

FROM AN TAISCE

An Bord Pleanála,
Marlborough St.,
Dublin 1.

30th September 2005

REF: Cobh Town Council Planning Reference: 05/52040
RE: Proposed alterations to St Colman's Cathedral Cobh

Dear Sir,

An Taisce wish to appeal the decision of Cobh Town Council to grant permission to the Trustees of St Colman's Cathedral for alterations to St. Colman's Cathedral under planning number 5/52040.

Breach of provisions of Department of Environment, Heritage and Local Government Architectural Heritage Protection Guidelines for Planning Authorities 2005 with regard to "*Places of Public Worship*"

Section 5.2.2 makes provision for a planning authority to "*respect liturgical requirements*".

While Section 5.2.4 refers to the provisions relating to declarations, it must be deemed applicable to considering planning applications including the requirement "*the basic considerations are the effects, if any, of the proposed works and special interest and structure including its interior, and whether the proposed alterations are necessitated by the liturgical requirements of worship*". We consider that the proposed works would significantly diminish the special interest of Cobh Cathedral as an intact Gothic revival interior and that the nature and extent of the proposed works have not been justified on liturgical or practical grounds. The provision in the DoEHLG Guidelines "*to minimise the impact of the proposed changes*" has not been complied with.

Inadequate Planning Appraisal by Cobh Town Council.

It is our contention that the locum Planning Officer to Cobh Town Council erred in his appraisal of the arguments presented for and against the development, and misinterpreted Section 57 (6) of the Planning and Development Act 2000, the Architectural Heritage Protection Guidelines for Planning Authorities Sections 5.2.2 and 5.2.5 ... (sic) 'the

planning authority shall, in addition to any other requirements of the Act, respect liturgical requirements'. We argue that he read this section as an imperative rather than a guideline, and did not give appropriate weight to arguments that the proposals were too extreme and would affect the essential fabric and architectural coherence of a valuable protected structure. The word 'respect' surely does not mean 'automatically prioritise above all other considerations'? This would reduce the Planning Officer's function under the Planning Act to that of a rubber stamp, whenever liturgical 'needs' are used to justify alterations, no matter how extensive, to heritage buildings.

The aim of this section of the Planning and Development Act is to achieve a balance between liturgical and heritage requirements. However, unlike the resident Planning Officer, the relief Planning Officer did not have the benefit of the pre-planning meetings which are advocated by the Guidelines (5.3.1) 'in order to ensure that the appropriate balance is struck between the architectural heritage and the need for use of the protected structure as a place of public worship'. A quick decision was made on this major issue during the three-week holiday of the resident Planning Officer, a decision that could easily have been delayed until the return of the resident Planning Officer by acting on, rather than ignoring, the advice contained in the submission from the Department of the Environment, Heritage and Local Government (DoEHLG) – that is, to seek further information.

We argue that the assessment period of four working days was insufficient to deal with the complexity of the arguments presented, and could not have allowed 'due consideration', especially as the Planning Officer was only seconded on a part-time basis to Cobh Town Council during that time. We further contend that the overly simplistic reduction of the objections to four unrepresentative categories is evidence that he did not adequately consider the approximately 140 submissions that he identifies as having read. Also, the planning file identifies 138 submissions as read, but there was a total of 213; we would like assurance that all legitimate submissions were fully considered, in line with the Planning Officer's duty.

We also submit that the relief Planning Officer's response (Report 3.5) to the well-considered submission of Cork County Council's Conservation Officer, a submission which was specifically requested by the resident Planning Officer, was very selective and superficial, and surprisingly dismissive of her qualifications and expertise in the area, despite the fact that the relief Planning Officer admits (Report 3.7) that his background is in general architectural practice – not in art, architectural or design history.

He also considers (Report 3.5) 'that the design team have carried out diligent research and preparation', but notes (briefly and again somewhat dismissively) that the Pugin Society challenged this research. The Pugin Society and Dr Rory O'Donnell are the acknowledged leaders in the field of scholarship and research on Puginian architecture. In its submission, the Pugin Society states that it made its expertise available to the Bishop and Cathedral Committee, but its offer was ignored. This does not seem very diligent. As the Pugin Society submission has pointed out, the historical justification for the proposed cathedral changes, as put forward by the appellant, is seriously flawed in many respects. A lack of architectural-historical knowledge and understanding is evidenced in the degree of misunderstanding and misinterpretation of sources.

Relevant Precedent of Decision by An Bord Pleanala re St. Senan's Church, Kilrush.

