Conserving Ireland's Architectural Heritage

Irish Georgian Society

An Bord Pleanála
64 Marlborough Street
Dublin 1

Date: 25th September 2017

Re: Application by South Dublin County Council to An Bord Pleanála under Section 175(3) of the Planning and Development Act 2000, as amended, for approval of the proposed 'Dublin Mountains Visitor Centre' development at Coillte's Hell Fire and Massy's Wood forest properties (totaling c.152 ha) in the townlands of Mountpelier, Killakee and Jamestown in South Dublin. Development is also proposed along stretches of the R115 and R113 regional roads connecting the site to the urban area of Woodtown and Ballycullen to the north.

An Bord Pleanála Ref.: PL06S.JA0040

Dear Sir,

The Irish Georgian Society of City Assembly House, 58 South William Street, Dublin 2 wishes to make this addendum submission on the application by South Dublin County Council to An Bord Pleanála under Section 175(3) of the Planning and Development Act 2000, as amended, for approval of the proposed 'Dublin Mountains Visitor Centre' development at Coillte's Hell Fire and Massy's Wood forest properties (totaling c.152 ha) in the townlands of Mountpelier, Killakee and Jamestown in South Dublin (ABP Ref. PL06S.JA0040). This submission is made in addition to the previous submission as lodged with An Bord Pleanála on Friday, 22nd September 2017. To that end, we enclose payment in the sum of €50.00, as payment of the submission fee.

Addressing the issue of traffic and parking; the stabilising of the structure of the so-called Hell-fire club; and the replacement over time of the monoculture conifer plantations with broadleaf managed under a regime of continuous canopy are welcome outcomes. The benefits to ecology and hydrology are apparent, not to mention potential aesthetic and amenity gains. However, whilst the proposed development contains aspects that are highly commendable, the Society has grave concerns about aspects of the proposal and considers that the subject application represents a lost opportunity.

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Chapter 3 of the EIA Report, at Objective 4, states that it is an objective of the proposed development ***"To reveal, interpret and protect the Dublin Mountains landscape, natural, cultural and archaeological heritage assets".***

In the light of this statement, it is surprising that nowhere within the EIA Report is there anything resembling an historic landscape assessment. In its absence, it is difficult to reveal, interpret and protect this cultural landscape that the project has failed to investigate in an appropriate manner. Thus, the design has singularly failed to be informed by the cultural assets of this landscape. The rhetoric of the planning documentation gave great importance to the significance of the landscape into which the development is to be inserted.

Indeed, the site for development sits within a palimpsest of designed landscapes emerging from distant antiquity through the eighteenth and nineteenth century. Because of the prominence and prospect that this place commands, these landscapes in their turn used and engaged with the wider landscape. Within chapters 11 and 12 of the EIA, "Archaeology and Cultural Heritage" and "Architectural Heritage" respectively, the discussion is almost entirely a catalogue of individual items. This proposed development is a landscape project in itself. Its ambition to reveal and interpret this very landscape (which is far from a *tabula rasa*) should engage with its history and assets and the proposed design be informed by a thorough understanding of its significance.

It is, therefore, entirely appropriate and, indeed, necessary, that an historic landscape assessment should form part of the EIA and have been carried out prior to the design of the project. It appears from the statements made in the EIA that the majority of the field work associated with chapters 11 and 12 in addition to that informing the "Landscape design and Reports" including the tree survey was carried out at a very late stage of the design and certainly after the final round of public consultation.

Specifically, failure to adequately and accurately assess the significance of a historic landscape can both undermine the integrity of that historic landscape and threaten the setting of structures and sites of heritage importance within and adjoining that landscape. Set out below are examples from the EIA Report that illustrate this.

<u>The Hell-Fire Club</u>

Section 12.3.1 of the EIS begins: *"Between 1723-5, William Connolly (sic) purchased a considerable amount of land and estates from the Duke of Wharton, including Rathfarnham Castle and Montpelier Hill..".* The section then goes on to speculate that the site of the Hunting Lodge (The Hell-Fire Club) built in 1725 was sited so that it would be possible to see both Rathfarnham Castle and Castletown House from the lodge. Whereas it is possible to see Castletown from that locality, there is no designed relationship to the principal spaces of the interior or the form that it would have presented to views to and from Castletown. However, it was clearly related to Rathfarnham Castle. The hunting lodge presents its principal façade and rooms to Rathfarnham. The lodge is on axis which the castle and, thus, could have been seen from the long gallery. The current height of trees along Grange Road, Rathfarnham now obscure the view, although it can still be seen from the floor above and the roof of Rathfarnham Castle (see Fig 1).

