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Architectural Heritage Impact Assessment Report

For

Proposed Housing at Rockbrae House, Vevay Road, Bray, Co. Wicklow, A98 N9F6

Client: Wicklow County Council



Photograph 1 – Rockbrae House Southeast

Date: 31st March 2025

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**Copies of this report
have been presented
by ACP to:**

Wicklow County Council

Acknowledgements:

Architectural Conservation Professionals acknowledges any information supplied by the Client and information obtained from the Record of Protected Structures (RPS), the National Inventory of Architectural Heritage (NIAH) and record of Monuments and Places (RMP)

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GLOSSARY OF TERMS

1. *ACA*

An Architectural Conservation Area is a place, area, group of structures or townscape that is of special architectural, scientific, social or technical interest, or that contributes to the appreciation of a protected structure, whose character it is the objective of a development plan to preserve - Section 52 (1) (b) of the 2000 Act.

2. *Area of Special Planning Control*

Areas of Special Planning Control provide powers to planning authorities not alone to give protection to the character of certain qualifying areas, but also to enhance that character, that is, to restore it and to require owners and occupiers to conform to a planning scheme – Section 84, of the 2000 Act

3. *NIAH*

The **National Inventory of Architectural Heritage**. The purpose of the NIAH is to identify, record, and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently as an aid in the protection and conservation of the built heritage. NIAH surveys provide the basis for the recommendations of the Minister for Arts, Heritage and the Gaeltacht to the planning authorities for the inclusion of particular structures in their Record of Protected Structures (RPS)

4. *Protected Structure*

A “**protected structure**” is defined as any structure or specified part of a structure, which is included in the Record of Protected Structures. The term “structure” is defined by Section 2 of the 2000 Act to mean ‘any building, structure, excavation or other thing constructed, or made on, in or under any land, or any part of a structure so defined, and where the context so admits, includes the lands on, in, or under which the structure is situate’. – Section 2 (1) of the 2000 Act

5. *Section 57 Declaration*

Section 57 Declaration Owners or occupiers of a protected structure may request a ‘declaration’ under Section 57 of the 2000 Act. The purpose of which is for planning authorities to clarify in writing the kind of works that would or would not materially affect the character of that structure or any element of that structure which contributes to its special interest. Declarations guide the owner as to what works would and would not require planning permission in the context of the protection of the architectural heritage. This is because the character of a protected structure cannot be altered without first securing planning permission to do so.

6. *RMP*

Archaeological sites are legally protected by the provisions of the National Monuments Acts, the National Cultural Institutions Act 1997 and the Planning Acts. The **National Record of Monument & Places (RMP)** is a statutory list of all known archaeological monuments provided for in the National Monuments Acts. It includes known monuments and sites of archaeological importance dating to before 1700AD, and some sites which date from after 1700AD.

7. *RPS*

Record of Protected Structures. A Protected Structure is a structure which is considered to be of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. The Record of Protected Structures (RPS) is a list of the buildings held by a Local Authority which contains buildings considered to be of special interest in its operational area. Section 51 (of the 2000 Act) requires that the development plan



shall include a Record of Protected Structures and that the Record shall include every structure which is, in the opinion of the Planning Authority, of special interest.

8. SAC

Special Area of Conservation are prime wildlife conservation areas in the country, considered to be important on a European as well as Irish level. Most Special Areas of Conservation (SACs) are in the countryside, although a few sites reach into town or city landscapes, such as Dublin Bay and Cork Harbour.

9. SPA

Ireland is required under the terms of the EU Birds Directive (2009/147/EC) to designate Special Protection Areas (SPAs) for the protection of:-

- Listed rare and vulnerable species;
- Regularly occurring migratory species;
- Wetlands especially those of international importance.

Levels of significance – NIAH Definitions 2021

International Significance

Structures of sufficient architectural heritage significance to be considered in an international context. These are exceptional structures that can compare with the finest architectural heritage of other countries. Examples include the Custom House in Dublin and Saint Fin Barre's Cathedral in Cork

National Significance

Structures that make a significant contribution to the architectural heritage of Ireland. These are structures that are considered to be of considerable architectural heritage significance in an Irish context and examples include Ardnacrusha Generating Station in County Clare; Sligo Courthouse; the Carroll Cigarette Factory in Dundalk; Emo Court in County Laois; and Lismore Castle in County Waterford.

Regional Significance

Structures that make a significant contribution to the architectural heritage of their region. They also bear comparison with similar structures in other regions in Ireland. Examples include the Georgian terraces of Dublin and Limerick; the Wikinson-designed workhouses in each county; and the Halpin-designed lighthouses around the Irish coastline. Increasingly, structures that warrant protection make a significant contribution to the architectural heritage of their locality. Examples include modest terraces and commercial buildings with early shopfronts.

Local Significance

These are structures that make a contribution to the architectural heritage of their locality but which do not merit inclusion on the RPS.

Record only

These are structures that are considered to have insufficient architectural heritage significance at the time of recording to warrant a higher Rating.



