

**Attachment 02**

**Consultation**

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### List of Organisation that were Consulted

Eastern Regional Fisheries Board 15A Main St. Blackrock Co. Dublin	Health Services Executive Block 4, Central Business Park Clonminch Portlaoise Rd, Tullamore Co. Offaly	Bord Failte Eireann Baggot Street Bridge Dublin 2
The Department of the Environment, Heritage and Local Government 6 Ely Place Upper Dublin 2	The Department of the Environment, Heritage & Local Government Customs House Dublin 1	Irish Farming Organisation Irish Farm Centre Bluebell Dublin 12
The Environmental Protection Agency PO Box 3000 Johnstown Castle Estate Co. Wexford	The National Roads Authority St. Martins House Waterloo Road Ballsbridge Dublin 4	The Minister for Transport Transport House 44 Kildare Street Dublin 2
The Minister for Agriculture & Food The Department of Agriculture & Food Agriculture House Kildare Street Dublin 2	The Minister for Finance Department of Finance Government Buildings Upper Merrion Street Dublin 2	The Irish Aviation Authority Aviation House Hawkins St. Dublin 2
County Manager Offaly County Council Aras na Chontae Tullamore Co. Offaly	The Minister for Communications, Marine and Natural Resources Department of Communications, Marine and Natural Resources 29-31, Adelaide Rd. Dublin 2	Enterprise Ireland Glasnevin Dublin 9
The Minister for the Environment, Heritage & Local Government The Department of Environment, Heritage & Local Government Dun Sceine, Harcourt Lane Dublin 2	An Faisce Tailor's Hall Back Lane Dublin 8	Geological Survey of Ireland Beggars Bush Haddington Road Dublin 4
The Minister for Arts, Sports and Tourism Department of Arts, Sports and Tourism 23 Kildare Street, Dublin 2	The Department of Enterprise, Trade and Employment 23 Kildare Street Dublin 2	Department of Community, Rural and Gaeltacht Affairs Dún Aimhirgin 43-49 Mespill Road Dublin 4
Commission for Electricity Regulation Plaza House Belgard Road Tallaght Dublin 24	Office of Public Works 51 St. Stephen's Green Dublin 2	The Heritage Council Rothe House Kilkenny
Department of An Tainaiste, Health and Children Hawkins House Hawkins St. Dublin 2		

6<sup>th</sup> October 2004

**Re: Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site.**

Dear Sir/Madam,

Bord na Móna Environmental Limited have been commissioned by Bord na Móna Energy Ltd. to undertake an Environmental Impact Assessment and the subsequent preparation of an Environmental Impact Statement (EIS) for Cloncreen Ash Repository Site at Clonbullogue, Co. Offaly. This EIS will accompany a Planning Application with Offaly County Council, for change of waste types accepted at the facility.

Edenderry Power Station have made an application to Offaly County Council and the Environmental Protection Agency (EPA) for the co-fuelling of the power station with Biomass and Meat and Bone Meal (MBM). As part of the management of the ash from the power station Cloncreen Ash Repository are required to submit a planning application with Offaly County Council for a change of waste types.

Cloncreen Ash Repository currently hold a Waste Licence with the Environmental Protection Agency and a review of the waste licence will be carried out in line with the planning application.

The proposed development will not entail any significant changes to the external aspect of the facility. However, planning permission is required for change of waste acceptance types from ash from a peat fired power station only, to ash from a power station which can use other fuel types (Biomass and Meat and Bone Meal (MBM)). The MBM which will be recovered as a fuel will not contain the Specified Risk Material (SRM) portion of MBM.

Bord na Móna Environmental Limited would, therefore, be grateful if you could provide any information you may feel is relevant to the proposed development and/or highlight any issues that you feel should be addressed in the EIS. As you are the central office for your organisation, you may also wish to involve your regional or local office, if you deem it appropriate.

It is proposed to submit the EIS to Offaly County Council (as part of the planning process).

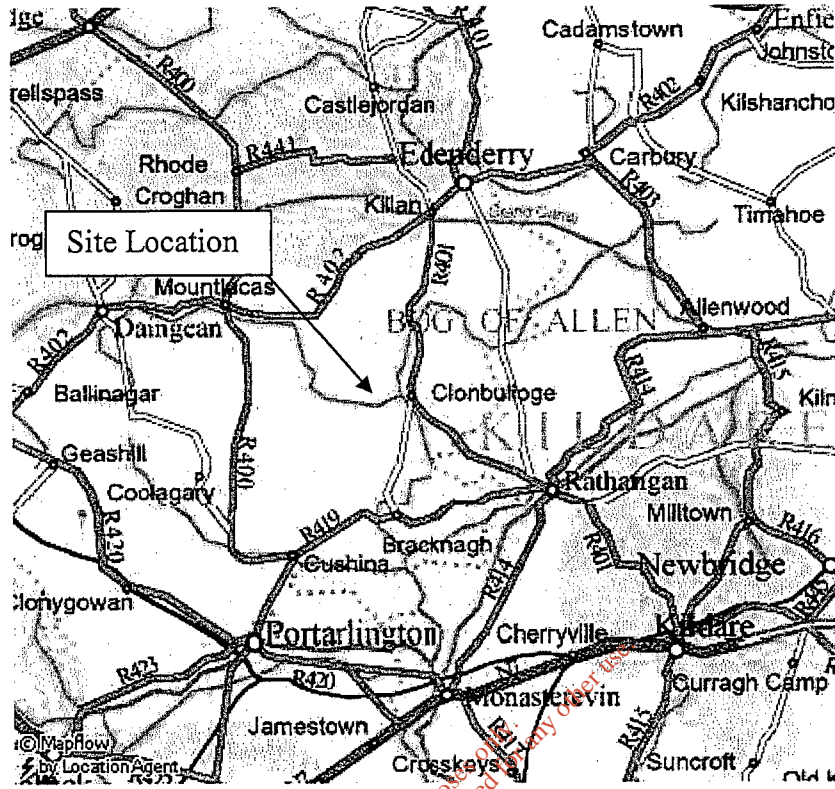
Thanking you in anticipation of your co-operation in this matter.

