

An Bord Pleanála Oral Hearing

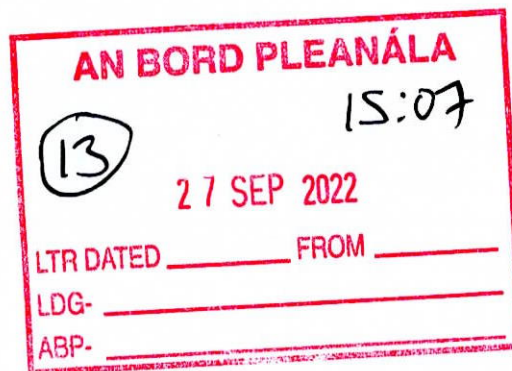
Córas Iompair Éireann/Iarnród Éireann

Dublin to Cork Railway Line Level Crossings

Brief of Evidence

Cultural Heritage

Bryn Coldrick



**Cork Line Level Crossings Oral Hearing
Brief of Evidence of Bryn Coldrick
Cultural Heritage**

1. QUALIFICATIONS AND ROLE IN THE PROPOSED PROJECT

1 My name is Bryn Coldrick. I am a Senior Consultant with Archaeological Management Solutions (AMS). I hold a Master of Arts degree (First Class Honours) in Local History from the National University of Ireland Maynooth, a Bachelor of Arts degree (First Class Honours) in Humanities (including History and Heritage Studies) from the Nottingham Trent University and a Postgraduate Certificate (with Distinction) in Social Science Research Methods, also from the Nottingham Trent University. I have worked as a heritage consultant in Ireland and Western Australia since 1999.

2 Over the past 23 years, I have undertaken cultural heritage constraints studies, route option selection studies and impact assessments, and prepared cultural heritage chapters of Environmental Impact Statements, for numerous industrial, retail, and residential developments as well as road schemes and other linear projects. These include upgrades to the national and regional road network, as well as flood relief schemes, water supply schemes and sewerage schemes.

3 In accordance with Section 39(1)(a) of the Transport (Railway Infrastructure) Act 2001 as amended and substituted (including by SI 743 of 2021), I confirm that I have over 23 years' experience undertaking and managing cultural heritage assessment contracts as part of Environmental Impact Assessment (EIA) Directive assessment processes. Together with the other Assessments which comprise the Environmental Impact Assessment Report, this Statement reflects the assessment prepared in Chapter 12 (Cultural Heritage) which comprises part of the assessments which comprise the environmental impact assessment report for this Railway Order Application and which inter alia contains:-

- (i) a description of the proposed railway works comprising information on the site, design, size and other relevant features of the proposed works;
- (ii) a description of the likely significant effects of the proposed railway works on the environment;
- (iii) the data required to identify and assess the main effects which the proposed railway works are likely to have on the environment;
- (iv) a description of any features of the proposed railway works, and of any measures envisaged to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- (v) a description of the reasonable alternatives studied by CIÉ which are relevant to the proposed railway works and their specific characteristics and an indication of the main reasons for the option chosen, taking into account the effects of the railway works on the environment; and
- (vi) A summary in non-tactical language of the above information.

4 I have been involved in the Cork Line Level Crossings Project since 2019 and have advised Iarnród Éireann on the cultural heritage constraints since the Preliminary Design stage of the Project which considered alternative options for the alternative access routes at each level crossing location. My involvement culminated in the preparation of the Cultural Heritage chapter (Chapter 12) in Volume 3 Part A of the EIAR which was submitted to An Bord Pleanála in April 2021. I also contributed to the Interactions and Cumulative Impact Assessment as set out in Volume 3, Chapter 17.

5 Chapter 12 in Volume 3 Part A of the EIAR was prepared with the benefit of inputs from a number of other Cultural Heritage specialists as listed in Appendix 1.

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6 I confirm that this statement of evidence addresses the potential impacts on Cultural Heritage in the context of the Environmental Impact Assessment (EIA) to be carried out by An Bord Pleanála in respect of the Project.

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2. OVERVIEW OF FINDINGS

7 As outlined in the EIAR Volume 3 Chapter 12, the Cultural Heritage assessment considered archaeology, architectural heritage, history and folklore in accordance with the Guidelines on the Information to be contained in Environmental Impact Assessment Reports (EPA 2017; 2022, 32).

8 The Cultural Heritage assessment carried out for the EIAR considered designated Cultural Heritage assets (i.e. protected and/or listed assets) including archaeological sites and monuments known to the Archaeological Survey of Ireland as recorded by the Sites and Monuments Record (SMR), Record of Monuments and Places (RMP), national monuments lists, and the list of Preservation Orders; Protected Structures listed on the RPS for Cork and Limerick; and buildings and other structures listed on the National Inventory of Architectural Heritage (NIAH). Previously unrecorded (undesigned) assets and areas of archaeological potential were identified during the assessment which included desktop research, cartographic analysis, aerial photography analysis, field surveys, and advance archaeological investigations as outlined below in Item ~~12~~ 9.

9 Irish Rail has facilitated extensive surveys and other investigations to identify and avoid potential archaeological effects including walkover surveys, geophysical surveys, advance test excavations, and topographical surveys as well as consultation with the National Monuments Service and the Conservation Officers of Cork and Limerick County Councils.

10 No Protected Structures or previously recorded archaeological sites or monuments will be impacted by the proposed Project.

11 Moderate adverse effects post-mitigation are predicted for two cultural heritage sites: the former gatekeeper's lodge at XC212 Ballycoskery (AH013 (IH-7)), which will be demolished, and the former train station at XC219 Buttevant (AH020) which is to be crossed by the new bridge and road alignment. These are not Protected Structures, and detailed building recording shall be carried out on all architectural heritage features that are to be removed or otherwise impacted by the development.

12 Slight adverse effects post-mitigation are predicted to previously unrecorded archaeological features adjacent to Imphrick Church and Graveyard at XC215 Shinanagh. These previously unrecorded archaeological features comprise a possible field system (AY035) and various subsurface features (AY036) potentially related to settlement and metalworking activity and were identified during the archaeological investigations conducted for this assessment. These previously unrecorded features shall be subject to full open-area excavation under the Archaeological Mitigation Strategy formulated for the Project in conjunction with the National Monuments Service and to which NMS have no objection.

13 Imperceptible to Slight adverse effects post-mitigation are predicted for the level crossings (IH-2, IH-3, IH-5, IH-6, IH-8 and IH-9) which are of local historical and social interest, and the goods shed listed on the NIAH at the former Buttevant train station (AH019).

14 The significance of impact on previously unrecorded potential archaeological remains at XC212 Ballycoskery, which include a possible enclosure (AY026) and a possible former road and relict field boundaries (AY044), as well as the watercourse (AY043) and areas of archaeological potential (AY047 & AY048) identified during the geophysical survey at XC219 Buttevant, cannot be determined without further archaeological investigation. This will take the form of test excavation and, in the case of AY043, underwater assessment in line with the Archaeological Mitigation Strategy agreed with the National Monuments Service. Under this strategy, all previously unrecorded subsurface archaeological remains will either be preserved in situ or, where this is not possible, preserved by record in accordance with Government policy as outlined in Framework and Principles for the Protection of the Archaeological Heritage.

