

Áras na hOidhreachta, Church Lane, Kilkenny, R95 X264. P23/60534

26 January 2024

Dear Sir/Madam

Re: P23/60534: Application for Permission for development at Westport House & Estate, Westport Demesne, Westport, Co. Mayo for the 'Restoration and Interpretation of Westport Estate', within and around the curtilage of a number of Protected Structures throughout the Estate

The Heritage council is a prescribed body under S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, both cultural and natural.

Westport is one of Ireland's most significant eighteenth-century environments. It unites a historic urban landscape of high national significance with an eighteenth-century Brownian landscape garden (sometimes called landscape park) of international significance, wherein are set significant eighteenth-century buildings. Westport demesne's centrepiece is Westport House, a great eighteenth-century mansion designed by Richard Castle for the Browne family in the 1730s. Castle also designed an extraordinary early designed landscape in the natural style. It could be contended that the designed landscape has a higher significance than any of its individual protected structures, when considered separately or together. The planning documentation rightly states that the Westport Demesne is widely acknowledged as being one of the best designed landscapes created in Ireland during the eighteenth and nineteenth centuries. Therefore, any proposed development that seeks to alter this landscape should be carefully considered, sensitively approached whilst ensuring no detrimental impacts to its characteristic authenticity.

It is also important to note that the Heritage Council has a longstanding relation with the Westport House estate, ranging from providing significant grant aid in the 1990s to the Browne family for the conservation of Westport House as well as engagement with the new owners on the proposed plans for the complex.

The development comprises several parts. Our comments are confined primarily to the landscape, architectural heritage, and ecology aspects of the scheme, and are divided as per the following:

- 1. Built/ Cultural Heritage
 - Landscape and Historic Demesne
 - Architectural heritage
- 2. Natural Heritage
 - European Protected Sites
 - Flora and Fauna (habitats in general)
 - Climate Change



The comments below from the Heritage Council have been informed by a review of the design as it relates to the historic demesne landscape by Dr Finola O'Kane, an expert in this area. This report has been attached as an addendum to this submission.

GENERAL

It should be noted that the planning application documentation, particularly the drawing scheduling, is somewhat convoluted and difficult to discern. To ensure that comments from prescribed bodies and the public are provided sufficiently, there needs to be greater effort in making the documentation more accessible.

Secondly, it is unfortunate that greater effort has not been made as part of the design of the proposed scheme with regards to ensuring continued free public access for pedestrians and cyclists from Westport town itself to the estate along the east west axis. While we do not doubt the intentions of the owners in this regard (as expressed at a meeting with the Heritage Council on 16th June 2023) it is unclear from the planning application what degree of public access will be maintained to the estate.

In the absence of a full EIAR, the alternatives discussed in the Planning Statement ought to have considered more the existing historic and natural environment, and its potential to accommodate new development. Appendix G does have general points on environmental matters, but they are not detailed at the level necessary to fully grasp the design iterations. In addition, it is not clear if preapplication discussions with the local authority fed into these alternatives. We note "that meetings (several, in many instances) or engagement" were undertaken with Mayo County Council's various departments. Yet it is not immediately clear what advice may have been given, or how it was considered or informed the final design of the scheme.

In addition, notwithstanding the submission of architectural heritage reports, we are not satisfied that the studies, alternatives and robustness of these reports and associated conclusions adequately demonstrate that there is not a likelihood of significant environmental impact in respect of the architectural heritage of Westport house and its demesne. As such we are not satisfied that a comprehensive EIAR is not required. While other environmental aspects may not encounter likely significant effects, there will be likely significant impacts on the historic environment and Mayo County Council should satisfy itself that an EIAR was not required.

At the same time, the Heritage Council consider the application for the proposed conservation works to the house timely as it is clear from the documentation submitted that there are certain essential repairs required to ensure the continued conservation of the historic fabric. Therefore, it should be stated from the onset, that the Heritage Council recognise the principle that efforts to ensure that such estates remain viable may be needed. Of note we take the view that the following issues are of benefit:

- 1. The retention of the east-west axis and the avoidance of any significant proposed works that would compromise the sitting and setting of Westport House, particularly views to it on approach from the west or east.
- 2. The reinstatement (partly) of the Italianate gardens, including the parternes to the rear of the house which were once a strong feature of the historic landscape design.
- 3. The establishment of a new avenue (lady's walk) that connects with the landing place on the Carrowbeg River.



- 4. The works to the house itself are generally sympathetic to its integrity, although there are some concerns with some works (detailed below).
- 5. Implementation of wildflower meadows and clear designated paths/boardwalks to lessen erosion/encroachment onto existing habitats.

BUILT HERITAGE

Landscape and Historic Demesne

The 'wild realms' concept will change the character of the existing landscaped demesne. Bearing in mind that the landscaped demesne in its entirety is integral to the overall integrity of the estate; the Heritage Council believe that the proposed scheme radically changes the authenticity of the estate, is excessive and cannot be supported, in its current form. The new narrative/interpretation that will be brought to the estate is ill advised. Firstly, far more interrogation of the archival sources/documentation should be undertaken to inform the overall approach. These have been detailed in the report in the addendum provided with this letter. A greater appreciation of the historic evolution of the landscape design of the demesne should have been demonstrated. The lack of this has ultimately contributed to a somewhat ill-conceived, all-encompassing design approach. Therefore, this undermines the authentic character of this demesne's landscape. It is contended that the existing historic environment cannot accommodate this new 'theme' without irreversible and permanent damage to an internationally important heritage asset.

Within this overarching view of the scheme, the following specific concerns should be noted.