Yours faithfully,

**Ms. Sarah Casey**  
Environmental Consultant  
Bord na Móna Environmental Ltd.

For and on behalf of  
Bord na Móna Energy Ltd

# Site Location



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### List of Organisation that Responded

• Eastern Regional Fisheries Board
• Health Services Executive
• The Minister for Transport
• The Department of the Environment, Heritage and Local Government
• The Minister for Agriculture & Food
• The Irish Aviation Authority
• The Environmental Protection Agency
• Department of Communications, Marine and Natural Resources
• The Minister for Arts, Sports and Tourism
• Department of An Tainiste, Health and Children

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Tánaiste and Office of the Minister  
Tánaiste agus Oifig an Aire



DEPARTMENT  
OF HEALTH AND  
CHILDREN  
AN ROINN  
SLÁINTE AGUS LEANAÍ

Quality and Fairness  
A Health System for You

10 November 2005

Ms Sarah Casey  
Environmental Consultant  
Bord Na Mona Environmental Ltd  
Main Street  
Newbridge  
Co Kildare

Dear Ms Casey

The Tánaiste and Minister for Health and Children, Mary Harney T.D., has asked me to thank you for your letter concerning the Proposed acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site and to let you know that it is receiving attention.

Yours sincerely

Paul Flanagan  
Private Secretary

Hawkins House Dublin 2  
Teach Haicin Baile Ácha Cliach 2  
Telephone (01) 635 4000 VPNI12  
Fax (01) 671 4508  
Email: [info@health.gov.ie](mailto:info@health.gov.ie)  
Website: <http://www.doh.ie>

28 October 2005

AN ROINN COMHSHAOIL,

OIDHREACHTA AGUS

RIALTAIS ÁITIÚIL

DEPARTMENT OF THE

ENVIRONMENT, HERITAGE AND

LOCAL GOVERNMENT

Our Ref: G2005/578

Ms Sarah Casey,  
Environmental Consultant,  
Bord na Mona Environmental Ltd.,  
Main Street,  
Newbridge,  
Co. Kildare.

**Re: Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site**

DÚN SCÉINE

Dear Ms Casey,

LÁNA FHEARCAIR

BAILE ÁTHA CLIATH 2

I wish to acknowledge receipt of your recent correspondence in relation to the above.

DÚN SCÉINE

HARCOURT LANE

Your enquiry has been allocated the above reference number which should be used in all correspondence with this office. In addition your enquiry has been circulated to a number of relevant individuals/divisions within the Department for their comments and we will revert to you in due course.

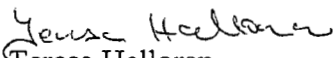
DUBLIN 2

If you need any further assistance please contact the undersigned.

Yours sincerely,

Tel: +353 1 888 3109

Fax: +353 1 478 0721

  
Teresa Halloran,  
Development Applications Unit.

**From:** "Noel McGloin" <noel.mcgloin@erfb.ie>  
**To:** <consultancyservices@bnm.ie>  
**Date:** 19/10/2005 10:22:20  
**Subject:** FAO: Sarah Casey RE: Cloncreen Ash Repository Site

Hi Sarah

We are in receipt of your letter regarding the above dated 6th October last. I am passing it on to my colleague David McInerney in the Southern Regional Fisheries Board as Clonbullogue is in his area.