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- 15 Detailed building recording shall be carried out on all architectural heritage features that are to be removed or otherwise impacted by the development in accordance with the recommendations of Cork County Council and Limerick County Council Conservation Offices.
- 16 Operational impacts on the setting of identified cultural heritage assets shall be mitigated through screening and landscaping as appropriate.
- 17 The documents listed in Appendix 2 to this report contain the required context and should be referred to throughout the Oral Hearing process.
- 18 The Planning and Development Act, 2000 (as amended) includes provision for the preservation and protection of the environment and its amenities, including the archaeological heritage and built heritage. Under Section 51 of the Planning and Development Act 2000, planning authorities are required to maintain 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 legal protections afforded to Protected Structures are set out in Part IV of the Planning and Development Act, 2000. Section 81 makes provision for the creation of Architectural Conservation Areas (ACAs) to preserve the character of a place, area, group of structures or townscape. The Act also requires Local Planning Authorities to prepare development plans that set out the Council's policies and objectives (including heritage objectives) in relation to proper planning and development.
- 19 There are no Protected Structures, Architectural Conservation Areas, or other sites/structures or features protected under the Limerick County Development Plan or Cork County Development Plan impacted by the Scheme.
- 20 The National Monuments Acts 1930 to 2014 afford protection to archaeological monuments through inclusion in the statutory Record of Monuments and Places (RMP), the Register of Historic Monuments, by being a national monument in the ownership or guardianship of the Minister for Housing, Local Government and Heritage or a Local Authority, or by being declared a national monument subject to a preservation order or temporary preservation order. The National Monuments Acts 1930 to 2014 can also protect elements of the architectural (built) heritage or offer dual/parallel protection in conjunction with the Planning and Development Act, 2000 (as amended). There are no such sites affected by the Scheme.
- 21 The National Inventory of Architectural Heritage (NIAH) was established under the Architectural Heritage (National Inventory) and Historic Monuments (Miscellaneous Provisions) Act, 1999, to fulfil Ireland's obligations under the Convention for the Protection of the Architectural Heritage in Europe (Granada Convention, 1985) by producing an inventory of architectural heritage. The NIAH, which is a unit within the Department of Housing, Local Government and Heritage, 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 built heritage.
- 22 The NIAH survey for Cork was undertaken between 2006 and 2010 and the NIAH survey for Limerick was undertaken in 2009. Both surveys are published online on the NIAH website and on the National Monuments Service' Historic Environment Viewer. No structures listed on the NIAH will be directly impacted by the Scheme.
- 23 Section 12.8 of the EIAR, in relation to the Cultural Heritage appraisal of residual effects, concludes that for Archaeological Heritage "The significance of construction impact post-mitigation is predicted to be imperceptible to slight. In five (5) cases (AY026, AY043, AY044, AY047, AY048), the residual significance of construction impact cannot be determined until further archaeological excavations are conducted because the full extent, nature and significance of these newly identified archaeological sites can only be fully understood following exposure and excavation of the archaeological remains". These excavations are included as environmental conditions in the Schedule of Mitigation (Volume 5, Appendix 1L) and, along with other mitigation measures (e.g. underwater archaeological assessment and archaeological monitoring), will

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ensure that adverse effects to newly identified archaeological sites are appropriately mitigated either through preservation in situ or, where this is not possible, preservation by record in accordance with Government policy and standard best practice (see Appendix 3, Table 12:20, below for a list of potentially significant construction stage archaeological impacts prior to mitigation).

24 Section 12.8 of the EIAR concludes that for Architectural (Built) Heritage "The significance of construction impact post-mitigation is predicted to be imperceptible to moderate in the case of demolitions". The moderate residual effects relate to the demolition of the former Gatekeeper's House at Ballycoskery (AH013/IH-7) and built heritage elements within the former railway station at Buttevant (AH020/IH-10).

25 Section 12.8 of the EIAR also concludes that "Residual impacts on eleven (11) other cultural heritage assets are predicted during construction, mostly due to the closure of the level crossings themselves (slight residual impacts) and imperceptible impacts on townland boundaries".

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3. SUMMARY OF THE SUBMISSIONS RAISED AND RESPONSES

Responses to Issues in Submissions

XC201

Submission:

- 26 The submission notes that the crossing is immediately adjacent to a Recorded Monument and within a Zone of Notification and consequently the works require to be notified to the National Monuments Service in accordance with the National Monuments Acts 1930 to 2014 (Amendment 1994 Section 12).
- 27 This issue has been raised in the submission from Limerick City and County Council.

Response:

- 28 The Recorded Monument in question is SMR LI047-045, an earthwork/enclosure referred to in the EIAR Volume 3 Chapter 12 as AY010 (see Figure 12.3 below). The Cultural Heritage assessment does not predict any impact on this monument and the project is not within its Zone of Notification; however, the Minister for Housing, Local Government and Heritage shall be formally notified of works within any Zones of Notification affected by the Project, as required under section 12 (3) of the National Monuments (Amendment) Act, 1994 (Recorded Monuments). This will be done via the notification procedure using the standard Notification Form which will be submitted to the National Monuments Service (NMS).
- 29 The NMS was consulted throughout the assessment and the mitigation measures for XC201, which were formulated in consultation with the NMS, include a programme of archaeological testing at Thomastown, which will be carried out by a suitably qualified archaeologist under a licence from the Minister for Housing, Local Government and Heritage and in consultation with the NMS (Volume 5, Appendix 12C, Archaeological Condition 6). The environmental conditions as set out in the Schedule of Mitigations also includes for archaeological monitoring to be carried out under an excavation licence where there is a potential for construction to impact archaeology (Appendix 1L).

XC212

Submission:

- 30 Concern has been raised that the Project is likely to result in a major increase in the impact on the built heritage of the church properties at Ballycoskery, particularly the historic setting of the gates to the Parochial House.
- 31 This issue has been raised in submissions from the Trustees of Diocese of Cloyne (July 2021, May 2022).

Response:

- 32 The Parochial House (NIAH 20900805, referred to in EIAR Volume 3 Chapter 12 as AH011) and its gated entrance are not listed as a Protected Structure in the Cork County Development Plan, nor are any buildings or structures within its curtilage.
- 33 There will be no impact on the Parochial House, its gated entrance (which is being retained), or St Mary's Church [AY025/AH010] (see Figure 12.6 below). Although there will be changes to the setting of the Parochial House gates, this setting is already diminished by the proximity of the housing estate to the east, and the setting of the church is diminished by the N20 and petrol station opposite.
- 34 The Parochial House (AH011), while recorded in the NIAH as being of Regional importance, is not included on the Record of Protected Structures (RPS) for Cork. The Cultural Heritage assessment predicts the effect on

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the Parochial House to be Slight Negative, based on there being an indirect impact of low magnitude. Following current EPA and NRA (TII) guidelines, a low impact to an architectural heritage asset of Regional importance represents a Slight Negative effect (EPA 2017, p.53; NRA 2005, p.32) which in the opinion of AMS is appropriate in this case.

- 35 Measures will be taken to prevent any impact on the gated entrance during construction. Current and proposed tree planting will reduce the visual impact of the development on both the Parochial House and church (see Volume 3, Chapter 13: Landscape and Visual). The proposed development will also have the effect of moving the road further away from the Parochial House gates, reducing the risk of accidental damage from vehicle strikes etc. With mitigation in place, the significance of effect is predicted to be imperceptible.

Submission:

- 36 Concern has been raised that the Project is likely to impact the entrance gate and piers of the Parochial House (NIAH 20900805) and they should be retained and protected during the works. It has been recommended that any works to historic structures within the area of intervention be specified and supervised by a suitably qualified conservation engineer.

- 37 This issue has been raised in the submission from the Cork County Council Conservation Dept.

Response:

- 38 As noted in Item 33, the gated entrance to the Parochial House (NIAH 20900805 [AH011 in EIAR Volume 3 Chapter 12]), including gates, piers and flanking walls, will be retained and protected during the scheme works.

Submission:

- 39 Concern has been raised that the Project is likely to impact the boundary wall of the Parochial House (NIAH 20900805 [AH011 in EIAR Volume 3 Chapter 12]). The submission asks that consideration be given to the retention of the wall. If this will not be possible, recording and mitigation should be carried out as per EIS [EIAR], Volume 3, Chapter 12: Cultural Heritage. The submission also asks that consideration be given to the reuse of the stone for the cladding of any necessary retaining wall and recommends that any works to historic structures within the area of intervention be specified and supervised by a suitably qualified conservation engineer.

- 40 This issue has been raised in the submission from the Cork County Council Conservation Dept.

Response:

- 41 The boundary wall to the right of the entrance to the Parochial House (NIAH 20900805 [AH011]), which is faced with concrete and in a poor state of repair, and of low architectural and historical value, appears to be remnants of the roadside wall that was partially removed for the Beechwood Drive housing development. The section of wall within the scheme shall be subject to detailed building recording prior to removal in accordance with the Schedule of Mitigation (Volume 5, Appendix 1L). As recommended in the submission of Cork County Council, it is proposed to reuse the stone for the cladding of any necessary retaining wall, supervised by a suitably qualified conservation architect.