1. Some greater level of archaeological investigation should be carried out to inform the layout of the landscaping in the walled garden. The proposal does bring a different narrative (See drawings 0605-S8-P03 through to 0673-S8-P03) to the estate, and there is substantial hard landscaping and level changes to the interior of the walled garden. It is not convincing that all historic features/evidence has been lost due to the previous use of the zoo and other modifications. We make this latter statement on the basis of the evidence presented in the geophysical survey report which shows at least 12 anomalies which are indicated as being 'suggestive of relict garden features, such as buried walls and infilled ditches and drains. Particularly striking is a seemingly integrated array of probable wall footings [1–7] that together appear to divide the garden into different panels or plots' (p16). The report also suggests the presence of 'of relatively deep garden soils, and it is possible that additional garden features are present beyond the effective depth of investigation (c.0.5m) of the resistance survey' (p16). We are of the view that investigation of the walled garden by a suitably qualified gardens archaeologist would reveal far more evidence of the evolution of the garden, of former planting and of what remains which could inform a more accurate reconstruction of the former gardening regime. We note that the Archaeological Impact Assessment states that 'There is no indication that more subtle features such as vegetable beds survive beneath the modern ground surface' (p43), however, in the absence of archaeological



investigation there is no secure basis for this statement. We recommend that further works be carried out on this aspect of the proposed application.

- 2. **Garvillaun** island, in the context of the demesne's landscape history, is a transition to the wider and or "wilder views" west towards Clew Bay. The island was purposely left largely unplanted
 - "left as a bare mound". There is a need to ensure that the cutting of steps (this should be avoided if possible), and new installations do not undermine the 'wilder' bareness of this part of the demesne. Hoggin paths, may be more synonymous with manicured garden design, and therefore may not be the best path solution. The mown path is more sympathetic. Stone steps in the form of 'mountain trail' could give a wilder feel although it is not clear from the landscape design drawings where the stone steps are to be located. Clever path design by working with contours can ensure that any path is not visible when viewed from the east, therefore ensuring that the 'wild' element of Garvillaun is retained.
- 3. There is a potential impact from the elevated walkway on Lady's Island on the visual amenity of the landscape demesne there is a need for stringent conditions on materials/ design of this walkway, including its supporting structures. However, the 4-metre-high section, at the punctuation point of the reinstated ladies walk is concerning. A viewingplatform appears to be provided here. The view south-east to Westport House would have been historically best perceived from ground level. The 'story telling area' could be created with a more modest and less obtrusive structure. Greater detailed drawings on the walkway are needed here. The concept sketches are not adequate and suggest a design that is not particularly sympathetic, especially outside of the growing season. We recommend that drawings are provided of this installation, namely as viewed from Westport House with winter and summer vegetation levels.
- 4. Greater detail is required for the Eartharium. There do not appear to be any sections/elevations of it, to ascertain its height. This is a case where further information may be justified as it is difficult to full appreciate/assess the scale of this feature.
- 5. It is difficult to find any note, on a plan view drawing, of the walled garden which explicitly states that the enclosing wall is retained. It is mentioned in the landscape assessment as being consolidated. But there are drawings/sections (0672 S8 P03 and 0673 S8 P03) showing works at the wall garden involving a retaining wall. Is this the existing protected structure (enclosing wall) or a new one? There is no mention of these sections in the sections drawing 0660 S8 P05. The wall should be fully retained and its integrity i.e. the character of a "coursed rubble limestone boundary wall to perimeter having overgrown coping".
- 6. The car park is of significant size. The Planning Statement suggests that there is no difference in parking provision change from 495 to 496. It is not clear how this is calculated, given the current informal layout. Regardless, this is immaterial in landscape terms, as significant land take will occur for a new area of surface car parking adjacent to the existing car park to the north of the estate. The car parking approach appears to concentrate more on catering for peak visitor numbers rather than considering the impact on the estate's character. Increasing hard landscaping will have a negative effect on the character of the landscape, whilst greater



effort should be made to seal the parking areas from view and provide more soft landscaping, particularly the car park in the immediate northwest of the coach house. Some detailing of car park surfacing, and layout could be supplied by condition — hard tarmac/asphalt with no soft landscaping can be overly harsh in terms of landscape design.

Architectural Heritage

There is a significant number of features of architectural interest on the demesne. There are two works, in particular, that require attention from an architectural heritage viewpoint, namely:

- 1. Restoration of Westport House to repair and upgrade the fabric and accessibility of the house alongside providing a new visitor and interpretive experience within
- 2. Restoration and repurposing of the Coach House, which includes some demolition and extension works to accommodate a visitor centre and associated amenities.

Both structures are protected structures under the Mayo County Development Plan 2022-2028. The Coach House (also known as the Stable Block) is listed on the National Inventory of Architectural Heritage as being of *regional* significance. It is a stable complex, built 1734-5, and is characterised as a detached nine-bay two-storey coach house-come-stable outbuilding on a T-shaped plan centred on three-bay full-height pedimented breakfront; two-bay two storey side elevations. Significant works are envisaged for the immediate setting of the building.

There is concern regarding the scale and massing of the new build elements. The existing stable block /coach house's setting will be irreversibly altered. Whilst it is not expected that every newbuild element in the setting of a protected structure should be subordinate to the existing structure, the scale and massing proposed, particularly the GOME building located to rear, will adversely dominate the setting and character of the protected structure. We suggest that the design of the GOME building be revisited to remove its overbearing impact on the coach house. It will be particularly visible outside of the growing season. There is also concern that the relationship between the Coach House and Westport House itself will be changed. Whereby the House could be perceived ancillary to the coach house area, based on the new size, scale and massing. This is illustrated well in the picture on page 15 of the Architectural Design Report for the Coach House.

Westport House is identified as having *national* significance on the NIAH. In the Mayo CDP 2022-2028 it is characterised as a detached seven-bay (five-bay deep) two-storey over raised basement country house, designed 1731; built 1732-4, on a quadrangular plan originally five-bay two-storey on an L-shaped plan with eight-bay full-height rear (west) elevation. The planning statement submitted with the application identifies interior and exterior works for the building. We have the following comments on this aspect:

- There is a need to gain by condition a phasing programme for the proposed works, to ensure that the house itself is refurbished as part of the earlier stages of the development.
- The works to the house itself are generally well-considered and it is recognised that a variety of skills will be needed to carry out the conservation repairs. As a body committed to supporting traditional building skills, it would be desirable to involve the Heritage Council's All Irelands Heritage Skills/ Museum Conservation internship programmes in this aspect of the scheme.



