



Planning Ref: 2460882

09 December 2024

Planning Department,
Meath County Council

Dear Sir/Madam

Re: 2460882 Demolishing Kell's Medical Centre, Innisfree (a former public house), and all ancillary buildings on the site. It will be replaced with a new medical centre on the ground floor, with apartments on the first and second floors, which include six one-bedroom apartments, along with all associated and ancillary site development works at Church Street, Kells, Co. Meath.

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council has significant concerns regarding this application. The application seeks to demolish two existing properties within an Architectural Conservation Area [Kells Historic Core ACA]. The properties earmarked for demolition are of historic character but more importantly reflect, and are part of, the *"modest yet elegant streetcapes of the historic core of Kells"*, which are generally *"composed of two storey late Georgian buildings, but with some nice doorcases and interesting shopfronts"*. Furthermore, the development is immediately adjacent to Saint Columba's Church and St. Columcille's Church and several other national monuments listed on the Sites and Monuments Record, including Kells round tower. The Medical Hall property is located immediately adjacent to the development site on Church Street and is also a protected structure.

It is from this ensemble of historic monuments, buildings and streetscapes that the uniqueness of Kells as an important monastic settlement is derived. This distinct heritage and built character remain to the present day and when perceived, is relatively intact. The synopsis for the ACA notes that *"Kells is one of the country's most culturally significant historic towns, and unlike many historic Irish towns much of its archaeology is visible"*. The proposed demolition and redevelopment, characterised by an architectural expression that is a dense and unsympathetic contemporary design, will significantly undermine this uniqueness, and will result in a significant negative impact on the historic core of Kells.

Baill na Comhairle | Council Members

Martina Moloney (Cathaoirleach | Chairperson),
Michael Farrell, Dr. John Patrick Greene, Fionnuala May,
Deirdre McDermott, Dr. Patricia O Hare, John G.
Pierce, Sheila Pratschke, Prof. Mark Scott,
Dr. Mary Tubridy

Charity reg. no 20036867

Aras na hOidhreachta, Lana an Teampaill,
Cill Chainnigh, Eire, R95 X264

Aras na hOidhreachta, Church Lane,
Kilkenny, Ireland, R95 X264

T 056 777 0777 | E mail@heritagecouncil.ie

www.heritagecouncil.ie



Policy HER POL 20 of the Meath County Development Plan 2021-2027 requires *“that all development proposals within or contiguous to an ACA be sympathetic to the character of the area, that the design is appropriate in terms of height, scale, plot density, layout, materials and finishes and are appropriately sited and designed with regard to the advice given in the Statements of Character for each area, where available.* Objective HER OBJ 22 seeks *“to avoid the demolition of structures and the removal of features and street furniture which contribute to the character of an ACA”.* It also goes on to state that *“The Council will require that any planning application for demolition or alteration within an ACA be accompanied by a measured and photographic survey, condition report and architectural heritage assessment”.*

There are several other policies and objectives in the Meath County Development plan 2021-2027, that seek the retention of historic building stock (HER POL 21, HER POL 22); and to ensure that the provision of new adjoining buildings are sensitively designed and do not detract from the character of the historic building (HER OBJ 23). The Statement of Character for Kells Historic Core ACA notes that *“the area of the monastery forms the nucleus around which the town has grown”.* Accordingly, this location is particularly sensitive to unsympathetic development; the impact of which would be considered of high magnitude given the value and significance of the immediate historic environment. There are several objectives also for this specific ACA, including: to preserve the historic street pattern within the core of the town; to protect the character of the existing streetscape by giving consideration to the suitability of style, construction materials, colour and decoration to be used in any proposals for development taking place within this area; and to avoid the destruction of minor historic elements whose cumulative loss would severely erode the cumulative cultural significance of the town.

There does not appear to be any Architectural Heritage Assessment with the application, that attempts to address the heritage impacts of this development in a manner that demonstrates compliance with the named policies and objectives. Regardless, the Heritage Council believe that there is little possibility that any assessment could justify the demolition of such properties which are integral to the layout and traditional streetscape of the historic core of Kells, therefore giving this ACA its special character, worthy of the designation. An ACA should be viewed in its entirety, and demolition of buildings within the ACA should be resisted. Furthermore, the replacement design by virtue of its ridge height, scale, rhythm, and plot size would negatively impact on both the character of Church Street, and the monastic core to the rear. The statement in the cover letter, submitted with the application, which states that by “replacing the existing two-story buildings, which have become incongruent with the area due to their deteriorated condition, with a structure that better aligns with the street’s architectural integrity will benefit the overall aesthetic of the ACA”, is unconvincing.

In addition, the Heritage Council strongly support the re-use of heritage assets both designated and non-designated. This does not just relate to built heritage but also climate ambitions, whereby the most sustainable building is the one that already exists, something that is evident in government funding programmes. There is disregard for the embedded carbon that currently exists in the property, and the waste that would be

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generated from its demolition. Accordingly, it is also contended that the proposal fails to comply with the climate related objectives in the Meath County Development Plan 2021-2027 i.e. Objective CS OBJ 13.

In conclusion, the Heritage Council cannot support this application. While it is recognised that in some circumstances demolition and replacement can be justified, this is not such a case, for the reasons set out in this submission. In addition, whilst bringing activity back into towns and villages is needed, and this application does seek a mix of uses, which is welcome; at first principles, this should be achieved within the existing historic fabric, with demolition being of last resort.

Kells is one of the country's most important historic monastic towns, and the proposal seeks a significant, and irreversible disruption to this character; a character which cannot be replicated or recreated. The proposal fails to comply with Policies HER POL 20, HER OBJ 22, HER POL 21, HER POL 22 and HER OBJ 23 of the Meath County Development Plan 2021-2027.

Yours sincerely

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