Submission:

- 42 The demolition of the Gatekeeper's House entails the loss of an element of significance of the historic railway system. Recording and mitigation should be carried out as per EIS [EIAR], Volume 3, Chapter 12: Cultural Heritage by Jacobs and any works to historic structures within the area of intervention be specified and supervised by a suitably qualified conservation engineer [Cork County Council Conservation Dept].

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Response:

- 43 The Gatekeeper's House is a derelict mid to late 19th century rendered structure in a poor condition. It is not a Protected Structure designated under the Cork County Development Plan and any architectural heritage impact assessment needs to be viewed in that context.
- 44 The Gatekeeper's House is referred to throughout EIAR Volume 3 Chapter 12 as IH-7/AH013 and is assessed as being of Local importance (see Figure 12.6 below). It is acknowledged that the demolition of this building represents a Significant Negative effect pre-mitigation for architectural heritage.
- 45 The Gatekeeper's House will be subject to mitigation measures as per EIAR Volume 3 Chapter 12 and the Schedule of Mitigation (Volume 5, Appendix 1L), which will include, as an environmental condition, detailed building recording by a suitably qualified built heritage professional of both the exterior and interior of the house and the shed within its curtilage. This building recording shall include, but not be limited to, written descriptions, measured drawings and the compilation of photographic and documentary archives as necessary and oral history where possible. The aim of the building recording will be to compile a comprehensive written and illustrated record of architectural heritage features which are being directly impacted. After the mitigations have been implemented, the residual impact on the Gatekeeper's House is predicted to be Moderate.
- 46 As recommended in the submission, works to historic structures within the area of intervention shall be supervised by a suitably qualified conservation engineer/architect.

Submission:

- 47 The submissions contend that the proposed overbridge is a generic design as used on motorway projects and "There has been no attempt to arrive at a design solution which respects the topography, urban form or built heritage of Ballycoskery or the tradition of Victorian railway engineering in Ireland." (Trustees of Diocese of Cloyne).

Response:

- 48 The proposed scheme has been designed in accordance with DN-GEO-03031 Rural Road Link Design and is not a generic design as used on a motorway.

Submission:

- 49 The submissions contend that "criteria used for the comparative analysis of design options and for the assessment of cumulative effects did not give appropriate weight to the visual character, built heritage and biodiversity and this resulted in a lower ranking for the underbridge option".
- 50 This issue has been raised in submissions from the Trustees of Diocese of Cloyne (July 2021, May 2022).

Response:

- 51 Alternative solutions were considered using Multi-Criteria Assessment (MCA) as part of the February 2019 Feasibility Study. The criteria include for consideration of the environmental impact of each option including cultural heritage aspects.
- 52 There is a relatively high potential for previously unrecorded archaeological remains in this area, as the proposed works are in close proximity to a Recorded Monument (moated site CO008-035). An underbridge option would involve significantly higher level of groundworks and disturbance increasing the likely impact on archaeological heritage.

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Submission:

53 Submission states that "While it is acknowledged in the EIAR that there will be significant effects on ... the built heritage of the ecclesiastical sites and particularly the gates of the parochial house ... the approach adopted is to mitigate rather than to avoid these effects."

54 This issue has been raised in the submissions from the Trustees of Diocese of Cloyne (July 2021, May 2022).

Response:

55 This appears to be a misreading/misinterpretation of Chapter 12 as the effects on the church (AY025/AH010) and the Parochial House (AH011) are predicted to be Slight Negative and relate to indirect impacts with neither asset being directly impacted by the Project. As already noted above, there will be no direct impact on either the church or the Parochial House gates, and the visual impact on both will be reduced by mitigation planting in conjunction with existing planting. The boundary wall to the right of the entrance to the Parochial House, which is faced with concrete and in a poor state of repair, shall be subject to detailed building recording prior to removal in accordance with the Schedule of Mitigation (Volume 5, Appendix 1L). However, removal of this wall does not result in a significant adverse effect on cultural heritage.

XC215

Submission:

56 The submission relates to the historic railway bridge at Shinanagh, which in the submission's opinion should be fully retained. The respondent notes that the photomontages appear to show a concrete bridge at this location rather than a stone bridge.

57 The submission relates to the impact on the stone wall leading to the railway bridge at Shinanagh and states that further consideration should be given to the retention of this historic wall. If this will not be possible, recording and mitigation should be carried out as per EIS [EIAR], Volume 3, Chapter 12: Cultural Heritage. Consideration should be given to the reuse of the stone for the cladding of any necessary retaining wall or for the construction of guarding. It is recommended that any works to historic structures within the area of intervention be specified and supervised by a suitably qualified conservation engineer.

58 These issues have been raised in the submission from the Cork County Council Conservation Dept.

Response:

59 There are no plans to alter Shinanagh railway bridge, which is referred to in EIAR Volume 3 Chapter 12 as IH-11 [AH015] (see Figure 12.8 below). Site inspection undertaken in October 2019 found that the stone bridge has already been largely replaced with a concrete structure in recent years, and therefore the bridge has diminished architectural heritage value and is not designated under the Cork County Development Plan.

60 The Cultural Heritage assessment considers the tie-in to the bridge, which will impact the approach walls, as a direct impact of low magnitude during construction, resulting in a Slight Negative effect. This shall be mitigated through an environmental condition requiring building recording (i.e. a written, drawn and photographic archive) of the impacted features in accordance with the Schedule of Mitigation (Volume 5, Appendix 1L). Following mitigation, there will be an imperceptible impact on the bridge.

XC219

Submission:

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61 The submission raises concerns relating to the impact of the scheme on the former Buttevant Railway Station and requests that consideration be given to the redesign of this node to avoid encroaching on the station's enclosure. If this will not be possible, consideration should be given to the design of guarding to the new bridge to match surviving historic railings on site (refer to Plate 12. 22 of EIAR Volume 3, Chapter 12). In any case, recording and mitigation should be carried out as per EIAR Volume 3, Chapter 12. It is recommended that any works to historic structures within the area of intervention be specified and supervised by a suitably qualified conservation engineer (Cork County Council).

Response:

62 Buttevant Station is referred to throughout EIAR Volume 3 Chapter 12 as IH-10/AH020. One of its buildings (a derelict railway goods shed) is listed on the NIAH (NIAH 20803040) and is referred to separately in the assessment as AH019 (see Figure 12.9 below). It is not a Protected Structure and is not listed under any designation under the Cork County Development Plan in the twelve years since the NIAH survey for Cork was completed and the level of significance must be addressed in that context.

63 The station complex will be subject to mitigation measures as per Chapter 12 and the Schedule of Mitigation (Volume 5, Appendix 1L), which will include, as an environmental condition, detailed building recording of all elements to be impacted (including the western goods shed, boundary walls, platforms, and sidings) by a suitably qualified built heritage professional, and archaeological excavation of subsurface features as required. The building recording shall include, but not be limited to, written descriptions, measured drawings and the compilation of photographic and documentary archives as necessary and oral history where possible. The aim of the building recording will be to compile a comprehensive written and illustrated record of architectural heritage features which are being directly impacted. After the mitigations have been implemented, the residual impact on the former railway station is predicted to be Moderate.

64 There will be no direct impact to the railway goods shed listed on the NIAH (NIAH 20803040 [AH019]), or any other upstanding features that are being retained.

65 As recommended in the submission, the design of guarding to the new bridge to match surviving historic railings on site and works to historic structures within the area of intervention shall be supervised by a suitably qualified conservation architect.

