in clear timeframes, it is unclear if the proposed mitigation in Section 6 of the NIS will be sufficient to address the range of impacts that may arise. Generally, greater detail is required on how the mitigation measures will be developed, with specific commitments to timing of delivery e.g. updating and roll-out of the Forest Service Guidelines. As noted in the NIS, it is important that the mitigation be reflected fully within the Programme itself as a key aspect of its delivery.

Thus, the Department is of the view that it is premature at this point to conclude that the proposed mitigation is sufficient to ensure that the Programme will not adversely affect the integrity of European sites.

### **Recommendations on Revision of the NIS:**

1. It is this Department's recommendation that the NIS be revised to more systematically to
- identify the full range of impacts that may arise from all the Programme measures,
  - consider how these will or may affect all qualifying interests/species of conservation interest, particularly in view of their current conservation status (as set out in Ireland's recent reports on Article 12 of the Birds Directive and Article 17 of the Habitats Directive) and with due regard to the range of attributes that have been established through this Department's programme of establishing site-specific conservation objectives ([www.npws.ie](http://www.npws.ie)).
  - more in-depth consideration of the projects and programmes that may work "in-combination" with the Forestry Programme and give rise to significant negative effects on sites, particularly in view of their current conservation condition. Particular attention should be given to the cumulative effects of the Programme with the previous programme and existing forestry estate, noting the pressure forestry currently applies to some Annexed habitats and species, the current "unfavourable" status of many of many of same, and the requirement to restore to favourable conservation condition. Consideration should also be given to the policy interaction between the level of incentives provided within the Rural Development Programme to support farming in Natura sites and other areas of high nature value and those provided to incentivise forestry in the same areas, and whether they interact in a manner that supports the conservation objectives of the sites, or are potentially contrary to them.
  - clearer linkage of mitigation design and demonstration of its effectiveness (including scientific analysis and information) to the effects that may arise. It needs to be clearly explained and reflected within the Programme how the mitigation will be developed, and when it will be ready for application, as this may affect the ability to roll-out aspects of the Programme with immediate effect.
  - transparency and auditability of the system for control/enforcement of these measures, including the development of indicators for the assessment of their effectiveness.

### **3. Data, Information Gaps, the Evidence-Base and Research and Development**

The Department notes the role that the Indicative Forestry Statement plays in informing opportunities for forest expansion in a manner that is compatible with other interests, including the environment, heritage and the landscape. As referred to above, the development of the evidence-base to inform the development of the forestry sector is necessary to ensure its goals can be achieved, and to also provide clarity to the sector. This is particularly pertinent to ensuring the Indicative Forestry Statement which is used to provide high-level national guidance is based on the most-up-to-date and relevant information, including data that has been collected by this Department on the occurrence of Annexed habitats and species. The IFS map presented in the Report is dated as 2005 and while reference is being made to it being updated, it is not clear how often. The use and analysis of more ecological data and information at the strategic level of this assessment could and should help to reduce the challenges at the site-level in assessing cumulative effects, and in understanding the potential of forestry to affect habitats and species, at significant levels, in the wider countryside (e.g. Annexed habitats and species outside sites, birds in the wider countryside, nationally protected species).

The Department would be happy to discuss with DAFM whether data that it holds may be used in such a way as to inform the next update of the IFS and strategic spatial planning for the Forestry Programme.

The Department would also welcome a commitment in the Programme to further research and development of effective mitigation measures, including for species other than the FWPM and hen harrier that may be affected by forestry.

### **4. Areas of high nature value outside designated sites**

The Department welcomes the commitment in the Forestry Programme to ensure that the afforestation target will avoid negative effects on areas of high ecological value, including areas under high nature value farming. This will be particularly important in protecting species protected under national legislation and in conserving birds in the wider countryside. However, it is unclear how this will be incorporated into the decision-making, as screening for EIA requirements may not trigger the assessment of applications where effects on such areas may occur. The enhancement of the IFS, as referred to above, and reference to data held by other bodies, such as the National Biodiversity Data Centre (e.g. for Flora Protection Order species) in decision-making could help to achieve this commitment. Furthermore, the IDEAL-HNV project and undertaken by Teagasc and

the Institute of Technology Sligo, supported by DAFM, is currently attempting to address the knowledge-gap concerning the national scale distribution of potential HNV farmland in Ireland and is working to set out criteria to define it. The integration of the outputs of that project into IforiS could also help to achieve this commitment.

