National Roads Authority

Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes





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Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes

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Disclaimer

This document was prepared by Manogue Architects, Conservation Specialists Bangor, Co. Down and Soltys:Brewster Consulting, Environmental Consultants, Belfast, Co. Antrim in association with the National Roads Authority, Dublin.

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CHAPTER 1 INTRODUCTION

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1.0 INTRODUCTION

1.1 Background and Legislative Context

The purpose of this document is to provide guidance for the identification and assessment of architectural heritage during the planning and design of national road schemes. These guidelines are not mandatory. However, they are put forward in order to achieve consistency of approach in both the identification and assessment of architectural heritage and its subsequent treatment during the different stages (i.e. Constraints Study, Route Corridor Selection and Environmental Impact Statement (EIS)) of road scheme planning undertaken in accordance with the National Roads Project Management Guidelines (NRPMG).

Architectural heritage and archaeology together form the built heritage. Therefore, it is recommended that these guidelines read in conjunction with the *Guidelines for the Assessment* of Archaeological Heritage Impacts of National Road Schemes (National Roads Authority, 2005).

The Roads Act, 1993, provides the statutory basis for compliance by Ireland with the EU Environmental Impact Assessment (EIA) Directive (85/337/EEC as amended by 97/11EC). Road development that is subject to EIA is detailed in the 1999 European Communities (EIA) (Amendment) Regulations and the Planning and Development Act, 2000. The 1992 Environmental Protection Agency (EPA) Act provides for the preparation by the EPA of *'Guidelines on the information to be contained in Environmental Impact Statements'* (Environmental Protection Agency, 2002). The National Roads Authority's Guidelines for EIA of National Road Schemes (2005) provide further information on the content of an EIS for a road scheme.

1.2 National Roads Project Management Guidelines (NRPMG)

The procedures followed by the National Roads Authority and local authorities in the planning, design and implementation of road schemes are specified in the Roads Act, 1993, and the NRPMG (2000).

The Roads Act requires the preparation of an Environmental Impact Statement (EIS) for certain types of road schemes and, following a period of public consultation, submission of the EIS to An Bord Pleanála for consideration.

Public consultation is catered for at a number of stages in the planning process and, as a matter of practice, is generally engaged-in as early as it is deemed practicable. There are a number of stages to the planning and consultation process as set out in the Authority's NRPMG.

The NRPMG were prepared to allow a phased approach to developing a major road scheme. The aim of this document is to provide advice on assessing the impacts of road development on architectural heritage during each of three specific phases of the guidelines: the Constraints Study (phase 2), Route Corridor Selection (Phase 3) and the Environmental Impact Statement (Phase 4). The three phases are illustrated in Figure 1.

INTRODUCTION

In order to avoid any significant or adverse impacts on architectural heritage, the treatment of architectural heritage should be considered during all three stages. The findings arising out of each stage should set the foundation for the next stage of planning and collectively should assist in the final design of the road scheme. As the stages progress, the area of study decreases, while the level of detail increases. The focus of attention during the constraints and route selection stages should be on impact avoidance while the EIS should describe any further steps needed to avoid impacts and, where avoidance is not possible, any necessary mitigation measures.

1.3 DoEHLG Architectural Heritage Protection Guidelines for Planning Authorities

The DoEHLG's '*Architectural Heritage Guidelines 2004*' were issued under Section 28 and Section 52 of the Planning and Development Act 2000. The guidelines provide criteria to be applied by planning authorities when selecting proposed protected structures for inclusion in the RPS¹. See Appendix 2. While primarily aimed at planning authorities, the guidelines could assist in the evaluation of architectural heritage merit. When considering architectural heritage merit, the architectural heritage consultant should consider both the structure or feature and its setting. The guidelines suggest that an architectural heritage impact assessment should be undertaken:

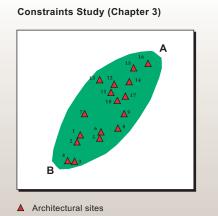
- (a) as part of a development application in order to provide sufficient information for the planning authority to make an informed decision on the potential impact on architectural heritage, or
- (b) where permission has been granted for works to a protected structure or a proposed protected structure, to record the existing fixtures or features which contribute to its special interest and which would be lost or altered as a result of the works.

¹ Record of Protected Structures – planning authorities have an obligation under Part IV of the Planning and Development Act 2000 to create a record of protected structures (RPS) which includes all structures or parts of structures in their functional areas which, in their opinion, are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest. The record forms part of a planning authority's development plan.



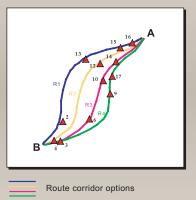
Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes

Figure 1: The phases of planning for the assessment of architectural heritage sites of national road schemes showing a typical study area and route corridor

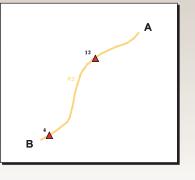


Architectural sites
 Study area

Route Corridor Selection Study (Chapter 4)



Environmental Impact Assessment (Chapter 5)



Preferred route

INTRODUCTION

1.4 Requirements of an Architectural Heritage Consultant

The survey and assessment of the architectural heritage for the purpose of these guidelines requires the expertise of a suitably experienced architectural heritage consultant/specialist. A combination of expertise and qualification is considered to be the most desirable and this may include some or all of the following activities: -

- work to protected structures, historic structures and structures in architectural conservation areas,
- preparation of National Inventory of Architectural Heritage (NIAH) Surveys,
- evaluation and preparation of architectural heritage assessment reports,
- other projects which demonstrate a proven experience and knowledge of the architectural heritage in its many forms, and
- preparation and evaluation of conservation management plans.

The architectural heritage consultant will need to be able to assess the significance of structures and their settings including designed landscapes, potentially affected by road scheme proposals. It will be necessary to have a knowledge of the different types, value and commonality of each item and its historic merit. The consultant will need to work with road designers and other specialists to prepare practical and reliable measures to mitigate potential adverse impacts on the architectural heritage, as an integral element of a comprehensive route selection and planning process and to clearly and comprehensively present their findings.

1.5 Consultees

Consultees in the EIA process include authorities or agencies with statutory responsibilities for the protection of architectural heritage, including the collection and provision of data and information, and those who should be informed of the heritage aspects of the proposed road development.

For architectural heritage the Statutory Consultees are:

- The relevant Planning Authority,
- Department of the Environment, Heritage and Local Government, Architectural Heritage Advisory Unit,
- The Heritage Council,
- An Taisce,
- Failte Ireland,
- The Arts Council (An Chomhairle Ealaíon).