Penalties for Offences

Architectural Heritage Protection

A Protected Structure and built fabric within its curtilage is protected by law under Part IV of the Planning and Development Act 2000. The penalties for breaches of this Act are severe. Section 156 of the Act states:-

(1) A person who is guilty of an offence under *sections 58(4), 63, 151, 154, 205, 230(3), 239 and 247* shall be liable—

(a) on conviction on indictment, to a fine not exceeding £10,000,000, or to imprisonment for a term not exceeding 2 years, or to both, or

(b) on summary conviction, to a fine not exceeding £1,500, or to imprisonment for a term not exceeding 6 months, or to both.

Monuments and Places included in the Record

Section 12 (3) of the Act provides for the protection of monuments and places included in the record stating that

"When the owner or occupier (not being the Commissioners) of a monument or place which has been recorded under subsection (1) of this section or any person proposes to carry out, or to cause or permit the carrying out of, any work at or in relation to such monument or place, he shall give notice in writing of his proposal to carry out the work to the Commissioners and shall not, except in the case of urgent necessity and with the consent of the Commissioners, commence the work for a period of two months after having given the notice."

A person contravening this requirement for two months notification to the Commissioners of Public Works in Ireland of proposed works at or in relation to a recorded monument or place shall (under Section 13 of the Act) be guilty of an offence and be liable on summary conviction to a maximum penalty of a £1000 fine and 12 months imprisonment and on conviction on indictment to a maximum penalty of a £50,000 fine and 5 years imprisonment.

It should also be noted that Section 16 of the National Monuments (Amendment) Act 1994 amended the National Monuments (Amendment) Act 1987 (the Act of 1987) so that under Section 2 (1) (a) (iv) of that Act **the use or possession of a detection device**

"in, or at the site of, a monument recorded under section 12 of the National Monuments (Amendment) Act, 1994,"

is prohibited otherwise than in accordance with a consent of the Commissioners of Public Works in Ireland granted under the provisions of Section 2 of the Act of 1987.

A person contravening the above provisions relating to use or possession of detection devices shall (under Section 2 (5) of the Act of 1987) be guilty of an offence and be liable (under Section 23 (1) of the Act of 1987) on summary conviction to a maximum penalty of a £1000 fine and 6 months imprisonment or on conviction on indictment to a maximum penalty of a £50,000 fine and 12 months imprisonment.

It should be further noted that under Section 7 (1) (a) of the National Monuments (Amendment) Act 1994 a member of the Garda Siochana may without warrant seize and detain:

"a detection device found in, at the site of, or in the vicinity of a monument recorded under Section 12 of the Act unless the person in possession of the device has a consent of the Commissioners of Public Works in Ireland in accordance with the provisions of Section 2 of the Act of 1987."



1.0 Scope of Study

The subject property is not on the record of protected structures, nor is it listed on the NIAH or NMS database. This report has been prepared following a request by the client to undertake an Architectural Heritage Impact Assessment in conjunction with the proposed planning application for proposed housing at Rockbrae House, Vevay Road, Bray, for the purposes of ascertaining whether the building has potential historic merit. Proposed works are to include construction of two multi unit, multi storey apartment blocks, two storey terraced housing units, carparking, bike spaces, repurposing of Coach House into bin and covered bike storage, new entrance and pedestrianising of the current entrance. Works will also include the demolition and removal of Rockbrae House and gate lodge with associated works to include (but not be limited to) reduction of garden wall heights with full removal of some sections. As Rockbrae House is not a protected structure, this report focuses on whether it has heritage significance and how this building should be treated in light of the findings of the report.

This Impact Assessment aims to provide the following:

- A brief historical overview.
- A comprehensive understanding of the impact of the proposed works.
- Conclusion and Recommendations.

2.0 Method of Study

The following methods and resources were used in establishing the Conservation Impact Assessment of the proposed works.

- The subject site was studied, visited and inspected by a Building Conservation Accredited Surveyor (SCSI and RICS).
- The subject site was studied, visited and inspected by a Chartered Building Engineer.
- The Record of Protected Structures constraint maps and lists (RPS) and the sites were studied.
- The author was supplied with the design proposals that would meet with a view to observing conservation best practice and to consider the impact on the historic fabric.
- The proposals were studied and assessed for their impact.

This report was prepared in accordance with national practice deriving from Architectural Heritage Protection Guidelines for Planning Authorities by the Department of the Arts, Heritage and Gaeltacht 2011 (Appendix B) and International practice from The Burra Charter 2013 (The Australia ICOMOS Charter for places of Cultural Significance)

3.0 Building Survey

The following surveys were undertaken as part of the data gathering process:-

- Inspection of first and last edition OSI maps



- Inspection of client's design proposals
- Visibility survey
- Photographic record of external aspects

4.0 History of the Site/Structure and Vicinity

4.1 Historical background- Brief History

Limited information was uncovered relating to Rockbrae House. Currently it is in the ownership of Wicklow County Council. It was acquired by the authority in 2022 from the Defence Forces. The Defence Forces purchased the property in 1947 and it became the headquarters for the 21 Infantry Battalion and was last home to the F.C.A. before lying vacant for some years (Commandant Bernard (Bryan) Hayden wrote 'History of Rockbrea House H.Q. 21 Infantry Battalion' in June 1984). Before 1947 the property was leased to various individuals, from the year 1875 (Hayden, 1984) when the Earl of Pembroke, a name synonymous with Irish history albeit, not the same heredity as Strongbow, first put the property up for tenure.

In April 2023 the building was damaged by fire.