### **5. The draft National Peatlands Strategy and Climate Change**

The Department notes the stated need to increase Ireland's forest cover to capture carbon. However it is unclear how this will be operationalised or assessed at the site level *i.e.* so that more carbon is not released by its siting on, for instance, inappropriate soils than will be stored through its planting. This is relevant to the commitment in the draft National Peatlands Strategy that the impact of planting on hydrology of peatlands, impacts on carbon loss and sequestration and the potential for adverse impacts on neighbouring watercourses will be considered.

Other relevant commitments which this Department would invite DAFM to consider in the context of the Forestry Programme include:

NPS P 9: Forest policy will consider and assess whether sufficient safeguards are currently in place to ensure that inappropriate afforestation does not occur on peatland, and

NPS P11: Relevant authorities will aim to ensure that forestry measures and management plans protect peatland habitats and associated species, as appropriate.

The Department is of the view that the aforementioned revisions to the NIS are particularly relevant in relation to these.

### **6. Invasive Species:**

DAFM is proposing to include Eucalyptus in the Forestry for Fibre Scheme. The Department notes that this is recognised to be a potentially invasive species in Ireland. The Forest Service is advised that the European Council has recently adopted a new Regulation on Invasive Alien Species (29th September 2014) and new legislation will be published in the Official Journal of the European Union in the coming weeks. The legislation will seek to protect native biodiversity and ecosystem services, and to minimise and mitigate their human health and economic impacts. There will be three types of intervention included in the legislation: prevention, early warning and rapid response, and management. As part of the proposals, a list of "invasive alien species of Union concern" will be drawn up, based on risk assessments and scientific evidence.

In practical terms, the Regulation seeks to attain these objectives through banning the intentional introduction of IAS into the EU and their intentional release into the environment, and putting in place measures to combat the unintentional introduction and release of IAS, the establishment of an early warning and rapid response system, and to eradicate, or at least control, the most harmful IAS throughout the EU.

The Regulation will come into force on 1st January 2015. Article 4 of the Regulation is considered to be one of the most important Articles. It introduces the concept of the list of Invasive Alien Species of Union concern, upon which most of the obligations in the Regulation is based. The List is to be adopted by the Commission on the basis of an Implementing Act. The criteria for inclusion on the list are briefly set out further below. As part of the development of the list the Commission will carry out Risk Assessments. The proposed list will be submitted to a Committee (established under Article 27) for consideration by January 2016. The Committee may be assisted by a Scientific Forum to be established under Article 28. The list will be comprehensively reviewed every six years, but may be updated as required having regard for the addition of new species (meeting the criteria set out below) or the removal of species that no longer meet the criteria.

4.3 Criteria for inclusion on the list (species must meet all criteria)

- (a) found to be alien to the territory of the Union excluding the outermost regions;
- (b) found to be capable of establishing a viable population and spreading in the environment under current or foreseeable climate change conditions in one biogeographical region shared by more than two member states or one marine subregion excluding their outermost regions;
- (c) found to have significant adverse impact on biodiversity or related ecosystems, or impact on human health or the economy;
- (d) show following a risk assessment performed as per Article 5(1) that action is required at Union level to prevent their introduction, establishment and spread;

(e) show that the inclusion on the list will effectively prevent, minimise or mitigate their adverse effects.

It is this Department's advice that the introduction or consideration of introduction of any species that could be included on the List of IAS of Union concern in advance of the list being adopted by the Commission should be avoided. Species on the list may not be, amongst other things, grown or released into the environment. The cost of the introduction of such species and the subsequent cost of control, management and eradication of same should the species be included on the List of Union Concern would lead to a significant expenditure of public monies.