Whilst recognising the need for universal access, the design of the external lift to the front of
the house needs further refining to ensure that irreversible damage is not done to the
stairs/balustrade. The detail and finishes of this should be agreed in advance with the Mayo
County Council Architectural Conservation Officer, in particular how it meets with the historic
balustrade and the type of materials used. Good examples are available to guide this particular
design element and could be consulted.

NATURAL HERITAGE

General Note

The Ecological Assessment far too often suggests that species are somewhat habituated to anthropogenic activity, whether it be bat species being accustomed to road noise, or birds being habituated to machinery noise, and therefore there is no impact from the development on species. Additional human activity on top of existing activity may surpass thresholds of tolerance for species.

In addition, lighting in general is an issue. Although the EIA does note that no significant cumulative impacts are envisaged, there are other schemes in the neighbourhood including a GAA pitch (assumed flood lit at times). Therefore, any additional light pollution is unwelcome. This is referenced in the following.

European (Natura 2000) Protected Sites and National Heritage Areas (NHAs/pNHAs)

There are two European protected sites that are relevant. That is the Clew Bay Complex SAC and the West Connacht Coast SAC. Potential pathways that could compromise the integrity of the site(s) are identified. The most immediate work that may have an impact is the construction of a structure traversing the water in the vicinity of the existing causeway. The primary works area does appear to be in the estuary/mudflats. While the existing causeway will undoubtedly undergo some refurbishment in achieving the provision of a boardwalk.

There are potential negative impacts during the construction phase, particularly in relation to water courses, with the key receptors being the qualifying interests of the SACs (mudflats in this case). It is essential that the mitigation measures identified in the report, and the drawings (silt trap etc) are part of the planning conditions, should permission be granted. This should include the presence of an Ecological Clerk for Works who can confirm the suitability of the construction site layout. Of key importance will be the preparation of a Construction Environment Management Plan (CEMP) that should include on site contingencies in the event of sediment spill or pollution runoff from the site.

The Ecological Assessment (Section 6.2.1.1) suggests that operational impacts will not impact on the qualifying interests. Although it must be said any increase in visitors will potentially disturb the existing ecology. The lighting scheme submitted with the application suggests that there are no lights on the boardwalk/new causeway crossing. Lighting can impact some aquatic species and terrestrial species, including Otter. European eels also, avail of darkness during the high-water induced silver eel migration during winter months. For any lighting on site, the possibility of switching off during closing times should be considered by condition. This is relevant for the section of the development adjacent to the SAC boundary where the current road traverses a canal (weir bridge) in a north - south direction. There is new lighting envisaged here.



Flora and Fauna (habitats in general)

Several habitat types have been identified on site. Species specific surveys have been conducted at various intervals and several habitats have been identified as Key Ecological Receptors (KERs).

Of particular concern is the impact on **bat species**. Old buildings and mature trees do provide roost potential. Therefore, it is essential that the mitigation measures identified in the ecological assessment be implemented by way of planning condition, should permission be granted. We note that 201 trees are identified for removal. While the requirement for pre-construction surveying of both trees and building structures is welcome, there should be the possibility for retaining any tree in the first instance, should a bat roost be found during pre-commencement surveys.

In terms of **birds**, at the very least, any removal of vegetation/ tree felling should be undertaken outside the bird breeding season (1st March to 31st August), and this should be applied by way of condition. While the mitigation against negative effects of **badger** setts should be broadened to ensure that no unnecessary heavy machinery is used in the vicinity of active setts. Furthermore, while the replacement artificial sett may help, there needs to be some level of certainty that badgers are not present during heavy site works. This includes the current inactive setts, to ensure that they do not become inhabited at some stage during the site works. Pre-construction commencement surveys are required by the project ecologist in advance of works. Again, the mitigation measures, identified in the ecological assessment should be included by way of planning condition. This should be the case for **otters** also.

The removal of vegetation/hedgerows should be kept to a minimum, particularly Annex 1 Alluvial Woodland. Where tree felling is required, some of the trees could be left in situ, or moved to another location in the woodland. Dead wood has ecological value in wooded environments, as long as it is not a fire hazard. This could be included by condition.

We have referred to lighting in the previous section. It is also noted that the Ecological Assessment gives little attention to the pontoon crossing in Westport house lough. Whilst it may not have a significant effect, and is not within the SAC, there needs to be some clarification that its placing in the lough will cause no undue negative effect on ecology. The watercourse does connect to the SAC.

Climate Change

The Planning statement suggests that cycle parking is prioritised. This is not borne out in the discussion, where no mention of cycle space numbers is provided. The drawings do indicate "cycle shelters". Some clarification is required on cycle space numbers, in the same way that emphasis is provided for car parking spaces. This is likely to be important for local trips, and or visitors to Westport who may be availing of existing good quality cycle routes in the area. Some detail by condition is needed here in terms of cycle stand design, and the need to ensure that they are covered cycle spaces.



CONCLUSION

In summary, the Heritage Council cannot support the scheme in its current form. There is a need not just for further information, but that the approach to the landscape design be revisited. Particular concern is also raised for the irreversible negative impact to the integrity and setting of the coach house. The scale and massing of the new build elements in this location should be reconsidered. It cannot be said that the proposed development fully complies with the Mayo County Development Plan Strategic Objective 7 (SO7) *Protection of the Natural and Built Environment*, nor the forthcoming polices for Westport House Demesne (objectives WHDO 1, WHDO 2, WHDO 3) in the draft Westport Local Area Plan 2023-2029. It is also suggested, given the prominence the demesne has in this draft plan, that the proposal may be somewhat premature until the draft plan has been adopted.