4.1.1 Historic Maps

The property begins to be recorded on the historic maps generated in the mid-1800s early 1900s. Prior to this, the site was an open field, with a portion at the roadside area occupied by buildings. These were narrow and adjoining and may be seen on First Edition maps early to mid 1800s. In the later maps these buildings have been removed. The later maps also show a roadside entrance and an avenue to Rockbrae House. Ancillary buildings, no longer present today, appear in the Walled Garden and also within the confines of the Coach House walled yard.

The avenue suggests that the house was accessed via the façade facing the road (east), whereas the information on the ground suggests that the main entrance was moved to the north façade. It would appear that over its short life the building was altered to create a different aspect to those visiting the property. The later maps also show that the garden confines were very rigid and angular, and in no way soft or flowing, suggesting that the larger land area was important, perhaps to generate food for the house. The result is that Rockbrae House's attendant grounds were confined with all of the roomier amenities to the front, including the working buildings of the holding.

If one looks at the properties in the general area (Glencourt, Ryecroft House, Newcourt, Loretto Convent, Vevay House etc), most have their working/agricultural buildings to the rear of the main house or behind a large wall to the side of the main house. The designer of this holding appears to have inverted the norms of the time.

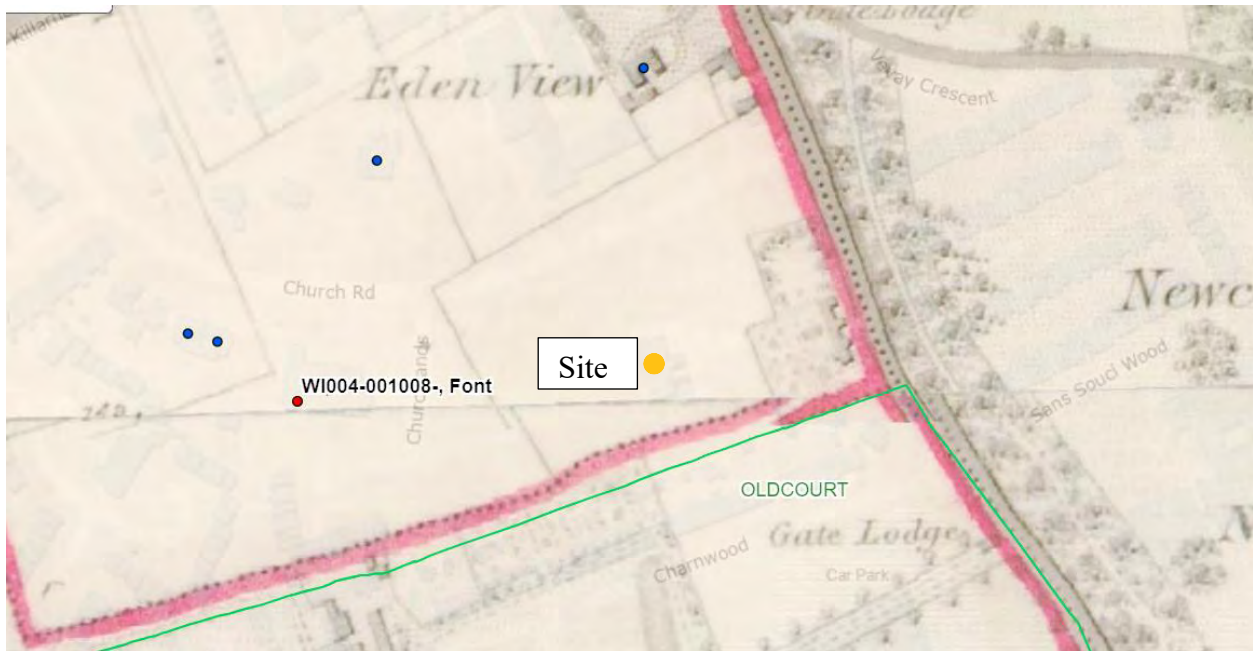


Figure 1 - MapGenie 6 inch First Edition Colour 1829-1842

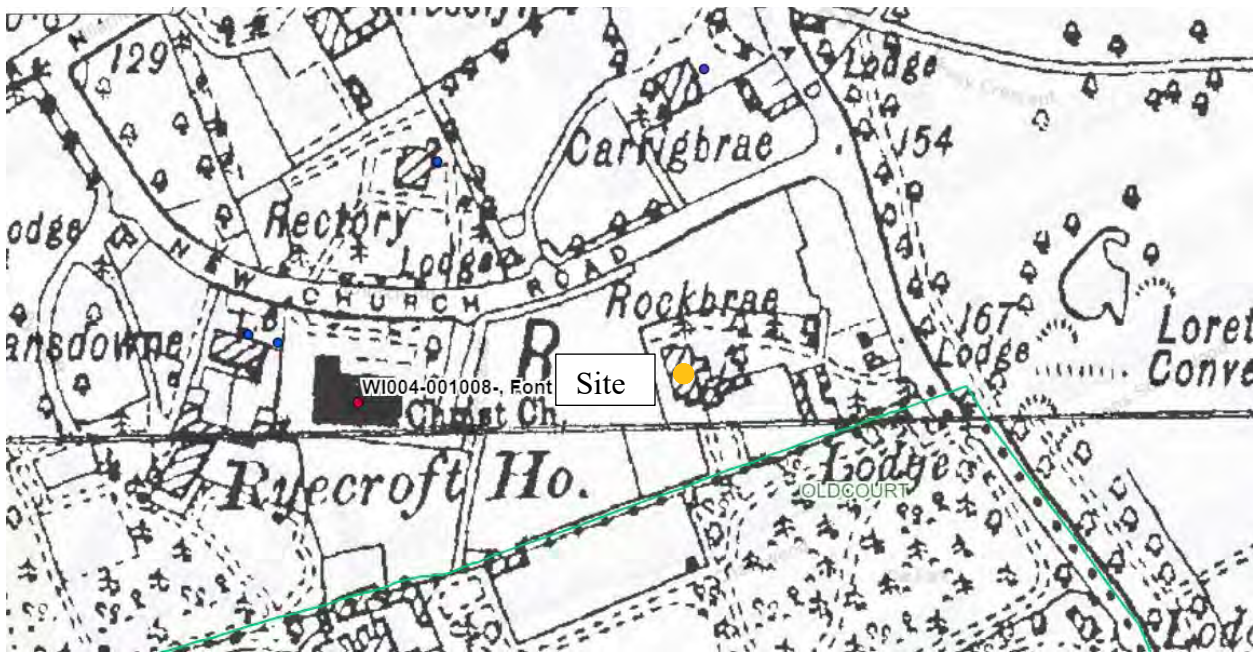


Figure 2 - MapGenie 6 inch Last Edition Black & White (Cassini) mid to late 1800s



Figure 3 - MapGenie 25 Inch 1888-1913

4.2 Protection Status

This building is not a protected structure, nor is it listed on the NIAH nor NMS database.

Protection Status	Y/N	Details
Record of Protected Structures	N	
Architectural Conservation Area (ACA)	N	
Recorded Monument	N	
Zone of Archaeological Potential preservation order	N	
State Guardianship or ownership	Y	
NIAH Building Record	N	
NIAH Garden Record	N	

Table 1 - Protection Status

4.2.1 Protected Structures

Both title documents, Record of Protected Structures, Wicklow County Council Development Plan 2016-2022 and 2022-2028 were examined. The property was not represented. Therefore the building is not a protected structure.

4.2.2 NIAH

The building or its attendant grounds were not represented on the NIAH database.



5.0 Existing Environment

5.1 Existing Development

The existing development is composed of an entrance off the public road with an unoccupied Gate Lodge inside the roadside boundary (northeast of the site). There is a two storey ancillary building, former coach house (referred to hereafter as Coach House), with small accommodations. This Coach House is within its own walled yard its rear façade (west), forms part of the Walled Garden. Again this building is unoccupied and used for storage. The main dwelling is fire damaged and is unoccupied. More details are contained hereunder in 5.3 Site Inspection.

5.2 Proposed Development