Further information on the Regulations and supporting documentation can be found on the website of the European Commission, at

[http://ec.europa.eu/environment/nature/invasivealien/index\\_en.htm](http://ec.europa.eu/environment/nature/invasivealien/index_en.htm)

## **7. Observations in relation to the SEA Biodiversity Objectives**

**Nationally protected species:** The previous submission from this Department advised that the Biodiversity Objectives should include consideration of nationally protected species, including those protected under the Flora Protection order. This was based on the Department's observations of the impact forestry may have on these species and their habitats. Such species do not appear to have been included within the Biodiversity Objectives for the SEA, thus an opportunity to consider them at both the strategic level and how to ensure their consideration at project-level planning to minimise effects on these species appears to have been missed. The Department would welcome greater consideration within the SEA as to how this may be achieved, and as part of our ongoing inter-Departmental discussions.

### **Consideration of birds in the wider countryside:**

The Department is also of the view that the SEA has not sufficiently considered the effects of the programme on birds in the wider countryside. While the proposal to undertake ecological site-level assessments for all applications is to be welcomed, to delay consideration of such issues to the site-level is likely to lead to an under-assessment of the cumulative effects forestry may have at a landscape or catchment level. The Department recommends that further consideration is given to this in the Strategic Environmental Assessment, particularly, but not exclusively for species such as breeding waders.

### **Monitoring:**

Section 8.2.4 sets out the environmental monitoring that may be undertaken. This includes a reference to "*overall coordination from DAHG*" but the intent or context of this is not entirely clear. The Department would welcome clarification as to what commitment is being sought by DAFM with regard to monitoring.

## **Archaeology**

Outlined below are the Department's observations with regard to archaeology. The Department was informed at a meeting with the Forest Service on Tuesday the 7<sup>th</sup> of October that the present version was a draft document. Therefore we have included an *amended* copy of the Consultation Environmental Report on Ireland's Forestry Programme 2014-2020 Strategic Environmental Assessment Final v2 with some proposed insertions in comment boxes for inclusion in the final published document. This amended copy forms part of the observations to the referral of the National Monuments Service of the Department of Arts, Heritage and the Gaeltacht. Otherwise our comments are organised in relation to some overall comments on the document and some detailed specific recommendations in relation to the Programme with reference to particular page numbers and proposed measures. The Department welcomes this opportunity and the discussions to date to feed into the forest programme and look forward to continued engagement.

### **Overall Comments**

The Department would welcome a fuller exposition of the character of cultural heritage within the national forest envelope in the document to be included in section 3.3.

The Department seeks information on the numbers of monuments within the area currently forested and indeed those areas which have received approval for afforestation but which have not yet been advanced. These could be grouped per county and per site classification or could be provided in terms of a descriptive text in relation to the range and type of monuments within forest holdings.

There is also no information within the current document in relation to the numbers of monuments which have been identified due to previous grant-aided afforestation.

It would be useful to have these figures as the identification of new monuments (and presumably their protection) is a benefit and positive outcome of previous Forestry Programmes. In addition it would be useful to know what affect recent severe storms have had in relation to wind-throw impact on monuments or on the identification of previously unrecognised monuments. With full accounting any changes in outcomes from programme to programme can be monitored into the future.

In addition to further examination of the baseline data in relation to archaeology there should be some consideration of the areas proposed as suitable for forestry according to the IFS in terms of the archaeological character of these lands and the potential to uncover previously unknown monuments. For instance an analysis of the location of Mesolithic material identified from the information accruing from road-building by the National Roads Authority has identified mid slopes – those areas between lowland and uplands as the preferred locations of sites and monuments of the Mesolithic period (Dr. Graeme Warren, “*Roads to Affluence? NRA roads archaeology and the Mesolithic in Ireland*” a presentation at the NRA Seminar 2014 Stories of Ireland’s Past. It would appear from the IFS that these are the same lands proposed as suitable for a wide range of forest types.

Issues of concern in relation to the cultural heritage were identified “woodland creation has potential adverse effects on cultural heritage and archaeology” in the initial scoping document but not fully explored in the developed draft SEA.