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A copy of the EIS should also be sent to the prescribed authorities in Northern Ireland where the proposed road development is likely to have significant effects on the environment in Northern Ireland. The Northern Ireland authorities are also entitled under section 51 of the Roads Act, 1993, to request a copy of the EIS. Where an EIS is sent to the Northern Ireland authorities it should be indicated that submissions thereon may be made to An Bord Pleanála within a specified period.

The statutory consultees have special responsibilities to respond to the procedural demands of the EIA process.

The Architectural Heritage Consultant will decide on the scope of the architectural heritage survey and assessment work, taking account of the views received and the advice provided in these guidelines.

At the EIS stage it is recommended that consultation be initiated with the Statutory Consultees to seek their views on the scope of surveys and assessment work, and on the suitability and acceptability of the predicted impacts and mitigation proposals for the proposed route.



CHAPTER 2 THE ARCHITECTURAL ENVIRONMENT

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Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes

2.0 THE ARCHITECTURAL ENVIRONMENT

2.1 Definition of Architectural Heritage

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, historic, archaeological, artistic, cultural, scientific, social or technical interest.

Figure 2: Churches and their settings are an important consideration in assessing their architectural heritage



2.2 Protection of Architectural Heritage

The current legislation provides protection to architectural heritage. However, not all of the architectural heritage of Ireland is either known or protected by legislation.

The architectural heritage consultant should make reference to, and take account of, the relevant legislation and guidance as appropriate in undertaking all stages of the environmental assessment.

The following national and international guidance and legislation need to be taken into account when assessing the merits of architectural heritage:

THE ARCHITECTURAL ENVIRONMENT

National Protection and Guidance

The National Monuments Act, 1930 and its subsequent amendments provide the formal legal mechanism to protect monuments in Ireland. The Minister for the Environment, Heritage and Local Government is the national authority with responsibility for this legislation.

European Guidance

The Convention for the Protection of the Architectural Heritage in Europe (the 'Granada Convention', 1985) was ratified by Ireland in 1997. The Convention emphasises the importance of inventories in underpinning conservation policies. The National Inventory of Architectural Heritage (NIAH; a unit within DoEHLG) was established to fulfil Ireland's obligations under the Granada Convention. The NIAH fulfils these obligations by producing an inventory of buildings in Ireland that date from 1700 to the present day. The body also provides guidance on the selection of protected structures, helps local authorities to make decisions on the merits of their building stock and promotes the general appreciation of Ireland's architectural heritage.



The statutory requirement for preparing an EIS in respect of certain road scheme proposals is outlined in detail in the NRA's EIA Guidelines (National Roads Authority, 2005).

New road development in Ireland is regulated under the Roads Act, 1993, which states that an EIS must include a description of the likely significant effects whether direct or indirect of a road on cultural heritage.

The Planning and Development Regulations, 2001, state that an EIS is "required to include a description of the aspects of the environment likely to be significantly affected by the proposed development including the architectural and archaeological heritage, and the cultural heritage".

International Guidance

The International Council on Monuments and Sites (ICOMOS) is an organisation dedicated to the conservation of the world's historic monuments and sites. It was founded the year after the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites (1964). ICOMOS seeks to establish international standards for the preservation, restoration, and management of the cultural environment and advises the World Heritage Committee and UNESCO on the nomination of new sites to the World Heritage List.

To be included on the World Heritage List, sites must be of outstanding universal value and meet at least one of ten selection criteria. The government of the country nominates sites, and Ireland, currently, has two World Heritage Sites.

2.3 The Nature of Architectural Heritage

Table 1 has been derived from the *Department of the Environment, Heritage and Local Government's Architectural Heritage Protection – Guidelines* (Department of the Environment, Heritage and Local Government, 2002) and it provides guidance on some of the structures and areas that may be defined as architectural heritage under current legislation and Government policy.

Unlike some archaeological heritage, architectural heritage is generally visible in all cases and has a presence in the landscape to a greater or lesser degree depending on its scale and extent. An understanding of the extent of architectural heritage within a road corridor's broad constraints study area would usually be possible at the constraints study stage of assessment, with few features unknown.

THE ARCHITECTURAL ENVIRONMENT



Figure 3 Historic street features merit preservation



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Architectural Type	Examples		
	(Examples given are illustrative and not exhaustive)		
Vernacular Rural and Urban	Farm buildings, stiles, cottages, houses		
Industrial	Mills, mill ponds, mill races, fish passes, breweries, distilleries		
Transport	Road bridges, railway bridges, stations and tracks, canals, canal locks		
Civil and Social	Public buildings, hospital buildings, school buildings, workhouses,		
	courthouses, post boxes, benchmarks		
Ecclesiastical	Churches, chapels, graveyards, meeting houses		
Military and Defence	Barracks, Martello towers, pill boxes		
Country Estate	Country houses, demesne lands and landscapes, demesne walls,		
	entrance gates and lodges, follies, out buildings and walled gardens		
Maritime	Harbours, quay walls, coastguard stations		
Monuments	Roadside memorials, plaques, statues, historic monuments		
Landscapes	Designed landscapes, vistas, planted features such as avenues, tree		
	clumps, water features, earthworks		

Table 1: Examples of Architectural Heritage

2.4 Sources of Architectural Heritage Information

Sources of background information that the architectural heritage consultant could draw on include:

- County Development Plans
- Record of Protected Structures (RPS)
- Record of Monuments and Places (RMP),
- National Inventory of Architectural Heritage (NIAH), and the
- Irish Architectural Archive (IAA)

As standard practice, consultants should always check any other relevant available information including, previously commissioned reports, local reference sources (e.g. libraries, private collections etc.), 1st edition maps, historic aerial photographs and locally produced publications and articles, which may contain valuable information. This could include undocumented knowledge from local residents and historians.



CHAPTER 3 CONSTRAINTS STUDY

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3.0 CONSTRAINTS STUDY

3.1 Objective

The objective of the Constraints Study is to identify structures and features of known architectural heritage merit. The Study collates information from readily available sources that will be used to inform the later stages of the planning process, i.e. Route Corridor Selection and EIS.

Information gathered on the architectural heritage will allow a preliminary schedule and map of architectural heritage constraints to be devised. This will form a component of the overall environmental constraints plan for the road development and inform the later planning stages of the Route selection and EIS.

The process of undertaking the Constraints Study is summarised in Figure 4.