As mentioned above the proposed development is for two number apartment blocks, terraced units, ancillary parking, bin storage and a new access road. It is intended by the client that out of the three independent structures on site, the Coach House will remain and will be repurposed as a bin and bike store. The main dwelling is to be demolished and removed from site. It is intended that the space left by the main dwelling will accommodate a multi storey apartment block (Block B) with a second apartment block (Block A) in close proximity. A group of terraced dwellings will be contained within the walled garden. The Gate Lodge and main dwelling, as well as sections of the roadside boundary wall, sections of the Coach House wall and sections of the Walled Garden wall are to be dismantled and removed to allow for the proposed access road to extend from the public road westward towards Block A, and will 't' off to proposed parking spaces between Block A and B.

5.3 Site Inspection

As the proposed development looks to retain the Coach House, this report centres around the structures to be demolished. That is, Main Dwelling, Gate Lodge and roadside boundary. The site was inspected on the 14th March 2025. To prevent further vandalism to the Main Dwelling, Wicklow County Council (WCC) closed off the door entrances and some ground floor windows with ply and Kelly blocks. They deemed the building too dangerous for access. Resultantly the inspection was limited as we were only able to look at those exposed sections that were not barred to us or gated off.

The construction chronology of the building could not be fully established as we were unable to take measurements or open up to investigate further. We did note however that the building appeared to be in two distinct portions; the northern section with a half-hipped projecting gable and decorative timberwork and proportionate window openings, the southern portion had a double hipped roof and windows were of varying shapes and sizes. The render also varied from one side of the building to the other.

As mentioned above the building had suffered assault by fire and the roof had been opened up to prevent smouldering and reignition. The resultant damage from firstly fire and then by water dousing, and consequential exposure to the elements thereafter, has left the building in very poor condition. We are of the opinion that, in the portion of the building whose interior may be seen, much of the decorative fabric was, and is being, negatively impacted on and may, in some cases,



be entirely lost. This can be glimpsed through openings here and there and the photographs hereunder will testify to this.

While it is obvious that the roof is now structurally and permanently damaged, glimpses through openings confirmed that other structural elements e.g. timber lintels and floor supports, have been irrevocably damaged. Generally however, the extent of such damage may only be surmised at this point as without access the report is limited. We were supplied with record photographs by the client taken in 2022. Only the portion of building with the half hipped gable was recorded but photographs are general, with little focus on the recording of decorative elements, or layout.