In addition it is acknowledged within the scoping document that “there is a lack of co-ordination across the rural tourism sector however, with many opportunities for sharing and promoting Ireland’s exceptional cultural heritage being missed”. We concur and therefore would seek to maximise the potential of all monuments in forestry in terms of their amenity.

The Department sees that there is potential within the programme to move beyond the current prevention of damage to monuments mode to a more sustainable future where provisions for the preventative maintenance of monuments, their buffers and access pathways could be provided for within the programme, on a par to what is being proposed under GLAS.

There are also opportunities to increase knowledge and to enhance the amenity of monuments in terms of the provision of information and signage, the inclusion of monuments within areas of proposed green corridors or neighbourwood and to treat those monuments which occur in forestry as important cultural assets available for amenity, recreation and tourism enhancement. The proposed measures offer several opportunities to improve the condition of monuments in forestry in a sustainable way.

In terms of the amenity values of monuments we would prefer that afforestation at the edges of the buffer zone be native species as these are the authentic setting for such monuments in the past.

We feel that the full opportunity to identify previously unrecorded archaeology isn’t being fully achieved in current afforestation programmes and we have suggestions on how that may be achieved into the future to be included within our recommendations to the Forest Service in relation to referrals.

## **Underwater Archaeology**

The 1987 and 1994 (Amendment) Acts of the National Monuments Act 1930 – 2004 specifically address the protection of underwater archaeology. Section 3 (4) of the 1987 Act provides that a person shall not dive on, damage, or generally interfere with, any wreck which is more than one hundred years old or an archaeological object which is lying on, in or under the sea bed or on or in land covered by water except in accordance with a licence issued by the Minister for Arts, Heritage & Gaeltacht under Section 3 (5) of the Act. Under that section the Minister may, at his or her discretion, grant or refuse to grant a licence and may make a licence subject to such conditions as he or she thinks fit and specifies in the licence. Under the National Monuments Act it is obligatory to report all discoveries of archaeological objects and wrecks over 100 years old within 4 days of discovery. Dive and detection device licence application forms are available through the Department's web site ([www.archaeology.ie](http://www.archaeology.ie)).

Forestry programmes, their associated works and secondary impacts such as the construction of access roads, drainage works etc. have the potential to negatively impact on known or potential submerged or buried archaeology and there will be a need for an appropriate level of archaeological assessment of these works.

The Shipwreck Database is accessible through the Archive Unit of the National Monuments Service. Over 17,000 wrecks have been recorded to date. Though earlier sources have been included where obtainable, the Inventory is largely based on documentary sources available from after 1700AD. As such, previously unrecorded wreck sites, including in the inland waterways may await discovery in the bogs, lakes and rivers of Ireland.

There will be a need for an appropriate level of archaeological assessment if works are to take place in the vicinity of recorded monuments, near protected wrecks or on or near water courses. It is therefore recommended that this Department is consulted with regard to any potential works located at or near archaeological monuments or wrecks or any works which will significantly affect watercourses such as rivers, streams or lakes. This will enable the Department to make an informed archaeological recommendation before works proceed.

There were some minor errors in the document and some material that needed updating – for instance the Local Authorities are not the repositories of information in relation to designated monuments and that a National Landscape Strategy has been published July 2014, these small errors have been corrected in the attached version of the document as highlighted sections with proposed rewordings in the comment box.

### **Specific Recommendations**

These comments relate to specific portions of the submitted text and will discuss points with reference to page numbers and document headings.

1.3.6.

P6

#### **Measure 1 Afforestation and Creation of Woodlands**

We have some concern that afforestation which is large in scale always has the potential to uncover previously unidentified archaeological monuments particularly those which are too small to register from the observation of aerial photography such as standing stones, stone rows, fulachta fia, boulder burials etc.