Yours sincerely,

Virginia Teehan
Chief Executive Officer

Addendum to Submission

Review of the estimated significance of the historic designed landscape of Westport demesne made in the planning documentation submitted to Mayo County Council, case number 2360534, and of the estimated impact of the scheme on that historic designed landscape.

for The Heritage Council Issue date: 25.1.2024



25 January 2024

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Review of the estimated significance of the historic designed landscape of Westport demesne made in the planning documentation submitted to Mayo County Council, case number 2360534, and of the estimated impact of the scheme on that historic designed landscape.
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Summary

Westport is one of Ireland's most significant eighteenth-century environments. It unites an historic urban landscape of high national significance with an eighteenth-century Brownian landscape garden (sometimes called landscape park) of international significance, wherein are set significant eighteenth-century buildings. In Ireland a demesne is the land surrounding a great house that is managed and farmed by the owner directly and is not leased out to others. Bounded generally by a high wall of stone, a demesne is typically a designed landscape of considerable scale, with an attendant level of aesthetic and agricultural ambition.

Westport demesne's centrepiece is Westport House, a great eighteenth-century mansion designed by Richard Castle for the Browne family in the 1730s. Castle also designed an extraordinary early designed landscape in the natural style that manipulated the river from its entrance into the demesne at Westport's Mall via various water features and attendant buildings to the sea. Later in the late eighteenth century a lake was formed by damning the river at its sea interface, creating a rare and highly significant composition of river, headlands, islands, sea inlets and twisting paths and views. This creates a maritime edge landscape of considerable rarity in Ireland and in Europe more generally- one where the wild character of the Atlantic's far western seaboard is mediated through a variety of lake and sea coastlines and environments, with islands used to break and conceal prospects, supported by belts of predominantly broadleaf trees. Its ambition in the design of aesthetically engineered water features, encompassing waterfalls, sluices, canalised elements and various dams and holding devices, is far greater than at Lissadell or Bantry House, as befits a Richard Castle landscape design, expanded and built upon by others. Castle's achievements as a landscape designer and hydraulic engineer may prove more significant than his achievements as a architect, as ongoing research is beginning to indicate. Westport demesne's impressive landscape design achievements were recorded by Ireland's premier landscape artist of the early nineteenth century, James Arthur O'Connor, who completed an important set of four demesne portraits in the 1814-1820 period (shown below with photos of their landscapes today where possible)

This report responds to the recent planning application no. 2360534 made to Mayo County Council. It reviews the application's estimated significance of the historic designed landscape of Westport demesne and the impact of the proposed scheme on that historic designed landscape.

This writer contends that Westport's designed landscape has a higher significance than any of its individual protected structures, separately or together. While the house is nationally significant, its comparative aesthetic value was arguably diminished by James Ivory's extensions in the late eighteenth century and again by the various extensions of the early twentieth century. Ireland has a poor record in protecting historic landscape in such instances, most notably the case of Powerscourt House, Co. Wicklow, where the landscape was sacrificed to protect a house that had been badly damaged by fire, with its significance consequently and irredeemably reduced. The significance of Ireland's eighteenth-century landscape design (and landscape more generally) is increasingly recognised internationally as arguably more significant than its architecture. The great architectural historian Nikolaus Pevsner described the eighteenth-century landscape garden as 'the most influential of all English innovations in art'.² In 1800 Ireland's population reached c.5 million, compared to England and Wales's c.9 million, making Ireland's proportional contribution to the then United Kingdom's body of landscape gardens high. Ireland was acknowledged to contain many of the most 'natural' and successful examples of the art form because its indigenous landscape character had proved so

¹Unpub. Proceedings of the Richard Castle Study Day, Russborough House, Co. Wicklow, 2023

² Nikolaus Pevsner, *The Englishness of English Art*, London, 1956, p.162

innately suitable for its artistic development in the mid eighteenth century by Capability Brown and others. William Gilpin, principal landscape theorist of the late eighteenth-century, awarded Ireland's landscapes a higher significance than British landscapes because of their exceptional suitability for generating picturesque landscapes, such as those of Westport demesne. In his seminal *Essays on the Picturesque* Gilpin placed Irish and Swiss landscapes at the apex of significance for Europe as a whole. This evidence for Irish designed landscape's exceptional international significance is not paralleled in international assessments of Irish architecture. Irish tourism, ironically, understands instinctively that the Irish landscape is its principal physical draw. It then often kills the golden goose by over-exploiting that same landscape. Mayo and Westport are uniquely placed to prevent such over-exploitation of historic designed landscape resources from happening again.

The report was commissioned on 16 January, 2024. It was informed by a day-long site visit to Westport demesne, including photographic survey, on 18 January, 2024 when the weather was fine and cold, with snow on the ground. The visit was facilitated by Barry O'Connor.

It is also compiled from ongoing research into the significance of the Westport estate on both sides of the Atlantic. The research employs sources and archives that are currently in the public domain in the National Library of Ireland and the National Library of Jamaica, the 1817 demesne survey book, which is in a private collection and copies of the Browne family's many paintings that were provided to the author for the 2013 Westport Study Day.

The submitted application is very large with many drawings produced by the many specialists involved in assessing, conserving and designing Westport demesne over the past few decades. The drawing schedule is erratic making it very challenging to assess the demesne as an overall entity. For example, the submitted landscape sections are provided in a separate pdf from the landscape plans. The submitted material also constantly refers to historic reports, particularly for the assessment of the demesne's significance, which are not included in the planning application. All these factors make the submission innately problematic to assess, particularly by the general public, and undermine the spirit of the planning process.

³ See Finola O'Kane, 'The Limits of Brown's Landscape; Translations of the Landscape Garden into Ireland' in Capability Brown: Perception and Response in a Global Context The Proceedings of an ICOMOS-UK Conference, held at the University of Bath, 7–9 September 2016, Garden History, Journal of the Garden History Society, 44(Suppl. 1 Autumn), 2016

⁴ William Gilpin, *Essays on the Picturesque*, London, 1794, p.43. See also Finola O'Kane, *Ireland and the Picturesque*; *Design, Landscape Painting and Tourism in Ireland, 1700-1840*, Yale University Press, 2013: Introduction

⁵ The great public buildings of eighteenth-century Dublin and the planning innovations of the Wide Streets Commissioners are arguably also of international significance but still, for this writer, less significant than eighteenth-century Irish landscape design.