Regards

Noel McGloin  
Senior Fisheries Environmental Officer  
Eastern Regional Fisheries Board  
15a Main Street  
Blackrock  
Co. Dublin  
IRELAND

Tel: 353-1-2787230 (direct line)  
Fax: 353-1-2787025  
E-Mail: noel.mcgloin@erfb.ie

**CC:** "David McInerney" <dmcinerney@srfb.ie>

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**From:** "Noel McGloin" <noel.mcglain@erfb.ie>  
**To:** <consultancyservices@bnm.ie>  
**Date:** 19/10/2005 10:22:20  
**Subject:** FAO: Sarah Casey RE: Cloncreen Ash Repository Site

Hi Sarah

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Regards

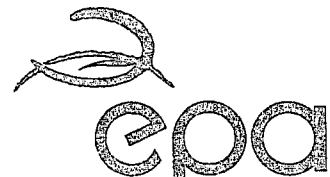
Noel McGloin  
Senior Fisheries Environmental Officer  
Eastern Regional Fisheries Board  
15a Main Street  
Blackrock  
Co. Dublin  
IRELAND

Tel: 353-1-2787230 (direct line)  
Fax: 353-1-2787025  
E-Mail: noel.mcglain@erfb.ie

**CC:** "David McInerney" <dmcinerney@srfb.ie>

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Ms Sarah Casey  
Environmental Consultant  
Bord Na Móna Environmental Ltd  
Main Street  
Newbridge  
Co. Kildare



Environmental Protection Agency  
An Ghníomhaireacht um Chaomhú Comhshaoil

Headquarters, PO Box 3000  
Johnstown Castle Estate  
County Wexford, Ireland

Ceanncheathrú, Bosca Poist 3000  
Eastát Chaisleán Bhaile Sheáin  
Contae Loch Garman, Éire

T: +353 53 60600

F: +353 53 60699

E: info@epa.ie

W: www.epa.ie

LoCall: 1890 33 55 99

18 October 2005

re: Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Meal) at Edenderry Power Station at Cloncreen Ash Repository Site.

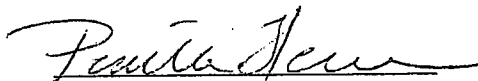
Dear Ms Casey

In reference to your correspondence dated 6/10/05 on behalf of Bord na Móna Energy Limited regarding any issues to be addressed in the EIS for Cloncreen Ash Repository Site (Reg. No. 49-1) at Clonbullogue, County Offaly.

The Agency would refer you to our guidelines: *Advice Notes on Current Practice (in the preparation of Environmental Impact Statement)* and *Guidelines on the Information to be Contained in Environmental Impact Statements*. Furthermore the Agency suggest that the EIS details the following:

- The long term sustainable closure plan for the site
- The potential presence of viable protein/prion in the ash dust

Yours sincerely,

  
Pernille Hermansen  
Inspector  
Office of Licensing and Guidance



Feidhmeannacht na Seirbhíse Sláinte  
Health Service Executive

Regional Health Office  
Dublin-Mid Leinster  
Unit 4  
Central Business Park  
Clonminch  
Portlaoise Road  
Tullamore  
Co. Offaly  
Phone: 0506 57600

12<sup>th</sup> October 2005

Ms. Sarah Casey  
Environmental Consultant  
Bord na Mona Environmental Ltd.  
Main Street  
Newbridge  
Co. Kildare

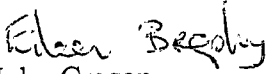
Re: Proposed Acceptance of Ash from the Co-fueled (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Respository Site

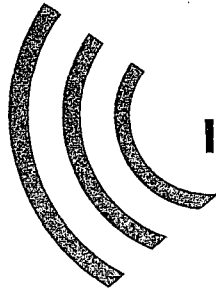
Dear Sarah,

I wish to acknowledge of correspondence regarding the above.

This matter has been referred to Mr. Liam O'Callaghan, Local Health Office Manager, Laois/Offaly, HSE Midland Area, Arden Road Tullamore (telephone no. 0506 59785).

Yours sincerely,

  
p.p. John Cregan  
Director  
Regional Health Office  
Dublin – Mid Leinster



**IRISH AVIATION AUTHORITY**  
ÚDARÁS EITLÍOCHTA NA hÉIREANN

AVIATION HOUSE, HAWKINS STREET, DUBLIN 2, IRELAND  
TEL: (01) 671 8655 FAX: (01) 679 2934  
WEB SITE: www.iaa.ie

11<sup>th</sup> October 2005

Ms. Sarah Casey  
Environmental Consultant  
Bord ma Mona Environmental Ltd.  
Main Street  
Newbridge  
Co. Kildare

**Re: Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site, Clonbullogue, Co. Offaly**

Dear Ms. Casey

I refer to your pre-planning query of 6<sup>th</sup> October 2005, to the Irish Aviation Authority, concerning the proposed development. I wish to advise you that we have no observations on the proposals.

Thank you for bringing the matter to our attention.

Yours sincerely

  
Tom Cooney  
Corporate Affairs Division

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IS. EN ISO 9001

REGISTERED OFFICE: AVIATION HOUSE, HAWKINS STREET, DUBLIN 2, IRELAND  
REGISTERED NO: 214092

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JACQUELINE JAMESON, ANNE LAIT, SHEILA MCCABE

# Office of the Minister

Transport House, Kildare Street, Dublin 2, Ireland.



Department of Transport  
An Roinn Iompair



## Óifig an Aire

Teach Iompair, Sráid Chill Dara, Baile Átha Cliath 2, Éire.