We submit that both the planning process and the decision taken on this important building was inadequately considered. We respectfully refer you to your adjudication on St. Senan's Church, Kilrush, Co. Clare (Reference PL64.210618 (P.A. Reference: 04/13)), a case with remarkable similarities to that of St. Colman's, where major alterations were also proposed, based on liturgical 'needs', to a protected church interior. We advocate that this planning decision should be considered by An Bord Pleanala.

Importance of St. Colman's Cathedral

St Colman's Cathedral ranks as one of the most important Victorian buildings in Ireland. It was begun in 1868 and finished in 1917, and as a result it is the product of a very significant and formative phase of Irish history. Its style is neo-Gothic and typically nineteenth-century in its level of elaborate and expensive ornamentation. Its iconography is partially modelled on French mediaeval models like Notre Dame de Paris, but is also heavily influenced by phenomena such as the nineteenth-century 'Devotional Revolution', and by the extensive antiquarian studies carried out in Ireland as part of the Celtic Revival.

The sheer size and drama of the building demonstrates the triumph of the Roman Catholic Church after Catholic Emancipation, and its wealth of shamrock and other emblematic Irish imagery proclaims the strong sense of national identity which emerged during this period. It is a hugely valuable record of a particular historical place and time, and as such should be treasured and protected for future generations.

St Colman's, is one of the small number of Gothic revival churches in Ireland of international significance. Its importance is all the greater because it has escaped the poorly considered "reordering" which has affected a number of the other major 19th century Roman Catholic cathedrals including Armagh and Killarney which was characterised by the large scale removal of major architectural features and loss of architectural character.

Adverse Impact of Proposed Works.

We consider that the proposed works would have a significantly negative impact on the architectural character of this internationally important Gothic revival interior. The proposal would involve extensive and undesirable removal of mosaic floor surfaces and would be contrary to the spatial layout and design conception of the cathedral interior.

The 'reordering' proposed will cause irreversible and unacceptable radical changes to the fabric of the building. The existing sanctuary floor is to be extensively cut into, with the result that a complex and skilfully executed ceramic mosaic floor, designed specifically for the cathedral by the architect George Ashlin, and made and laid by Ludwig Oppenheimer of Manchester in 1892, is to be removed, and partly replaced further to the west. Technically, it is doubtful whether the expertise exists to carry out such a procedure, even if it were justified, and it would certainly be extremely expensive and

risky. Exhortations in the DoEHLG submission, regarding other significant mosaics, were also ignored by the Planning Officer.

The altar rails are also to be cut up and 'redistributed'. The historical justification proffered for this is an early architect's projection of the cathedral which shows no altar rails. This engraving, however, also uses a distorted visual perspective in order to convey an enhanced sense of space, and shows no seating. The image is a romantic and conventional one, produced to heighten interest in the project and raise funds. No nineteenth-century architect designing for the Roman Catholic Church would have even contemplated producing a church which would not have a communion rail. The building as executed departs considerably from the original 1868 contract drawings – mainly in elevation rather than plan, and is generally more complex and elaborate. Most of these changes were initiated in 1871, when E.W. Pugin was still alive, and not after his death, as has been claimed in the proposals. To use E.W. Pugin's original vision of St Colman's to justify the present proposals is inappropriate and misguided – Cobh Cathedral, like all buildings, is the product of a complex net of historical, socio-economic and religious circumstances, not just the architect's original vision, and is all the more worthy of protection for that reason.

The architects of St. Colman's set out to produce a Victorian building, *not* a mediaeval one, contrary to the claims made in the proposal for re-ordering. They borrowed the vocabulary of mediaeval gothic, but the church was carefully planned to conform precisely to the post-Tridentine liturgy in use in the nineteenth century. Unlike mediaeval churches, which are boxed off into compartments, Cobh has a clear visual sweep from the narthex to the elaborately-decorated apse, riveting the viewer's attention on the altar, which is of the Benedictine style pioneered by E.W. Pugin. From the west, the effect is of looking down a tunnel to the light at the end, and this is cleverly emphasized by the fact that the transepts are almost invisible because of the nave, triforium and clerestory arcades running across their entrances without a break. This too is a characteristic of the architecture of Pugin and Ashlin, as is the shallow and almost rudimentary nature of the transepts themselves.

This emphatic and extremely deliberate emphasis on the long axis of the church means that the proposed changes will completely destroy the architectural coherence of the building, resulting in visual chaos. Pugin and Ashlin created no architectural focus at the crossing (unlike, for instance, William Burges in St Fin Barre's in Cork), and attempting to establish one by extending the sanctuary floor, removing the altar rails and introducing furniture, will result in a visual conflict with the existing layout.