3.2 Approach

The Constraints Study area will be determined by the commissioning road authority in accordance with NRPMG guidelines. For national road developments, the overall width of the broad study area could range from 5-10kms up to 30-40kms depending on the specifics of the particular scheme.

At this stage in the assessment process, data collection is based on a desk study to identify all features and structures of known architectural merit, to record their presence on a map of the study area, and to list them in a preliminary schedule of architectural heritage.

3.3 Consultation to Gather Baseline Information

The architectural heritage consultant will need to consult all available sources of architectural heritage information as part of the desk study including the sources listed in section 2.4 above. Where NIAH² or RPS information is incomplete or unavailable, the architectural heritage consultant will need to rely on existing documented records with a desk-based evaluation of other information sources including books, published articles and 1st edition maps. This will include an evaluation of aerial photographs of the study area if available at this stage.

² To date the NIAH has published surveys for eight counties. The consultant should bookmark and regularly consult the NIAH website www.buildingsofireland.ie for the current position.

If all available records contain nothing of architectural heritage merit the definitive position must await site visits or windshield surveys that are undertaken as part of the Route Corridor Selection Phase.

3.4 Contents of the Constraints Study

The architectural heritage consultant should compile a preliminary schedule of architectural heritage within the study area. This will include structures and features of architectural heritage and any recognized heritage areas of merit. These may include individual buildings or groups of buildings, architectural conservation areas, streetscapes, vistas, historic artifacts and features, historic landscapes, parks and gardens.

The schedule should indicate the source of information (e.g. RPS, NIAH or other) and the architectural heritage consultant will record the importance and legal status of the structure or area i.e. international, national, regional or local as shown in the model schedule in Table 2.

Table 2: Examples of Architectural Heritage in the Constraints Study

Reference No.	Address	Location/ Coordinates	Site Type	Source	Importance/ Legal Status
N11/001	Location 1	OS 345 678	Church	NIAH	Regional
N11/231	Location 2	OS 456-789	Rural Village	Dev Plan 2003	National

3.5 Architectural Heritage Constraints Map

All architectural heritage features and structures of merit within the study area should be shown on the Constraints Map at an appropriate scale. Separate colours and symbols should be used to represent each type of constraint. The relative importance (i.e. international, national, regional or local) of mapped features, structures or areas should be distinguished.

For accuracy and ease of reference, mapping should be in a format that is compatible with the overall Environmental Constraints Plan and could be in the form of a digital Geographical Information System (GIS) for mapping of architectural heritage constraints.

3.6 Communicating the Constraints

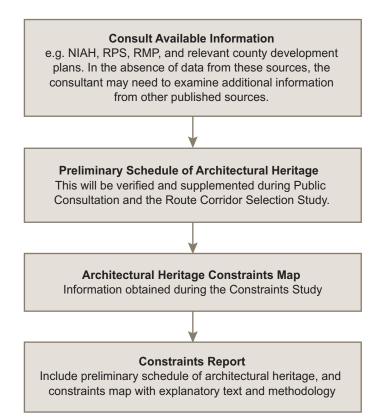
The overall findings of the architectural heritage constraints study should be presented in a report to the Project Engineer for incorporation into the overall project Constraints Study. This should be formatted to include the Preliminary Schedule of Architectural Heritage, the Architectural Heritage Constraints Map and explanatory text setting out methodology, list of sources consulted and discussion and evaluation of features of architectural heritage merit that would present constraints on development.





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Figure 4: Flowchart Summarising the Constraints Study – Architectural Heritage





CHAPTER 4 ROUTE CORRIDOR SELECTION STUDY

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4.0 ROUTE CORRIDOR SELECTION STUDY

4.1 Background

Following the Constraints Study, a number of broad route corridor options will be identified by the Project Design Team derived from the informed and balanced consideration of all physical and environmental constraints presented within the constraints study report. These corridors can be several hundred metres in width and it is within these corridors that potential route options will be subsequently identified.

4.2 Objectives

The objective of the route corridor selection study is to produce a common assessment and detailed technical comparative evaluation for each potential route option. Features and areas of architectural heritage merit that potentially could be affected by each route option should be identified and, where feasible, consideration to the avoidance of significant adverse impacts for the road scheme should be developed at this stage of the assessment process. The study should elaborate and supplement the information already gathered during the Constraints Study.

A comparative and qualitative evaluation of the relevant architectural heritage within each route corridor should be produced to assist in the identification of the preferred route option. Architectural Heritage impacts have to be seen in the broader perspective of other environmental, engineering and socio-economic constraints. The preferred route from an architectural heritage perspective, as identified in the route corridor selection study on architectural heritage, may not be the overall optimum route when other impacts and considerations are evaluated. However, it will be a matter for the project design team to have due regard to the conclusions of the study concerned when evaluating all relevant route options and coming to an informed decision as to what, on balance, is the preferred route choice.

4.3 Approach

Information gathered at the Constraints Study Phase will provide the baseline for the desk studies at the route corridor selection phase. This study is the main background information-gathering phase of the assessment process and a consistent methodology and criteria need to be adopted for the assessment of architectural heritage within each route corridor. The approach should involve a combination of techniques to identify, describe, map and evaluate the significance of likely adverse impacts that each route possesses. This may entail an assessment of relevant books, published articles, 1st edition maps and aerial photographs, if available.

A study area for architectural heritage will need to be identified for each route option considered within the broad study corridors. The extent of the study area for architectural heritage should as a rule encompass an overall width of 200 metres, i.e.100m from the centre line of each possible route. This would, however, need to be increased where necessary by the consultant, if structures or features of significant architectural heritage merit extended beyond a width of 200 metres, for example at junctions, bridges and intersections. The extent of the study area for architectural heritage within the broad study corridors may differ to that of other environmental aspects (ecology, landscape etc.).

ROUTE CORRIDOR SELECTION STUDY

The documentation generated for the route selection report will be utilised during the Environmental Impact Assessment phase and may be required to support evidence at the An Bord Pleanála oral hearing.

4.4 Compilation of Base Maps

In general, a scale of 1:50,000 or larger is suitable for the mapping of architectural heritage. In most situations, sufficient data to compile a suitable base map will be available from Ordnance Survey Ireland. Aerial photography may at this stage be available for the project and these could potentially form the basis of a map.



