

Date: 19/09/2022
Your Ref: SD22A/0322
Our Ref: DS-DS-A220909-0002

The County Secretary
Dún Laoghaire-Rathdown County Council

Re: Application by Rathgearan Ltd for the demolition of all existing derelict structures on the site and the construction of 18 residential units provided in 2 separate blocks; Block 1 will be 3 storeys high and will contain 12 units; Block 2 will be two storeys high and will contain 6 units; The 18 units consist of 6 one bed apartments, 6 two bed apartments, 3 three bed duplexes and 3 three bed apartments; Ancillary development including reusing existing vehicular access/egress off Hazelhatch Road, providing a new vehicular egress (only) onto Main Street, car and cycle parking, open space, landscaping, boundary treatment (including existing stone wall at east side of the site to be partially removed, along with gates, with main portion of wall repaired and lowered), footpaths, circulation areas and all associated site works at lands at former McEvoy's Pub, Main Street, Newcastle, Co. Dublin.

A Chara,

We refer to the Council's notification in relation to the above-proposed development. Outlined below are the archaeological recommendations of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage.

Having appraised the Archaeological and Cultural Heritage Impact Assessment (ACHIA) report and the Visual Impact Assessment (VIA) report and undertaken an inspection on 19/09/22, the following is the response of the National Monuments Service (NMS) of the Department of Housing, Local Government and Heritage (DHLGH).

Refusal of planning permission is recommended, on archaeological and built heritage grounds, for the current proposed development.

The Department is fully supportive of meeting the current housing needs within the State, but nevertheless must review particular proposals having regard to their heritage impact. We would be happy to consider, however, any revised proposal should the applicant wish to resubmit one, having taken on board our archaeological and built heritage concerns as outlined in this response.

It is noted that the proposed development is within the Zone of Archaeological Notification (ZON) for the following archaeological monument that is listed in the Record of Monuments and Places (RMP): DU020-003--- Village. Additional archaeological monuments within this ZON include, but are not limited to, the following RMPs: DU020-00301- Motte, DU020-00302-

Church and Graveyard, DU020-003003- Cross, DU020-00304- Tower house, DU020-00306- Tower house possible site.

The NMS is in receipt of a report titled *Archaeological and Cultural Heritage Impact Assessment of a proposed apartment development at Newcastle North, Newcastle, South Dublin County* by Dr Charles Mount and a report titled *Visual Impact Assessment concerning 18 Unit Residential Development on lands at Former McEvoy's Pub, Newcastle, Co. Dublin* by David Mulcahy Planning Consultants Ltd.

The proposed development area is in Newcastle, a landscape rich in medieval archaeological remains, but which a recorded monument, RMP No. is itself DU020-003- Village. According to the National Monuments Service's Historic Environment Viewer accessed via www.archaeology.ie:

Newcastle was first mentioned as a royal manor in 1215 and had borough status by the late fifteenth century. The settlement was a linear one based on a single street, running east-west. The marketplace was located in the roughly sub-triangular space in front of the church.

The proposed development is partially within the area of the 'marketplace' that is now known as the Fair Green / Village Green.

There are five other recorded monuments within the immediate area of the proposed development site. One of these monuments, RMP No. DU020-00301- Motte, is within the same field as part of the proposed development.

According to the Newcastle Local Area Plan:

(the) motte, which is dated to circa 1200 AD, is located within walled grounds beyond the Village Green to the north of Main Street and near Hazelhatch Road on the western side of the village. The Motte is the only surviving example of such a monument within a former royal manor in County Dublin. It is thought that the lordly residence and administrative centre for the Manorial settlement of Newcastle-Lyons occurred either on or near the Motte, which may have remained in use until the advent of the tower house.