Tel: +353 1 670 7444    Locall: 1890 443311    Fax: +353 1 604 1183    Web: www.transport.ie    Email: minister@transport.ie

12 October 2005

Our Ref: MOTCO5/7123

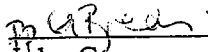
Ms Sarah Casey  
Environmental Consultant  
Bord Na Mona Environmental Ltd  
Main St  
Newbridge  
Co Kildare

Dear Ms Casey

On behalf of Mr Martin Cullen TD, Minister for Transport I wish to acknowledge receipt of your letter dated 06 October 2005, regarding the proposed acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site.

As this is a matter, which comes under the remit of the National Roads Authority, I have forwarded your correspondence to the office of Mr Fred Barry, Chief Executive, National Roads Authority for information.

Yours sincerely

  
John Conroy  
Private Secretary



Department of Arts, Sport and Tourism  
AN ROINN EALAÍON, SPÓIRT AGUS TURASÓIREACHTA

Office of the Minister  
OIFIG AN AIRE

Ms. Sarah Casey  
Environmental Consultant  
Bord na Móna Environmental Ltd  
Main Street  
Newbridge  
Co Kildare

10<sup>th</sup> October, 2005

Our Ref: 054572/MAST  
Your Ref:

Dear Ms. Casey

I wish to acknowledge receipt of your recent correspondence to Mr. John O'Donoghue TD, Minister for Arts, Sport and Tourism, regarding the preparation of an Environmental Impact Statement (EIS) for Cloncreen Ash Repository Site at Clonbullogue, Co Offaly.

I will bring your correspondence to the Minister's attention as soon as possible.

Yours sincerely

Thérèse O'Connor  
Private Secretary



Department of Communications,  
Marine and Natural Resources

An Roinn Cumarsáide,  
Mara agus Acmhainní Nádurtha

Office of the Minister  
Oifig an Aire

Dublin 2  
Baile Átha Cliath 2

Tel +353 1 678 2000  
LoCall 1890 44 99 00  
Fax +353 1 678 2029  
Email: minister.dempsey@dcmnr.ie  
www.dcmnr.gov.ie

07 October 2005

Ms Sarah Casey  
Environmental Consultant  
Bord na Móna Environmental Ltd  
Main Street  
Newbridge  
Co Kildare



**Re: Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site.**

Dear Ms Casey

I wish to acknowledge receipt of your correspondence of 6<sup>th</sup> October 2005, the contents of which will be brought to the Minister's attention.

Yours sincerely

*Carina O'Donoghue*

Carina O'Donoghue  
Private Secretary to the  
Minister for Communications, Marine and Natural Resources



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Office of the Minister for Agriculture and Food, Dublin 2.

Oifig an Aire Talmhaíochta agus Bia, Baile Átha Cliath 2.

11 October 2005

Ms. Sarah Casey  
Environmental Consultant  
Bord Na Móna Environmental Limited  
Kinsin Street  
Newbridge  
Co. Kildare

PLEASE QUOTE REF NUMBER ON ALL CORRESPONDENCE

Our Ref: 2005/23288P /PM

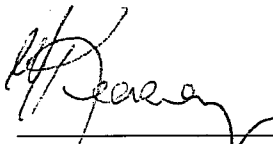
Dear Ms. Casey

I refer to your recent letter addressed to the Minister for Agriculture and Food, Mary Coughlan TD, concerning Proposed Acceptance of Ash from the Co-fuelling (Biomass and Meat and Bone Meal) at Edenderry Power Station at the Cloncreen Ash Repository Site.

I have brought the contents of your letter to the Minister's attention.

Best wishes.

Yours sincerely,

  
Martina Kearney  
Private Secretary



16 November 2005

Our Ref: G2005/578

AN ROINN COMHSHAOIL,

ODHREACHTA AGUS

RIALTAIS ÁITIÚIL

DEPARTMENT OF THE

ENVIRONMENT, HERITAGE AND

LOCAL GOVERNMENT

Ms Sarah Casey,  
Environmental Consultant,  
Bord na Mona Environmental Ltd.,  
Main Street,  
Newbridge,  
Co. Kildare.

**Re: Proposed acceptance of Ash from the Co-fuelling (Biomass and meat and bone meal) at Edenderry Power Station at the Cloncreen Ash Repository site.**

DÚN SCÉINE

A Chara,

LÁNA FHEARCAIR

We refer to the Council notification in relation to the above-proposed development. Outlined below are the architectural and archaeological recommendations of the Department of the Environment, Heritage and Local Government.

BAILE ÁTHA CLIATH 2

DÚN SCÉINE

### Architectural Heritage:

HARCOURT LANE

In the event of an Environmental Impact Statement being made for the proposed development, its content should take into account the effect on the architectural heritage of the locality.

MLIN 2

It may be in the present case that, given the nature of the proposed development, there will be no impact on any structures in the vicinity or in the area generally, whether of architectural heritage merit or not. It is recommended that this is clearly stated in the EIS documentation in order to show that consideration of architectural heritage was taken into account as required in the regulations.