Figure 5 Vernacular buildings may also have heritage merit



4.5 Survey Methodology for the Route Selection Stage

Within the defined route option study area, the Architectural Heritage Consultant should conduct a 'windshield' survey supplemented with additional site visits, if necessary, to verify and, as appropriate, supplement the record of architectural heritage structures and features of merit that may be potentially affected by the route options. All due regard for health and safety procedures should be followed when conducting the windshield survey. Site visits will assist in:

- Confirming the nature, location, condition and extent of architectural heritage features that will potentially be impacted by the scheme.
- Noting additional unidentified architectural heritage as defined under the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999.
- Evaluating potential magnitude and significance of potential impact.
- Providing a photographic record of individual features of merit likely to be significantly impacted by a particular route.

4.6 Inventory of Architectural Heritage

A Preliminary Inventory of Architectural Heritage should be compiled for each route corridor option. The Inventory should draw on data and information recorded during the Constraints Study. Entries in the Preliminary Inventory should include a short description of each feature or area of architectural heritage interest, the legal status and importance of the feature, approximate date, distance from the proposed route option, and identify the type of impact whether direct or indirect. An example is provided in Table 3.

Reference Number	N11/001 (unique reference no. identified by the consultant for the site
	or feature)
Photo. Reference no.	P0014 (unique reference no. for photographs used in the report)
Address	Location 1 (to include the name of the property/feature and the
	Townland)
Location/	NGR345 678 (the national grid reference for the property/feature)
Coordinates	
Site Type	Church
	Located on natural rising ground to the south of the route and on the
Description	edge of the village. The church is a 3 Bay single cruciform church
Description	constructed of limestone with granite quoins and detailing. Northern
	transept exposed to Route B.
Approximate Date	1850
Sources	NIAH
Importance	Regional/A Building of County Importance
Legal Status	Protected Structure
Approx. distance	50m
from Route B	
Type of Impact	Indirect Impact

Table 3: Preliminary	Inventory o	f Architectural	Heritage - Route B
10010 01 1 1 011111101			nontage neuro b

ROUTE CORRIDOR SELECTION STUDY



Figure 6 An Historic Weir that is still functional

4.7 Impact Assessment of Route Options

The collated information on the prevalence of architectural heritage of merit within the route option corridors will provide the basis on which each route option is assessed. The most favourable route will be identified through a quantitative and qualitative appraisal of route corridors to arrive at a professional conclusion. An Impact Assessment Table as illustrated in Table 4 should be devised by the consultant to enable a comparison of the various route attributes.

The Architectural Heritage Consultant should notify the project design team as to the potential for impact on architectural heritage along each route option being considered and whether potential impacts on architectural heritage are likely to be a key consideration in selecting a preferred route option.

A route selection report for architectural heritage must be produced to inform the design team and to provide a record of the route assessment process. The findings from this report, along with those produced for other environmental aspects, is included within the overall route selection report for the scheme prepared by the Project Design Team and will be available for subsequent viewing by statutory consultees and others.

Impacts would generally be categorized as one of three types:



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Direct Impacts – where a feature or site of architectural heritage merit is physically located in whole or in part within the footprint of a potential route alignment. In this case the main form of mitigation would be realignment and avoidance, where feasible, and having regard to the significance of the feature or site concerned.

Indirect Impacts – where a feature or site of architectural heritage merit or its setting is located in close proximity to the footprint of a potential route alignment. In this case mitigation could ameliorate and reduce potential negative impacts; however, the design of mitigation at the route selection stage would be largely undefined and would, instead, be addressed as part of the EIS Phase in the event of the route option being identified as the preferred route.

No predicted impact - where the potential route option does not adversely or positively affect an architectural heritage site.

The level of impact should be defined in accordance with the criteria provided in the published Environmental Protection Agency Guidelines (Environmental Protection Agency, 2003), namely:

• Profound, Significant, Moderate, Slight and Imperceptible³

and should be classed as either:

• Positive or Negative

When assessing each of the route options both quantitative and qualitative attributes of the architectural heritage should be considered.

Quantitative attributes assessed when comparing route options can be defined as: relative number of structures or features of architectural heritage merit present in the study area of each route and their relative distance from the centre-line of the route.

Qualitative attributes assessed when comparing route options can be defined as: type of site and relative importance, condition and rarity of structures or features present within the study area.

The overall level of impact recorded will be a professional judgment made by the architectural heritage consultant based on the consideration of both quantitative and qualitative attributes.

Reference No.	Address	Location/ Coordinates	Site Type	Type of Impact	Distance from Route B	Impact Level
N11/001	Location 1	NGR 345 678	Church	Indirect Negative	95m	Moderate
N11/231	Location 2	NGR 456-789	Rural Village	Direct Negative	0m	Profound

Table 4: Impact Assessment Table – Route B

3 Definition of these terms as they relate to architectural heritage is provided in section 5.9 on page 33

4.8 Comparison of Route Options

Comparison of route options should be made through the use of a Route Option Appraisal Table taking account of the relative merits of affected features and sites. This should enable an informed decision to be made on a preferred route option, having regard to the implications for architectural heritage as part of a comprehensive route evaluation and selection process. The relative ranking of route options from the architectural perspective should be presented in the Route Option Appraisal Table, an example of which is set out in Table 5.

Impact Level	Route A	Route B	Route C
Negative			
Profound	Removal of two 19th	Removal of 18th	
	century cottages on the	century agricultural	
	RPS and one derelict	building of national	
	mill building of	importance	
	national importance		
Significant	Partial removal of an	Removal of gate lodge	Partial removal of
	otherwise intact mill	garden wall, stone stile	estate boundary wall
	race and mill pond	and two grave stones	
		in graveyard	
Moderate	Potential cutting within	Visual intrusion into	Removal of corner of
	10m of gate lodge	the setting of derelict	hedge which provides
		mill building of	screening to the estate
		National Importance	buildings
Slight/Imperceptible	Some visual		Route passes within
	encroachment on		20m of folly walls
	graveyard		
Positive			
Slight/Imperceptible		Least traffic relief to	
		18th century bridge	
Moderate	Greatest traffic relief to		Opens up views of
	18th century bridge		estate buildings from
			the road. Greater
			appreciation of historic
			vistas
Significant		Improved access for	Improved access for
		visitors to the estate	visitors to estate
Preference Level	Least Preferred (3)	Less Preferred (2)	Most Preferred (1)

Table 5: Route Option Ap	praisal Table
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When comparing the route options (A, B and C) above, the architectural heritage consultant should also consider predicted impacts, the potential to mitigate impacts and likely residual impacts on individual features when reaching a conclusion on a preferred route option.

