



STRUCTURES AT RISK FUND CIRCULAR SRF/2016

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Abbreviations

ACA	Architectural Conservation Area
ACO	Architectural Conservation Officer
DAHG	Department of Arts, Heritage and the Gaeltacht
DECLG	Department of Environment, Community and Local Government
LA	Local Authority
MAHG	Minister for Arts, Heritage and the Gaeltacht
RPS	Record of Protected Structures
SRF	Structures at Risk Fund 2016

Circular SRF/2016

1. Background and Purpose of Structures at Risk Fund

This guide provides local authorities with information in relation to the operation and administration of the Structures at Risk Fund 2016.

1.1 Background:

In 2011, the Department of Arts, Heritage and the Gaeltacht (DAHG) introduced the Structures at Risk Fund (SRF) after the suspension, due to budgetary constraints, of the Civic Structures Conservation Grants Scheme and the Local Authority Conservation Grants Scheme. The SRF operated successfully until 2013 and, after a hiatus in 2014, was re-introduced in 2015.

The SRF will operate again in 2016 with funding available to the amount of **€624,000**.

The principal change for 2016 relates to the Irish Historic House in private ownership. An Action Plan for the Sustainable Future of the Irish Historic House¹ was launched in 2015 and sets out a roadmap of actions for this specific area of our architectural heritage. In total and on this basis €74,000 of the €624,000 being provided under the SRF will be allocated for the funding of the type of House covered by the action plan. Local Authorities are invited to include projects from such Houses if applicable.

Due to the limited capital resources available for the operation of the SRF in 2016, DAHG will consider 2 applications per local authority (LA), only 1 of which may be a publicly-owned building. A third application can be made if it relates to an Irish Historic House in private ownership.

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

The minimum level of funding available under the SRF will be €15,000 up to a maximum grant of €30,000. The minimum level of funding available under the SRF apportioned €74,000 towards historic houses in private ownership will be €5,000 up to a maximum grant of €10,000.

DAHG will advise the Minister on applications for assistance under the SRF.

The role of the Department of Arts, Heritage and the Gaeltacht

The key areas of responsibility of the Department of Arts, 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, DAHG acts on behalf of the Minister of Arts, Heritage and the Gaeltacht (MAHG) in her function as a prescribed body for the purposes of architectural heritage protection, and provides a similar role with respect to archaeological and natural heritage protection.

The primary custodians of structures, protected under the Planning and Developments Act, are their owners and occupiers, and they, along with the planning authorities, are charged with the responsibility for their protection.

¹ See An Action Plan for the Sustainable Future of the Irish Historic House in Private Ownership @ http://www.ahg.gov.ie/app/uploads/2015/11/ihh_report_english1.pdf

1.2 Scope of the Fund:

The aim of the SRF is to reduce the risk of deterioration of Ireland's architectural heritage while continuing to support employment for conservation professionals, contractors and specialists. The fund is a support to owners/occupiers in their long-term commitment to securing the future of the architectural heritage. Thus the SRF represents a method of prioritising funding to ensure that monies are spent in the most efficient way on vulnerable aspects of Ireland's architectural heritage.

The SRF is intended to assist with works to safeguard structures into the future that are protected structures under the *Planning and Development Act 2000* (as amended) where, in the opinion of the DAHG, an urgent need for works to such structures has arisen and has been demonstrated. In certain cases, the scheme is available for the conservation of structures within Architectural Conservation Areas (ACAs) where, in the opinion of DAHG, a need for works to enhance the character and appearance of an ACA has arisen and has been demonstrated.

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

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.

2. Eligibility, Qualifying and Non-Qualifying Works

2.1 Types of Eligible Structures:

The categories of structures eligible for assistance are as follows:

Protected Structures i.e. those structures included in the Record of Protected Structures (RPS) of each planning authority; ²

Proposed Protected Structures i.e., those structures that are proposed for inclusion in the RPS of each planning authority but have not yet been formally approved for inclusion. All proposed protected structures awarded funding under this scheme must be added to the RPS by 31 December 2016;

Structures in Architectural Conservation Areas (ACAs), where exceptional circumstances are deemed by the Department to apply.