Tel: +353 1 888 3109

Fax: +353 1 478 0721

The attached Appendix 1 is put forward to assist in taking the material asset of architectural heritage into account. Some of it may be relevant to the content of the EIS for the proposed development"

### Appendix 1

#### Proposals for the Cloncreen Ash Repository Site.

#### Environmental Impact Assessment in relation to Architectural Heritage

*The following comments and recommendations are made as an aid to making an Environmental Impact Assessment of the impact on architectural heritage and is not an indication of the view of Heritage and Planning Division of the Department of the Environment and Local Government on the merits of the proposed development.*

*The nature of the proposed development may mean that there will be little or no impact on the architectural heritage in vicinity of existing or proposed development. However it should be noted that, as set out below, 'architectural heritage' is a material asset which must be taken into account where an environmental impact statement is to be prepared. In that context the following may be of assistance in ensuring that the issue of 'architectural heritage' is properly addressed and the content of the environmental impact statement is not subject to unwarranted challenge on that account.*

## **1. Environmental Impact Assessment Background**

1.1 An Environmental Impact Statement (EIS) relating to a proposed development requires a description of aspects of the environment likely to be significantly affected by that proposal, including in particular -

*"material assets, including the architectural and archaeological heritage, and the cultural heritage".*

1.2 Since the adoption of the European Communities (Environmental Impact Assessment)(Amendment) Regulations 1999, S.I. 93 of 1999, which came into effect on the 1<sup>st</sup> May 1999, the matter of 'architectural heritage' is now an integral part of the EIS process. This is repeated in regulations under the 2000 Planning and Development Act. As such it is important that it documented in its own right within the EIS. It should not overlooked or only addressed as an adjunct to considerations of an archaeological or cultural heritage nature.

1.3 It should be noted that, as set out in Section 3 below, "*Defining Architectural Heritage*", it is not correct to equate 'architectural heritage' with a sub-set of structures taken from the architectural heritage of an area which are included by a planning authority in the Record of Protected Structures. In addition, as also set out in Section 3 below, reliance merely on a 'desk top study' in order to identify the impact on structures of architectural heritage merit within the vicinity of a proposed development is not likely to be sufficiently comprehensive.

1.4 Given the location of a proposed development it may be that there is little of architectural heritage merit in the vicinity or in the area generally. However, it is recommended that this should be specifically investigated. Where no structures of architectural heritage merit exist in the vicinity of a proposed development, this should be clearly stated in the documentation in order to establish the 'technical' completeness of the environmental assessment statement.

1.5 Where structures of architectural heritage merit are encountered, it is recommended that they be treated as set out in Section 4 below.

1.6 In the present case, on account of the nature of the proposed development, it may be that there will be no impact on any structures in the vicinity or in the area generally, whether of architectural heritage merit or not. It is recommended that this is specifically stated in the documentation in order that it is clearly shown that consideration of architectural heritage was taken into account in order to establish the 'technical' completeness of the environmental assessment statement.

## 2. Content of EIS Documentation Dealing with Architectural Heritage

2.1 It is customary to recommend that a chapter or section titled "*Architectural and Archaeological Heritage, and the Cultural Heritage*" is included in any documentation prepared for the purpose of an EIS.

2.2 It is also customary to recommend that the content of the chapter or section should be laid out, in part, to specifically set out the work of identification and assessment in relation to '*architectural heritage*'.

For example, it might read

*"The impact of the development will be assessed with reference to  
Architectural Heritage ...  
Archaeological Heritage ...  
Cultural Heritage ..."*

## 3. Defining Architectural Heritage

3.1 The term "*architectural heritage*" is defined in the Architectural Heritage (National Inventory) & Historic Monuments Act, 1999, as meaning "all  
(a) structures and buildings together with their settings and attendant grounds, fixtures and fittings,  
(b) groups of such structures and buildings, and  
(c) sites,  
which are of architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest".

3.2 For guidance on what is encompassed by the term "*architectural heritage*", it is recommended that reference is made to Section 2.5 of the "*Architectural Heritage Protection, Guidelines for Planning Authorities, 2004*" issued by the Department of the Environment, Heritage and Local Government. While this section relates to protected structures, it illustrates the range of structures which should be taken into account when assessing architectural heritage.

3.3 Many structures which could be considered to constitute the architectural heritage of an area are not likely to be documented. This may leave shortcomings either in a "*desk-top*" study of known sources of information or in bibliographical reference material presented as a review of the architectural heritage of an area.

3.4 It should also be noted that reference to the content of the Record of Protected Structures (RPS) in the County Development Plan for information on structures of architectural heritage merit in a locality is likely to prove insufficient. The definition of structures to be included in the Record of Protected Structures in a development

plan is set out in Section 51(1) of the Planning and Development Act of 2000. This section states that

*"For the purpose of protecting structures, or parts of structures, which form part of the architectural heritage and which are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, every development plan shall include a record of protected structures, and shall include in that record every structure which is, in the opinion of the planning authority, of such interest within its functional area."*

In effect the RPS is a subset of the architectural heritage of a locality which the planning authority considers specifically to be of special interest under specific headings. As such, the RPS does not necessarily represent the architectural heritage of a locality. It follows that exclusive reliance on the content of the RPS, or a proposed RPS, is likely to give consideration only to part of the architectural heritage that may be found in the vicinity of a development.