66 In addition to the specific issues raised, the submission:

- (i) noted that the proposed Project does not result in loss/injury to any Protected Structure or Architectural Conservation Area and as such is considered to accord with objectives set out in the Cork County Development Plan; and in its favour, the Project limits the impact and damage to historic features when considering the scale and scope of the intervention proposed;
- (ii) noted the cumulative negative impact on the cultural landscape resulting from the loss or alteration of several architectural historic features within the area of intervention;
- (iii) recommended that any permitted works to historic structures within the area of intervention should be specified and supervised by a suitably qualified conservation engineer and that the mitigation measures proposed by the Cork County Council Conservation Officer should be incorporated into a revised scheme or, pending decision to grant, by way of condition;
- (iv) recommended that conditions be included relating to the continued and appropriate protection and recording of the Archaeological Heritage (as directed by the National Monuments Service) and the Architectural Heritage of the area, and specify full and strict adherence to the proposed mitigation as set out in the EIAR, the Construction

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Environmental Management Plan and all related project management plans and method statements; and

- (v) noted that the Bord may consider it appropriate to assess the design of the proposed works at and within the vicinity of former Buttevant station, in so far that it would protect this material asset for potential future use as a commuter rail station or heritage centre or other use that would recognise its cultural, historical and heritage value.

67 Irish Rail's response to these general issues may be summarised as follows:

- (i) Irish Rail welcomes the acknowledgement that the Project has attempted to limit the impact and damage to historic features.
- (ii) Section 12.10 of the EIAR Volume 3 Chapter 12 addresses cumulative effects, specifically in relation to the proposed upgrade of the N20 national primary route to a motorway (M20). It is acknowledged that there are likely to be cumulative effects within the Project resulting from the loss or alteration of several architectural historic features within the area of intervention. These effects will, however, be reduced and offset by the environmental conditions (mitigation measures) outlined in the Schedule of Mitigation (Volume 5, Appendix 1L), which includes detailed building recording of all architectural heritage features that are to be removed or otherwise impacted by the development.
- (iii) The additional mitigation measures proposed by the Cork County Council Conservation Officer shall be incorporated as environmental conditions in a revised Schedule of Mitigation and supervised by a suitably qualified conservation engineer.
- (iv) In relation to the continued and appropriate protection and recording of the Archaeological Heritage and Architectural Heritage, a comprehensive set of mitigation measures has been compiled in consultation with the National Monuments Service. These measures are set out in the Construction Environmental Management Plan (Volume 5, Appendix 1I) and the Schedule of Mitigation (Volume 5, Appendix 1L) and are based on the mitigations outlined in EIAR Volume 3 Chapter 12, the Scoping Opinion of the Development Applications Unit (DAU) (Volume 5, Appendix 12B) and the DAU Mitigation Strategy (Volume 5, Appendix 12C).
- (v) Regarding potential future use as a commuter rail station or heritage centre or other use, this would be a separate project to be taken forward by others.

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APPENDIX 1: Contributing Specialists

68 Chapter 12 in Volume 3 Part A of the EIAR was prepared with the benefit of inputs from a number of other Cultural Heritage specialists, including

- Bryn Coldrick (Senior Consultant, AMS),
- Freya Clare Smith (Archaeologist, AMS),
- Dr Richard Clutterbuck (Project Archaeologist and Built/Architectural Heritage Specialist, AMS),
- Ed Danaher (Archaeologist and Managing Director, AMS),
- Joanne Hughes (Archaeologist and EIA Manager, AMS),
- Jamie McNamara (Built/Architectural Heritage Specialist, AMS).

69 The geophysical surveys were carried out under licence from the Department of Housing, Local Government and Heritage (formerly the Department of Culture, Heritage and the Gaeltacht) by Dr Ger Dowling (archaeo-geophysicist, AMS), John Nicholls (Target Archaeological Geophysics) and by Donald Murphy and Robert Breen of Archaeological Consultancy Services Unit (ACSU).

70 The advance targeted archaeological test excavations and topographical survey were carried out by Ian Russell and Donald Murphy (respectively) of ACSU and monitoring of geotechnical investigations was undertaken by Kate Taylor and Damien McCarthy (TVAS Ireland Ltd).

71 The archaeological investigations were undertaken, and the resulting mitigation strategy prepared, in consultation with Mairead Weaver and Mark Keegan of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (see Volume 5, Appendix 12B and Appendix 12C).

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APPENDIX 2: Supporting Documents

- Non-Technical Summary
- EIAR Volume 3 Chapter 12 (Cultural Heritage)
- Preliminary Cultural Heritage Screening Report (Smith 2019; Volume 5, Appendix 12D)
- Geophysical Survey Report of Lands at XC211 Newtown (Dowling 2020a; Volume 5, Appendix 12E)
- Geophysical Survey Report of Lands at Imphrick (Dowling 2020b; Volume 5, Appendix 12F)
- Geophysical Survey Report XC211 (Newtown Townland) & XC215 (Shinanagh Townlands) (Nicholls 2020; Volume 5, Appendix 12G)
- Cork Line Level Crossings Project Co. Cork Geophysical Survey Report (Murphy 2020a; Volume 5, Appendix 12H)
- Cork Line Level Crossings Project Newtown, Ballyhea, Co. Cork. Targeted Archaeological Test Excavations Report (Russell 2020a; Volume 5, Appendix 12I)
- Cork Line Level Crossings Project – XC215 Shinanagh, Co. Cork. Targeted Archaeological Test Excavations Report (Russell 2020b; Volume 5, Appendix 12J)
- Cork Line Level Crossings Project – XC215 Imphrick, Co. Cork Topographical Survey Report (Murphy 2020b; Volume 5, Appendix 12K)
- Cork Line Level Crossing Project, Counties Limerick and Cork: Archaeological Monitoring Report (Taylor & McCarthy 2020; Volume 5, Appendix 12L)

The following reports were previously prepared for the Scheme and are also available:

- Flynn, C. 2010. Archaeological Assessment XC212 Level Crossing Ballycoskery Co. Cork. Unpublished report prepared by Valerie J. Keely Ltd for Roughan & O'Donovan / Iarnród Éireann, October 2010.
- Flynn, C. 2011. Archaeological Assessment Level Crossings XC219 Clashnabuttry Co. Cork XC215 Shinanagh Co. Cork XC209 Ballyhay Co. Cork XC201 Thomastown Co. Limerick XC187 Fantstown Co. Limerick. Unpublished report prepared by Valerie J. Keeley Ltd on behalf of Roughan & O'Donovan and Iarnród Éireann, July 2011.
- Goodbody, R. 2012. Historic Building Survey XC219 Level Crossing, Buttevant, Co. Cork. Unpublished report prepared for Roughan & O'Donovan / Iarnród Éireann by Rob Goodbody Historic Building Consultant on behalf of Valerie J. Keeley Ltd.

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APPENDIX 3: Table and Figure Extracts from the EIAR

Table 12.20: Potentially Significant Construction Stage Impacts of the Proposed Project on Cultural Heritage (NB: refer to original Table 12.20 for full list of construction stage impacts)

Site Number	Crossing	Site Type	Importance	Type of Impact	Quality of Effect	Magnitude of Impact	Significance of Effect
AH013 (IH-7)	XC211 & XC212	House – gatekeepers lodge	Local	Direct	Negative	Very High	Significant
AH020	XC219	Railway station	Regional	Direct	Negative	High	Significant
AY035	XC215	Earthworks (Possible Field System) and Spread	Medium	Direct	Negative	Very High	Moderate–Potentially Significant
AY036	XC215	Various Subsurface Features	Medium	Direct	Negative	Very High	Moderate–Potentially Significant
AY026	XC211 & XC212	Earthwork (Possible Enclosure)	Unknown	Direct	Negative	Very High	Unknown
AY043	XC219	Watercourse (Area of Potential)	Unknown	Direct	Negative	Low	Unknown
AY044	XC211 & XC212	Former Road & Field Boundaries	Unknown	Direct	Negative	Very High	Unknown
AY047	XC219	Area of Potential	Unknown	Indirect	Negative	Low	Unknown
AY048	XC219	Area of Potential	Unknown	Direct	Negative	Very High	Unknown