2.3 Qualifying Works include:

Roofs: Works to ensure the structural stability and/or weather tightness of a building envelope 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 traditional materials and details. 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 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.

Interiors: Works to repair internal structural elements. Works to conserve significant decorative features.

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.

² 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)).

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 DAHG.

2.4 Non-Qualifying Works include:

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 regular 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.

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 DAHG's *Architectural Heritage Protection Guidelines for Planning Authorities* (2011) and relevant volumes of DAHG's *Advice Series*.

3. The Application Process

3.1 Overview

DAHG will consider **2 applications per local authority (LA)**, only 1 of which may be a **publicly-owned building** plus an additional one if it relates to an Irish Historic House in private ownership.

It is recommended that each LA **advertise** the SRF on its website, with contact and application form details available.

It is matter for each LA to **prioritise** applications for consideration under the fund. It is advised that the LA assess each application using the criteria applied by DAHG (see Section 6). When assessing applications LAs should give due consideration to applications for structures in public and private ownership.

All applications submitted by LAs up to the limits set out above will be considered by DAHG, **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. LAs should not apply for a disproportionately large amount of the SRF fund unless they deem the project to be particularly urgent.

The aim of the SRF is to reduce the risk of deterioration of Ireland's architectural heritage while continuing to support employment in the conservation and construction industries. ***Therefore it is essential that applicants supply details to the LA regarding the employment benefit of the scheme including the estimated number of days (a day is defined as 8 hours for the purposes of this scheme) of employment required for the duration of the project (to include construction, professional staff and others).*** The applicant will be required to provide details regarding the employment benefit at recoupment stage. The aim of this is to report **additional** employment generated. Therefore where public sector workers are utilised on a project they **should not be considered** for the purposes of the employment generated.

Where applications meet the terms and conditions of the fund, an **inspection** of the eligible structure shall 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 should also ensure that conservation works proposed by the applicants will be **overseen by appropriately qualified conservation professionals**. DAHG recognises that there may be exceptions to this where the specific expertise lies with the practitioner, e.g., a thatcher.

Where a project has not commenced by 9th September 2016, DAHG, following consultation with the relevant LA, reserves the right to reallocate funding as it deems appropriate.

3.2 The Application Process for Owners/Occupiers

Applications for funding under the SRF must be made by the owners (or occupiers with the consent of the owner) to the relevant LA (using **Form A-Section One**) by a deadline set by the LA.

In cases where the structure is in the **ownership of a LA**, or where a LA is providing financial assistance for works to an endangered structure under Section 59 of the *Planning and Development Act 2000* (as amended), or is carrying out or arranging to carry out works to an endangered structure under Section 69 and/or Section 70 of said Act, the application can be made by a designated officer of that LA.

A comprehensive **Method Statement** must be submitted by the owner/occupier with each application (see Section 4). The Method Statement should both describe the structure and what works are proposed and should 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. Proposed works should be fully **described and illustrated** in accordance with best practice standards as outlined in DAHG's [*Architectural Heritage Protection Guidelines for Planning Authorities \(2011\)*](#) and, in DAHG's [*Advice Series*](#) publications, where appropriate. Visual aids may include plans, drawings, video clips, photographs and/or other illustrations (high-resolution digital images). A site location map of suitable scale and quality clearly marked must be provided.

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

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

DAHG 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).

Applications judged by the LA to be eligible and which meet the criteria should be submitted to DAHG for consideration by the deadline of **4 p.m. Friday 22nd April 2016**.

4. A Guidance Notes on Method Statements

4.1 Method Statement

All grant applications to the Department must be supported by a **Method Statement** which 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.** It should not exceed **TEN A4** pages.

Any proposed 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 of historic materials and techniques.

A Method Statement should include:

1. A concise description of the existing structure

This should be a concise description of the structure as it currently exists, noting all its salient features, its appearance, setting, form, present function, significance, brief architectural history (if available) and the materials of which it is composed.

