



An Roinn
Cultúir, Oidhreachta agus Gaeltachta
Department of
Culture, Heritage and the Gaeltacht

STRUCTURES AT RISK FUND CIRCULAR SRF/2018

November 2017

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Abbreviations

ACA	Architectural Conservation Area
ACO	Architectural Conservation Officer
BHIS	Built Heritage Investment Scheme
DCHG	Department of Culture, Heritage and the Gaeltacht
DHPLG	Department of Housing, Planning and Local Government
LA	Local Authority
MCHG	Minister for Culture, Heritage and the Gaeltacht
RPS	Record of Protected Structures
SRF	Structures at Risk Fund 2018

Appendices

- I. Application Form A – to be completed by Applicant
- II. Checklist/Overview – to be completed by Local Authority
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1. **Background and Purpose of Structures at Risk Fund**

1.1 **The role of the Department of Culture, Heritage and the Gaeltacht**

The key areas of responsibility of the Department of Culture, Heritage and the Gaeltacht regarding built heritage are to develop, promote and implement policies and legislation for its protection, and to promote best practice in its conservation.

As set out in the *Planning and Development Acts* and associated regulations, DCHG acts on behalf of the Minister of Culture, Heritage and the Gaeltacht (MCHG) in her function as a prescribed body for the purposes of architectural heritage protection, and performs a similar role with respect to archaeological and natural heritage protection.

The primary custodians of structures, protected under the Planning and Developments Act 2000 (as amended), are their owners and occupiers, and they, along with the local authorities, are charged with the responsibility for their protection.

1.2 **Purpose of the Scheme:**

This fund assists with works to safeguard certain historic structures into the future where, in the opinion of the DCHG, an urgent need has been demonstrated. It aims to reduce the risk of deterioration of Ireland's architectural heritage while supporting employment for conservation professionals, contractors and specialists. It also supports owners/occupiers in their long-term commitment to securing the future of the architectural heritage.

Only structures or parts of structures in immediate danger of significant deterioration will qualify for consideration for funding by DCHG.

The SRF is not intended to assist in the carrying out of routine maintenance, alterations or improvements. All works carried out under the SRF must be **capital** works. In respect of the apportioned amount for Irish Historic Houses in private ownership, funding will be provided on the basis of strategic and urgent conservation works.

1.3 **Scope of the Fund:**

The SRF will operate in 2018 with funding available to the amount of **€1,324,000; €74,000** of which will be allocated for funding towards the type of house covered by *An Action Plan for the Sustainable Future of the Irish Historic House*, launched in 2015.

Due to the limited resources available for the operation of the scheme in 2018, DCHG will consider four applications per local authority (LA), only one of which may be a publicly-owned building. A fifth application may be made if it relates to an Irish Historic House in private ownership.

The total funding available for each individual project shall not exceed **80%** of the total project cost.

The minimum funding available under the **SRF** will be **€15,000 up to a maximum grant of €30,000**.

The minimum funding available for a fifth project in respect of **a historic house in private ownership** will be **€5,000 up to a maximum of €10,000**.

2. Eligibility, Qualifying and Non-Qualifying Works

2.1 Eligible Structures:

Protected Structures: Structures in the Record of Protected Structures (RPS) of each local authority ¹

Structures eligible for or proposed for inclusion in the RPS but not yet formally approved for inclusion. Such structures must meet the criteria for inclusion in the RPS by the local authority, i.e. must be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view.

Structures in Architectural Conservation Areas (ACAs), or within the amenity of a National Monument, where exceptional circumstances are deemed by the Department to apply.

2.2 Qualifying Works:

Roofs: Works to ensure the structural stability and/or weather tightness of a roof using appropriate materials and detailing; the salvage and reuse of existing slate and other materials from the structure should be a priority. Works to repair thatched roofs using appropriate, compatible traditional materials and details, reed is permissible where it replaces a reed roof. Works to renew damaged or missing metal sheeting, gutter linings and flashings (of materials such as lead, copper or zinc) to appropriate details. Where there is a risk of theft of metalwork from a roof, the use of suitable substitute materials as an interim solution may be considered acceptable.