Westport's Significances

Response to Howley Hayes' Westport Demesne Conservation Masterplan report of 2021

Westport demesne's many significances have been ably analysed and documented by the 2021 *Westport Demesne Conservation Masterplan*. (The quotations from this are presented in italics).

This response concurs generally with its '12.0 Conclusions' and in particular: The Westport Demesne is widely acknowledged as being one of the best designed landscapes created in Ireland during the eighteenth and nineteenth centuries, representing a perfect balance between impressive natural topography, subtle man-made interventions, judicious planting and clever hydrological engineering.

The Westport Demesne is a sophisticated, natural-style landscape containing woodlands, meadows and water features, together with numerous ornamental and functional buildings that were once linked by an extensive network of paths.

The surviving structures include – bridges, a stables building, a formal farm yard complex, a boat house, a garden temple, a picturesque ruined church tower, gates lodges, a splendid ice house and a large walled garden.

Westport Demesne provides a notable variety of habitats, all in close proximity. These include - parkland, pasture, woods, hedges, areas of bracken, gorse, marshy fields, ponds, a river, a lake, a walled garden and a sea inlet.

Many different layers of significance survive at Westport including - Architectural, Artistic, Archaeological, Historical, Ecological and Social.

Of the several damaging encroachments into the demesne, during the second half of the twentieth century, the most damaging was the loss of what was formerly known as the front lawn, together with the original formal entrance gates, located on the axis of the canalised mall on the north side of Westport Town.

The principal threats to the significance of the Westport Demesne lie in the – fragmentation of the estate; derelict, redundant buildings; unmanaged woodlands and loss of horticulture; conflicts between different user interests; unsatisfactory past interventions; inadequate traffic management; and lack of economic viability.

Car and coach parking should be re-designed and screened, and relocated predominantly to the north and east of the farmyard, to keep the majority of the demesne pedestrian only.

Based on the Howley Hayes report and a reading of the planning application the following summaries and additions are made:

1. Westport Demesne is already an historic place of international significance because its 1817 survey book testifies to the parallel and linked landscape design of a great transatlantic landed estate that was supported by the institution of transatlantic slavery. ⁶ Its significance is

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⁶ For an expansion of this argument see: Finola O'Kane, 'Designed in Parallel or in Translation? The linked Jamaican and Irish landscapes of the Browne family, Marquises of Sligo' in Finola O'Kane & Ciara O'Neill (eds.), *Ireland, Slavery and the Caribbean; Interdisciplinary Perspectives 1620-1830.* Manchester: Manchester University Press, 2023, pp. 282-301; Finola O'Kane, 'The Irish-Jamaican Plantation of Kelly's Pen, Jamaica' in *Caribbean Quarterly*, 64(3-4), 452-466: doi:10.1080/00086495.2018.1531557; Finola O'Kane, 'Colonial

substantial not only for the people of Ireland but also for the people of Jamaica. Its history is significant for the wider history of European imperialism because it documents how poor edge regions of the European continent (and not only the metropole) benefitted from the asset wealth transfer that occurred between the colonies and the 'home' countries, in Westport's case for c.200 years.

- 2. The assessment of the estate's significance has been impacted by the alienation and connected reduced access to key archives, paintings and documents, with many sold or rendered otherwise inaccessible since 2013 onwards. Many of the historic key sources have not been adequately employed to address the various and many significances. There is a surprising absence of research from:
 - a. The exceptional 1817 survey book which was made by George W. Hildebrand, the estate's steward. As the sole surviving demesne map produced by the demesne for its own design and management purposes (unlike an Ordnance Survey map) it provides a comprehensive snapshot of the estate's design mentality and ambition in 1817, then at the peak of its design significance. In particular it provides a rationale for the very contrasting characters of the demesne's eastern and western portions. How the demesne's design mediated from town to bog and from river to sea is one of its most outstanding attributes. The ground character was carefully coloured to explain the estate's improvement policies and to smoothly move from the pleasure ground around the house to the more distant agricultural environments. Although much of the western portions are now outside the current ownership they remain key historic landscapes as constituent elements of the demesne design and form part of the historic curtilage of Westport House.;



Amalgamation by Neil Crimmins of Westport demesne's 1817 Survey book, Private Collection

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landscapes: design strategies from Ireland and the Irish Caribbean' in M. Mosser, J. Tito, & S. Zanon (eds.), *Historical Gardens, Truth or Fiction?/ Giardini storici, verità e finzione*, Treviso, Italy: Fondazione Benetton Studi e Richerchi, 2021, pp 35-51



View from Barrett's Hill westward showing the demesne's racecourse to right centre.

b. The extraordinary record of the demesne provided by the c.1814-1820 demesne portraits of James Arthur O'Connor, particularly those painted from within the demesne, and particularly his *View from Barret's Hill* for evidence of the boathouse/turf yard//causeway's design history. These paintings document the demesne's design under the principles of picturesque design (for which the Irish landscape proved so suitable) with its emphasis on foreground, middle ground and distant ground. These vistas should be protected and cleared because of their high levels of significance. Attempts to find the exact prospect to the house from Barret's Hill failed because of tree growth (see photo below).



