

Senior Executive Officer
Planning Department
Kildare County Council
Áras Chill Dara
Devoy Park
Naas
Co. Kildare

Date: 28th September 2017

Re: Celbridge Local Area Plan 2017-2023 (Direction 2017)

Dear Sir or Madam,

The Irish Georgian Society is a membership organisation, which encourages and promotes the conservation of distinguished examples of architecture and the allied arts of all periods in Ireland. These aims are achieved through our education programmes, by supporting and undertaking conservation works, publishing original research, planning participation and fundraising. The Society has had a marked and widely acknowledged impact on the conservation of built heritage in the state and has wide experience of the problems associated with the restoration, repair and maintenance of the fabric of historic property.

The Irish Georgian Society is gravely concerned by the contents of the draft Ministerial Direction issued in respect of the *Celbridge Local Area Plan 2017-2023*, which states that “*In relation to ... The zoning of lands for open space at Donaghcumper located adjoining to the north of the R403 (included in Material Alteration no.8)... The Celbridge Local Area Plan 2017-2023 is not in compliance with guidelines to planning authorities issued by the Minister under S28 of the Planning & Development Act 2000 as amended, specifically the Development Plans Guidelines (2007). The LAP is therefore in breach of S31(1)(c) of the Planning & Development Act 2000 as amended.*”

The Society respectfully submits that, having regard to the international heritage importance of the Castletown / Donaghcumper / St. Wolstan’s historic designed landscapes and having regard to the planning history of the site at Donaghcumper, zoning of lands at Donaghcumper for town centre use would render the *Celbridge Local Area Plan 2017-2023* incapable of implementation and, therefore, in contravention of the duty of the planning authority to secure objectives of the plan under section 15 of the *Planning and Development Act 2000*, as amended, and the core principle of the *Development Plans Guidelines for Planning Authorities: that plans should set realistic objectives that can be secured.* The Society, therefore, suggests that it is correct to materially alter the zoning of the Donaghcumper lands to a zoning for open space as zoning the Donaghcumper lands for town centre use is not in compliance with guidelines to planning authorities issued by the Minister under section 28 of the *Planning and Development Act 2000*, as amended, and is therefore in breach of section 31(1)(c) of the *Planning and Development Act 2000*, as amended.

The Society’s grounds for making this submission are set out in more detail in the sections below.

Town Centre Zoning on Donaghcumper lands is contrary to Section 15 of the Planning and Development Act 2000, as amended, and guidelines to planning authorities issued by Minister under Section 28 of the Planning and Development Act 2000, as amended
Section 15 (1) of the *Planning and Development Act 2000*, as amended, provides that:

“It shall be the duty of a planning authority to take such steps within its powers as may be necessary for securing the objectives of the development plan.”

In discussing this duty, the *Development Plans Guidelines for Planning Authorities* (June 2007) provides:

“Within the terms of its powers, a planning authority has a specific duty to ensure that the objectives set out in the development plan are secured. In this regard, plans should be grounded in financial reality and should set realistic objectives that can be achieved through public, local or private resources. Partnership with the private sector through, for example, PPP arrangements should also be considered. Within two years of making the plan, the manager must report to the elected members on the progress made in achieving the plan’s objectives.”

[Emphasis added.]

Permission for the development of the Donaghcumper lands has been refused numerous times by An Bord Pleanála on the grounds of the likely significant negative impacts on architectural heritage of international importance, on historic landscapes and landscapes of high amenity value and on ecology. The Society considers that An Bord Pleanála’s decision to refuse permission for the development of infrastructure, which would facilitate the development of the Donaghcumper lands for town centre use is considered significant (KCC Reg. Ref. 09/665; ABP Ref. PL 09.236613). Permission was refused, inter alia, on the grounds that:

- *“The Board is not satisfied that the proposed development would not prejudice the sensitive development of Celbridge, including the protection of the setting of buildings of architectural significance in the vicinity, and adversely affect the character and setting of both Castletown House, a protected structure of international importance, and of Donaghcumper House.”*
- *“The proposed development would be unduly close to the River Liffey, would result in an excessive degree of encroachment into the Liffey Valley lands which, as set out in the current Kildare County Development Plan, are significant in terms of landscape character and of high amenity value and sensitive to development.”*

For the reasons outlined in the sections below, it is difficult to see how it would be possible to design a town centre scheme on the Donaghcumper lands, which would not adversely affect the character and setting of Castletown House and Donaghcumper House, particularly through *“the loss of historic parkland, [which] would negatively impact on this designed landscape”* (Ref.: ABP Refusal in respect of ABP Ref. PL 09.233937). However, even if this were possible, An Bord Pleanála’s concerns about development being unduly close to the River Liffey cannot be overcome due to the shape of the site, which is shallowest at the point closest to the existing Celbridge town centre. In short, it would not be possible to develop these lands as part of Celbridge town centre either encroaching in a material way on the River Liffey or fracturing the retail offer of Celbridge into two separate areas. Specifically, adequate set back of new development on the Donaghcumper lands from the River Liffey would negate any potential for town centre development to function in any meaningful way as part of the existing commercial centre of Celbridge and would result in a haphazard, piecemeal and unsustainable form of development.