Rainwater disposal: Works to repair or, where this is not feasible, replace rainwater goods to ensure efficient disposal of water from the building. Lead and cast-iron should be replaced like-for-like. However, where there is a risk of theft or vandalism, the use of suitable substitute materials as an interim solution may be considered acceptable.

External walls: Works to ensure the structural stability and/or weather tightness of the building envelope. Works to remedy defects or problems that have the potential to create serious future damage if left untreated, such as foundation settlement, chimney collapse, fungal attack on timber or salt migration within the fabric.

Windows, doors and associated elements: Works to prevent water ingress. Works to repair significant elements of external joinery with minimal replacement of decayed timber. Repair of stained glass windows and associated works in accordance with best practice as set out in Chapter 6 of *The Conservation of Places of Worship*, Advice Series (2011), <http://www.chg.gov.ie/app/uploads/2015/07/The-Conservation-of-Places-of-Worship-2011.pdf>.

¹ The definition of a 'structure' in relation to a protected structure or proposed protected structure includes the structure and its interior, the land lying within the curtilage of the structure and any other structures within that curtilage and their interiors and all fixtures and features which form part of the interior or exterior of any of these structures (Section 2, *Planning and Development Act 2000* (as amended)).

Interiors: Works to repair internal structural elements such as floors, walls, staircases and partitions. Works to conserve significant decorative features such as wall and ceiling plasterwork, interior joinery and fittings and decorative elements as appropriate.

Temporary works: Works to reduce the risk to a structure from possible or partial collapse, subject to the maintenance of adequate ventilation of the structure, and the protection of significant features of the building from endangerment. In exceptional circumstances, where it is considered necessary to remove fixtures or features of interest for safe-keeping, this shall be conditional on the inclusion of acceptable proposals for their secure storage for later reinstatement within a stated timeframe.

Historic ruins: Works to stabilise masonry or other elements at risk.

Other works: A case may be made by the applicant and/or the local authority for other works which they deem to be of exceptional importance for consideration by DCHG.

2.3 Non-Qualifying Works:

Regular maintenance, alterations and minor repairs: Works of this nature are considered to be the duty of the owner/occupier, and should be carried out on a routine basis to protect a structure from endangerment.

Alterations and improvements: All new works to a structure, for example the installation or renewal of building services, thermal insulation, damp-proofing, loft conversion and extensions. Works to restore the character of a structure.

Demolition: Works to demolish or remove any part or element of a structure except where it involves careful dismantling in advance of an agreed scheme of repair and reinstatement.

Restoration and reconstruction: Works involving the complete or partial restoration or reconstruction of lost or destroyed elements of a ruinous historic structure.

Works that are not essential to secure the conservation of the structure, including works to improve energy efficiency (such as fitting of double-glazed units, wall or floor insulation or micro-renewables).

Works that have commenced before the local authority has carried out an inspection.

All qualifying works should be in accordance with the standards of best practice as outlined in the Department's *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) <http://www.chg.gov.ie/app/uploads/2015/07/Architectural-Heritage-Protection-Guidelines-2011.pdf> and relevant volumes of the Department's *Advice Series*. (<http://www.chg.gov.ie/heritage/built-heritage/architectural-heritage-advisory-service/advice-for-owners/>)

3. The Application Process

3.1 Overview

DCHG will consider **four applications per local authority (LA), only one of which may be a publicly-owned building.**

Each LA may submit **one additional application in respect of an Irish Historic House in private ownership.**

Each LA shall **advertise** the Scheme on its website.

Local authorities shall assess each application using the criteria applied by DCHG, giving due consideration to applications for structures in public and private ownership.

Eligible applications submitted to the Department will be considered by DCHG for funding, **however, not all may be successful.**

LAs should ensure that the amount of funding sought is likely to make a **significant contribution** to eliminating risk and in preventing further deterioration of the structure, thus ensuring its survival into the future.

As the aim of the scheme is to reduce the risk of deterioration of Ireland's architectural heritage while supporting employment in the conservation and construction industries, the applicant will be required to provide details of the employment benefit of the project. Where public sector workers are utilised on a project they **should not be considered** for the purposes of the employment generated.

Inspection of the eligible structure must be carried out by the Architectural Conservation Officer (ACO) or, where an ACO is not employed, by a member of the LA's professional staff competent to undertake this function.