3.5 This usually means that a primary survey of the area in the vicinity of a proposed development has to be carried out in order to establish what existing elements of architectural heritage will be affected, if at all, by the proposed works.

3.6 It should be noted that a comprehensive site survey at project planning stage will identify most of the significant elements of the built environment in the vicinity of a proposed development. If a competent architectural heritage assessment is made of that information, it will identify those elements of architectural heritage merit upon which it is preferable not to have an adverse impact.

3.7 It is emphasised that competent architectural heritage expertise will be required to make an assessment of survey information. It is customary to recommend that this particular expertise is engaged early in the planning of the project in order that relevant input is available in good time. In effect most issues relating to impact on architectural heritage can be "designed out" at planning and design stage of the proposed development simply by identifying and avoiding significant elements of that heritage. In consequence, it can be expected that adverse impact on architectural heritage in the vicinity of a proposed development is much reduced.

#### **4. Identifying and Assessing Architectural Heritage**

- 4.1 As stated in Section 3.6 above, a comprehensive site survey at project planning and design stage will identify most of the significant elements of the built environment in the vicinity of a proposed development. Most of this built environment is upstanding and self-evident. It should be the norm that all structures of architectural heritage merit which may be impacted upon by a proposed development should be identified at project planning and design stage, evaluated as to architectural heritage significance, and the perceived amount of disturbance or intrusion upon them by the proposed development is assessed as part of planning and design stage of the project.
- 4.2 As stated in Section 3.7, if addressed in an appropriate fashion it is likely that any adverse impact on architectural heritage and any conflicts are largely "designed out" of the proposed development at planning and design stage.

4.3 As stated in Section 3.3, many structures which could be considered to constitute the architectural heritage of the area are not likely to be documented for the purpose of "a desk-top study". In the absence of readily available and comprehensive documentation, it is customary to recommend that all structures encountered on the ground in the vicinity of a proposed development are documented and an architectural heritage assessment of them set down.

4.4 Where an evaluation of the impact of the proposed development on structures of architectural heritage merit is carried out early in the planning and design process it will be evident what level of documentation regarding each structure should be provided for the purpose of an environmental impact statement. This information will indicate the consequent degree of recording or documentation which is warranted in each case.

4.5 It should be noted that the process is no more than the identification and assessment of the architectural heritage merits of any or all structures which are encountered in proximity to the proposed development, and stating the perceived effect on them. It should be noted that extensive paper research in relation architectural heritage is not required in advance of examining the actual reality in the vicinity of a proposed development.

A comprehensive survey carried out for the purpose of normal planning procedures will indicate most structures in a locality which are likely to be affected by a proposed development. Making an assessment of the architectural heritage value of just those structures will confine the work to manageable proportions. Aerial photographs can be of assistance for the purpose of identification. However, smaller structures or items of architectural heritage merit which are not evident on maps or aerial photographs should also be taken into account in the course of a site survey.

Placing an initial emphasis on documenting structures in a paper-search of historical maps or papers, and then confirming their existence by field work is a questionable approach. Apart from being time-consuming, it also risks overlooking structures on the ground which are not documented in research sources.

4.6 It should be noted that some information will overlap in part with material gathered for other parts of the environmental impact statement, e.g. structures associated with "Agricultural Assets" or "Non-Agricultural Assets", or such like. To that end all structures should be documented for the purpose of architectural heritage assessment early in the design process.

4.7 At a minimum, the term 'documented' means -  
an accurate and succinct description of the structure;  
an assessment by competent expertise of its architectural heritage merit ;  
the extent of the structure set out on a map of sufficient scale;  
a sufficient number of photographs which illustrate, particularly to someone not in a position to visit the location on their own account, the built form and architectural heritage significance of the structure under consideration;  
an assessment of the impact which the proposed development is likely to have on the structure; and

supporting information, where applicable and appropriate, such as any research documents or, perhaps, sketch plans of each floor level of structures which are directly impacted.

4.8 It is important that the matter of '*architectural heritage*' is explicitly documented and assessed in its own right within an environmental impact statement. It should not simply be addressed as an adjunct to considerations of an archaeological nature. In this regard information concerning architectural heritage will need to be assessed by competent expertise in order to set down a proper assessment of the value of structures of architectural heritage merit.

## **5. Presentation of Architectural Heritage Information in an Environmental Impact Statement and Associated Record Documentation**

### **Content Relating to Architectural Heritage**

5.1 Few development proposals will not have some impact on their surroundings. The environmental impact statement process is intended to establish if the extent of impact is such that it is, or is not, acceptable in terms of the wider value or benefit that the proposed development will bring with it. Within this context there may be, on occasion, a direct impact in architectural heritage terms on one or more structures if a proposed development is to proceed. However, in a situation where the issue of architectural heritage is addressed early in the project planning and design process, it is customary to find that relatively few structures are likely to be affected.

