

An Chomhairle Oidhreachta The Heritage Council



Submission on the environmental assessment of the Draft CAP Strategic Plan 2023-2027

The Heritage Council of Ireland - An Chomhairle Oidhreachta

We welcome the opportunity to comment on the Draft CAP Strategic Plan 2023-2027 and associated Environmental Assessment.

The Heritage Council, in partnership with the Department of Agriculture, Food and the Marine manages the GLAS traditional farm buildings grant scheme. [Note: The Department always states 'on behalf of'] The principal objective of this scheme is to ensure that traditional farm buildings and other related structures that contribute to the character of the landscape and are of significant heritage value, are conserved for active agricultural use.

Draft CAP Strategic Plan 2023-2027

We note that under the proposed CAP Strategic Plan 2023-2027 (Pillar II - Interventions, Measure 1 - Agri-Environment Climate Measure AECM) *“a new flagship agri-environment and climate measure (AECM) will replace the current GLAS scheme and will achieve increased environmental ambition. It will consist of a General option and a Cooperation Project option. Farmers wishing to participate will be assigned to the General or Cooperation option depending on the categorisation of their holding. Both options will focus on climate change mitigation and adaptation, sustainable use and development of natural resources, and contributing to halting and reversing biodiversity loss, enhancing ecosystem services and preserving habitats and landscapes”*.

Under the AECM-General option (Tier 3, General Actions) we are encouraged to see actions relating to:

- Traditional dry-stone wall maintenance
- Protection and maintenance of archaeological monuments

We note however the absence of actions relating to traditional farm buildings and other vernacular features - stone gate piers, for example, and wrought-iron gates.

The retention in use of traditional farm buildings and other vernacular features avoids the mining, quarrying, felling, manufacture and transport of new building materials; this is true for all the parts of a building as well as the structure as a whole. The restoration of this traditional building stock to active use produces fewer GHG emissions and reduces the amount of material to be sent to landfill when compared with new. Building conservation and adaptive re-use are strategic, up-stream methods of avoiding fresh carbon emissions. An existing building is a host of embodied carbon and the more farm buildings we renovate and adapt for use on the farm, the less new-build will be needed. This contributes to **climate change mitigation** and the **sustainable use of resources**.

Traditional farm buildings and other vernacular features are important habitats for a number of bird, insect and other animal species, notably - but certainly not limited to bats and the Barn Owl. They may also provide habitats for numerous plant species, wall flora in particular. Due to the loss and degradation of natural sites used for shelter and breeding, they are of significant ecological value with many vulnerable species (such as **Barn Owl** and the **Lesser Horseshoe Bat**) now relying on such buildings for their survival. Many can support a great diversity of wildlife, including species of conservation concern and their conservation - if sensitively managed - can contribute to the **preservation and enhancement of these habitats and to the reversal of biodiversity loss**.

Traditional farm buildings and other vernacular features are an **integral component of the Irish rural landscape**.

The conservation of traditional farm buildings and other vernacular features - which aligns directly, as shown above, with the aims of the AECM - can be supported through the retention and enhanced provision of the Traditional Farm Buildings Grants Scheme, so long as this retains a conservation ethos which recognises these buildings as an active contributor to preserving biodiversity, the sustainable use of resources and the mitigation of climate change as well as their inherent cultural heritage value

The Traditional Farm Buildings Grants Scheme has been in continuous operation since 2008 as part of a competitive measure embedded with the Department's agri environmental schemes. It is an efficient, administratively light scheme that generates **measurable, publicly-visible results**. In 2019, for example, the scheme assisted 74 grantees to conserve 108 traditional farm buildings and 5 other structures. Since 2008 circa 800 buildings have been conserved for active agricultural use. To disseminate further the benefits to a wide audience data captured on wildlife and protected species is being submitted to the National Biodiversity Data Centre and the grant aided works represented on the Heritage Maps portal. Projects grant-aided under the scheme regularly feature in the local and national media, generating public awareness of and goodwill towards the Department of Agriculture, Food and the Marine. This grant scheme has allowed us as a heritage body to support the farming community, creating

partnerships that deliver a public good in managing the landscape. It has demonstrated pathways to cross compliance and quality in environmental protection and carbon sequestration through the reuse of buildings.

Projects grant-aided under the scheme help to strengthen the socio-economic future of rural areas by providing local commerce and employment; providing training opportunities for traditional building skills. It also provides opportunities to farmers to carry out works themselves and in the process acquiring new skills which are then available locally for other buildings, both on- and off –farm. The project buildings serve as exemplars for the repair of others on the farm, and in the rural locality, preserving features of the local landscape that may be significant repositories of community memory.

The retention of traditional farm buildings in agricultural use is a key component of the Traditional Farm Buildings Grants Scheme. The conservation of our farm inheritance – sending it into the future – includes making modifications to it that are necessary for it to remain useful and relevant to the working farm. A conservation approach begins with appreciating and making full use of the assets that we have – ecosystems, buildings, landscapes, infrastructure, and communities.

SEA Environmental Report on the Draft CSP 2023-2027

In 5.7 (Landscape, p.95) we note the use of the European Landscape Convention (ELC) definition of landscape as *“An area as perceived by people whose character is the result of the action and interaction of natural and/or human factors”*. In 5.7.2 (Regional Landscapes, p.98) we welcome the observation that *“the simplicity of agricultural buildings in Ireland and the use of locally-sourced materials naturally connect built structures to their surrounding environments”*.