*LAs shall also ensure that conservation works proposed by the applicants will be **designed, specified and overseen on site by appropriately qualified and experienced building conservation professional(s)**. DCHG recognises that there may be exceptions to this given the scale and nature of works being proposed or where the specific expertise lies with the practitioner, e.g. a thatcher or stone mason. LAs must ensure all necessary certifications will be required as appropriate while works are in progress and on completion.*

DCHG will require interim progress reports from the LA at the end of **June 2018**, indicating if a contract has been awarded/placed, if work has commenced and the funding, if any, paid to the applicant. Where a project has not commenced by **7 September 2018**, the Department, following consultation with the relevant LA, reserves the right to reallocate the funding to another project.

The Department may allocate and reallocate funding under the scheme as it sees fit, including to projects meeting the criteria for the scheme where an urgent need has arisen in the course of the year.

3.2 The Application Process for Owners/Occupiers

Applications must be made by the owners (or occupiers with the consent of the owner) to the relevant local authority (using **Application Form A – see Appendix I**) by a deadline set by the LA, but no later than **31 January 2018**.

Where the structure is in the **ownership of a local authority**, or where a local authority is providing financial assistance for works to an endangered structure under Sections 59, 69 and/or 70 of the *Planning and Development Act 2000* (as amended), the application may be made by a designated officer of that local authority.

LAs are required to seek good quality digital photographs of the project from the applicant before works commence. These may be used later for a ‘before and after’ comparison for reporting purposes.

Please note that DCHG reserves the right to use any or all images supplied by either the applicant or LA to advertise or publicise the scheme. Applicants and LAs are advised to obtain permission to use images (if necessary) before they submit them to DCHG.

A comprehensive **Method Statement** must be submitted by the owner/occupier with each application (see Section 4 for guidance on Method Statements).

If an applicant or LA has already commissioned a conservation plan or method statement for a project, DCHG will accept **relevant parts** of this documentation as part of an application if it fulfils the criteria contained within this document.

DCHG will accept supplementary material with the application form **ONLY IF** it has a direct bearing on an application (i.e. dendrochronology reports, archaeological reports, technical research, joinery and material analysis, analytical and three-dimensional drawings, detailed historical research, etc.).

3.3 The Application Process for Local Authorities

Applications judged by the LA to be eligible and which meet the criteria should be submitted to DCHG for consideration by the deadline of **4 p.m. on 16 February 2018**, accompanied by a completed summary and checklist (**Appendix II**) and Application Form B (**Appendix III**).

LAs must ensure that Form A is fully completed by the applicant, and in compliance with the terms of the Circular, in particular –

- **The amount of funding requested does not exceed the maximum grant available.**
- **The amount and source of matching funding is clearly stated**
- **Details of other exchequer funding have been declared, including funding applied for under the BHIS**

A separate email in respect of each project must be sent to SRF@chg.gov.ie, ensuring all relevant material for that application is included. The size of the email must not exceed 15MB. Fragments or partly completed applications, or multiple applications in the same email, will not be accepted.

The email subject should be ‘SRF 2018’ and include the project name and the name of the LA

Applications will be accepted by email only. Hard-copy format OR ANY OTHER FORMAT will not be accepted by DCHG EXCEPT BY PRIOR AGREEMENT

4. **A Guidance Notes on Method Statements**

4.1 **Method Statement**

The **Method Statement** must describe the condition of the structure, and give details of how conservation/repair works will be carried out. This document does not need to be unduly long but it must be **appropriate to the nature and scale of the proposed works**, e.g. a Method Statement in relation to re-thatching will not require as much detail as one for structural or masonry repairs. It should not exceed **TEN A4** pages.

Works should be in line with best conservation practice and should aim to employ methods of minimal intervention. Works should be based on a proper understanding of the structure, and make use of appropriate materials. Their overall aim should be to arrest further deterioration by addressing what is causing risk to the structure. Replacement of original material should be kept to a minimum and should only be carried out when absolutely necessary. The proposed works should only be undertaken by appropriately qualified conservation practitioners who have experience in the use of historic materials and techniques.