2. A concise description of the works proposed

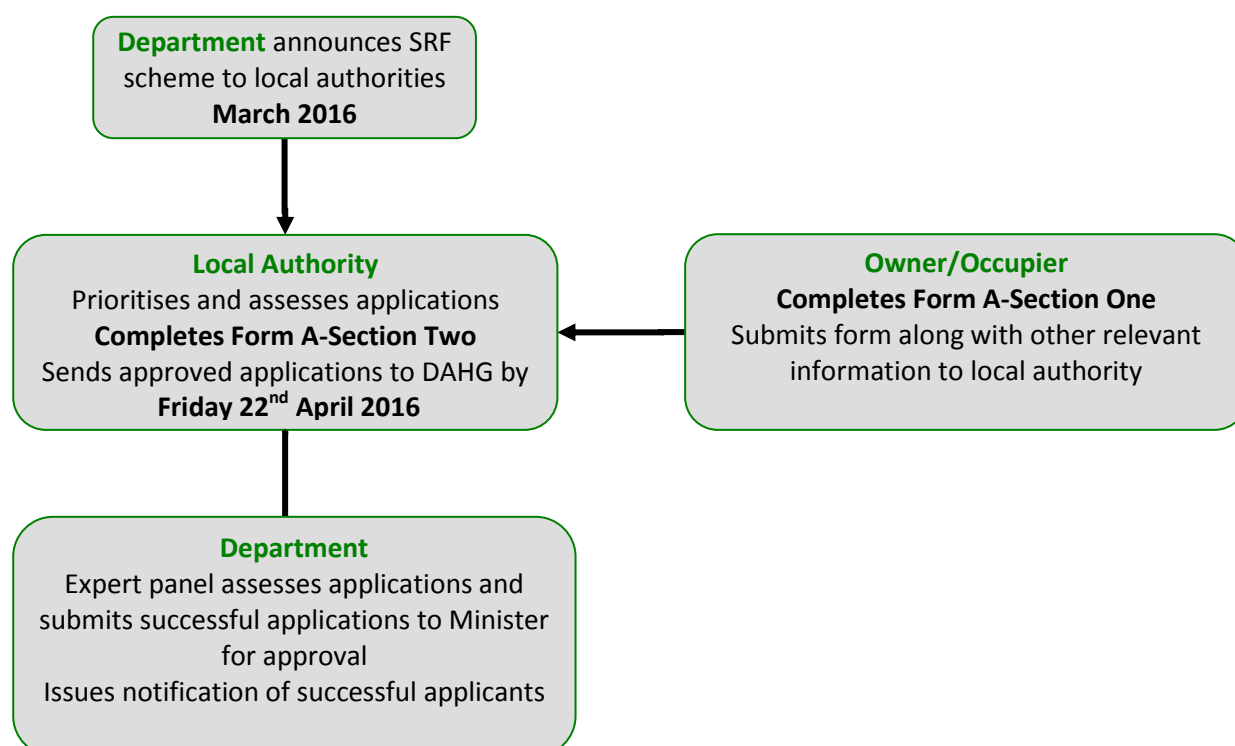
This should identify the issues that are causing risk, what remedial works are proposed, how the work will be done, what materials will be used and how the fabric of the building will be conserved. It must include relevant plans, drawings and supporting visual media such as video clips, photographs or other illustrations and should typically address the following (but by no means exclusive) 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)

This should address any likely impact of works on a structure and outline ways of mitigating adverse impacts. Mitigation may for example 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



IMPORTANT

1. Applications should be forwarded by the LA to reach DAHG by 4.00 p.m. **Friday 22nd April 2016**
2. Submit ONE copy only of **Form A** for each approved application with supplementary material by email to builtheritage@ahg.gov.ie. The size of the email should not exceed 15MB
3. The email subject should be entitled 'SRF 2016' and include the project name and the name of the LA

Applications in hard-copy format OR ANY OTHER FORMAT will not be accepted by DAHG EXCEPT BY PRIOR AGREEMENT

6. The Assessment Process

Applications received by the deadline of **4.00 p.m. Friday 22nd April 2016** will be assessed by an expert panel within the Department based on the following equally weighted criteria:

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

Significance: it is a matter for the LA to assess the significance of structures. 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 deemed to be 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: this refers to 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: this relates to 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 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.