5.2 As it is also the purpose of the environmental impact statement procedure to establish what the actual impact of proposed development will be, the reality of the situation should be clearly set out in the environmental impact statement. It is for the regulatory authorities to determine if the outcome of any impact is acceptable within the overall context of the proposed development. Therefore all statements in respect of the assessment of architectural heritage merit and the perceived impact upon it should be factual and without bias.

5.3 The section setting out the list of structures which may be affected by a proposed development should set out in tabular form, for example, in the following format -

- reference number which cross-references to the site survey or location maps in order to locate the structure;
- brief description of the structure;
- assessment of its architectural heritage merit ;
- proximity of the structure to the proposed development in metres
- brief assessment of the impact which the proposed development is likely to have on the structure; and
- a representative 'thumbnail' photograph showing the general configuration and architectural heritage significance of the structure.

5.4 It should be noted that merely transcribing measures appropriate to the protection of the archaeological heritage is usually inappropriate in relation to structures of architectural heritage merit. For instance;

5.4.1 It should be noted that structures of architectural heritage merit are generally self-evident and can be identified early in the site selection or design stage of a proposed development. It should not be the case that previously unknown structures are encountered at construction stage. Therefore it is inappropriate to specify in an environmental impact statement that baseline survey work of architectural heritage will be required after either the completion of the environmental impact statement or in the course of site or construction work. Equally, it is inappropriate to specify that appropriate corrective measures relating to structures of architectural heritage merit will be decided upon at construction stage, with or without the approval of the Minister for the Environment, Heritage and Local Government. To do so is, in effect, an admission that due consideration of the impact on architectural heritage has not been made in setting out the environmental impact statement.

5.4.2 Putting forward "*mitigation measures*" rarely has a relevance to structures of architectural heritage merit. Instances may occur where a particular structure, for example, a set of entrance gates or boundary wall, can be moved back or relocated to facilitate a proposed development. However, generally structures which have to be dismantled or demolished to facilitate construction work, or perhaps allow a safer site access to the construction works, cannot be reinstated as they originally were. In such circumstances there is no mitigation which can be offered if a structure of architectural heritage merit is to be destroyed. Clearly the only mitigation is avoidance, where avoidance is possible.

5.4.3 Similarly, the siting of new development in close proximity to a structure of architectural merit may compromise the setting of that structure or have an adverse visual impact upon it. The practical reality is likely to be that there is little mitigation which can be offered which ameliorates adverse impact other than amending the layout of the proposed development as appropriate, if it is possible to do so.

5.4.4 In the context of archaeological heritage, it is customary to record in some detail archaeological artefacts which are encountered in the vicinity of a development. In the case of structures of architectural heritage merit, unless there is an actual physical impact such as partial or total demolition, or close proximity to the proposed works, there is little point in making detailed records for their own sake of those structures beyond the basic documentation specified in Section 4.7 above.

To do so would in effect be an unwarranted imposition in relation to a proposed development, and would not be sought in other forms of development where an environmental impact statement does not apply. If a structure is adjacent to but largely unaffected by a proposed development, then it remains as an artefact of architectural heritage merit which can be used, visited or examined on a continuing basis. Making or presenting superfluous documentation relating to architectural heritage as part of the environmental impact statement process is likely to serve little practical purpose.

5.4.5 It should be noted that the use of the term "*preservation by record*" is not appropriate in relation to structures of architectural heritage merit. In the case of archaeological sites it is generally recommended that there should always be a

presumption in favour of avoiding adverse impact, and that '*preservation in-situ*' should always be the first option to be considered. Where impact on archaeological sites is unavoidable it is said that the process, consequent to excavation and the recovery of artefacts and/or associated information, is one of '*preservation by record*'.

Where it is proposed to demolish structures of architectural heritage merit, the physical artefact is not preserved if the structure is actually removed. As there is likely to be no physical remains when the structure is destroyed, it is no more than an euphemism to state that the structure is protected or preserved through making record documents. Therefore use of the term "*preservation by record*" is inappropriate in relation to impact on architectural heritage.

5.4.6 Where it is proposed in an environmental impact statement that structures of architectural heritage merit will be "*monitored*" as "*mitigation*" during construction work, for instance by the use of tell-tales for vibration monitoring or the like, it is in effect a tacit admission that the impact of the proposed works on the structure is unknown. The offer of "*monitoring*" is a concession that, in effect, damage consequent on the works will be rectified. However, this remains no different from the situation in respect of any other structure within the vicinity of a proposed development. If the structure is of sufficient merit as to warrant protection, then the best "*mitigation*" which can be offered is avoidance, if avoidance is possible.

#### **Record of the Past**

5.5 Where it is necessary to demolish structures of architectural heritage merit in order to carry out a particular development proposal, these cases should be highlighted as such in the environmental impact statement. These structures should be documented as appropriate to their significance and, in addition to the original survey photographs, record photographs should be taken before demolition. This combined documentation should be treated as a "*record of the past*". It is recommended that it is specified in the environmental impact statement that these records are deposited with an appropriate archive, e.g. the County Library Archive.