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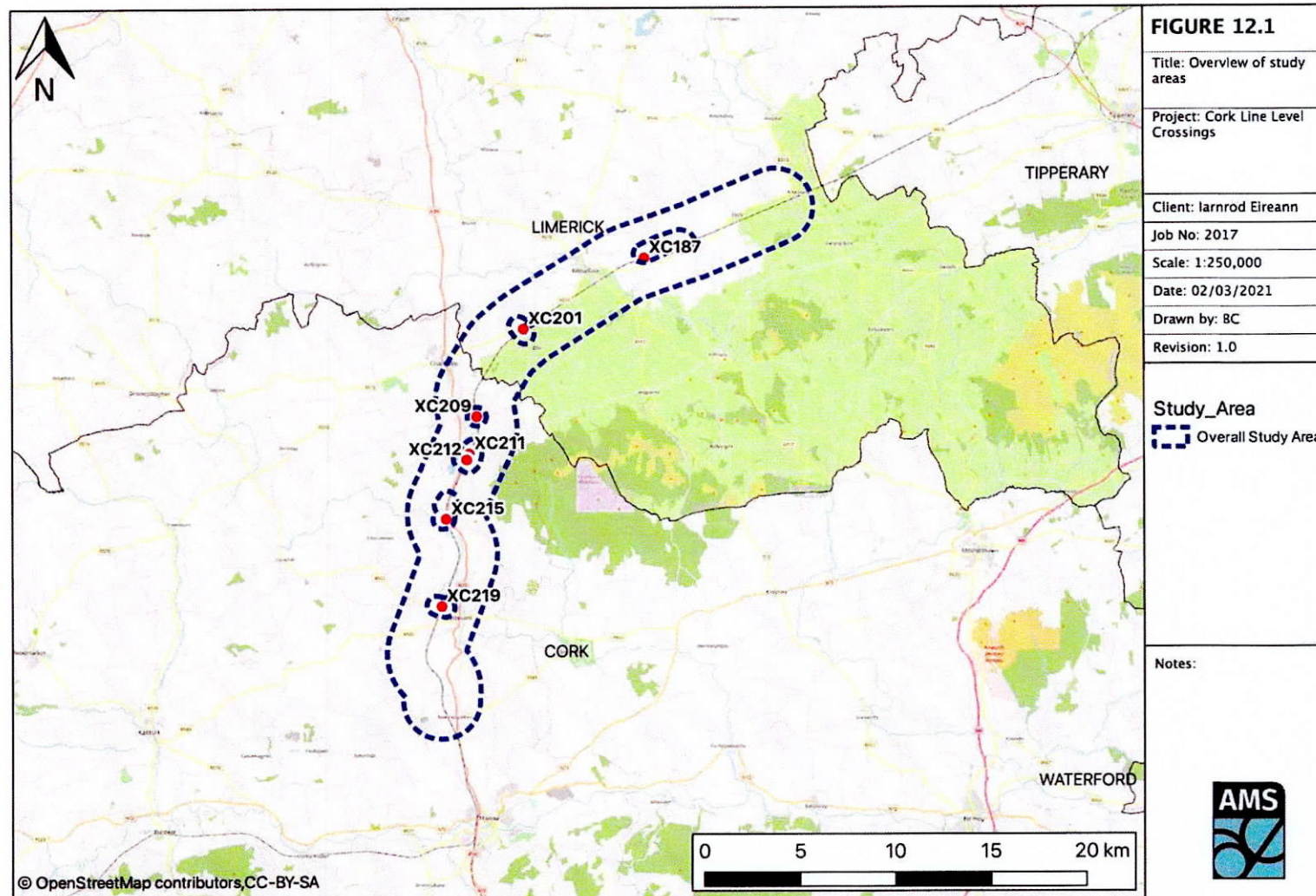


Figure 12. 1: Overview of study areas

FIGURE 12.2

Title: XC187 Fantstown Cultural Heritage Receptors

Project: Cork Line Level Crossings

Client: Iarnród Éireann

Job No: 2017

Scale: 1:15,000

Date: 02/03/2021

Drawn by: BC

Revision: 1.0

Legend:

- Cultural Heritage Receptors
- Archaeology
 - Cork_SMR
 - Cork_SMR_Zone
 - Limerick_SMR
 - Limerick_SMR_Zone
- Architectural_Heritage
 - Limerick_NIAH
 - Cork_NIAH
 - Cork_RPS
 - Limerick_RPS
- Other Cultural Heritage
 - Industrial_Heritage
 - Cork-Dublin_Railway
- Townland Boundaries
 - townlands_ITM

Scale: 0 250 500 750 1000 m

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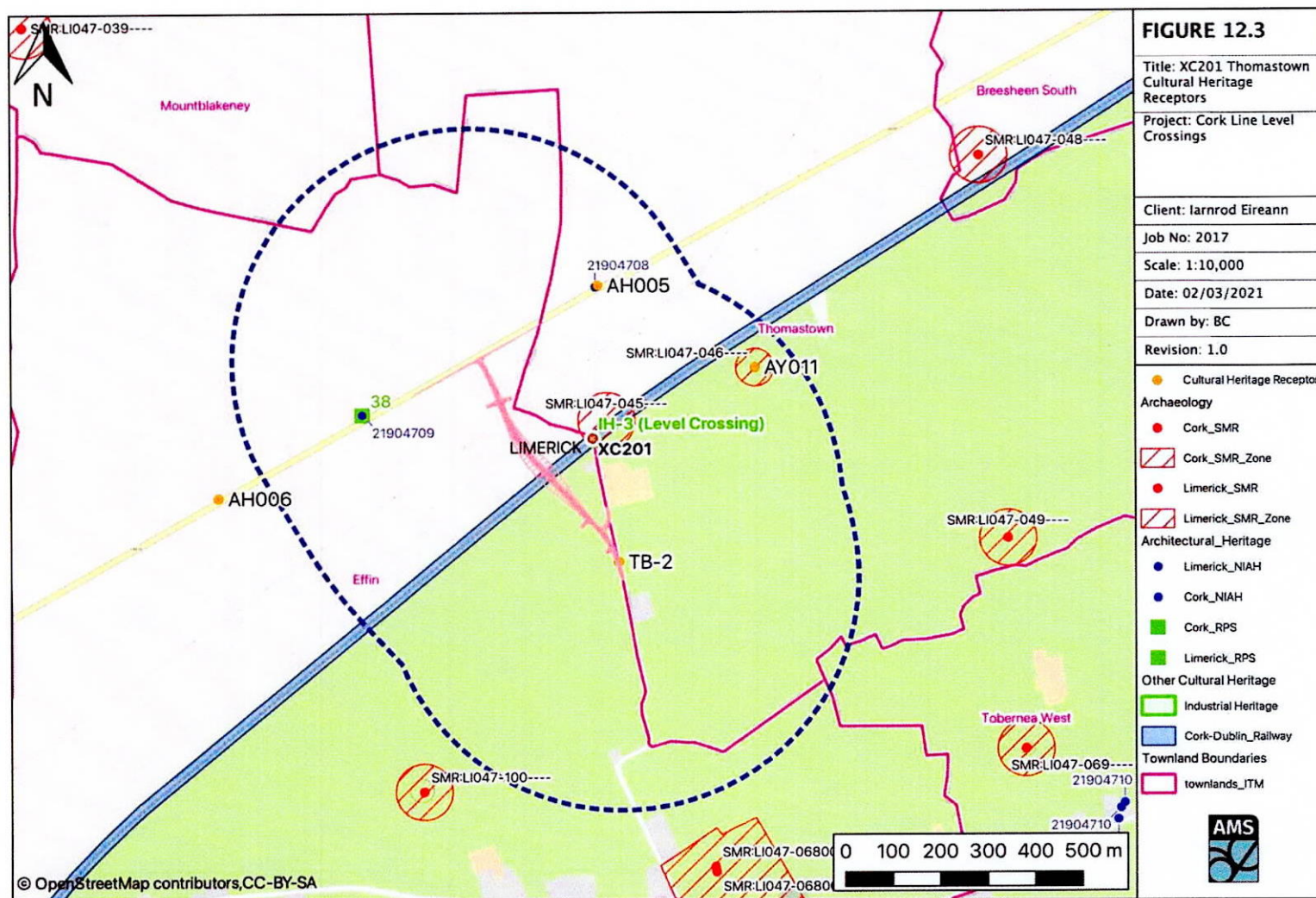


