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29th July 2009

Angelika Grohmann-Worle,
ERM Ireland Ltd,
Suite 508,
The Capel Building,
Mary's Abbey,
Dublin 7

Your Ref: 0100952
Our Ref: G2009/450

Re: Proposed Endesa CCGT Power Plant, Great Island, Co. Wexford

Dear Angelika,

We refer to your correspondence of the 3rd July looking for comment on a Draft Scoping Report for the abovementioned Power Plant in Great Island, Co. Wexford. Outlined below are the architectural and archaeological heritage observations of the Department of the Environment, Heritage and Local Government. Nature Conservation observations, if any, will follow in due course.

Architectural Heritage

Environmental impact assessment for the proposed development should take into account the effect of the proposal on the architectural heritage of the locality.

In that regard the Advice Notes in the attached Appendix 1 is put forward as an aid to making that assessment.

As pointed out in the advice notes,

"1.4 Given the location of the proposed development, it may well be that there is little of architectural heritage merit in the vicinity or in the area generally upon which there may be an adverse impact beyond that which already exists. However, it is recommended that this should be specifically investigated.

Where no structures of architectural heritage merit exist in the vicinity of or on the site of the proposed development, this should be clearly stated in the documentation in order to establish the 'technical' completeness of the environmental impact assessment or an EIS.

Equally, where no greater impact is likely to occur than that which already exists in relation to structures of architectural heritage merit either on the site or in the vicinity of the proposed development, this should also be clearly stated in the documentation in order to establish the 'technical' completeness of the environmental impact assessment or an EIS."



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In relation to Section 4.8.1 of the Draft Scoping Report, it should be noted that “*architectural heritage*” encompasses more than just protected structures included in the Record of Protected Structures or structures included in National Inventory of Architectural Heritage surveys. In that regard current knowledge and methods of assessment would go beyond a simple reference to desk top sources.

It is recommended that assessment of the architectural heritage merit of structures deemed to be of architectural heritage merit is carried out specifically by someone with sufficient experience and competence to make that assessment. It is also recommended that the Advice Notes are forwarded to that person.

It may also be useful to consult with the County Conservation Officer about any undue impact on structures of architectural heritage merit which might occur on foot of any proposed development.

Archaeological Heritage

As part of an environmental review of the project this office will require a full archaeological impact assessment to be carried out and the results of the same to be forwarded to this office.

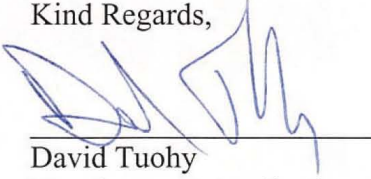
In assessing impacts on the archaeological heritage regard must be had to the following:

The area's monuments can be identified from the Record of Monuments and Places, County Wexford. Those monuments that are National Monuments in State ownership or guardianship and monuments subject to Preservation Orders should be identified and zones of visual amenity defined for them. It should be noted that and direct impact on national monuments in State or Local Authority care or subject to a preservation order will require the consent of the Minister for the Environment, Heritage and Local Government under section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004. Areas of high archaeological potential including subsurface archaeological structures should be identified. A pointer to the potential for the occurrence of subsurface archaeology is the annual Excavations Bulletin which contains brief accounts of excavations conducted in Ireland each year; these reports are also at www.excavations.ie. Information on occurrences of chance finds of archaeological objects is also a useful indicator of archaeological potential – information may be obtained from the National Museum and local museums. Any potential impacts on archaeological heritage should be subject to full archaeological assessment.

Please acknowledge receipt of this letter and forward any further correspondence to the undersigned at the following address:

Development Applications Unit,
Department of the Environment, Heritage and Local Government,
Dun Sceine,
Harcourt Lane,
Dublin 2.

Kind Regards,



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Encl.: Appendix – Advice notes – Scoping for EIA in relation to Architectural Heritage

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Appendix 1

Proposed New Power Station at Great Island, Co. Wexford

Advice Notes – Scoping for Environmental Impact Assessment in relation to Architectural Heritage

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

It may be that there will be little or no impact on the architectural heritage in vicinity or on the site of the 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 the 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 1st May 1999, the matter of 'architectural heritage' is now an integral part of the EIS process. As such it is important that it is documented in its own right within the EIS. It should not be 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 the proposed development, it may well be that there is little of architectural heritage merit in the vicinity or in the area generally upon which there may be an adverse impact

beyond that which already exists. However, it is recommended that this should be specifically investigated.

Where no structures of architectural heritage merit exist in the vicinity of or on the site of the proposed development, this should be clearly stated in the documentation in order to establish the 'technical' completeness of the environmental impact assessment or an EIS.

Equally, where no greater impact is likely to occur than that which already exists in relation to structures of architectural heritage merit either on the site or in the vicinity of the proposed development, this should also be clearly stated in the documentation in order to establish the 'technical' completeness of the environmental impact assessment or an EIS.

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

2. Content of EIS Documentation Dealing with Architectural Heritage

2.1 It is recommended 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 or an environmental impact assessment..

2.2 It is also recommended 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 It should be noted that structures of particular architectural heritage merit in a locality may not have been considered for inclusion in the RPS because they have simply not come to the attention of the planning authority.

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. Given the nature of the proposed development the 'site survey' may take in for wider planning consideration a greater area than simply that of the location of the site itself. 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 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.

3.8 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 3.8, 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 consideration for the proposed development 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.

In assessing impact on structures of architectural heritage merit 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 may overlap in part with material gathered for other parts of the environmental impact assessment or for the basic design of the scheme. 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 of architectural heritage merit 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.

Only where there is a direct and unavoidable impact should further documentation be required as set out in Section 5.9 below.

5.4.2 Putting forward “*mitigation measures*” has limited relevance to structures of architectural heritage merit which are either to be partially or fully demolished. 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 physical 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 The procedure of “*preservation by record*” in relation to the removal of structures of architectural heritage merit should only be used as a last resort. 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. This has a parallel in relation to architectural heritage whereby avoidance in the first instance is the best option. Where impact on particular 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 only associated information that is protected or preserved through making record documents. The procedure of "*preservation by record*" is a limited form of mitigation that can be offered. 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.

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. Again, if the structure is of sufficient merit as to warrant protection and there is a belief that damage may occur consequent on the proposed development, then the best "*mitigation*" which can be offered is avoidance, if avoidance is possible.

Records 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 at a future time by others to, for instance, historical maps 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 Records 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 and the perceived impact upon it. 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.

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