5.3.1 External – Main Structure



Photograph 2 - Roof damaged by fire.



Photograph 3 - Access door closed off.



Photograph 4 - Gothic style church-like timber fixed pane window.



Photograph 5 - Access to southeast facade restricted.



Photograph 6 - Northern facade. Windows demonstrate absence of ceilings/roof.



Photograph 7 - Showing the decorative fascia to the roof overhang on projecting gable and dormer windows.



Photograph 8 - Rear facade from northwest. Rooms open to the sky.



Photograph 9 - Rear facade taken from the southeast, open roof and partially boarded up window opes.



5.3.2 Internal – Main Structure



Photograph 10 - Inner face of ground floor bay window.



Photograph 11 - Room interior showing collapse ceiling joists.



Photograph 12 - Water damage lath-and-plaster ceiling west facing room.



Photograph 13 - Fireplace features lost to fire.



5.3.3 External – Gate Lodge



Photograph 14 - Gate Lodge front facade. Inappropriate modern interventions used over the years.



Photograph 15 - Rear Facade. Vegetation obscures true condition.



5.3.4 Internal – Gate Lodge



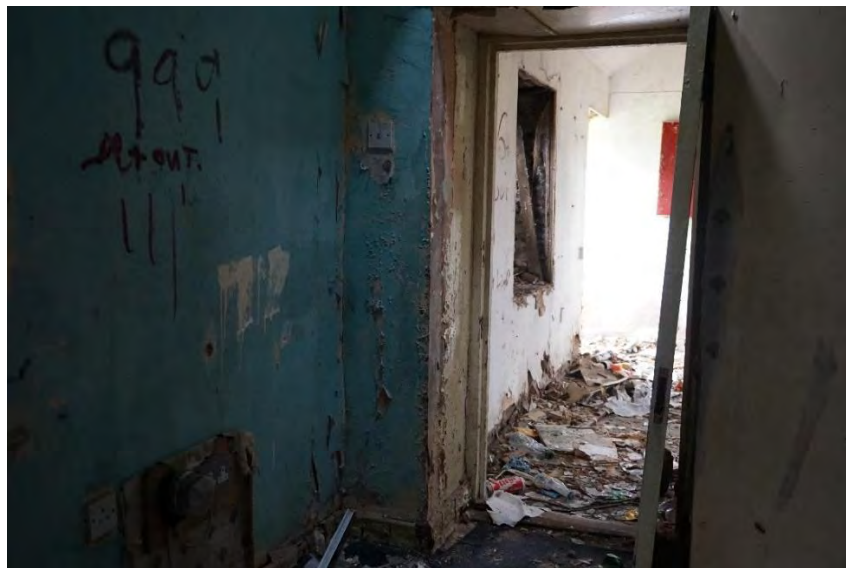
Photograph 16 - Debris, waste and modern interventions obscured much of the original fabric.



Photograph 17 - Indicators of moisture penetration and vegetation growth.



Photograph 18 - concrete blockwork extension to rear. Vegetation and signs of neglect.



Photograph 19 - debris and general long term neglect.



5.3.5 Roadside View – Boundary Wall



Photograph 20 - Concrete blockwork replacement boundary.



Photograph 21 - Main entrance to be adjusted and pedestrianised.



5.3.6 Site side View – Boundary Wall



Photograph 22 - Concrete blockwork replacement roadside boundary.



6.0 Impact Of Proposed Development

As mentioned previously, it is Wicklow County Council's wish to develop the subject site to accommodate residential units and associated amenities and infrastructure. The impact of the proposed development is the removal of the Main Dwelling, the Gate Lodge and a portion of the roadside boundary wall as well as internal garden walls. The Coach House will be retained and repurposed.

6.1 Impact on Main Dwelling:

It is proposed that Block B be situated on the footprint of Rockbrae House. The impact is the demolition and complete removal of the structure including elements underground and unseen. Residential use will be returned to the site.

The Main Dwelling will be permanently lost, however the building does not have the status and protection offered under the Planning & Development Act 2000, as amended, for Protected Structures. The Planning and Development Act, 2000, defines the architectural heritage to be structures or parts of structures which are of Architectural (A), Historical (H), Archaeological (Ag), Artistic (Ar), Cultural (C), Scientific (Sc), Social (So) or Technical (T) interest. We were unable to find evidence of its special interest within the above categories, however the latter may become apparent during the planning/development process, at which point this might be reviewed.

Internal photographs, supplied by the client of the half hipped gable portion of the house, while limited, do not show any features that might be of architectural significance. From an external only viewpoint, it is our opinion that the architectural style is mixed, dividing the building into two distinct offerings. However these styles in isolation or together offer no new understanding.

This is not to say that the building does not have points of interest, however. The treatment of the sand cement/Ordinary Portland Cement render especially around window and door reveals is of high quality and skill. Decorative panelling dividing ground and first floors also show a high level of craft.



Photograph 23 - Decorative sand cement/OPC reveals and panels.



Photograph 24 - Decorative sand cement/OPC reveals and panels.



Photograph 25 - Decorative reveals carried over to the double hipped portion.

Treatment of reveals was used to create a stronger architectural link between the two halves of the building, as similar treatment to reveals migrated to the double hipped portion, but only on the west face. The use of smooth and textured render coats still broadcast a separation, however. Cement render started to become more frequently used from 1910. A difference in render finish, roof style, window proportions/placement may indicate different construction eras, or they may have been used to signify social class separation or a combination of both.