Figure 12. 3: XC201 Thomastown cultural heritage receptors

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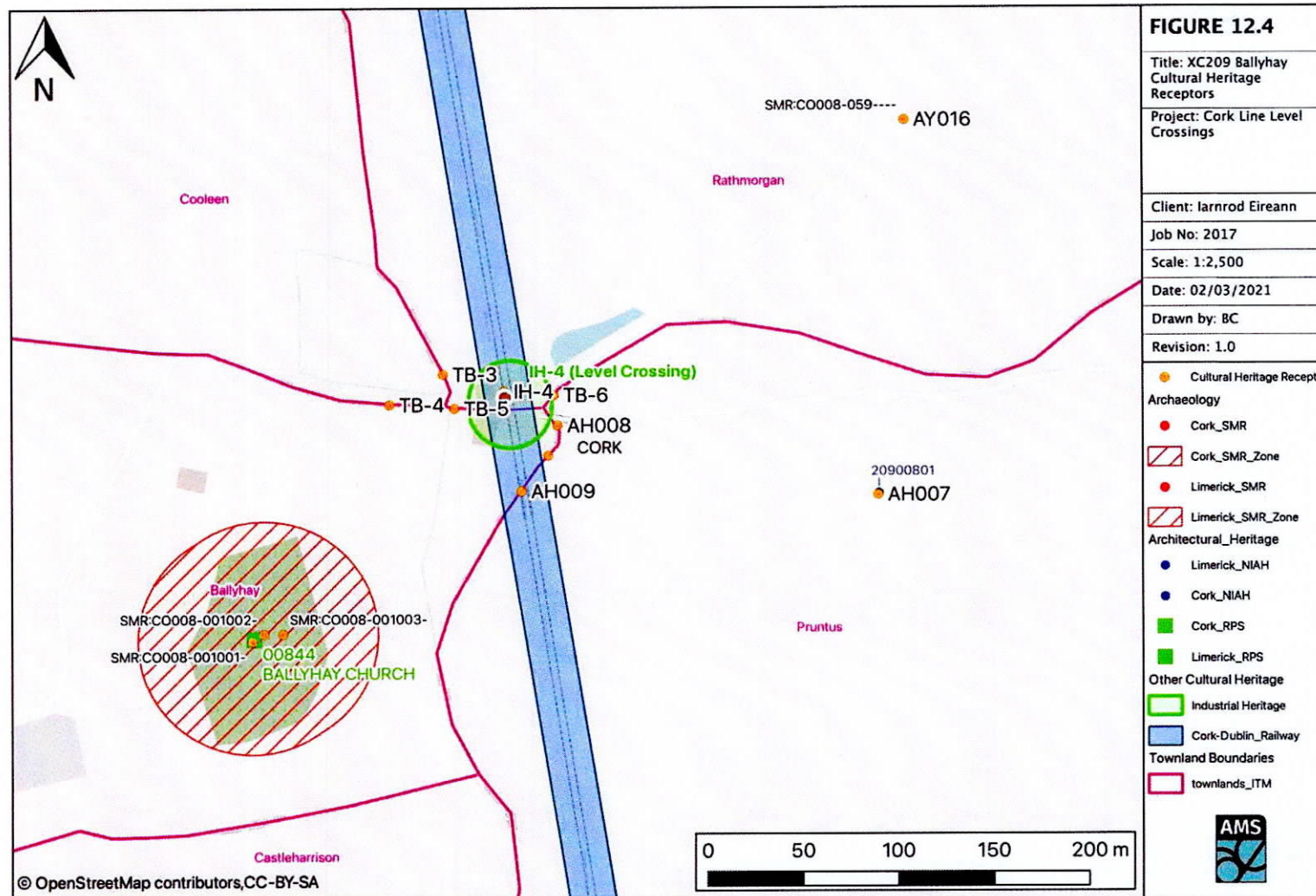


Figure 12. 4: XC209 Ballyhay cultural heritage receptors

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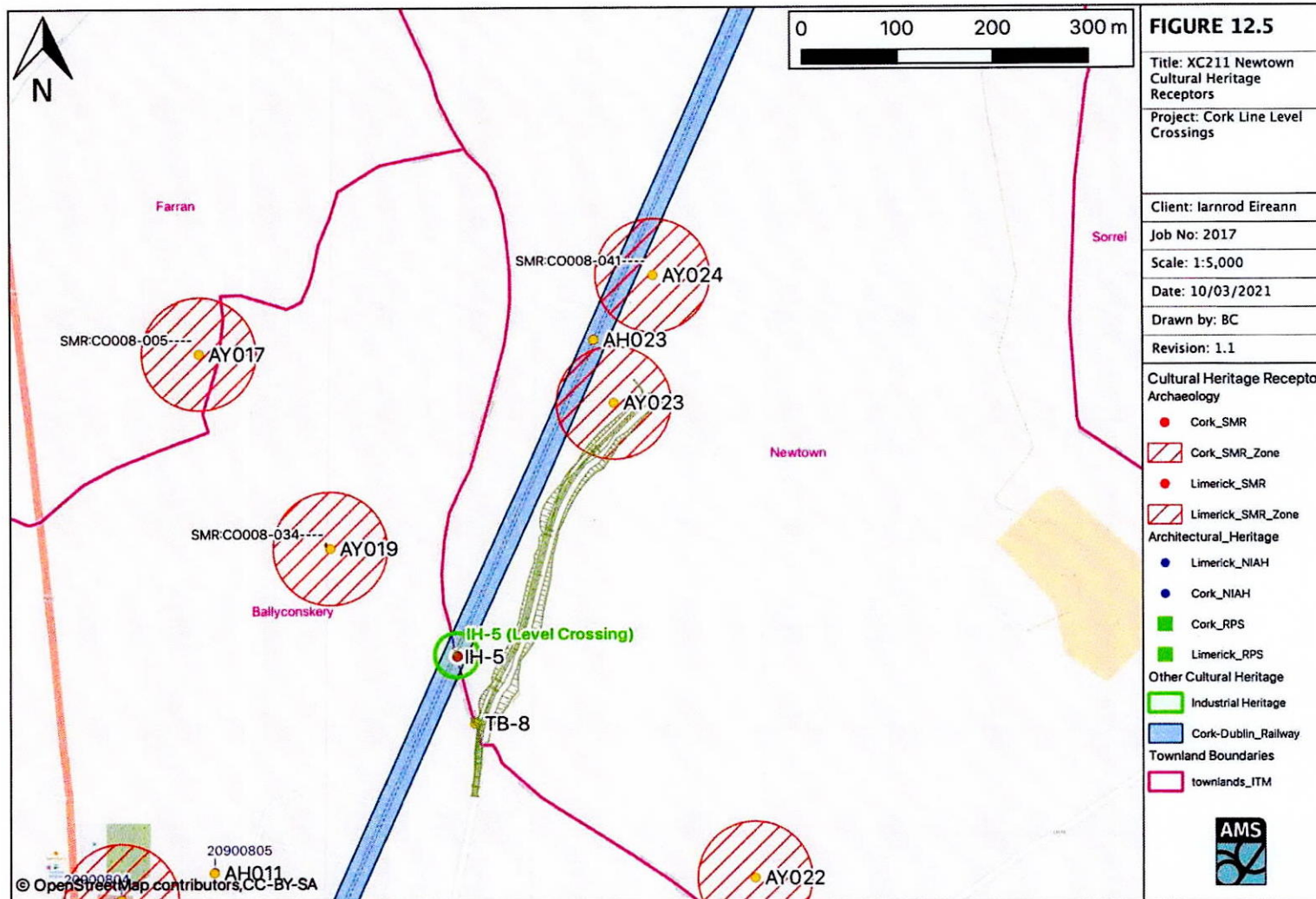