In this case Route C is considered the most preferred option since it results in the least direct impact on features of architectural heritage. The estate boundary wall it affects is solely of local

importance and only 2% of the overall wall would need to be removed. It does, however, result in indirect impacts on the setting of the estate buildings and the folly.

Route A is the least preferred despite it providing the greatest traffic relief to the 18th century bridge since it results in direct impact on a mill building of national importance and on two cottages identified on the RPS. It also impacts on the otherwise intact mill race and pond and has indirect effects on the setting of the gate lodge and the graveyard.

Route B is less preferable than C, but marginally better than option A, since it also results in direct impact on a single agricultural building of national importance. It also has an indirect impact on the setting of the mill building.

Generally, the route option with the lowest predicted impact should be the most preferred option while the route with the greatest predicted impact should be the least preferred. As in Table 5, the preferred route may not necessarily be the route with the lowest number of impacts on the architectural heritage. A route that has relatively minor indirect impacts on 8 sites may be preferable to a route option that has just one direct impact resulting in the demolition of a building of regional or national architectural heritage merit.

Balancing the relative indirect and direct impacts on a number of sites requires professional judgment. The reasoning behind the considered opinion and preferences reached will need to be detailed in the route selection report. Consideration must be given to the nature and magnitude of the likely impacts and the nature and heritage merit of the sites which are likely to be affected. When assessing the nature of impacts, the architectural heritage consultant should consider the following range of potential impacts in accordance with the Glossary of Impacts provided by the EPA in their *Advice Notes on Current Practice in the Preparation of Environmental Impact Statements* (Environmental Protection Agency, 2003):

The Quality of the Impact – whether positive or negative. *The Duration of Impact* – whether short-term, long term, permanent or temporary.

The Type of Impact - whether cumulative, reversible or capable of being mitigated.

When determining the relative merits of the architectural heritage and relative potential impacts, the architectural heritage consultant should pay due regard to the importance and legal status of the structures or features under consideration.

ROUTE CORRIDOR SELECTION STUDY

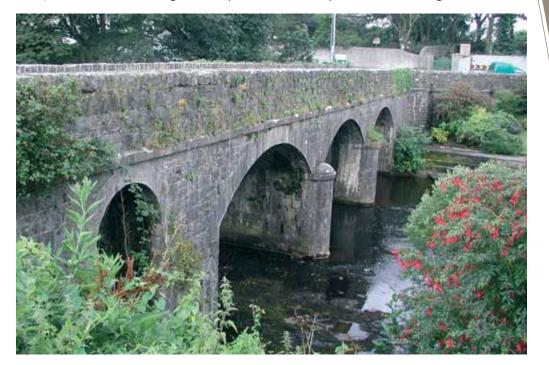


Figure 7: An historic bridge can be preserved, where possible as a heritage feature

4.9 Contents of the Route Selection Report for Architectural Heritage

The report prepared at the route selection stage should take the format of:

- A non-technical introduction, which describes the architectural heritage study area and refers to the findings of the Constraints Study.
- A methodology, which describes the sources of information and its limitations, if any. The methodology should refer to relevant legislation, codes of practice, guidance and advice notes and these should be listed.
- A description of the receiving environment of each route option that should identify and describe each area and provide a schedule of structures or features of architectural heritage merit.
- An impact assessment of each route option.
- A conclusion, based on a comparison of the qualitative and quantitative potential impact of each route option, identifying the preferred route from the architectural heritage perspective.

The report should include a plan of each route option study area with the location of all structures and features of architectural heritage merit shown, including their settings where relevant.

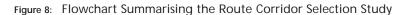
Liaison with Consultant Archaeologist

To ensure consistency between archaeological and architectural inventories, and to avoid duplication of constraints records, the Architectural Heritage Consultant and the Consultant Archaeologist/Specialist should confer on the findings of their investigations for each route option.





Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes







CHAPTER 5 ENVIRONMENTAL IMPACT STATEMENT

ALL DATE

5.0 THE ENVIRONMENTAL IMPACT STATEMENT

5.1 Objective

The objective of the EIS phase is to assess construction and operational impacts of the proposed national road on architectural heritage. The EIS builds on the information contained in the earlier Constraints Study and the Route Corridor Selection Study. However, at this stage, the EIS focuses on the impact of the preferred route in greater detail with the benefit of the preliminary road design. The scheme design will identify anticipated road footprint and land-take requirements more precisely than in the earlier phases of scheme planning.

The most effective form of mitigation of impacts on architectural heritage is avoidance, and this would generally be a key factor at the route corridor selection phase. Once a preferred route has been determined, it may still be necessary, where feasible, to amend the design in a further effort to avoid identified impacts or to adopt mitigation measures to minimize impacts on architectural heritage features of merit.

It should be noted that mitigation measures may not always fully negate the impacts; however, a given impact could be reduced to an acceptable level.

The EPA *Guidelines on the Information to be Contained in Environmental Impact Statements* (Environmental Protection Agency, 2002) and NRA EIS Guidelines (National Roads Authority, 2005) give a detailed explanation of the overall process of compiling an EIS.

The stages for the assessment of architectural heritage of the EIS phase are summarised in the flowchart in Figure 12.

5.2 Approach

The information collated during the Constraints Study and Route Selection Study should form the basis of the Environmental Impact Assessment of architectural heritage for the Preferred Route. Detailed assessment of structures and features should only be necessary where there is a need to evaluate the architectural heritage constraints in terms of avoidance, mitigation measures and costs.

Where the final route alignment has been adjusted to allow for mitigation of impacts on architectural heritage features this should be emphasised in the EIS report.

The architectural heritage consultant should redefine the width of the preferred route study corridor in a manner that would allow detailed assessment of any impacts on architectural heritage of merit arising from the construction and operation of the new national road. This would as a rule, be 50 metres either side of the centre line of the new road. The consultant should use professional judgment in deciding where the study corridor should be extended in respect of the chosen route to take into account structures, demesnes and the settings of architectural heritage beyond the proposed study area. The relationship of structures or features to one another may also be of importance and should be considered and evaluated, where appropriate.

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5.3 Methodology

The methodology for assessing architectural heritage within the EIS should include a description of the method of impact assessment in relation to features of architectural heritage merit. Sources of information and consultations should be fully described and any difficulties in obtaining information should also be detailed. The methodology should take account of and make cross-reference to existing standards and guidelines and should set out the significance criteria used to assess the impact of the development on the architectural heritage.