We are of the opinion that the decorative render finishes should be recorded and retained by photograph. We are also of the opinion that materials need to be tested and recorded. See Conclusions and Recommendations hereunder.

6.2 Impact on Gate Lodge:

It is proposed that the main access road to the residential complex be put through the footprint of the Gate Lodge. The impact is the demolition and complete removal of the Gate Lodge structure including elements underground and unseen.

The Gate Lodge will be permanently lost, however the building does not have the status and protection offered under the Planning & Development Act 2000, as amended, for Protected Structures. We were unable to find evidence of its special interest.

6.3 Impact on Roadside Boundary Wall:

It is proposed that a section of the front boundary wall is to be opened to allow a new access to the proposed development, the current access being too narrow to allow increased traffic loading. The impact is the demolition and complete removal of a section of modern concrete blockwork wall to facilitate safe access and egress to the proposed estate.

The roadside boundary wall is of modern construction and does not have the status and protection offered under the Planning & Development Act 2000, as amended, for Protected Structures. We



were unable to find evidence of its special interest. It is modern construction to be replaced by similar, therefore we are of the opinion that there is no impact.

6.4 Impact on walls of Walled Garden and Coach House yard:

It is proposed that a section of the walls to the Wall Garden and Coach House yard be demolished to facilitate the access road, and that where wall sections are isolated due to partial removal of sections, that these isolated sections be reduced in height and used as features and delineations within the new development layout.

Garden walls are a valuable feature in any period property, however these do not have the status and protection offered under the Planning & Development Act 2000, as amended, for Protected Structures. It is our opinion that the architect responsible for the design of the proposed development shows consideration and appreciation of the workmanship and architectural beauty and functionality of these walls, and as such, all effort must be made to ensure that only those sections marked for removal and reduction are to be impacted on, and that the remaining sections are to be retained, with appropriate remediation where necessary. We are of the opinion that impact is minimal.



7.0 Conclusions and Recommendations

In conclusion, while we were unable to find aspects of special interest this viewpoint was restricted due to limited information available and lack of access to the Main Dwelling. However, the remaining fabric of the building, although damaged, potentially contains information on the historic fabric (construction materials), the layout of the house, and possible historic information on the interiors (decoration, styles and materials).

The demolition will result in the complete loss of known and unknown information about the building. We therefore recommend that the building prior to demolition is recorded to ICOMOS standards including sampling of materials such as timber, masonry, mortar, plasters, renders, paint and ironwork. This will enable any items of significance to be recorded so that at some future date, if additional information on the building's significance becomes available, that this information can be used to inform the record of the building.

The following mitigation measures are proposed:

1. Black and White Archival Photographic and High Resolution Digital Record - to be carried out before and during demolition works.
2. All historic fabric scheduled for removal shall be 'Retained by Record ' to ICOMOS standard including a Measured Survey to scale of 1:10 minimum, fabric sampling and testing.
3. All demolition works on site are to be phased to facilitate the recording of the remaining building by the Building Conservation Accredited Surveyor.
4. All works to the remaining historic structures are to specified (specifications and method statements) and supervised by the Building Conservation Accredited Surveyor.



8.0 Signing Off Statement

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Client: Wicklow County Council

Signed:

For ACP Archcon Professionals Limited.

Date: 31st March 2025





9.0 Project References

The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance, 2013.
<http://australia.icomos.org/>

National Inventory of Architectural Heritage

<http://www.buildingsofireland.ie/>

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Irish Architectural Archive

<https://iarc.ie/>

National Monuments Service Ireland

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Galvin, T. (2023) 'Fire destroys former site of Bray Defence Forces HQ', *Bray People*, 12 April.