Figure 12. 5: XC211 Newtown cultural heritage receptors

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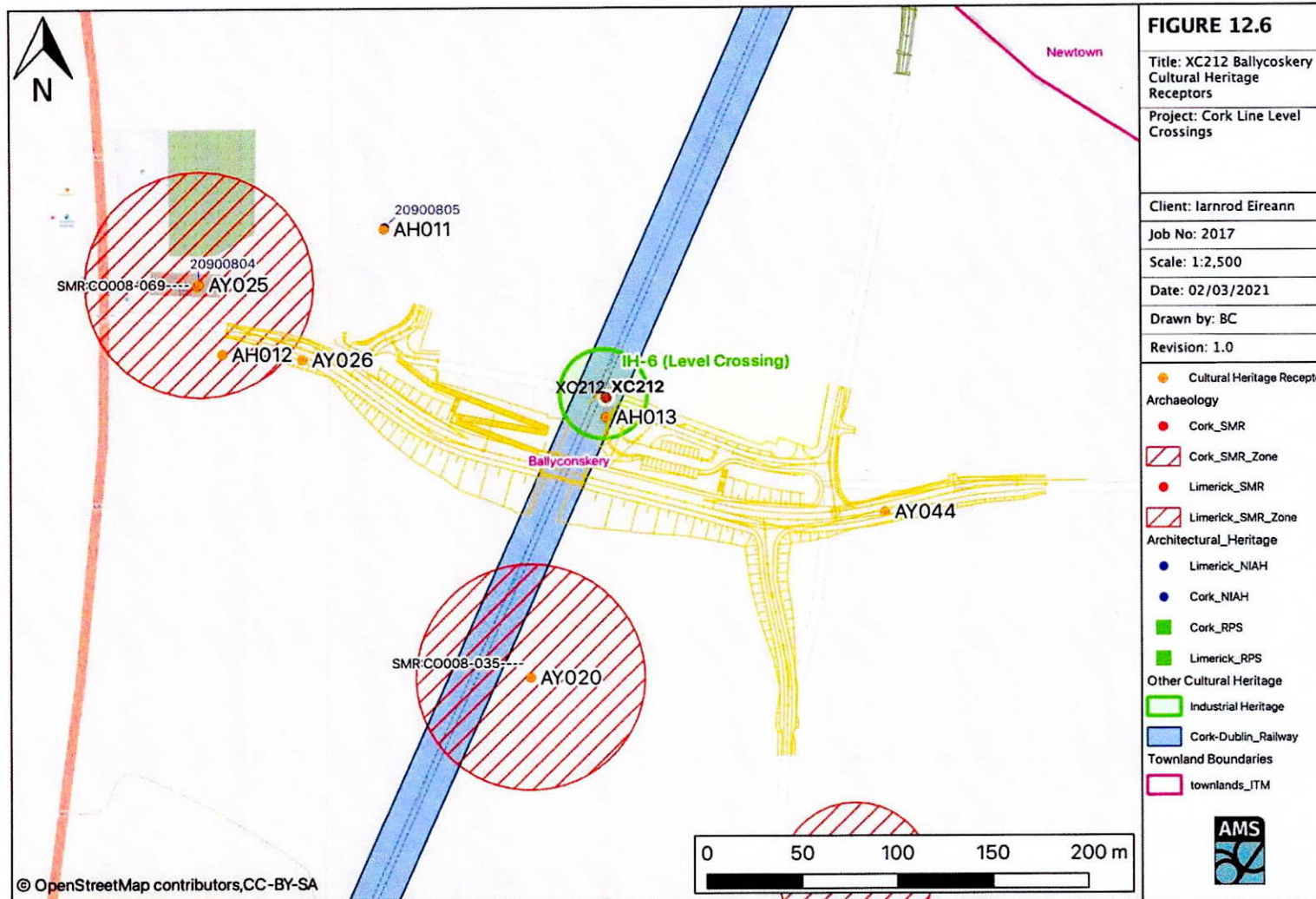


Figure 12. 6: XC212 Ballycoskery cultural heritage receptors

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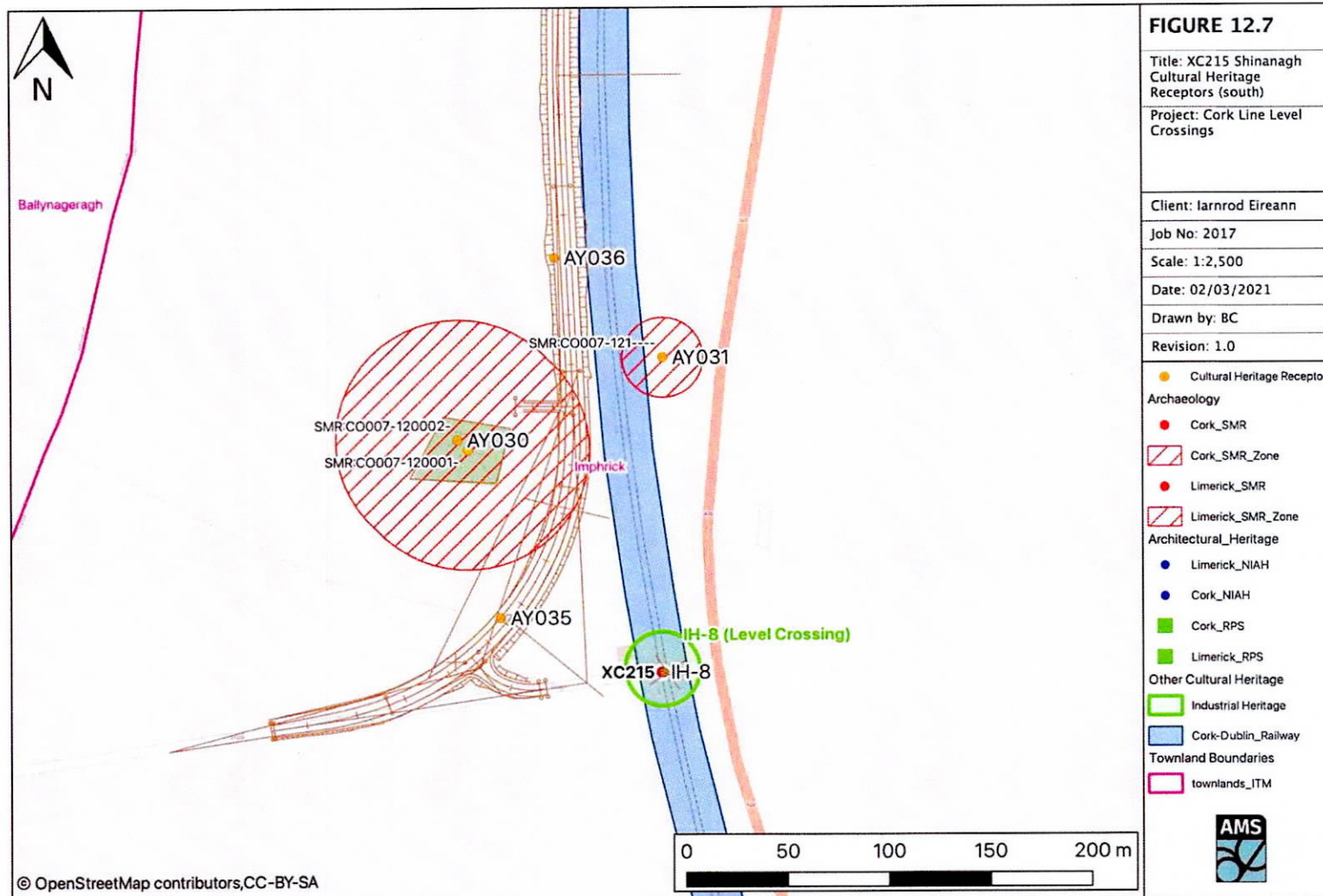


Figure 12. 7: XC215 Shinanagh cultural heritage receptors (south)