5.4 The Receiving Environment

Where aerial photographs and historic mapping were not available at the earlier stages, these should be consulted at this stage. Detailed research will only be necessary where there are potentially significant impacts on architectural heritage that will be potentially affected by the preferred route. In the majority of cases, information about structures and features of architectural heritage merit gathered at the earlier Constraints Study and Route Corridor Selection Study Phases will be adequate for the assessment of impacts at the EIA Phase.

5.5 Specialist Surveys

In certain instances, some specialist architectural or heritage survey may be needed to establish a greater level of certainty about a feature and to allow a more defined mitigation strategy to be specified. Specialist survey is only likely to be required where a preferred route passes through, or within the setting of an architectural heritage feature or area of significance, and where insufficient data is known or documented about the feature. This is most likely to be the case where the structure or feature is rare or fragile. For example more knowledge may be required about the way in which a structure has been constructed so as to determine the extent and nature of protective measures required during certain construction activities close by. Information gathered may influence the mitigation strategy or construction methodology.



Figure 9: Industrial buildings are an important part of the architectural heritage



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5.6 Inventory

An inventory of the architectural heritage features likely to be affected by the preferred route should be provided (see Table 6). The inventory should be based on the preliminary inventory prepared at the route selection stage but updated with observations from the field and aerial survey and include illustrations and photographs. Only those structures and features potentially affected by the preferred route should be included in the Final Inventory and the locations should be illustrated on the scheme map.

The final inventory should include supplementary information about each feature including:

- Accurate distance from centre line of road
- Nature of the predicted impact
- Quality of impact
- Predicted impact before mitigation
- Mitigation measures
- Magnitude of Impact before and after mitigation
- Significance of level of impact before and after mitigation
- Extent of impact

ENVIRONMENTAL IMPACT STATEMENT

Reference Number	N11/001
Photo. Reference no.	P0014
Address	Location 1
Location/ Coordinates	OS 345 678
Site Type	Church
	Located on natural rising ground to south of route on edge of the village
Description	The church is a 3 Bay single cruciform church constructed of limestone
	with granite quoins and detailing. Northern transept exposed to Route B
Approximate Date	1850
Sources	NIAH
Importance/	Regional/Building of County Importance
Legal Status	
Distance from centre	52m
line of Route B	
Type of Impact	Indirect Impact
Nature of Impact	Visual Intrusion within setting of building
	Approach stone walling will need to be realigned
Quality of Impact	Negative
* Magnitude of impact	High
(see Table 8)	
* Impact	Significant
Significance	
(see Table 8)	
Mitigation	Minor Alignment of road allowing construction of false cutting and
Measures	additional planting to reduce impact on setting
Magnitude with	Medium
mitigation	
Impact Significance	Moderate
with mitigation	
Extent of impact	10m of wall to be demolished and realigned

Table 6: Final Inventory of Architectural Heritage for a Preferred Route

Table 6 is an example of an extract from a Final Schedule of Architectural Heritage for a Preferred Route incorporating the above impact appraisal information. The schedule should be adapted by the architectural heritage consultant to suit the particular circumstances of the scheme. The extract shown is for a single architectural heritage feature.

In Architectural Conservation Areas, streets or villages may owe their character to the relationship between a variety of buildings. This character would be affected by severance, loss of some buildings or the general reduction in the quality of the setting. When groups of buildings are affected by a proposed scheme, the cumulative as well as individual impacts should be taken into account.

Designed historic landscapes, parks and gardens may also be affected by the same impacts that affect buildings of heritage merit.

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5.7 Impact Assessment

The significance of perceived impact on structures and sites of architectural merit is determined by a combination of the architectural heritage importance of the structure and the degree of impact.

Importance (in terms of local, regional, national and international) will be dependent on the eminence afforded to the architectural heritage feature or structure.

The **magnitude** of impact (low, medium, high, very high) is derived from a consideration of the nature of impact as listed in Table 7. The nature and magnitude of impacts affecting architectural heritage could take various forms and should be determined by the architectural heritage consultant.

Nature of impact	Examples
Individual Impacts	
Negative	
Total loss of structure or grounds	Demolition of buildings or features or removal of demesne land
Partial loss of structure or grounds	Part removal of buildings or features or part removal of demesne land
Visual Intrusion	National road encroaching on established views of buildings, structures or landscapes, the disruption or destruction of designed vistas, light intrusion
Severance	Interruption of linked features such as gardens, outbuildings or lodges
Degradation of setting	Changes in the original landscape, townscape or garden setting of a building or structure
Degradation of amenity	Loss of amenity, especially where the historic house is open to the public
Positive	
Increased physical separation	Delegation of existing national road every from structures
Reduced visual intrusion	Relocation of existing national road away from structures,
Reunification of structures	Removal of severance caused by existing road
Enhancement of setting	Changes in the original landscape, townscape or garden setting of a building or structure
Enhancement of amenity	Improvement of amenity, especially where the historic house is open to the public
Cumulative Impacts	
Combined effects of road development in the vicinity	Other simultaneous and sequential road development

Table 7: Nature of Impact on Architectural Heritage

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As defined within the EPA Guidelines on the content of EISs (Environmental Protection Agency, 2002), significance in the context of impact assessment relates to the importance of the outcome of the impact, i.e. the consequence of the change. This consequence of change is a function of the magnitude of impact measured against the importance of the architectural heritage feature receiving the impact. This relationship is illustrated in Table 8.

This methodology is derived from standard EIA practice as defined in the EPA Guidelines on the preparation and content of EISs (Environmental Protection Agency, 2002 and 2003).

Magnitude of Impact		Importance of Architectural Heritage			
		Local	Regional	National	International
Negative A change that reduces the quality of the environment	Very High	Significant	Significant	Profound	Profound
	High	Moderate	Significant	Significant	Profound
	Medium	Slight	Moderate	Significant	Significant
	Low	Imperceptible	Slight	Moderate	Significant
Neutral A change that does not affect the quality of the environment.		No Impact			
Positive A change that improves the quality of the environment	Low	Imperceptible	Slight	Moderate	Significant
	Medium	Slight	Moderate	Significant	Significant
	High	Moderate	Significant	Significant	Significant

Table 8:	Schedule	of	Significance
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Levels of Significance:

Levels of significance for architectural heritage impacts are based on the levels stated in the *EPA Advice Notes on Current Practice in the Preparation of Environmental Impact Assessments* (Environmental Protection Agency, 2003) and are described in Table 9.