The Method Statement should include:

1. A concise description of the structure

The structure as it currently exists, noting all its salient features, its appearance, setting, form, present function, significance, brief architectural history (if available/relevant) and the materials of which it is composed.

2. A description of the works proposed

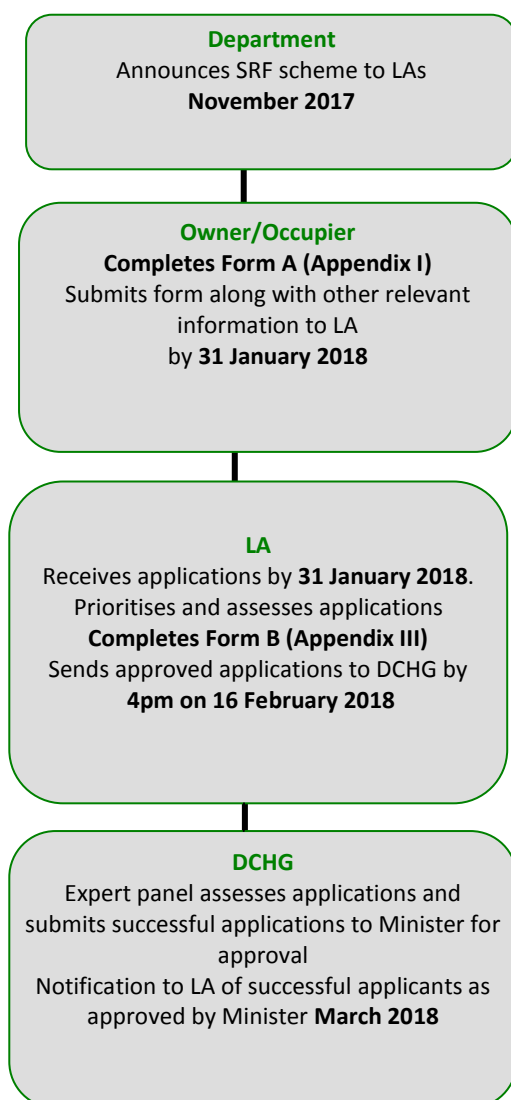
This should identify the issues that are causing risk, what remedial works are proposed, how the work will be done, what materials will be used, and how the fabric of the building will be conserved. It must include relevant plans, drawings and supporting visual media such as video clips, photographs or other illustrations and should typically include the following issues:

- a) Are the works temporary or permanent?
- b) What types of repairs are being proposed and in which locations?
- c) What treatment/replacement of damaged fabric is envisaged?
- d) What replacement materials (if any) will be incorporated?
- e) Details of on-site supervision and monitoring;
- f) A brief schedule or sequence of works;
- g) An estimated project cost.

3. Impact statement and proposed mitigation measures (if applicable)

Any likely impact of works on a structure and ways of mitigating adverse impacts. Mitigation may include design, timing and methodology (i.e. roof repairs timed to avoid interfering with bat colonies or rendering works timed to allow lime mortar to set), reversibility, careful choice of materials, etc.

5. Submission of Applications - Overview



6. The Assessment Process

Applications received by the DCHG before the deadline of **4.00 p.m. on 16 February 2018** will be assessed by an expert panel within the DCHG based on the following equally weighted criteria:

- **Significance of Structure**
- **Urgency of Works**
- **Quality of Method Statement**
- **Efficacy of Works**

Significance: The *Planning and Development Act 2000*, as amended, requires that a protected structure be of **special interest** under the following categories: architectural, historical, archaeological, artistic, cultural, scientific, social and technical

Urgency: Works are urgent where there are safety, fire or security risks, where there is a risk of water ingress and/or dry rot, where there is evidence of critical damage to the historic fabric (including any significant features, decoration, or artefacts, etc.), where there is active structural movement, where the rate of decay has accelerated exponentially or where other extenuating circumstances apply.

Method Statement: The relevance and standard of the method statement submitted having regard to the guidance note, the proposed works, scale of the project and the quality of experience of the person or team charged with delivering the project.

Efficacy of Works: The value of works being undertaken in securing the survival of the structure in the medium to long-term or to meet specific area-based regeneration objectives of the LA. Applicants should explain how the amount of funding sought demonstrates **value for money** and makes a **significant contribution** to eliminating risk and in prevent further deterioration of the structure, thus ensuring its survival into the future.