10.0 Appendices

Appendix 1 Proposed Layout Drawings – Wicklow County Council

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AERIAL VIEW FROM SOUTH EAST



VIEW FROM MAIN ENTRANCE AT VEVAY RD

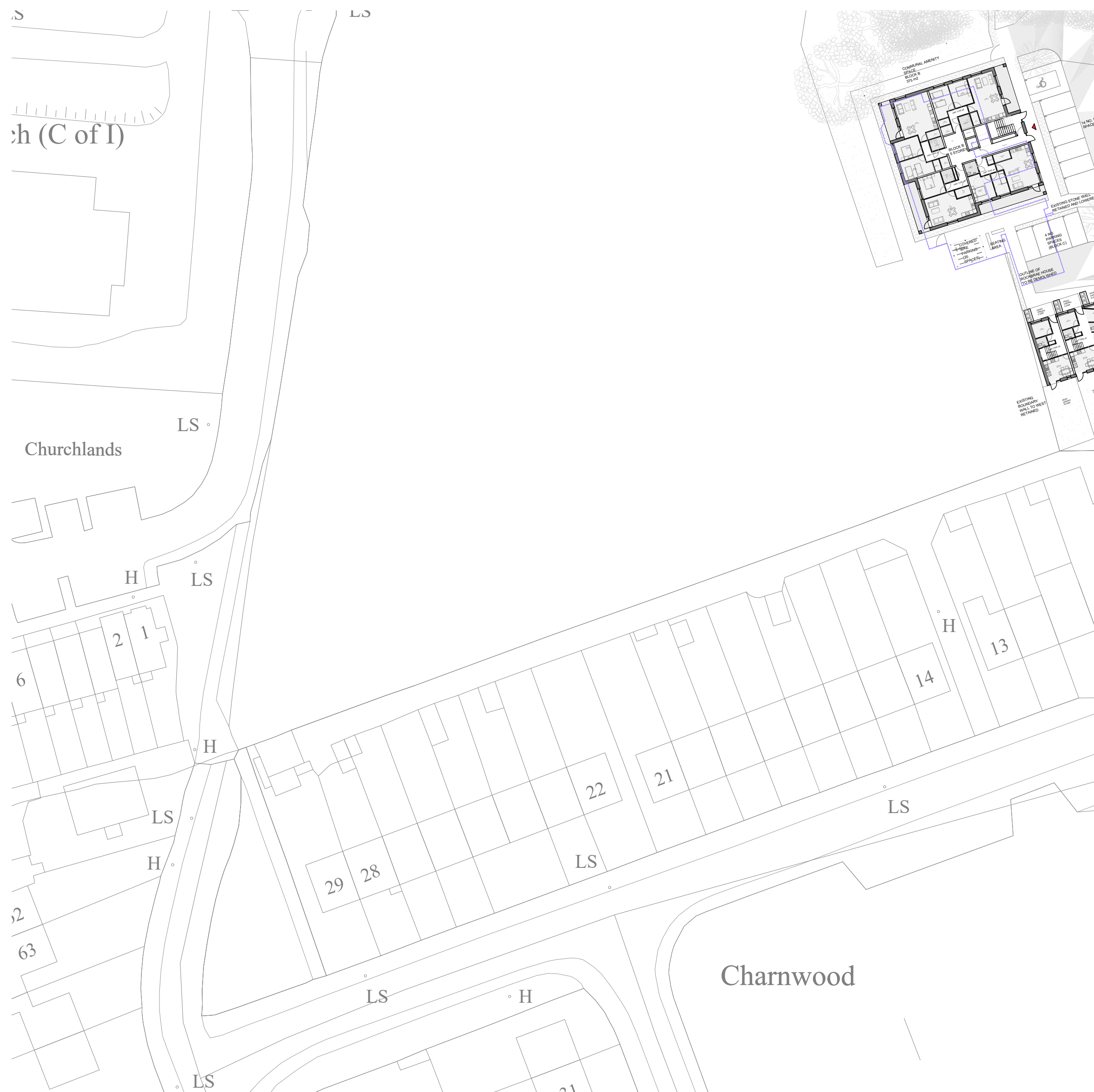