Figure 1: View of the Hell Fire Club from Rathfarnham Castle

Furthermore, Mountpelier Hunting Lodge is conspicuous on the skyline in the painting "View of Rathfarnham Castle" by Thomas Walmsley's (1763-1806) that currently hangs in Castletown House, Celbridge (Fig 2)

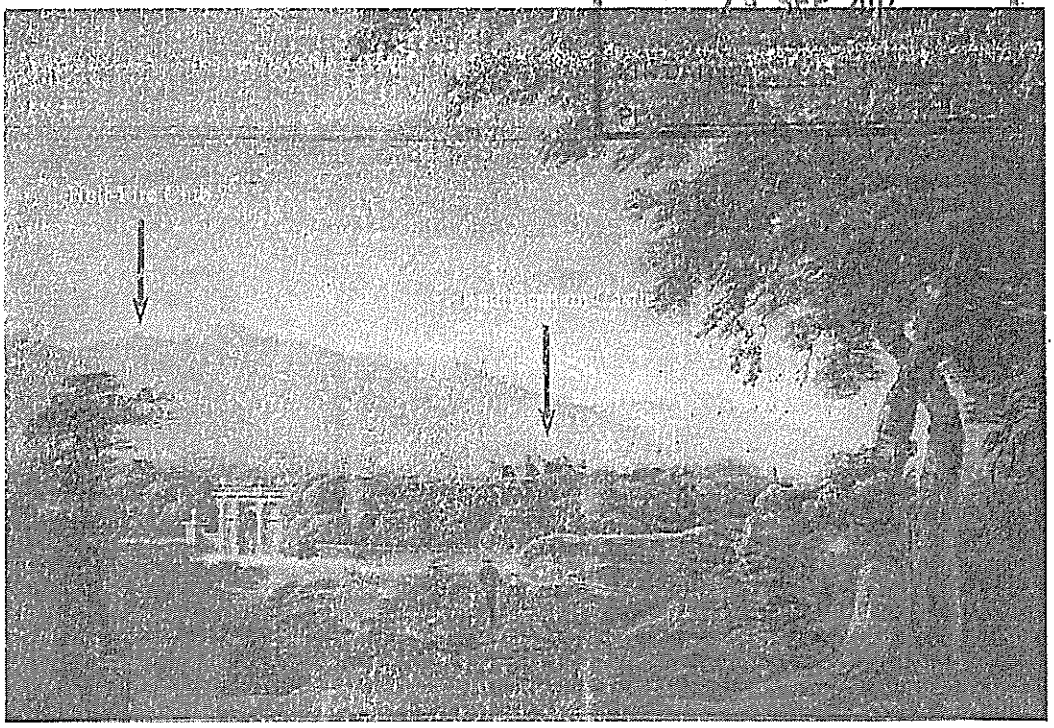

Figure 2: "View of Rathfarnham Castle" by Thomas Walmsley's (1763-1806)

