New Forestry Programme 2014 – 2020
Submission to Consultation Process

Institute of Archaeologists of Ireland
22\textsuperscript{nd} April, 2014

The Institute of Archaeologists of Ireland (IAI) is the professional organization that represents archaeologists throughout Ireland. Our membership is fully representative of the archaeology sector, working in private sector consultancy, local authorities, government departments, higher education institutes and state heritage agencies in the Republic and in Northern Ireland. These professional archaeologists are stakeholders in State heritage policy and play an important role in facilitating infrastructure development and the planning process through mitigation of impacts on archaeological heritage that is protected by national and EU law. In recent years the State has developed a strong professional approach for dealing with such impacts arising from infrastructure programmes, all of which is relevant to forestry developments.

The impact of forestry on the protection of archaeological heritage (both above ground monuments and sub-surface deposits and objects) continues to be of concern. With some 140,000 recorded monuments, and many times more sub-surface sites, the Republic of Ireland is particularly rich in these remains. Archaeological sites are particularly vulnerable at different stages in the forest cycle, be it preparation for planting, forest establishment/thinning and final harvesting. The proposal to expand forestry in Ireland by 2046 to 18\% of land area has significant implications in respect of archaeological heritage that need to be properly evaluated. A failure to do so poses risks not only to archaeological heritage but also to successful implementation of the forestry programme. This could lead to costly delays, community protest and even legal action arising from non-compliance with State and EU heritage
legislation. These difficulties can be avoided by a partnership approach that seeks to mitigate such impacts and to exploit the opportunities provided by this cultural resource in a forest environment. This also requires an active engagement with the National Monuments Service (Department of Arts, Heritage and the Gaeltacht) at an early stage in the process, as well as a proactive approach on the ground where forestry developers work with professional archaeologists to achieve desired outcomes.

The following might be considered as part of this process:

1) Archaeological assessment of new forestry plantations

The proposed expansion of forestry requires baseline studies and pre-planting assessment of archaeological impact to be carried out at an early stage in the programme. These studies will inform management policy and help to develop mitigating procedures to reduce the potential impact of on the archaeological heritage. The development of protection plans for individual archaeological sites and landscapes requires direct consultation between foresters, the Stage heritage service and professional archaeologists at all stages in forestry development.

Any risk to archaeological heritage can be reduced through proper consultation and reliable assessment prior to planting. The initial desk-top assessments should be accompanied by some form of pre-planting inspection on the ground, undertaken by qualified archaeologists for the purpose of identifying known and unrecorded sites of archaeological and historical interest. This will allow appropriate measures (exclusion zone, rescue excavation etc) to be taken to ensure the preservation of this cultural heritage either in situ or by record. It requires a commitment to site inspection prior to planting and groundworks, which is where our members can make an important contribution. At the present time field assessment by trained archaeologists does not need to be carried out in unless there is a known archaeological site within the proposed area. This poses enormous challenges given the limitations of State records in respect of sub-surface archaeology in dryland and bog settings, and its limited coverage in upland areas.

There are further concerns in relation to what happens following planting. Management of archaeological sites in established forestry must be strengthened if their survival is to be ensured in the longer term. Where sites are particularly vulnerable to accidental machine damage and uncontrolled tree growth specific management procedures must be enforced.
Unambiguous marking of the protected buffer zone must be introduced and maintained throughout the life cycle of the forest plantation to ensure protection of archaeological sites, particularly during felling operations. The maintenance of access tracks and signposting to facilitate public access to archaeological heritage is another consideration.

2) Compliance with State heritage legislation
The National Monuments Acts (1930-1994) provide legal protection for archaeological sites and monuments in the Republic of Ireland. Statutory protection is conferred on archaeological sites entered in the Record of Monuments and Places (RMP), a database compiled by the National Monuments Service, Department of Arts, Heritage and the Gaeltacht. This is a field-verified listing of known archaeological sites, however many others remain to be discovered particularly in upland areas where the State mapping has been minimal. An over-reliance on the RMP in respect of forestry planning is problematic. The incomplete nature of this database in respect of sub-surface archaeology can be demonstrated by the many new sites discovered by the National Roads Authority over the past 15 years of road construction in Ireland.

The existing Forest Service guidelines and protocols on archaeology and forestry facilitate the implementation of this National Monuments legislation, even if there is currently only one archaeologist employed directly by the State for this purpose. For established procedures to work there is an need for strong liaison with the National Monuments Service, which itself is suffering from staff cutbacks. Consideration must be given to staff allocation within the National Monuments Service at a level appropriate to support the forestry programme. It is also important to engage directly with local authority archaeologists on the new forestry programme. Finally, considering the land areas involved, it is important that the forestry developers themselves continue to have an understanding of potential archaeological impacts. There is a need to invest further in forestry training, where State and professional archaeologists brief those parties on relevant issues. This will also promote greater adherence to the Forest Service guidelines on archaeology and forestry.