A previous planning application (South Dublin Planning Ref. SD06A/0026) at this site was Refused permission by An Bord Pleanála:

Having regard to the location of the site in a prominent position with extensive road frontage, within an Area of Archaeological Potential and in close proximity to protected structures and a motte which is a recorded monument, it is considered that the excessive scale and design of the proposed development, including carparking, would constitute overdevelopment, would be an inappropriate form of design in the area, would adversely affect the character, heritage value and setting of the protected structures and would conflict with the objectives of the current Development Plan for the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

Having considered the above and our own assessment of the proposed development, the following sets out the main areas that support the Department's recommendation for Refusal:

1. Negative Impact on Particular Monuments and the wider Archaeological Landscape

- The proposed development is partially within the Fair Green, a constituent part of the recorded monument RMP No. DU020-003--- Village.
- Of the other recorded monuments within the immediate area of the proposed development, the setting and visual amenity of the recorded monument RMP No. DU020-00301- Motte and RMP, will be directly impacted by the proposed development.
- The development as currently proposed will have both a visual impact and physical impact on the historic fair green which is an integral part of recorded monument RMP DU020-003--- Village.

2. Submitted documentation is insufficient

- The physical impact of the proposed development on the Fair Green of the recorded monument RMP No. DU020-003--- Village is not considered in the ACHIA report.
- The impact of the proposed development on the setting of the recorded monument RMP No. DU020-00301- Motte is not considered in the ACHIA report. It is claimed in the report that *'the existing buffer to the Castle – motte (RMP DU020-00301- will remain and there will be no impact on the setting of the monument'* (pp 26). The Department disagrees with this statement for the following reason -
- The impact of the proposed development on the setting of the recorded monument RMP No. DU020-003001- Motte is not considered in the VIA report.

3. Proposed Development is Contrary to the Policy and Objectives of the South Dublin County Council Development Plan 2016-2022 and the Newcastle Local Area Plan (adopted until 9th December 2022)

South Dublin County Council Development Plan 2016-2022

- UC3 Objective 1:

To protect and conserve the special character of the historic core of the traditional villages and ensure that a full understanding of the archaeological, architectural, urban design and landscape heritage of the villages informs the design approach to new development and renewal, in particular in Architectural Conservation Areas (ACAs)

- UC3 Objective 2:

To promote design standards and densities in traditional village centres, that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale and external finishes.

- HCL2 Objective 2:

To ensure that development is designed to avoid impacting on archaeological heritage that is of significant interest including previously unknown sites, features and objects.

- HCL2 Objective 3:

To protect and enhance sites listed in the Record of Monuments and Places and ensure that development in the vicinity of a Recorded Monument or Area of Archaeological Potential does not detract from the setting of the site, monument, feature or object and is sited and designed appropriately.

It is an objective of the Newcastle Local Area Plan:

- That development at the western end of Main Street contributes to the establishment of a Historic/Cultural quarter and enhances the views and setting of upstanding monuments. Development in the Historic/Cultural quarter shall incorporate built and natural heritage features wherever possible including archaeological features discovered during archaeological investigation. **(Objective LUD4)**

It is an objective of the Newcastle Local Area Plan:

- Development of the former public house site at the north-east corner of the junction between Main Street and Hazelhatch Road shall include a sensitively designed gateway feature that announces the approach into Newcastle and its Historic/Cultural quarter. This could include for the incorporation of elements from the former public house structure and any archaeological material found on site. Development of this site shall be sensitive to the setting to the Motte and Saint Finian's Church of Ireland Church and should incorporate views of the Motte and Church, where possible, within the buildings overall design setting. **(Objective LUD5)**

Concluding Remarks

This Department has real concerns on archaeological and built heritage grounds to the development as is currently proposed. There will be a direct negative impact to the Fair Green that will fundamentally alter the Fair Green, which forms an intrinsic and significant part of the recorded monument RMP No. DU020-003--- Village.

There will also be a negative impact on the setting of the recorded monument RMP No. DU020-00301- Motte. The submitted ACHIA and VIA reports are insufficient in clarity, mitigation strategies and in considering the cumulative impacts of the proposed development; finally, the proposed development is contrary to certain heritage Policy and Objectives as outlined in the current South Dublin County Development Plan 2016-2022 and the Newcastle Local Area Plan (adopted until 9th December 2022).

For the reasons outlined above, it is the considered opinion of this Department, on archaeological and built heritage grounds, that a grant of planning for the development as currently proposed be REFUSED.

The National Monuments Service of this Department will be happy to consider any new design proposals that are submitted, and which consider fully, and integrate within the design proposal, the archaeological heritage and cultural integrity of the village of Newcastle and its surrounding recorded monuments.

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