Indeed, given the physical barrier of the River Liffey and the lack of pedestrian connections, the site itself would not seem to be a suitable choice for town centre development (i.e. retail

/ commercial development) having regard to the sequential approach outlined in the *Retail Planning Guidelines for Planning Authorities*, issued by the Minister under section 28 of the *Planning and Development Act 2000*, as amended, which states:

“Where, following the sequential approach, the consideration of an edge-of-centre site becomes necessary, the applicant and the planning authority must ensure that edge-of-centre sites are within easy walking distance of the identified primary retail area of the city or town... Generally edge-of-town sites should be adjacent to the boundary of the central area but consideration should also be given to the local context, including the function and the character of the site in relation to the city/town centre as well as the ease of movement between the site and the city/town centre in terms of physical linkages and barriers such as any necessity to cross major roads and car parks. A site will not be well connected to a centre where it is physically separated from it by a barrier such as a major road, railway line or river and there is no existing or proposed pedestrian route which provides safe and convenient connection between the new edge-of-centre site and the original city/town centre.” [Emphasis added.]

Development of the Donaghcumper lands for town centre development would also contravene the Core Strategy of the *Kildare County Development Plan 2017 -2023*, which emphasises: *“Protecting local assets by preserving the quality of the landscape, open space, recreational resources, natural, architectural, archaeological and cultural heritage and material assets of the county”*. Town centre development on the sensitive Donaghcumper lands would also contravene numerous provisions set out in Chapter 12: Architectural & Archaeological Heritage of the Development Plan and within the Local Area Plan itself.

Due to the extraordinary sensitivity of this highly constrained site, it was not possible to secure the development of the Donaghcumper lands since it was first zoned for development in 2002, despite numerous planning applications. In circumstances where it has not been possible to secure permission even for enabling infrastructure for development due to heritage and ecological constraints, it cannot be reasonable or realistic to propose an objective for the major development of the highly constrained and sensitive Donaghcumper lands for town centre use. As such, the Society respectfully submits that, having regard to the international heritage importance of the Castletown / Donaghcumper / St. Wolstan’s historic designed landscapes and having regard to the planning history of the site at Donaghcumper, zoning of lands at Donaghcumper for town centre use would render the *Celbridge Local Area Plan 2017-2023* incapable of implementation and, therefore, in contravention of the duty of the planning authority to secure objectives of the plan under section 15 of the *Planning and Development Act 2000*, as amended, and the core principle of the *Development Plans Guidelines for Planning Authorities*: that plans should set realistic objectives that can be secured. The Society, therefore, suggests that it is correct to materially alter the zoning of the Donaghcumper lands to a zoning for open space as zoning the Donaghcumper lands for town centre use is not in compliance with guidelines to planning authorities issued by the Minister under section 28 of the *Planning and Development Act 2000* as amended, specifically the *Development Plans Guidelines for Planning Authorities* and the *Retail Planning Guidelines for Planning Authorities* and, is, therefore in breach of section 31(1)(c) of the *Planning and Development Act 2000*, as amended.

Impact on Castletown’s extended landscape

The Irish Georgian Society’s foremost concern about the proposal to zone the Donaghcumper lands for town centre use relates to the detrimental impact such development would have on Castletown House and its extended landscape incorporating the adjoining Donaghcumper and St. Wolstan’s demesnes.

During the second half of the eighteenth century these three demesnes were the focus of an extraordinary project in landscape design that sought to enhance the setting and appreciation of Castletown house and its parklands through extending its views across the River Liffey and into its neighbouring demesnes. This vision was masterminded by Thomas and Lady Louisa Conolly and achieved through careful collaboration with neighbouring landowners as well as through land acquisitions. John Harris OBE, the leading architectural historian and former head of the Royal Institute of British Architects drawings collection, has noted that the roof of Castletown was designed and used as a platform for the purpose of viewing this extended landscape.