DCHG may contact the LAs for clarification of the content of an application before the panel assessment process commences.

Following assessment of the applications, the panel will recommend qualifying projects to the Minister for her approval. **The Minister's decision on the grant of awards is final.** LAs will be notified of the outcome of the assessment process, and the list of successful projects will be published on DCHG's website www.chg.gov.ie. This should also be published on the LA's own website.

Please note that DCHG may carry out inspections of structures being considered for funding or inspections of structures approved for funding if deemed necessary.

7. **Recoupment of Funding**

Matching funding of **at least 20% of total project expenditure is required**. Where matching funds of 20% cannot be met by the applicant, DCHG must be notified at the time of application, and justification for funding above 80% of the total project cost **must** be submitted.

Any grant offered will be solely for the works described in the offer unless otherwise agreed in writing with the Department.

Funding from **voluntary efforts** cannot be used to satisfy the matching expenditure requirement.

Where an applicant has applied for, or has received funding from other schemes financed by the Exchequer or the EU for the works concerned, the cumulative total of such funding **and** the grant under this scheme **must not exceed 80% of the total cost, except in exceptional circumstances**. Verification of the total cost of the project is a matter for the local authority. This limit does not prevent a LA from supplementing SRF grants with its own resources.

Value Added Tax (VAT)* is eligible for rebate under this scheme, however, only for that portion of works which is being grant-aided and only in circumstances where such VAT is not recoverable by the beneficiary by any other means. Other taxes and charges (in particular direct taxes and social security contributions on wages and salaries) do not constitute eligible expenditure except where they are genuinely and definitively borne by the beneficiary of the grant.

Professional Fees are eligible, however, only for that portion of works which are grant-aided. This may include surveys and method statements, on-site supervision and monitoring, reasonable travel and subsistence costs and sign-off on project.

All works must be completed and verified by the LA before payment of grant funding can be sought.

The LAs are responsible for payment of the grants to the owners/occupiers of approved SRF projects **in advance** of seeking recoupment from DCHG.

Any grant funding provided to a LA which is subsequently recovered under Section 70 of the *Planning and Development Act 2000* (as amended), from the owner/occupier of the grant-aided structure, must be refunded to DCHG.

Once payment to an applicant has been made, the LA must complete and return **Form C (Appendix IV)** by the **2 November 2017** to recoup the grant from DCHG. Form C must be signed by the Architectural Conservation Officer (ACO) (or where an ACO is not employed, by a member of the LA's professional staff competent to undertake this function) with oversight of the project and countersigned by the Chief Executive Officer or Director of Services. The form **must** be accompanied by proof of payment e.g., printout from Agresso or similar financial system (showing applicant's name, amount paid and



date of payment) and visual aids such as photographs or video clips to allow DCHG compare 'before' and 'after' images of the completed works.

Any grant funding unclaimed by the due date will be forfeit

General Information

Procurement: The LA must ensure that the Department of Finance's *National and EU Public Procurement Guidelines* are followed. Comprehensive information on all aspects of public procurement is available on www.procurement.ie. For public sector construction projects it is the responsibility of the LA to ascertain whether works are public sector construction projects and are bound under the principles of the Department of Finance Circular 6/10: *Capital Works Management Framework 2010*.

Financial Management Requirements: All procedures must comply with Circular 13/13: *The Public Spending Code: Expenditure Planning, Appraisal & Evaluation in the Irish Public Service – Standards Rules & Procedures*, whereby all Irish public bodies are obliged to treat public funds with care and ensure that the best possible value-for-money is obtained wherever public money is being spent or invested.

<http://publicspendingcode.per.gov.ie>

The LA should adhere to their responsibilities, as Grantor and as Grantee, in relation to Circular 13/2014: *Management of and Accountability for Grants from Exchequer Funds*, in relation to expenditure of public funds by way of disbursement of grant funding to all bodies, including agencies, companies, committees, advisory groups, charities, or individuals, whether through directly from the Votes of the Government Departments/Offices or through an intermediary body or series of bodies.