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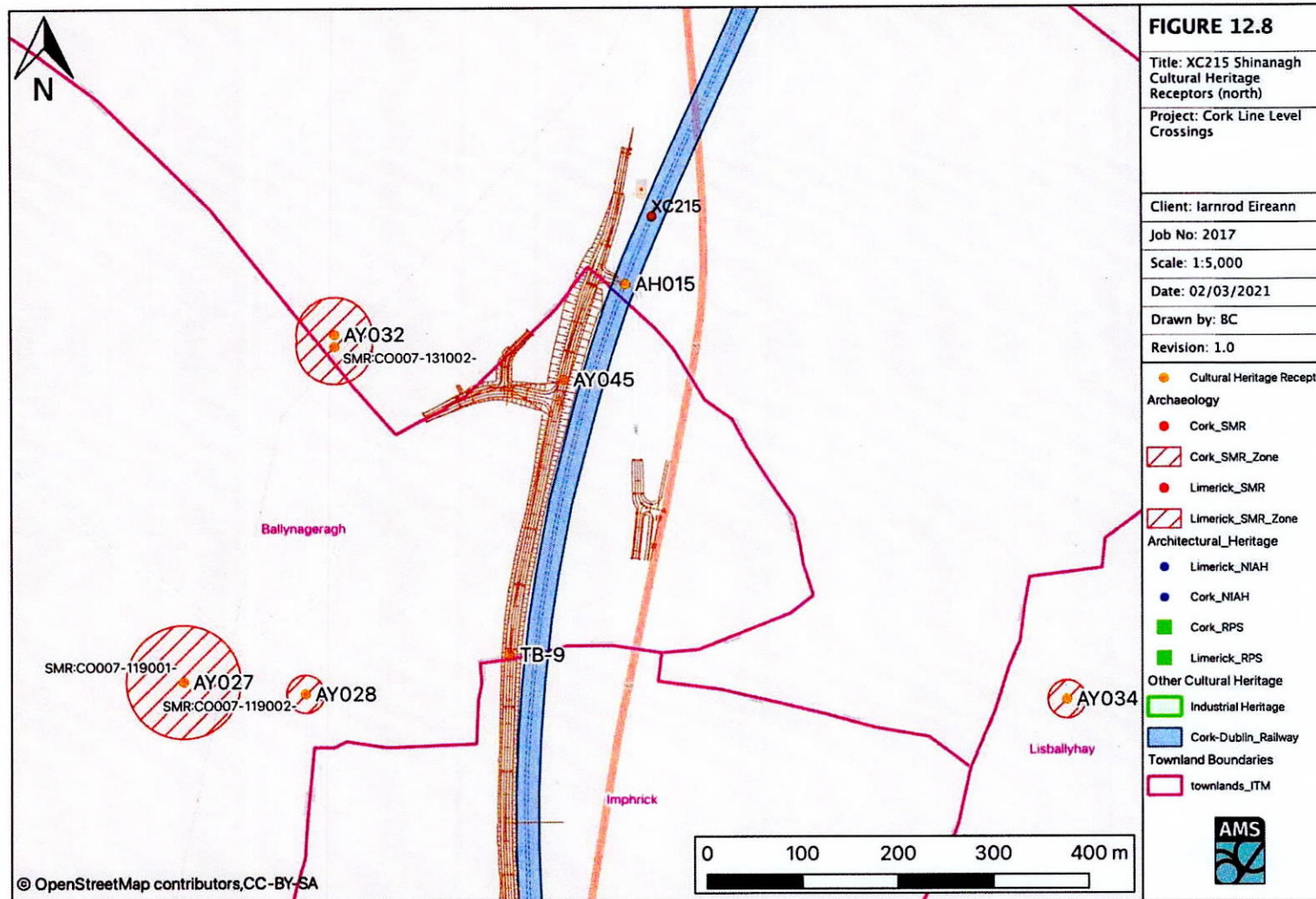


Figure 12. 8: XC215 Shinanagh cultural heritage receptors (north)

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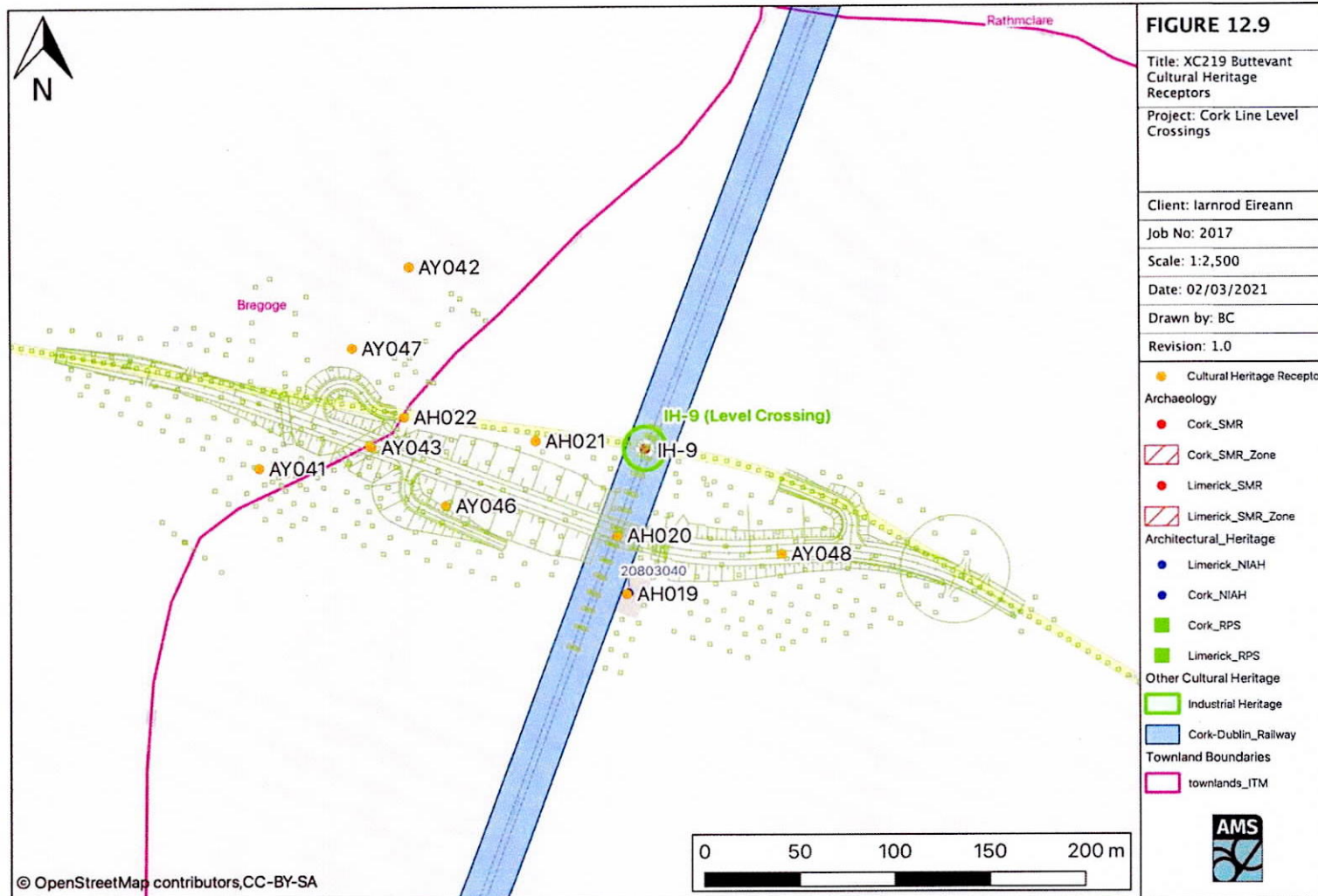


Figure 12. 9: XC219 Buttevant cultural heritage receptors

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ADDENDUM NOTICE SUBMISSIONS 2022

XC212

Submission:

72 Concern has been raised about the "potential for significant cumulative impacts" at Ballyhea village arising from the Project in conjunction with the N/M20 Cork to Limerick Road Improvement Project.

73 This issue has been raised in the submission from the Trustees of Diocese of Cloyne (May 2022).

Response

74 Cumulative effects for cultural heritage are addressed in Section 12.10 of EIAR Volume 3 Chapter 12.

75 The submission includes a map from an information brochure dated March 2022 published as part of the public consultation for the N/M20 project. This is a 500m-wide notional corridor that does not provide sufficient detail to assess potential impacts/effects on cultural heritage at Ballyhea village, including cumulative effects. Furthermore, the proposed Project is more likely to have commenced development prior to the M20 scheme of works.