In *Landscape Design in Eighteenth Century Ireland* (Cork University Press, 2004), Dr. Finola O’Kane notes the following:

“Both Thomas Conolly’s list of acquisitions and the design of such landscaping features as the riverside walk reveal that the Conollys’ primary intention was to expand their landscaping vision far beyond Castletown’s demesne wall. The Liffey, which bordered the four estates of Castletown, Leixlip, St. Wolstan’s and Donaghcomper, connected all four into a combined landscape under Conolly control.” (at page 119)

At the centre of their ambitions were major landscaping works undertaken on the banks of the River Liffey that saw the development of a new river walk laid out on two levels. O’Kane describes these works and notably highlights how these survive to this day:

“She (Louisa) designed a route from Celbridge to the Dublin gate with a topographic section carefully moulded to expose riverside vistas of new and existing buildings.” (at page 64).

“Louisa developed a sequence of views leading from the pond eastwards past the bathing house, the ice house, the tower, abbey and gate of St. Wolstan’s and terminating at the Batty Langley Lodge... This walk is substantially intact today. Its upper level still commands long distance views back to the house, towards the follies and out to the neighbouring country houses of St. Wolstan’s and Donaghcomper” (at page 65; emphasis added)

The symbiotic relationship of these demesnes is further explored in the Kildare County Council commissioned report *Designed Landscape of Castletown Celbridge and Adjacent Demesnes* (Dr. Finola O’Kane & Dr John Olley, 2006, UCD School of Architecture, Landscape and Civil Engineering).

In this report O’Kane and Olley note that *“the entire valley landscape was composed and controlled through uniting the design efforts of various estates - a greater whole was formed from the sum of the parts”* (at page 4). They state that:

“...this composite landscape design is of considerable significance and should be awarded all due protection, recognition and public dissemination” (at page 28).

The development of a new town centre on the lands at Donaghcumper would undoubtedly compromise the character and setting of this great extended landscape and would have a notable detrimental affect on key sections of the riverside walk laid out by Lady Louisa. The development of a new town centre would forever compromise one of Ireland’s greatest eighteenth century landscapes.

The Irish Georgian Society also wishes to note that this development would undermine ongoing initiatives by the Office of Public Works to restore the riverside walk as one element of an

overall plan to greatly enhance the visitor's experience of Castletown and its demesne. Should a new town centre be developed at Donaghcomper, this element of the OPW's plans would be compromised as the carefully planned landscape views designed by Lady Louisa would be forever lost.

Impact on Donaghcomper and its demesne

Independently of its impact on Castletown, the Irish Georgian Society is also highly concerned about the affect that a new town centre would have on Donaghcomper house and its demesne. Donaghcomper dates originally from the eighteenth century but was remodelled in a Tudor-Revival style by William Kirkpatrick c. 1835. Today the house retains its extensive parklands and, along with its demesne, is included in the Record of Protected Structures for Co. Kildare.

In their report *Designed Landscape of Castletown Celbridge and Adjacent Demesnes*, O'Kane and Olley describe the evolution of the designed landscape at Donaghcomper in the context of Taylor's map of 1783 and the Ordnance Survey maps of 1840 and 1900. In doing so they present an inventory of significant landscape features including riverside and boundary walks and also describe the house and its associated buildings ("*a very complete ensemble of great importance*", at page 20). The demesne structure is summarised as follows:

"This substantial area of land is still appreciable and intact as a demesne, with its characteristic demesne wall, boundary and other plantations, circulation system, stables and farm buildings, kitchen gardens, parkland and fields." (at page 19)

In identifying the significance of the Donaghcomper demesne in its own right, the Irish Georgian Society is of the opinion that the O'Kane and Olley report provides sufficient reason to protect the demesne as a whole from development. Indeed, the report recommends that "*key areas of the Donaghcomper demesne would warrant ACA (Architectural Conservation Area) designation*" (at page 32).

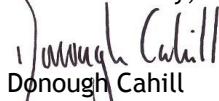
Conclusion

The research works undertaken by of Dr. Finola O'Kane and Dr. John Olley through the Kildare County Council commissioned report *Designed Landscape of Castletown Celbridge and Adjacent Demesnes* and through Dr. Finola O'Kane's *Landscape Design in Eighteenth Century Ireland* clearly demonstrate the significance of the Castletown, Donaghcomper and St. Wolstan's extended designed landscape.

The Irish Georgian Society is strongly of the opinion that the development of a new town centre in Donaghcomper would have a wholly negative and irreversible impact on the character and integrity of this landscape which must be considered as one of the most important surviving designed landscapes in the country.

In light of this, the Irish Georgian Society urges Kildare County Council to proceed with Material Alteration No. 8 changing the zoning of the town centre (Objective A) site at Donaghcomper to Objective F2: Strategic Open Space in the *Celbridge Local Area Plan 2017-2023*, which is in line with the Planning Authority's obligations under the *Planning and Development Act 2000*, as amended, including the requirement to have regard to guidelines issued by the Minister under section 28 of that Act.

Yours sincerely,



Donough Cahill

Executive Director, Irish Georgian Society