LHS JA O'Connor, View of Westport House from Barret's Hill, c. 1820; RHS, Photo Jan 2024



LHS, JAO'Connor, View of Westport House from the Quay, c.1820; RHS: Photo of view Jan.2024



LHS, JA O'Connor, *View of Westport*, c.1820 V&A; RHS, NLI, Lawrence Coll. L_ROY_00153



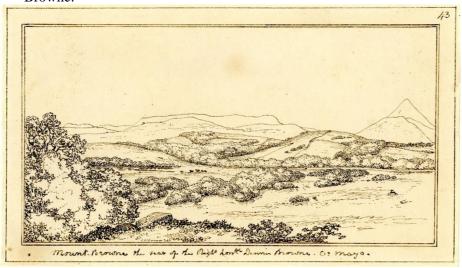
LHS, JA O'Connor, View of Westport, c.1820; Photo Jan. 2024

c. Westport demesne's established tradition of connecting new landscape features potently with those of the distant past. The demesne's exceptional early eighteenth-century landscape design threaded an approach route between the mount of the church on the left hand side and and the ancient mount of Caher-na-Mart on the right (see photo below). The route was not built on top of Cathair na Mart but instead glanced off it, thereby creating a subtle relationship between features of very different periods and respecting the significance of each.



Photo from the front of the house looking eastward, January 2024.

- d. Archaeological research (including trench excavations) in the walled garden and coach house areas where substantial alterations to the ground levels and topsoil are proposed.
- e. The NLI's Lawrence collection of photographs have been used to considerable effect in other walled garden restorations. Many Lawrence Collection photographs survive undigitized in the NLI. It is recommended that a structured method of gathering and analysing photographic evidence is employed.
- f. The wider estate's sources and histories which may provide suitable comparative material for aspects of Westport demesne's restoration. The Browne family owned and developed other estates in Ireland and Mayo, most particularly Mount Browne, which is incorrectly identified as Westport demesne on page 18 Consarc's *Restoration and Interpretation of Westport estate, Co. Mayo, Volume 1.* The drawing which preceded the oil painting is in the V&A Museum, London, which identifies the house as Mount Browne:



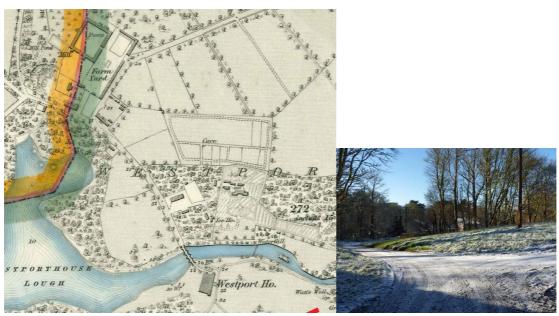
3. Generally the historical interpretation of the Browne family's achievements and contributions is considered simplistic and biased towards the positive. The family's involvement in many divisive events in Irish history (1798 rebellion, the Irish famine etc.) and their involvement in transatlantic slavery requires a more nuanced and truthful approach to the interpretation and communication of the estate's positive and negative heritage.

Expanding from the Howley's report list above, the principal threats to the significance of the Westport Demesne are considered to also include:

1. The extension of Richard Castle's Coach House, the second most significant building on the demesne, to six times its size- from an existing footprint of 263.4 m² to a total ground floor footprint of 1585 m² in an area of high historic significance (p. 18 of Taylor McCarney Architects, *Proposed Coach House Visitor Centre and Design experience*, Architectural Design Report, Dec. 2023). This is considered to be a substantial over-development of a protected structure, impacting particularly on the setting and character of both the Coach House and the Walled Garden, both significant protected structures.

It will incur the loss of historic landscape in the area east and north of the Coach House which may contain traces of the historic pathways, the ice house indicated on the first edition OS map and other minor structures shown on the maps that do not still stand above ground (see below).

The extension and other interventions are located in an area judged to be of 'exceptional significance' and 'fundamental to the design concept or to historic interest' in the Howley Hayes Conservation Plan (see below).



Left: Detail of 1st edition OS map showing the Coach House, possible Ice House, Walled Garden and Lady's island areas. Right: Photo towards existing Coach House complex from NE.

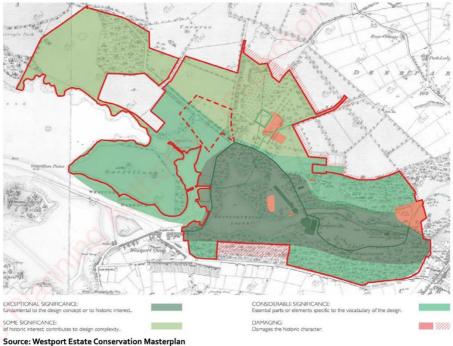


Figure 4: Conservation Masterplan Proposed Statement of Significance

- 2. The inappropriate-development of the walled gardens' setting and character through the introduction of substantial hard landscaping, level changes, new structures of scale and inauthentic interpretative strategies, as detailed in the Authenticity section below.
- 3. Some inappropriate development of Lady's Island, particularly the elevated walk and the proposed scale of the Story Telling Building.

- 4. Some inappropriate development of Garvillaun, particularly the 'Stone Deposit at Summit' proposal which will create problems for the accurate interpretation of the estate's authentic archaeological features.
- 5. Further expansion of carpark areas despite the existing large provision of carparking on site
 - 6. The loss of authenticity due to ahistorical interpretation strategies, as detailed below.
- 7. As the Howley report states 'while they remain in separate ownership, the two key areas of Rusheen and the Gardener's Cottage, remain as important parts of the historic demesne and are listed as protected structures within the Mayo County Council Development plan.' The unfortunate alienation of more parts of the demesne has influenced some of the scheme's circulation strategies. Rusheen's alienation has required the construction of the pontoon bridge to provide faster access to Garvillaun island's proposed 'Upper Realm'. This undermines the historic design of the Ladies Island/Garvillaun inlet, whose original eighteenth-century design is shown above in the James Arthur O'Connor *View from Barrett's Hill*.
- 8. The lack of a prominent and intrinsic entrance to the demesne from the town devalues the demesne's historic relationship with its estate town and the historic symbiosis between the town's urban design and the demesne's landscape design is thus rendered more difficult for a visitor or resident to experience. It considered to limit the development's potential to provide economic benefits for the people and town of Westport.
- 9. The separation of visitors into two cohorts (first the residents of the house and secondly the members of the public) in many Irish hotel environments has led to decreasing access levels to demesnes more generally. Such demesnes were intrinsically part of historic estate towns and were traditionally open to the public through rights of way or by historic practice. They often functioned as the main open recreational spaces in such towns and provided for the absence of suitable public parks. They have become increasingly privatised as elite hotel and golfing spaces in recent decades. It is considered that this application's division of visitors into 'adventure-seeking' and 'historic interest seeking' cohorts will have a similar effect.