- *development which is extensive in terms of area or length (this would always include development over one kilometre in length but by no means be restricted to this); (Framework and Principles for the Protection of the Archaeological Heritage, DAHGI, 1999, p 26)*

The National Monuments Service will recommend the imposition of requirements for field survey in relation to new afforestation proposals of a certain scale. We will require referral to the Department of applications above a certain scale whether or not the proposed afforestation lies within 200m of a Recorded Monument or a monument included in the SMR. It should be noted that several local authorities have objectives within their development plans to protect previously unknown archaeology and these recommendations accord with that aim.

The Department suggests that within proposals for afforestation that provision within the Measure be provided as an option for maintaining the access pathway, exclusion zone to the monument and monument area free of scrub encroachment in accordance to guidelines agreed between the Minister of Agriculture, Food and the Marine and the Minister of Arts, Heritage and the Gaeltacht in relation to GLAS. We suggest that such preventative maintenance work should attract a payment for work carried out on monuments specified in the Forest Management Plan and should be in addition to the initial afforestation grant.

In relation to the submitted document in addition to the comments on the document itself we have the following query. In relation to p.8 Table 1.1 Agroforestry - will farmers in GLAS be able to partake in this measure?

In relation to some of the preventative maintenance measures the Department of Arts, Heritage and the Gaeltacht is proposing within GLAS it may also benefit the protection of archaeological monuments if farmers are encouraged to plant and alternative shelter area (perhaps as an agroforestry action?) at a distance from the monument in question but close enough to provide animals with alternative shelter within the same field. We would welcome further discussion with the Forest Service and their colleagues in DoAFM in relation to these aspects of the RDP.

With regard to native woodland establishment in the environs of archaeological monuments care should be taken to plant species appropriate to the construction period of the monument in question. The advice of the NMS can be sought in relation to this aspect.

P9

#### **Measure 4 Prevention and Restoration of Damage to Forests: Reconstitution Scheme**

Provision should be made within this measure to allow funding for private landowners to commission walk-over surveys to assist identifying monuments exposed due to the effect of extreme weather events. This will relate to extreme weather events resulting in wind-throw of an area large in scale.

P9

#### **Measure 5 Investments improving the Resilience and Environmental Value of Forestry: Woodland Improvement (Thinning and Tending – Broadleaves)**

Similar to proposals within Measure 1 we suggest that within this Measure the opportunity be provided for maintaining the access pathway, exclusion zone to the monument and monument area free of scrub encroachment according to guidelines agreed between the Minister of Agriculture, Food and the Marine and the Minister of Arts, Heritage and the Gaeltacht in relation to GLAS. We suggest that such preventative maintenance work should be payable for work carried out on monuments specified in the Forest Management Plan and should be in addition to the fixed grant. It should be payable in relation to a single monument with additional top-up depending on the numbers of monuments and their scale for which maintenance works are proposed.

P9-10

#### **Measure 6: Investments improving the Resilience and environmental value of Forests: Native Woodland (Conservation) Scheme.**

The Department suggests that consideration be given providing within this measure for the conversion of forestry adjacent to the exclusion zone around monuments to native woodland which will enhance the amenity of monuments in an authentic way.

With regard to native woodland establishment in the environs of archaeological monuments care should be taken to plant species appropriate to the construction period of the monument in question. The advice of the NMS can be sought in relation to this aspect.

P10

#### **Measure 7: Knowledge Transfer and Information Actions**

The Department of Arts and the Gaeltacht would welcome engagement between the Forest Service, Teagasc, Professional Forestry Associations and the Institute of Archaeologists of Ireland

(IAI) in relation specifically to CPD. The Department would welcome the opportunity to provide guidance in relation to preventative maintenance of monuments in forestry ideally in co-operation with the IAI CPD programme.

P13 1.4.2.

Does the IFS map include opportunities and constraints including areas of notification for monuments in the SMR or does it include the digital version of the RMP? Please include within the text.

You are requested to send the acknowledgement to this letter and any further correspondence to this Department's Development Applications Unit at [manager.dau@ahg.gov.ie](mailto:manager.dau@ahg.gov.ie); if this is not possible, correspondence may, alternatively, be sent to:

The Manager  
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Is mise, le meas



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