5.6 It should be noted that the purpose of documenting structures which are to be either demolished, partly demolished, or significantly impacted upon is to set down a record of the situation as it existed at a particular point in time, that is, just before removal. This information may be cross-related to, for instance, historical maps at a future time by others as part of research work for historical purposes or social study.

Few structures which are removed as part of a proposed development are ever likely to be reconstructed. Therefore carrying out extensive measured work and making detailed drawings will rarely be required. Documentation relating to most structures to be removed need only give a reasonable representation of the structure as it existed prior to removal. Photographs which illustrate the basic form and relevant detail of a particular structure may reduce the requirement of measured work to a minimum. Following removal, the information associated with the structure simply becomes a "*record of the past*".



5.7 It should be noted that, where a structure is to be demolished and its associated site cleared, archaeological investigation may be justified. This should be highlighted in the chapter in the environmental impact statement dealing with archaeological heritage.

5.8 Where a structure or feature of architectural heritage merit is to be dismantled and relocated as part of a proposed development, the authenticity of the original should be maintained.

This will mean, for instance, that

the structure is documented in sufficient detail both before and in the course of being dismantled in order to allow it to be accurately rebuilt to its original form;

it is carefully dismantled in order to avoid undue damage to its constituent parts;

it is reconstructed using, in so far as is practicable, its original materials;

it is reconstructed using, in so far as is practicable, the original construction techniques. For instance, lime mortar is used for in cut-stone or coursed random rubble work rather than sand/cement based mortars;

it is reassembled as an accurate representation of the original, maintaining the same profiles, surface finish, and faithful detailing rather than a pastiche reproduction. For instance, where an original wall is of solid masonry, its reinstatement should not be of a concrete block core with masonry facing to one or both sides;

any replacement parts are faithful in style, material, and size to the original. For instance, any individual parts of a cast-iron railing, or segments of replacement railing should replicate the original.

#### **Content of Record of the Past**

5.9 The documentary information specified in Section 4.7 above is of a general nature sufficient to establish the basic architectural heritage merits of a particular structure. As set out in Section 5.6 above, a "*record of the past*" should be made for particular structures which are either to be demolished or significantly impacted upon. Depending on their particular architectural heritage merit, it is recommended that such structures are documented to the following levels;

5.9.1 Structures of relatively minor architectural heritage merit or significance:

the original survey documentation as set out in Section 4.7 above, viz.

an accurate and succinct written description of the structure;

an assessment of its architectural heritage merit ;

the extent of the structure set out on a map of sufficient scale;

a sufficient number of record photographs which illustrate the built form and architectural heritage significance of the structure;

any additional information such as any research documents; and, in addition,

record photographs taken before demolition, and which include a clear indication of scale such as calibrated ranging rods.

5.9.2 Structures of greater architectural heritage merit or significance;

as for Section 5.9.1 above, but including sketch floor plans and sections drawn on squared paper which gives an indication of a recognisable scale. Architectural and constructional details should be documented by photographs which include a clear indication of scale.

5.9.3 Structures of specific architectural heritage significance;  
as for Section 5.9 2 above, but including measured drawings to an appropriate scale showing the general site layout and general floor plans, sections and elevations.

5.9.4 Structures of particular architectural heritage significance;  
as for Section 5.9 3 above, but including a full set of measured drawings and rectified photographs. The measured drawings should also include constructional details to an appropriate scale. It should be noted that this specification will only be required in exceptional circumstances. It is more likely that such structures will have been identified at planning and design stage, and will have been avoided by the proposed development in the first instance.

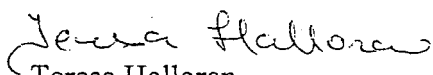
### **Archaeological:**

As part of the preparation of the Cultural Heritage element of the EIS, this Department recommends that you engage a suitably qualified Archaeologist to carry out an Archaeological Assessment of the area proposed to be developed or subject to ground disturbance. The Archaeologist engaged should carry out relevant documentary research, including examination of all relevant maps and, where relevant, aerial photographs. The Archaeologist shall examine the nature, extent and locations of any archaeological monuments, structures or features within or close to the area proposed for development. This shall be based on thorough field inspection. Photographs (including context shots), annotated maps, etc. shall be included in the impact and survey report, even if no monuments are obvious on the ground. The impacts of the proposed development on any such archaeological monuments, structures or features on or close to the proposed development site should be addressed (including Visual Amenity). Following from this, the Archaeologist shall suggest mitigatory measures to be implemented to avoid impact on any archaeological features/material. This Department, upon receipt of the report/EIS shall make recommendations to the Planning Authority.

Finally, this recommendation is based on the papers submitted to this Department on a pre-planning basis and is made without prejudice to any decision the Minister may take upon sight of a formal planning application or the submission of an Environmental Impact Statement.

If you require any further information please do not hesitate to contact this office.

Mise le meas,

  
Teresa Halloran,  
Development Applications Unit.