

National Monuments Service, Department of Housing, Local Government and Heritage response to the Public Consultation on the Environmental Assessment of the draft CAP Strategic Plan (CSP) 2023-2027

Introduction

The National Monuments Service of the Department of Housing, Local Government and Heritage welcomes the opportunity to engage with DAFM on the draft CAP Strategic Plan (CSP) 2023-2027.

NMS notes that Ireland's CAP Strategic Plan (CSP) for the period 2023-2027 will underpin the sustainable development of Ireland's farming and food sector by supporting viable farm incomes and enhancing competitiveness, by strengthening the socio-economic fabric of rural areas, and by contributing to the achievement of environmental and climate objectives at national and EU levels. NMS notes that the CSP will take more holistic approach and the submission below is framed around meeting those objectives.

Archaeological monuments are a finite resource, which although they have stood in the landscape for hundreds or perhaps thousands of years, are in many ways fragile and once damaged or destroyed (often including the loss of artefacts or human remains), cannot be meaningfully restored. Under the Good Agricultural and Environmental Condition (GAEC) standards of Cross Compliance, archaeological sites and monuments are designated as Landscape Features. They often harness important zones of biodiversity as well as being important cultural heritage assets with, in many cases, significant potential to assist rural development through a contribution to rural communities' sense of place, well-being and local tourism.

The retention and maintenance of Archaeological Sites and Monuments is required under the GAEC rule regarding non-productive areas and landscape features and this rule has carried over into the eco-scheme. Measures directed specifically towards the care of archaeological monuments on farmland have been included in both the general and cooperation teams options under Agri-environment-climate Measures (AECM) and NMS welcomes this

NMS has had a very positive and constructive cooperation and engagement with DAFM, in terms of Cross Compliance under GAEC 7. This Service would like to acknowledge the degree to which the importance of archaeological monuments to biodiversity and as cultural heritage and rural development assets and their contribution to the many objectives of the CSP, has been recognised in the draft plan.

NMS believes strongly that carefully considered actions in the CSP will enhance even further the value of archaeological sites and monuments to their owners; realise their role in the provision of habitats and biodiversity and encourage their management and preservation.

Detailed Submission

Having considered the draft CSP and the accompanying SEA report, NMS offers the recommendations numbered 1 to 4 below.

In the draft CSP, NMS sees opportunities for the **protection and maintenance of archaeological monuments on farmland**, through the application of specific actions directed towards their care in both AECM options (see point no. 1 below).

In addition to advising regarding the details of these specific archaeological actions, NMS would like to explore with DAFM the potential for **focussing other practices allowed for in the draft CSP, which are not specifically directed towards archaeology**, but could be carried out at or near monuments, without impacting on them adversely in any way. By this means NMS would see there is scope for in effect placing monuments at the centre of a high nature value farming areas on individual farms, thereby facilitating their protection, whilst contributing, in the broadest possible way, to the aims of the CSP (see point no. 2 below).

NMS has contributed to the **training** of farmers and farm advisors in successive Rural Development Programmes, for many years. This includes contributing a presentation on archaeology and GLAS, given at DAFM Farm Advisor training events, by NMS archaeologists. NMS would seek to continue this important activity and to expand it in line with the recommendations below (see points 1, 2 and 3).

The proposal to feed practices developed in **European Innovation Partnerships (EIP)** into the CSP, via AECM Cooperation Teams is of particular interest to NMS. This Service would seek to continue and expand our involvement in this space (see point 4).

1. Agri-environment Climate Measures actions specifically directed towards archaeological monuments

In the lead-up to the last programme, at the request of DAFM, NMS was pleased to contribute detailed information regarding the structure of the archaeological measure in GLAS entitled 'Protection of Archaeological Sites' and we note the following:.