DAHG 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.** All local authorities that have submitted applications for consideration will be notified of the outcome of the assessment process by DAHG. The list of successful projects awarded funding under SRF 2016 will also be published on DAHG's website www.ahg.gov.ie and should also be published on the LA's own website.

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

7. Recoupment of Funding

Any grant approved under this scheme is required to include matching funding of **at least 20% of total project expenditure**. Where matching funds of 20% cannot be met by the applicant, DAHG 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 of Arts, Heritage and the Gaeltacht.

It should be noted that 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**. However, 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 for rebate under this scheme, however, only for that portion of works which is grant-aided and which may include surveys and method statements, on-site supervision and monitoring, reasonable travel and subsistence costs and sign-off on project.

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

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

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 DAHG.

Once payment to an applicant has been made, the LA must complete and return **Form B** by the **28th October 2016** to recoup the amount of the grant from DAHG. This form must be signed by the Architectural Conservation Officer (ACO) or a member of the LA's professional staff 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 and visual aids such as photographs or video clips to allow DAHG compare 'before' and 'after' images of the completed works.



Any grant funding unclaimed by the due date will be forfeit

General Information

Procurement: the Department of Finance's *National and EU Public Procurement Guidelines* must be followed in respect of grant administration. 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. DAHG will provide the Revenue Commissioners with a list of successful applicants under this scheme.

Transfer of Ownership/De-listing: if the structure being grant-aided is deleted from the RPS, is sold, or the ownership transferred within a period of 5 years from date of payment of the grant, the LA reserves the right to "claw-back" some or all of the grant monies. 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 2016, DAHG reserves the right to seek a refund or funding from the LA.

Statutory Requirements: grant approved works must meet all statutory requirements including the need for planning permission. Where works are proposed to sites/monuments protected under the *National Monuments Acts 1930-2004*, proof must be provided by the applicant that the statutory requirements for notification or for Ministerial consent under those Acts have been complied with. Confirmation of required notifications, Ministerial consents and/or planning permissions must be provided by an applicant when making a claim for a grant.

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 planning authority. 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.

The onus is on the applicant to comply with all other statutory requirements, such as EU Habitats Directives (if applicable), foreshore licenses (if applicable), Safety, Health and Welfare legislation, and environmental and employment legislation. The attention of the local authority is drawn to: *(DAHG 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 Migration Guidelines for Ireland* is available on DAHG's website at: www.npws.ie/publications/irishlifemanuals

Annual Report and Publicity: A LA should include information on its operation of the fund in its Annual Report as provided for under Section 221 of the *Local Government Act 2001*. The contribution of DAHG should be publicly acknowledged in all advertisements and publicity in relation to this scheme.

Cross-Check Procedures: in some cases projects may be eligible to receive funding from more than one publicly-funded grant scheme. To ensure that the 80% limit of the total project cost from public funding, inclusive of VAT, is not exceeded, save in exceptional circumstances, information provided in **Section 1 of Form A** should be cross-checked by the LA in respect of possible other grants which may be available for a particular project in 2016. In particular this information should be cross checked with:

- (a) The Thatching Grant Scheme administered by the Department of Environment, Community and Local Government (DECLG) (if relevant);
- (b) Conservation grants administered by the Heritage Council, and
- (c) 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, except in exceptional circumstances.**

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

Contact: For further information required regarding this scheme, please contact **Built Heritage and Architectural Policy, Department of Arts, Heritage and the Gaeltacht**, Tel. 01 888 2465 or 01 888 2147 or email builtheritage@ahg.gov.ie

*Tax requirements may be subject to change by the Revenue Commissioners