The New Landscape Interventions and their Impact

The 'Concept' behind the new landscape interventions is explained below in the *Planning Statement* (Section 4.4):

The Concept

What are people looking to find and experience?

- Magic and Mystery
- An opportunity to connect
- · An opportunity to belong
- · An opportunity to contribute to building a better world

The old pagan ways in Ireland were based on three strands of knowledge and belief.

1. Understanding and remembering the ancestors and the past 2.Understanding nature, so to learn how to work with her rather than against her 3. Connecting daily life with that of the realms of the otherworld

These are the aims for the experience here

The intention is to introduce a new 'Wild Realms' landscape, divided into three Tolkein-esque realms or components- the Lower Realm, Middle Realm and Upper Realm, into an authentic eighteenth-century historic demesne landscape. According to the *Planning Statement* the intended 'aims for the experience are' divided into four categories: 'Direct, Subtle, Discovered and Immersive'. The concept design also argues for the addition of various new structures or 'notable elements' into these three 'Realms'.

In the Lower Realm the *Planning Statement* lists these as:

1. An Eartharium entrance passage structure; 2. An elevated walkway; 3. An elevated Story Telling Structure

In the Middle Realm/Walled Garden the *Planning Statement* does not list all the new 'notable elements' but the Paul Hogarth Landscape Plan Drawing no. 121 lists 11 such features: 'Living Willow Webbed Tunnel; Slide; Living Willow Hut; Wind Harp; Fire Bowls; Dragon Body, Head and Claws; Living Willow Tunnel; Living Willow Church; Rustic Banquet Table (Chef's Table); Cascading Water Feature; Fire Stage'

In the Upper Realm/Garvillaun Island the *Planning Statement* includes concept sketches of two alternative forms of 'Stone Deposit at Summit' as a new feature.

The *Planning Statement* (p.49) also states that 'at the Quay road bridge area, at the beginning of the Upper Realm, a control point, toilets and associated facilities will be provided to service this realm'. As the quay road and bridge area are significant elements of the historic designed landscape, drawings of such a control point will be required.

In general, some of these new landscape features are made of vegetable material, have a low impact are screened from historic vistas and are reversible.

However, some are permanent structures and the finished surfaces, requisite level changes and structural supports that they require form substantial interventions in an historic landscape and their impact is consequently high. Some of them are intended to contain substantial lighting and other 'experience' installation equipment. This makes them highly serviced and interiorised in parts, rendering them buildings rather than garden structures (See Paul Hogarth Sections, Drg. 704, Sections A-A & B-B & HSD's Eartharium Workbook- Rev 3). Such buildings need to be assessed as such and not presented as ephemeral garden structures made of roots, tree

branches and other vegetative material alone. Features such as the elevated walkway, the Storytelling House, the Eartharium and the Fire Pit require foundations, service trenches and other elements that are not typically required by folly buildings such as moss houses, stumperys, hermitages, hovels and cave structures, which they suggest but which they are not.

Some of the new landscape features follow in the tradition of folly-building on such demesnes, where key structures were designed to convey atmosphere and provide enjoyable experiences. Yet the proposed structures differ from this established landscaping tradition because the projected volume of visitors has demanded an increase in scale to one far in excess of traditional folly buildings. The bump in scale is most evident in the Treetop Story Telling Structure (Paul Hogarth, Drawing no. 706) and the Walled Garden's Dragon's Belly Fire Stage (PH drg. No.709) and in the walled gardens' overall design. Its connected impact on the volume of hard surfacing materials, protective panels, hard verges, paths and servicing and maintenance requirements is high. Generally the designed path widths are wider than in a typical wilderness or pleasure ground environment that might typically flank an eighteenth-century country house. Although these features do arguably follow the established use of the Pirate Adventure Ground, that development detracted from the historic character of the designed landscape and should not be repeated.

Response to Louise Harrington's Westport House Demesne Historic Landscape Assessment, Dec. 2023

This report demonstrates many of the proposals to conserve and restore Westport's designed landscape features are positive and will improve the character and legibility of the historic landscape.

The report's Summary of Impacts (Table 2) is generally concurred with, except for the following exceptions and expansions of the mitigating measures required:

Garvillaun Island (Upper Realm)

Generally the intervention to Garvillaun Island is not considered particularly adverse as long as it entails no substantial modifications to the hill's land profiles and contours (See Paul Hogarth & Co. Drgs. 702 & 703). The paths should not be cut into the hillside's existing topographic profile and the historic planting to the island's eastern prow (as detailed in the 1817 survey album or the various iterations of the OS maps) should be restored. The issues with the proposed 'Stone Deposit at Summit' are expanded upon below.

Lady's Island (Middle Realm)

Generally the interventions proposed to Lady's Island are positive, particularly the removal of the Pirate Adventure Ground area and the restoration of Lady's Avenue. However, the drawings do not completely convey how the elevated walkway will be constructed and concealed from the approach route between the northeastern gate and the house or from the various points along the northern and southern lakesides from which it might be seen (PH sections, drgs no. 704, Section A-A & plan nos. 120 & 121). As this is not a rainforest canopy condition what benefit derives from being 4m above the ground when looking at deciduous trees?

Figure 14: Elevated Walk (Conceptual)





The substantial interior of the Eartharium is a matter for concern as is the height of the Storytelling building (14m above ground). Nor is it possible to adequately assess its impact from Concept sketches. Could more of the interior experience of the Eartharium be made exterior?