- The inclusion of a proposed Tier 3 action entitled 'Protection and Maintenance of Archaeological Monuments', in the AECM general option is much welcomed. NMS would be pleased to contribute, as before, to the detailed design of this action in collaboration with DAFM colleagues.
- The interdisciplinary approach proposed in the Local Cooperation Teams under the AECM Cooperation Teams option is innovative and very positive. There is undoubtedly benefit to be had from for example, archaeologists and ecologists cooperating to devise actions which will promote biodiversity and habitats whilst contributing to the positive management of archaeological monuments. NMS stands ready to provide input here.
- The requirement that archaeological expertise will be one of the core higher skills available to Co-operation Teams is very positive and has potential to make a valuable contribution to the protection of archaeological monuments, particularly as the high priority, high nature value farming areas where the teams will operate, will by their nature, be areas with high archaeological potential. DAFM can be assured of the support

of NMS in implementing this innovation and would welcome the opportunity to discuss further with DAFM how we might assist.

2. Directing non-archaeological actions towards archaeological monuments

Central to this would be the establishment of a principle within the CSP, that when a monument is identified at farm plan stage, there should be a bias towards directing appropriate actions (not just archaeological actions) towards the monument. By this means, a number of actions could be concentrated around a landscape feature to maximum effect, addressing many requirements of the CSP at the same time.

NMS proposes the following actions for consideration by DAFM:

- Prioritise the inclusion of monuments in the 4% (or 7%) non-productive features under GAEC and eco-scheme rules.
- In the context of GAEC 1, explore ways to ensure that monuments with no surface trace (but potentially with extensive buried archaeological remains close to the surface) remain in grassland.
- As the locations to be addressed by GAEC 2, ‘the protection of peatland and wetland’, become clearer, NMS would seek to advise DAFM regarding the treatment of archaeological areas, as part of this process, as both types of land tend to be archaeologically rich areas.
- Eco-scheme Practice 2, Extensive Livestock Production, could be facilitated, as grazing with low stocking rates keeps encroaching vegetation away from monuments- this has been advocated by NMS previously.
- Many of the Tier 3 AECM General Option actions may be suitable, particularly those connected with grasslands and margins, in facilitating the conversion of the areas of monuments with no surface trace to permanent grassland or species rich grassland.
- Many of the Tier 3 AECM Cooperation Option actions may be suitable for implementation near monuments.
- Minimum tillage, which is a mandatory action in Tier 2 of the AECM options, may be suitable where crops are grown in the vicinity of upstanding or buried monuments in tillage fields.

3. Training

The NMS has been pleased to assist DAFM in the provision of training to Farm Advisors concerning the implementation of the archaeological measures in GLAS.

- NMS would seek to continue to assist DAFM in this space, by providing a revised presentation addressing all archaeological issues that might arise on the ground in the implementation of the finalised CSP. To facilitate this, NMS would seek involvement in the detailed design of the archaeological actions proposed in both AECM options.
- As stated at point 2 above, NMS would seek to advise regarding the archaeological requirements of the proposed Cooperation Teams and to provide training to them.

In addition NMS would be able to advise DAFM as to how archaeological monuments will be protected and maintained as landscape features in Cross Compliance and how they might best contribute to the overall objectives of the CSP, by the application of a range of actions at or near archaeological monuments to maximum effect. NMS can also advise DAFM concerning training needs that might arise for this.

4. European Innovation Partnership (EIP)

NMS is currently involved in two EIP projects (Farming Rathcroghan Project and Comeraghs Upland Communities) in which the management of archaeological monuments in different farming contexts are very important elements.

- NMS sees great value in the EIP projects in both the protection of archaeological landscapes and individual monuments and meeting important shared objectives across our departments. Our Department is seeking to now develop a suite of new UNESCO World Heritage sites and is engaging with Local Authorities and communities on various applications received this year. The Rathcroghan landscape, with its EIP, is under consideration as part of a Royal Sites of Ireland bid along with 5 other important heritage sites across the country, and the EIP at Rathcroghan is seen by us as extremely advantageous to meeting the challenging yet transformative UNESCO requirements of any future World Heritage designation. NMS would seek to explore with DAFM the potential for all these expansive cultural and heritage landscape applications to be considered for EIPs, through a project in Stream B- (EIPs aimed at addressing areas related to environmental, biodiversity and climate change challenges).

NMS looks forward to discussing the foregoing points with your Department in the near future. We would request a meeting with DAFM officials in January if possible to discuss.

ENDS

National Monuments Service

10 December 2021