<http://circulars.gov.ie/pdf/circular/per/2014/13.pdf>

Tax Clearance Procedures: relevant tax clearance procedures in respect of public sector grant payments as set down by the Revenue Commissioners must be adhered to. Please refer to www.revenue.ie for further details. In line with Section 4(1) of Department of Finance Circular 44/2006: *Tax Clearance Procedures: Grants, Subsidies and Similar Type Payments*, it will be a matter for each LA to ensure that the proper tax clearance procedures are being adhered to by applicants, contractors and subcontractors, and in line with LA's own financial control procedures.

Applicant in receipt of related Tax Relief: for those owners that have received a determination under **Section 482** of the *Taxes Consolidation Act 1997* (as amended) (formerly Section 19 of the *Finance Act 1982*) and/or where the owner/occupier has received tax relief under the **Home Improvement Scheme** or the **Living City Initiative**, the onus, however, will be on the owner/occupier in receipt of these tax reliefs to inform the Revenue Commissioners of any funding received through this scheme. DCHG will provide the Revenue Commissioners with a list of successful applicants under this scheme.

Transfer of Ownership/De-listing: if the grant-aided structure is deleted from the RPS, is sold, or the ownership transferred within a period of 5 years from date of payment of the grant, some or all of the funding awarded may be subject to claw-back (consistency with BHIS). In the event of transfer of ownership prior to grant payment, the LA may make arrangements to transfer the grant to the new owner of the property subject to his/her compliance with all conditions attached to the grant. For proposed protected structures awarded funding and which are not added to the RPS by the 31 December 2018, DCHG reserves the right to seek a refund or funding from the LA.

Statutory Requirements: grant-approved works must meet all statutory requirements, including planning permission. Where works are proposed to sites/monuments protected under the *National Monuments Acts 1930-2004*, the statutory requirements for notification or for Ministerial consent under those Acts must be complied with.

Where an applicant seeks a declaration under Section 5 or Section 57 of the *Planning and Development Act 2000* (as amended), to exempt specific works from planning control that are the subject of a grant application, the request should be processed as quickly as possible by the relevant IoLA. Only works that would not materially affect the character of the structure, or any element of it which contributes to its special interest, may be exempted from a requirement to obtain planning permission in this way.

An applicant will be required to submit copies of all relevant permissions, declarations, notifications or consents when making a claim for a grant.

The onus is on the applicant to comply with all other relevant statutory requirements, such as the Wildlife Acts, foreshore licenses (if applicable), Safety, Health and Welfare legislation, and environmental and employment legislation. The attention of the local authority is drawn to: (DAHRRGA 2012) *Strict Protection of Animal Species: Guidance for local authorities on the application of Articles 12 and 16 of the EU Habitats Directive to development/works by or on behalf of a local authority*. The publication *Bat Mitigation Guidelines for Ireland* (2006) is available on DCHG's website at: <https://www.npws.ie/publications/search?title=bat+mitigation&keyword=&author=&series=All&year=&x=0&y=0>

Annual Report and Publicity: Each LA should include information on its operation of the fund in its Annual Report. The contribution of DCHG should be publicly acknowledged in all advertisements and publicity in relation to this scheme.

Other Exchequer Funding: Projects may be eligible to receive funding from more than one publicly-funded scheme. To ensure that the matching funding requirements for the scheme are met, information provided by the applicant in Section 1f. of the application form should be cross-checked by the LA in respect of possible other grants from other schemes, in particular:

- (a) The Thatching Grant Scheme administered by the DHPLG
- (b) Built Heritage Programmes administered by the DCHG (including BHIS)
- (c) Conservation grants administered by the Heritage Council, and
- (d) Any other relevant public grant schemes.

Where an applicant has applied for or has received funding from other schemes financed by the Exchequer or the EU for the works concerned, the cumulative total of such funding **and** the grant under this scheme **must not exceed 80% of the total cost, other than in exceptional circumstances.**

Freedom of Information Acts: applications for funding under the scheme may be subject to the Freedom of Information Acts.

Contact: For further information required regarding this scheme, please contact **Built Heritage, Architectural Policy and Strategic Infrastructure, DCHG**, Tel. 01 888 2428 or email SRF@chg.gov.ie