In the Irish rural landscape, traditional farm buildings and other vernacular features are a key component of its character. The protection of these buildings and features - by means of targeted schemes like the Traditional Farm Buildings Grants Scheme - ensures the protection of *the many cultural, social, economic and environmental values embedded in the landscape*.

In 5.7.3 (Landscapes: Existing Environmental Problems, p.102) we welcome the recognition of farm buildings and traditional vernacular features in considering how agricultural activities can impact the rural landscape. We note in particular the observation that *“The image of the Irish rural landscape is a key marketing and promotional tool for the agri food industry as well as the tourism and recreational industry. As the EPA has pointed out, erosion of this often the result of many environmental factors undermines the credibility of the rural landscape”*.

The protection of traditional farm buildings and other vernacular features- by means of targeted schemes like the Traditional Farm Buildings Grants Scheme - ensures the continued credibility of the rural landscape as a marketing and promotional tool for major sectors of Irish industry.

In 5.8.1 (Cultural Heritage: Existing Environmental Problems, p.105) we note the observation that: *“The key issues for the archaeological, architectural and cultural heritage associated with the implementation of the draft CAP (2023-2027) is the resulting potential for both direct and indirect impacts on the heritage features and their settings as a result of siting new infrastructure and land use change”* and that *“[three of] The main issues associated with the development of the draft CAP and cultural heritage relate to: • erosion and loss of cultural heritage features such as hedgerows, gate posts, stone walls • greater understanding and appreciation of setting of cultural heritage features, this can include villages and towns as well as larger archaeological features in the landscape. • Geohazards present a risk in terms of loss of landscape features, local landscape enhancement and cultural geo-tourism.*

We propose that traditional farm buildings and other vernacular features could usefully be included in each of these three bullet points.

In 5.11 (Evolution of the Environment in the absence of the CSP 2023-2027, p.112) we note the observations below:

- *Landscape: Agricultural developments would be assessed under the planning and development statutory framework. However, there would be no targeted support for agricultural landscape elements already in the countryside such as farm buildings etc. in combination effects would continue relating to the interaction of landuse, agricultural activities and parameters such as soil, water and biodiversity. In the absence of a plan, this would remove this protection and enhancement measures for the landscape, potentially leading to its fragmentation, loss and deterioration.*
- *Cultural Heritage: Legislation and guidance from international and national level affording both the architectural or archaeological elements a high level of protection. However, intangible cultural heritage and vernacular features which are not protected could continue to be lost through loss of boundaries (stone walls, hedgerows), gates, posts etc. The potential setting of archaeological sites may in combination be adversely affected.*

And in 6.1 (Strategic Environmental Objectives, pp.116), we note the following SEOs:

SEA Topic	Objective	Questions: Will the CSP?
Landscape (L)	1. Contribute to the conservation, protection, enhancement and manage the character and quality of	1. Enhance and maintain key agricultural features of the landscape? 2. Recognise the local and regional diversity of

	Ireland's distinctive landscape and seascape	<p>landscape character and support retention of same?</p> <p>3. Support and promote the integration of new farm buildings sensitive to into local landscapes character through appropriate design, siting and screening.</p>
Cultural Heritage (CH)	1. Contribute to the protection, enhancement, and management of Ireland's rich archaeological and cultural heritage as well as vernacular and traditional farm buildings and features	<p>1. Safeguard and support the protection of archaeological sites, field monuments and cultural heritage?</p> <p>2. Support and maintain vernacular farm buildings?</p> <p>3. Support the reuse for sustainability and adaption of farm buildings?</p> <p>4. Support the upskilling or retraining in traditional farm practices and traditional building skills?</p>

It is our belief that if the answers to the 7 key questions posed in the right-hand column are to be 'yes', then the CAP Strategic Plan must include specific references to:

- Traditional farm buildings and other vernacular features; and
- The Traditional Farm Buildings Grants Scheme

Conclusion

Since 2008 the Heritage Council has had a strong relationship with the Department of Agriculture, Food and the Marine which has benefitted traditional farm buildings and the flora and fauna associated with them across Ireland as well as the farming communities which care for them. While this may not be a large-scale measure in the context of the CAP, in terms of the heritage sector and the care and conservation of these buildings, this is an important measure of national relevance.

In the midst of a climate change and biodiversity crisis traditional farm buildings serve as an active contributor in the preservation and enhancement of biodiversity, the sustainable use of resources, the positive enhancement of our rural landscape and the retention of a cultural heritage asset. They have multifaceted aspects, adding value to the environmental ambitions of the CAP Strategic Plan without adding built volume. In the current discourse about the impact of the national herd, the sequestered carbon in conserved farm buildings could be an important offset measure in this debate.

We note that at the Rural Development Plan Monitoring Committee meeting of the 10th November last it was stated that an amendment to the CAP Strategic Plan could be made to allow for the inclusion of the Traditional Farm Buildings Grants Scheme. Based on the track record of the scheme since 2008 and on the relevant sections of the CAP Strategic Plan cited above we respectfully suggest that such an amendment is warranted.

Further information on the Traditional Farm Buildings Grants Scheme is available at: <https://www.heritagecouncil.ie/projects/traditional-farm-buildings-grant-scheme>