	5
	Profound
	An impact that obliterates the architectural heritage of a structure or feature of
	national or international importance. These effects arise where an architectural
	structure or feature is completely and irreversibly destroyed by the proposed
	development. Mitigation is unlikely to remove adverse effects.
	Significant
	An impact that, by its, magnitude, duration or intensity alters the character and
	/or setting of the architectural heritage. These effects arise where an aspect or
	aspects of the architectural heritage is/are permanently impacted upon leading
lity	to a loss of character and integrity in the architectural structure or feature.
Qua	Appropriate mitigation is likely to reduce the impact.
ive	Moderate
Impacts of Negative Quality	An impact that results in a change to the architectural heritage which, although
	noticeable, is not such that alters the integrity of the heritage. The change is
	likely to be consistent with existing and emerging trends. Impacts are probably
npae	reversible and may be of relatively short duration. Appropriate mitigation is
Ч	very likely to reduce the impact.
	Slight
	An impact that causes some minor change in the character of architectural
	heritage of local or regional importance without affecting its integrity or
	sensitivities. Although noticeable, the effects do not directly impact on the
	architectural structure or feature. Impacts are reversible and of relatively short
	duration. Appropriate mitigation will reduce the impact.
	Imperceptible
	An impact on architectural heritage of local importance that is capable of
	measurement but without noticeable consequences.
	Significant
	A beneficial effect that permanently enhances or restores the character and /or
	setting of the architectural heritage in a clearly noticeable manner.
lity	Moderate
Qualit	A beneficial effect that results in partial or temporary enhancement of the
Impacts of Positive (character and /or setting of the architectural heritage and which is noticeable
	and consistent with existing and emerging trends.
	Slight
	A beneficial effect that causes some minor or temporary enhancement of the
	character of architectural heritage of local or regional importance which,
	although positive, is unlikely to be readily noticeable.
	Imperceptible
	A beneficial effect on architectural heritage of local importance that is capable
	of measurement but without noticeable consequences.

 Table 9: Definition of Levels of Significance as stated in Table 8

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Figure 10: Small features can also be significant in terms of architectural heritage

5.8 Proposed Mitigation Measures

Mitigation by retention in situ

Avoidance of architectural heritage is the preferred mitigation measure, although either direct or indirect impacts on architectural heritage could occur with a new road scheme. Provided that there is no strong contradiction with other environmental constraints and route selection considerations every effort should be made to achieve avoidance and preservation of architectural heritage features and settings *in situ*, where feasible. This applies particularly to nationally or regionally important features and their settings. It is anticipated that this would be achieved in most cases during the Route Selection Phase where the preferred road scheme would seek to avoid heritage features of significant merit. Mitigation by retention *in situ* is site-specific and would need to be described in the EIS and subsequent detailed design and engineering.

Mitigation by reduction of impacts

Where negative impacts cannot be avoided, they may be partially reduced, e.g. the route of the road scheme may be adjusted within the topography to make best use of opportunities for natural screening by trees and hedgerows, or stone walls to reduce the potential impact on the setting of architectural heritage retained *in situ*. Alignment may also be adjusted, where feasible depending on other constraints, to enable earthworks or planting to reduce the effect of other environmental impacts. Mitigation measures may also reduce the setting should be devised by the architectural heritage consultant in association with the project design team.

When the preferred route affects heritage structures or heritage landscapes of merit and preservation *in situ* is not a feasible option, mitigation measures should be devised in order to reduce the magnitude of and level of significance of impact on the architectural heritage. Where a building of heritage merit is impacted directly, preservation by record may be the only option



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available. Where a demesne landscape, historic setting or conservation area is impacted, a combination of preservation by record and other measures such as planting, earthworks or design of new road features should be considered.

Record of the past

In some circumstances total demolition of a nationally and internationally important architectural structure or feature may be unavoidable. This would constitute a profound negative impact on architectural heritage (Table 9). In this case the only option is to create a 'record of the past'. The purpose of documenting the structure is to set down a record of the situation, as it exists at a particular time. The record should describe the main features of the heritage structure (see Appendix 3). The site may be subject to an archaeological investigation if the architectural structure is to be demolished.





5.9 The EIS Report for Architectural Heritage

The EIS report for architectural heritage should provide a description of the architectural heritage likely to be significantly impacted by the Preferred Route. The purpose of the architectural heritage impact assessment is to:

- Assess the receiving environment in architectural heritage terms.
- Identify and evaluate the significance of the impact of the scheme on architectural heritage.
- Advise on and propose measures to avoid or minimise and to ameliorate the impact of the scheme on architectural heritage.

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• Identify and evaluate the significance of the residual impact of the scheme with mitigation in place.

The EIS report in dealing with architectural heritage should include the following:

- Introduction and description of the preferred route.
- Description of the methods used to collate the information on architectural heritage of merit and any limitations experienced.
- Description of the architectural heritage receiving environment based on documentary research, detailed field inspection, aerial survey.
- Specialised survey undertaken (if required).
- Inventory of features of architectural heritage merit.
- Consultation with the statutory authorities and others.
- Impact assessment.
- Proposed mitigation measures.
- Illustrations, photographs and mapping (for mapping criteria, see section 3.3.5 of the NRA EIS Guidelines).

The EIS report should include a plan of the scheme proposal drawings with the location of all structures and features of architectural heritage merit shown within the study area, including their settings, where relevant.

Liaison with Consultant Archaeologist

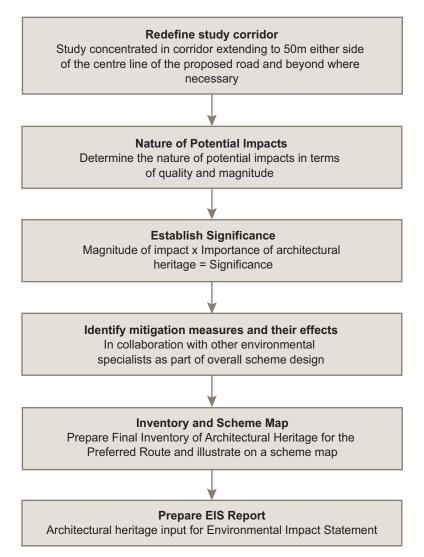
To ensure consistency between archaeological and architectural sections of the EIS, the Architectural Heritage Consultant and the Consultant Archaeologist should confer on the findings of their EIS investigations.





Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes







References and Sources of Further Information

Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes

Bond, A. & Langstaff, L. (2002) Architectural Heritage SUIT Position Paper (2/6) *The Consideration of Cultural Heritage within EIA Practice throughout Europe*. EIA Unit University of Wales, Aberystwyth.