Overall the scale of immersive/interior experience provided by the new interpretative structures is very high and these buildings' impacts are hard to assess without more comprehensive drawings. Some of the building detailing does not convince and may deteriorate very quickly (Haley Sharpe Design, *Eartharium Workbook*, *v.3*)

Walled Garden

The walled garden is a very historically significant space for the west of Ireland's agricultural, horticultural and social eighteenth and nineteenth-century history.

Generally the conservation and restoration of the greenhouses, bothies, sheds and other historic structures within the walled garden is a very positive development.

However, the new landscape interventions require considerable disturbance of the topsoil and the introduction of many paved areas, particularly in the area north of the old greenhouse walls (See Paul Hogarth drawings 120 & 121 and Section Drawing 708, concept drawing and photo below).

Figure 23: Ether Feature (Conceptual)





The archival documentation presented does not include material that might allow for the identification and analysis of the specific walled garden areas: (orchards, flower gardens, vegetable gardens, cold frames, mushroom house, gardener's records room etc.). Some material is evidently held in the house archive that might have been more interrogated. Most substantial walled gardens (Kylemore for example) would have historic photos and maps that would allow such areas to be identified and the loss of significance proposed by the development carefully estimated. In the absence of such documentation (which may yet exist in the Westport House archive or un-digitised Lawrence collection photos) it is recommended that some garden archaeology (3/4 trenches bisecting the main garden and the garden extension running eastwest and north-south) should be carried out to determine what plant species were cultivated over time, where the historic paths were located and from what materials the paths were made. The geophysical survey submitted as part of the application indicates the presence of numerous sub-surface features (at least twelve anomalies) which suggests that garden archaeological features survive intact.

The walled garden's past use as a zoo does not mean that all such historic evidence has been lost and many pockets of archaeological information typically survive. It is also recommended that a walled garden's traditions of careful horticultural and agricultural management, biodiversity, seed banking and others be reused in the new 'Middle Realm' concept, which purports to be inspired by the earth yet is still introducing substantial hard landscaping into a space that was historically highly cultivated and biodiverse. It should be possible to develop an interpretative concept that stems and grows from the existing historic environment rather than merely applying the Dragon's lair, willow church and other features to the historic landscape.

The structure onto which the Willow Church will be positioned should be conserved in its entirety (not only the steps), including its interesting substructure and interior (see photo below). Details of the substructure do not appear on CONSARC's drawing CDG-WG-12-0105 'Proposed Greenhouse and Retained Steps' nor on Paul Hogarth's plan drawing no. 121. It is recommended that the level difference between the original walled garden and its extension (as mediated by this building and its steps) should be conserved. Where possible the original ground levels throughout the walled garden should be conserved as they explain the logic of its siting and with further research should also provide indications of what was grown where and why.



Coach House & its vicinity

Overall the most highly impactful development proposal is the very considerable extension of Richard Castle's Coachhouse, a protected structure and the impact of the very substantial extension on that structure's historic setting and significance.

The proposed extension is considered to be of inappropriate scale for the protected structure of the coach house and its setting. Its construction will require the irreversible removal of the historic landscape east and north of the coach house, which may contain an eighteenth-century ice house. Some archaeological investigation in this area is required. The financial arguments put forward for this building are not considered to sufficiently mitigate against the irreversible damage done to the protected structure's character and setting.

Questions of Authenticity

In an historic landscape of national and international significance the issue of authenticity is a key component of its universal human value.

The UNESCO NARA Document on Authenticity (1994) includes the following articles that are considered particularly relevant to the proposed Interpretation of Westport demesne:

- 4. In a world that is increasingly subject to the forces of globalization and homogenization, and in a world in which the search for cultural identity is sometimes pursued through aggressive nationalism and the suppression of the cultures of minorities, the essential contribution made by the consideration of authenticity in conservation practice is to clarify and illuminate the collective memory of humanity.
- 9. Conservation of cultural heritage in all its forms and historical periods is rooted in the values attributed to the heritage. Our ability to understand these values depends, in part, on the degree to which information sources about these values may be understood as credible or truthful. Knowledge and understanding of these sources of information, in relation to original and subsequent characteristics of the cultural heritage, and their meaning, is a requisite basis for assessing all aspects of authenticity.
- 6. Increasing awareness within the public of this fundamental dimension of heritage is an absolute necessity in order to arrive at concrete measures for safeguarding the vestiges of the past. This means developing greater understanding of the values represented by the cultural properties themselves, as well as respecting the role such monuments and sites play in contemporary society.

The 'interpretative values' used in the *Planning Statement* are listed as 'Direct, Subtle, Discovered and Immersive' and do not include 'Authentic'. The interpretation of this historic landscape should provide an accurate communication of the landscape's history and significance rather than a vague concept of 'Wild Realms'. This concept is likely to date quickly, is founded on no rigorous analysis or understanding of the demesne's history and significance and seeks, in its essence, to muddy the definition of time and thereby undermine any visitor's education in the authentic history of this landscape.

The UNESCO NARA Document on Authenticity (1994) defines conservation as 'all efforts designed to understand cultural heritage, know its history and meaning, ensure its material is safeguard and, as required, its presentation, restoration and enhancement.'

Conservation analysis may not be simplified or collapsed into the general umbrella term of adaptive reuse, which can be applied to any building or landscape, regardless of whether it has any cultural and historic value. Conservation must seek to convey the accurate history and meaning of a building or a landscape while adaptive reuse is not held to the same standards. The development proposals regarding the site's reinterpretation as three 'Wild Realms' are thus framed as adaptive reuse rather than conservation and thereby reveal their limitations in safeguarding such a landscape of international and national significance.

Sustainable Tourism

Westport is potentially one of Ireland's most agreeable and successful tourist destinations. The extent to which the volume of tourism intended by the proposal can be deemed sustainable or desirable for the demesne, the town and the region is a difficult question. The submitted application is at substantial pains to demonstrate financial return.

Many Irish towns have arguably suffered a substantial reduction in significance due to the over-development occasioned by tourism, Killarney in particular. Whether the economic benefits of tourism have accrued to society more generally and as equitably as possible is complicated and requires more careful assessment.