3) EU legislation and industry guidelines
There are many areas of EU law and policy relevant to the protection of archaeological heritage and the rights of the general public in terms of access. In terms of specific policy, the Forestry Programme is now subject to Strategic Environmental Assessment (SEA). In developing any new Forestry Programme to be funded under State Aid rules, the same EU rules as apply to the development of national Rural Development Programmes (RDP) must be followed. The effect of this is that a screening exercise must be conducted (and published) with an appropriate response (SEA, Environmental Report or other assessment). We recognize that the identification of an effect on an archaeological site/monument or group of archaeological monuments in any particular project would in it itself be sufficient to trigger a requirement for a full (and costly) environmental impact assessment in which archaeology would be one on many considerations. The key issue for us is an assurance that the impact of a forestry project on an archaeological site/landscape is an important consideration in the screening process, with appropriate levels of response available to safeguard that same heritage.

The consultation document confirms that the new Forestry Programme must be compliant with State Aid rules and EU guidelines. This means that measures set out in the new forestry programme must meet the conditions laid down in the current Rural Development Programme (2007–13). The RDP includes provision for the proper consideration of archaeological heritage, including the need to identify and protect features of historical and archaeological interest in the rural landscape. The RDP also highlights the importance of archaeological/historical heritage in respect of rural community development and agri-tourism.

A separate Environmental Report on the Forestry Policy Review published in June 2013 identified archaeology as an environmental issue and contains a discussion of the regime for addressing potential impacts on archaeology (p. 26-8). The Review notes that in recognition of the obligations placed on Competent Authorities under Annex III of the EIA Directive, special consideration is given to the wider landscape setting of known archaeological sites and monuments, and in particular their relationship with other roughly contemporary or determinably linked sites – that is, identifiable archaeological complexes and landscapes. The recorded or evident inter-visibility of sites and landscape relationships should be taken into account for archaeological complexes and areas, with outright refusals or requirements for the maintenance of linkages or whole areas to be left open and unplanted.
Areas classified by the NMS as archaeological areas, zones of archaeological potential, or zones of archaeological amenity, as well as listed and tentative World Heritage Sites should be given special consideration. The report recommends that to prevent or limit any significant adverse impacts on archaeology a review of the Forest Service Guidelines on Forestry and Archaeology, Forestry and the Landscape and Forest Harvesting and the Environment and their implementation be carried out.

4) *Archaeology and agri-tourism*

It is important that Archaeology is considered as an asset rather than an impediment to proper forestry development. There are many examples where archaeological heritage can be presented within forestry environments, as part of the overall approach to landscape appreciation, amenity, recreation and tourism. Again, this requires positive engagement with State heritage bodies and professional archaeologists to ensure that promotion of sites is carried out in an appropriate and authentic manner.

Archaeology is a valuable and irreplaceable cultural resource, which has the potential to contribute to local history and an understanding of place. The destruction of archaeological heritage through a failure to engage with the spirit and letter of national and EU law can have serious consequences at a local level. These need to be examined as part of a broader consideration of forestry impact on rural communities. The *Institute* recognizes the strategic importance of forestry to Ireland, but does not accept that its successful implementation is in any way incompatible with proper care of our cultural heritage. There are important benefits to be gained from a partnership approach to the management and promotion of archaeological heritage in forestry environments. The consultation paper circulated on the 2014–20 forestry programme makes no mention of archaeological heritage however this aspect can be considered under such headings as Measure 4 (the NeighbourWood proposal establishing the amenity and cultural heritage value of woodlands).

In conclusion, there are several issues in the New Forestry Programme 2014–2020 that are of interest and concern to the *Institute of Archaeologists of Ireland* and its members. We consider ourselves to be a relevant stakeholder and request that the views of our organization be represented in future discussions. We would also like to be informed when the draft Forestry
Programme and the accompanying Environmental Report (as required under the SEA Directive) is published. We understand from a recent press release issued by Minister Hayes that the international consultancy firm RSM McClure Watters (Consulting) Ltd. have been contracted to carry out an Ex Ante Evaluation, Strategic Environmental Assessment and Appropriate Assessment of the New Forestry Programme (2014–2020). We may make a more detailed submission in respect of the programme or environmental report at that juncture.

In the interim, it is of concern to our organization that in developing any new programme the Department would:

a) Develop and put in place appropriate procedures, standards, and sufficient staff resources to ensure that any archaeological sites or monuments that could be affected by the planting of new forests under the programme, or which are located in existing forests where works are undertaken under the programme, are properly protected. Where appropriate, this might require include pre-development impact assessments, test excavation, and/or in works mitigation such as archaeological monitoring.

b) That consideration is given to updating the Forest and Archaeology Guidelines, in particular the minimum exclusion distances, to reflect the advice for managing ancient monuments in woodland contained in the Department of Environment, Heritage and Local Government publication Good Farming Practice and Archaeology, as well as increases in our knowledge about certain site types derived from more recent archaeological discoveries.

We are available for further consultation as required and look forward to supporting the work of the New Forestry Programme in a manner that is beneficial to all interests.

Yours sincerely

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