Department of Arts, Culture and the Gaeltacht (1996) *Strengthening the Protection of Architectural Heritage*.

Department of the Environment, Heritage and Local Government (2004) *Architectural Heritage Protection Guidelines for Planning Authorities*.

Environmental Protection Agency (2002) Guidelines on the information to be contained in Environmental Impact Statements.

Environmental Protection Agency, (2003) Advice Notes on Current Practice in the Preparation of Environmental Impact Statements.

National Roads Authority (2003) Design Manual for Roads and Bridges.

National Roads Authority (2000) National Roads Project Management Guidelines. (Version 1.1)

National Roads Authority (2005) Environmental Impact Assessment of National Road Schemes – A Practical Guide.

National Roads Authority (2005) *Guidelines for the Assessment of Archaeological Heritage Impacts of National Road Schemes*.

National Roads Authority (2005) Guidelines for the Testing and Mitigation of the Wetland Archaeological Heritage for National Road Schemes.

NIAH Surveys

Given the ongoing publication of NIAH County Surveys, the architectural heritage consultant is advised to consult the NIAH <u>www.buildingsofireland.ie</u> for the most current information.



APPENDICES

NATIONAL ROADS AUTHORITY

Guidelines for the Assessment of Architectural Heritage Impacts of National Road Schemes

Appendix 1 Contact Details – Statutory Consultees

The Development Applications Unit Department of the Environment, Heritage And Local Government, NIAH (National Inventory of Architectural Heritage) Dún Scéine, Harcourt Lane, Dublin 2, Ireland Tel: (01) 888 3100 Email: devapp@environ.ie

The Arts Council (An Chomhairle Ealaíon) 70 Merrion Square, Dublin 2, Ireland. Tel: (01) 6180200 Tel: (01) 6761302

The Heritage Council Rothe House, Kilkenny, Ireland. Tel: (056) 777 0777 Email: mail@heritagecouncil.com

An Taisce (The National Trust for Ireland) Tailor's Hall, Back Lane, Dublin 8, Ireland. Tel: (01) 454 1786 Email: info@antaisce.org

Failte Ireland Baggot Street Bridge, Dublin 2. Tel: 1890 525 525 or (01) 602 4000 Fax: (01) 855 6821

APPENDICES

Appendix 2 Protecting Architectural Heritage

Guidelines for the criteria to be applied by planning authorities when selecting structures for inclusion in the RPS are given in the "*Architectural Heritage Protection Guidelines for Planning Authorities*" (2004) which are issued under section 28 and section 52 of the Planning and Development Act, 2000. Planning authorities have the responsibility for deciding which structure to include in the record. Most planning authorities will have a Record of Protected Structures and the process of deciding which further structures should be included in the record occurs in three stages: "identification, assessment and notification".

Stage 1 Identification

A planning authority can identify structures of special interest from:

- Planning authority 'lists' (that may have been compiled as a result of earlier legislation)
- National Inventory of Architectural Heritage
- Ministerial recommendations
- Inventories carried out by planning authorities (in the event of the NIAH survey not yet being undertaken)
- The record of monuments and places
- Other sources

Stage 2 Assessment

"The planning authority should identify whether a structure has one or more of the characteristics of special interest which would merit its inclusion.' Categories of special interest

- Architectural
- Historical
- Archaeological
- Artistic
- Cultural
- Scientific
- Technical or social

Stage 3 Notification

The owners or occupiers must be notified of a proposal to include a structure in the record of Protected Structures under Section 2 of the Planning and Development Act, 2000.



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Appendix 3 Documentation of a 'Record of the Past'

The minimum level of documentation should involve:

- 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 taken before demolition with a clear indication of scale that illustrate the built form and architectural heritage significance.
- An assessment of the impact which the development is likely to have on the structure.
- Supporting information e.g. research documents, sketch plans of each floor level of structure which are directly impacted.

Moderate architectural heritage merit/significance

As above but also include:

- Sketch floor plans and scaled sections.
- Document architectural and constructional details by photograph including scale.

Specific architectural heritage merit/significance

As above but also include:

• Measured drawings to an appropriate scale showing the general site layout and floor plans, sections and elevation.

Exceptional architectural heritage merit/significance

As above but also include:

 Measured drawings and rectified photographs that should include constructional details to an appropriate scale.

Appendix 4 Glossary	y of Terms
ACA	(Architectural Conservation Area): An architectural conservation area is a place, area, group of structures or townscape that is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or contributes to the appreciation of protected structures.
Cumulative Impact:	The addition of many small impacts to create one larger, more significant impact.
DoEHLG:	Department of the Environment, Heritage and Local Government
EIA:	(Environmental Impact Assessment) The term used to describe the process of EIA throughout its stages.
EIS:	(<i>Environmental Impact Statement</i>) A statement of the significant or likely significant effects, if any, which a proposed development, if carried out, would have on the environment.
EPA:	Environmental Protection Agency
ICOMOS:	(<i>International Council on Monuments and Sites</i>) The International Council on Monuments and Sites (ICOMOS) is an organisation dedicated to the conservation of the world's historic monuments and sites. It was founded the year after the international adoption of the Charter for the Conservation and Restoration of Monuments and Sites in Venice (1964).
NIAH:	(<i>National Inventory of Architectural Heritage</i>) The NIAH is a unit within the Heritage and Planning Division of the DOEHLG. It was placed on a statutory footing by the Architectural Heritage (National Inventory) and Historic Monuments Act 1999.
NMAP:	(<i>National Monuments and Protection Division</i>) Now replaced by Heritage and Planning Division of Department of the Environment, Heritage and Local Government.
Potential impacts:	The full extent of the adverse effects before mitigation has taken effect.
Predicted impacts:	The extent of the impact, the magnitude and complexity of the impact, the probability of the impact, the duration, frequency and reversibility of the impact, construction and operational impacts.



(44

(45)

PS: (Protected Structure):	Means (a) a structure, or (b) a specified part of a structure which is included in a record of protected structures, and, where that record so indicates includes, any specified feature which is within the attendant grounds of the structure and which would not otherwise be included in this definition. (Section 2 of the 2000 Planning and Development Act).	
RPS (Record of Protected Structures)		
	For the purpose of protecting 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 (Section 51(1) of the 2000 Planning and Development Act).	
Residual impact:	The final or intended impact after proposed mitigation measures have taken effect.	
UNESCO:	United Nations Educational, Scientific and Cultural Organisation.	