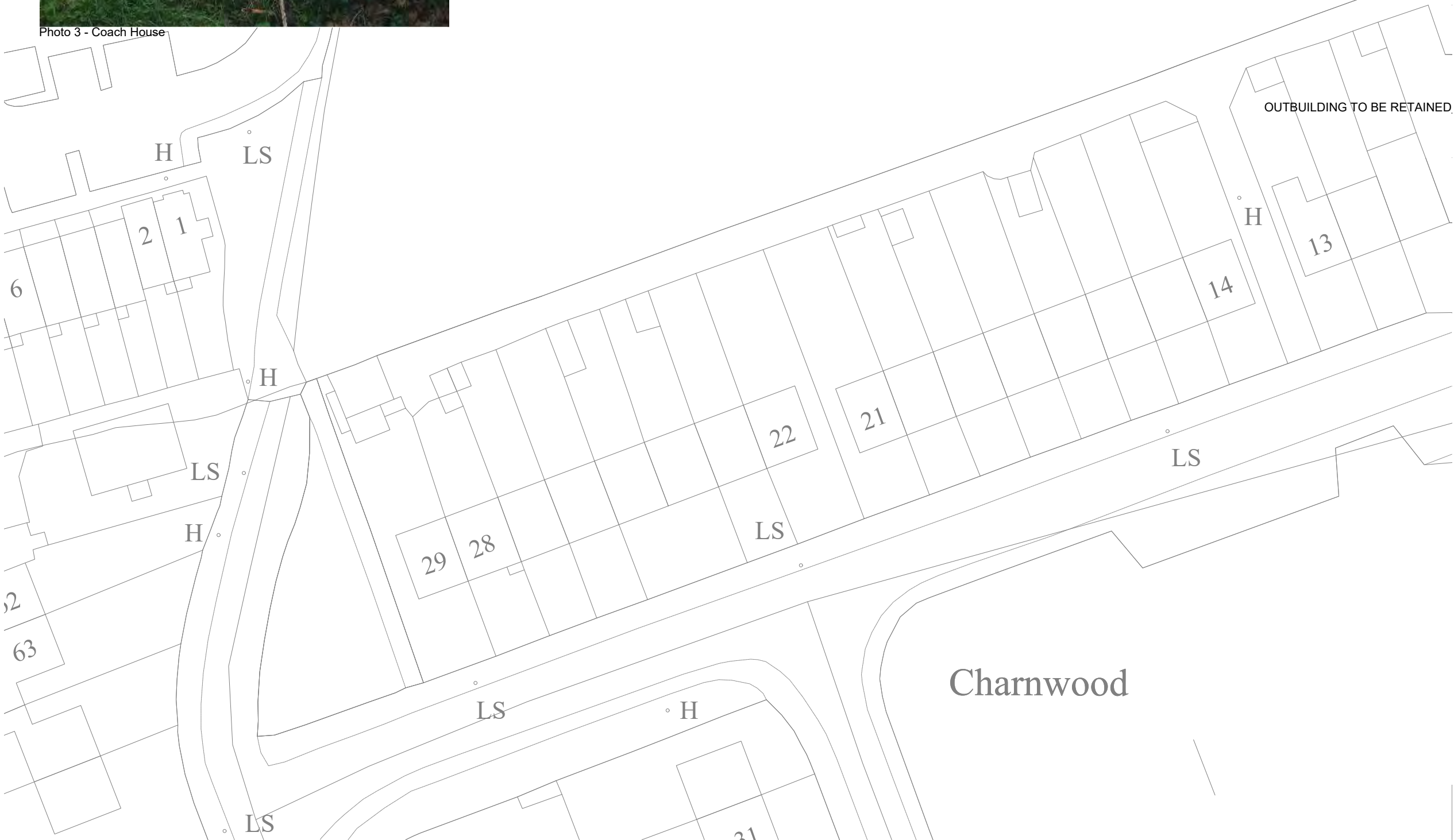
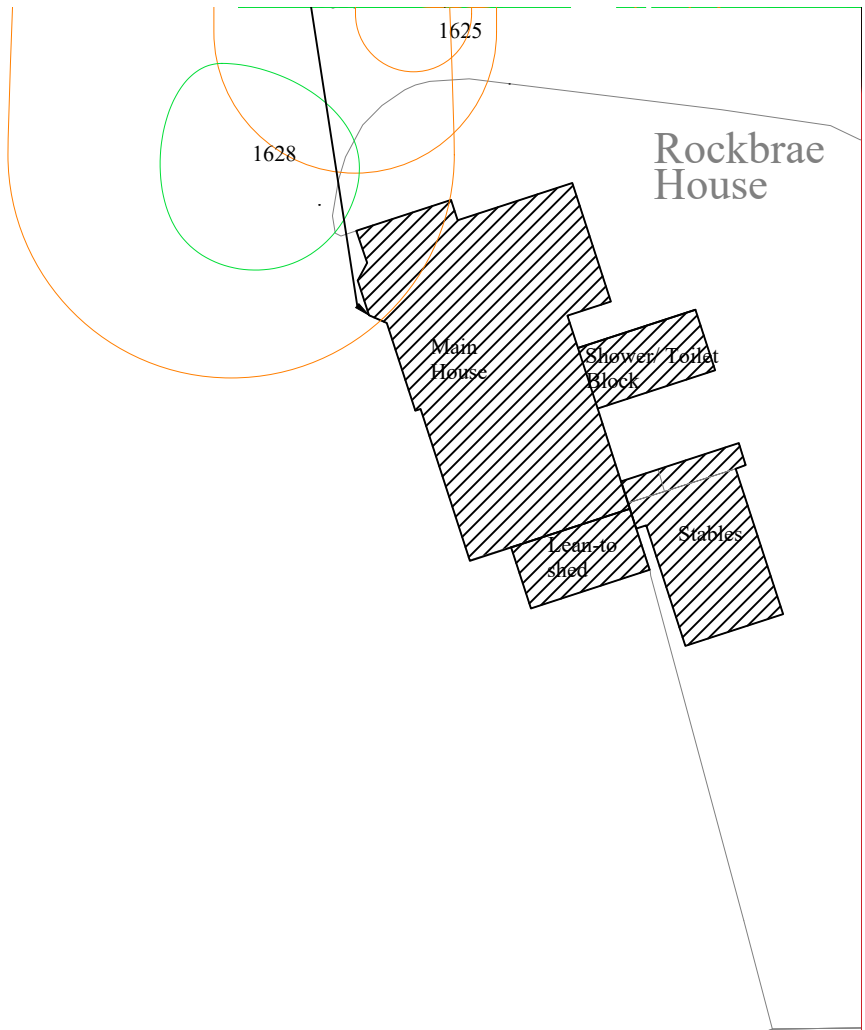




Photo 3 - Coach House







Appendix 2 Photographs pre fire damage – Wicklow County Council



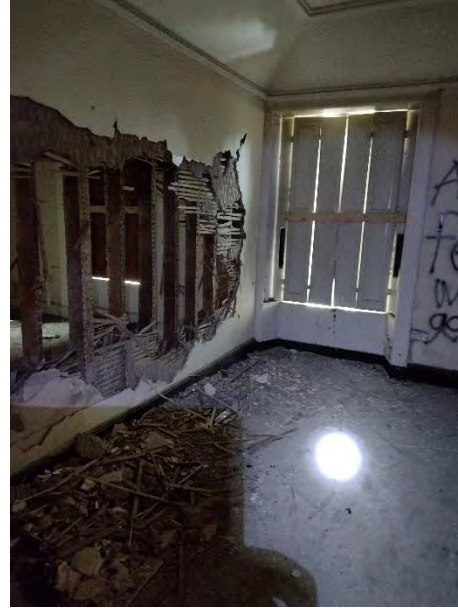
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