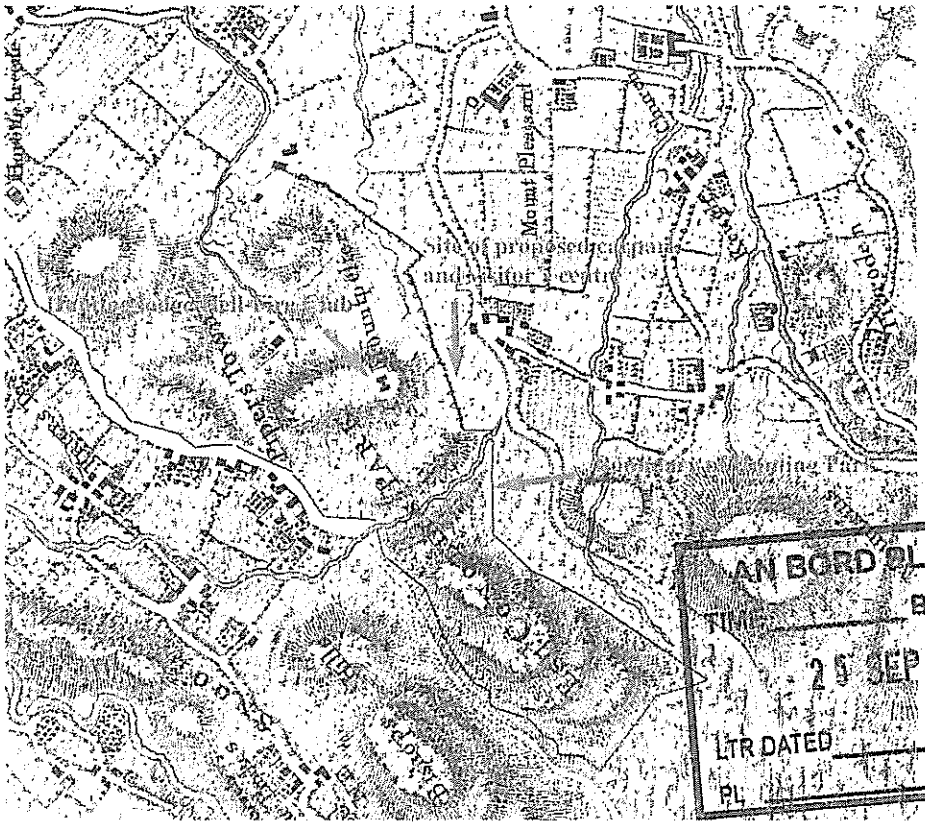

Figure 3: Annotated Extract from John Rocque's An Actual Survey of the County of Dublin (1760)

The 1760 Rocque map of County Dublin (Fig 3), which is not referred to anywhere in the EIA Report, shows the hunting lodge on Mountpelier Hill. In addition, it shows most of the enclosure of what was possible a hunting/deer park and it is labelled "Esq. Conolly's Park". It is likely that the boundary of the Park was substantial. The line of the boundary intersects the area of the car park and the site of visitor's centre of the proposed development.

Aside from the obvious consequences of failing to correctly interpret the design of the historic landscape on the integrity of the landscape, the use of inaccurate information in preparing a design response for the setting of buildings of high architectural heritage significance (e.g. the Hell Fire Club, Rathfarnham Castle and Castletown House) and sensitivity has the potential to result in considerable negative impacts on those structures.

<u>Massy Estate</u>

The Society notes that the papers of the Massy Estate, which are extant, have not been consulted in the preparation of the relevant chapters of the EIA Report and other documents accompanying this application.

The demesne of the Massy estate was a 19th century designed landscape. As such, it would have been an extension of the plan of Killakee house, to be experienced through all the senses as one inhabited outside spaces or moved along walks or rides. In the 19th century, house and landscape often were a single coherent design. The design of a demesne involved the configuration of the structure of the site and planting to elaborate and enhance the natural setting. Rivers, watercourses and features, hills, valleys and mountains were all engaged and embraced, whether as framed views or as elements within the designs.

There has been no attempt within the tree survey, and the relevant chapters of the EIA Report to understand the part of the designed landscape of Killakee House that runs along the Glendoo River. Contained in this area are the structures of the walled gardens, the rustic bridges and walks but questions remain unresolved:

- What was the historic planting?
- How did it contribute to the choreographing of the journey along the walks, concealing, revealing and framing the built structures of the bridges etc. and the cascades along the river as well as views of the hills and wider valley?
- What of this design is still extant?
- What has been obscured by self-seeded trees and scrub?
- What could be recovered by judicious interventions?

All these and other questions remain unanswered within the EIA Report and within the design in order to achieve the major aim of the proposal *"to reveal, interpret and protect the Dublin Mountains landscape, natural, cultural and archaeological heritage assets"*. An answer to these and other questions may have been informed by consulting the Massy papers.

Whereas chapter 12 of the EIA Report acknowledges the site of the Turner Glasshouse in the principal walled garden, the drawing 16508-2-103 of the Landscape design drawings erroneously labels the site of later glass houses as the Turner structure and suggests clearing scrub to reveal the remains; whereas the paving and the plan footprint of the Turner house is to remain under scrub and self-seeded trees.

Furthermore, given that the ground at the upper, southern end of the principal walled garden is 4 meters above the height of the wall at the north end, it would seem likely that views beyond the garden to features of the wider landscape would have been significant in the vista along the axis of this pleasure garden to the magnificent Turner glasshouse.

Conclusion

In conclusion, the Irish Georgian Society submits that the proposed development at Coillte's Hell Fire and Massy's Wood forest properties (in the townlands of Mountpelier, Killakee and Jamestown in South Dublin (ABP Ref. PL06S.JA0040) has the potential to result in a significant negative impact on the architectural, archaeological and cultural heritage of the area and to compromise the integrity of the historic and designed landscapes described above. The Society further submits that it is critical that any development of these lands be informed by a comprehensive assessment of the sensitivities and significance of the historic landscapes and of a thorough assessment of the impact of the development of these historic landscapes on architectural, archaeological and cultural heritage on the setting of the numerous protected structures within and neighbouring these lands.

Please do not hesitate to contact us if we can be of any further assistance.

Yours faithfully,

Donough Cahill

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Executive Director IGS