Relevant Issues relating to St. Senan's Kilrush Decision.

We refer to the An Bord Pleanála inspectors report on St Senan's church where in upholding the local Planning Officers decision he concluded

I concur with the planning authority [in refusing permission] that the proposed alterations here would make a significant alteration to the building's character and would result in the unnecessary removal of elements.....When viewed from the direction of the altar the works will interfere with the sense of spaciousness within the church and alter the original composition. The appellants have argued strongly that such changes are necessary to ensure the works are in line with the new liturgy. While there is an onus on the planning authority and the Board to take account of liturgical requirements when

assessing such works, I do not consider that in this case any convincing case has been made that they are in fact required by the liturgy ...The works to the sanctuary...are quite substantial and involve the enlargement of the existing area, the removal of elements, and the restructuring of the existing layout. Much of the work will involve salvaging and reusing existing marble fittings.

As mentioned above, Cobh Cathedral was not designed merely as a mediaeval pastiche, but as a functioning nineteenth-century Roman Catholic Church, in line with the directives of the Council of Trent. Since Vatican II, liturgy requirements have changed, and the layout is considered not to be convenient for the present ritual.

There is absolutely no doubt that liturgy requirements will change yet again – as they have done several times in the last two millennia – and it is indefensible to use them to justify making irreversible and intrusive changes to an important historic structure such as St Colman's, especially when they are so unsympathetic to its style and destructive to its fabric.

Inadequate Justification on the basis of Liturgical Requirements

The proposal is being justified as with a large number of alterations already accommodated in Irish Roman Catholic churches on the basis of the Second Vatican Council. It is instructive to note that the major historic churches of Rome have not been subject to the level of alteration and removal of features which has occurred in so many Irish churches and would be involved in this proposal for Cobh. Accordingly the nature and extent of the proposed alterations and removal of features has not been justified with regard to any Vatican 2 of liturgical requirements.

We can claim that we have observed the alterations which have taken place in cathedrals and churches in other Irish dioceses, as a result of 'liturgical requirements', and also in cathedrals and churches, from mediaeval to neo-gothic, throughout Italy, France, Croatia and many other predominantly Catholic countries. In Europe, we have encountered nothing as intrusive or destructive as the alterations proposed for St Colman's. Similarly, we note the comments of someone who has competence in liturgical matters, Cardinal Desmond Connell, who was interviewed in *The Sunday Business Post*, March 04, 2001:

The new Cardinal Archbishop of Dublin has hit out at the state of liturgy and architecture in the Catholic Church. This is the first time Dr Desmond Connell has publicly criticised the changes in church architecture and liturgy which followed the Second Vatican Council. Both issues have been at the root of significant public dissent and controversy in Ireland over the past 30 years.

In an interview following his appointment as cardinal, Dr Connell was asked whether he had any plans to build a cathedral in Dublin. (At present, the Anglican Church of Ireland has two cathedrals in the capital – Christ Church, the diocesan cathedral, and St Patrick's, the national cathedral. The Catholic Church has only a 'pro-cathedral'.)

Connell responded: 'None whatsoever. If I had the wealth of Croesus itself, I would not build a cathedral because liturgy and architecture at the moment are in such confusion

that anything that would be built at this stage would be rejected in a very short time.’

The cardinal's remarks are especially significant as he is a member of the Congregation for the Doctrine of the Faith (CDF), the Vatican's watchdog body which enforces doctrinal matters, including liturgical orthodoxy

We direct your attention to the following quote copied directly from the website of Fr Ger Casey, Administrator of the Cathedral in 1996/7:

The Restoration of the Cathedral at Cobh, formerly Queenstown, is recognised by the European Heritage as well as the Irish Heritage programmes. The architecture of Pugin and Ashlin is seen here in splendid detail. The Cathedral is in everyday use for worship and prayer. It accommodates the celebration of all liturgy as envisaged by the revised rites of the Catholic Church. (<http://www.iol.ie/~gercasey/>. See also HCAC below).

In the Boards Inspector's assessment of the St Senan's planning decision, he concluded that

*While I accept that liturgical change has made the proposed alterations desirable I am not convinced by the arguments submitted that such radical alterations are necessary or justified. I consider that they would result in a significant impact on the protected structure. I also have concerns that the alterations... would act to confuse the history of the structure. I therefore concur with the decision of the planning authority [to **decline planning permission**] in this regard.*

We contend that precisely the same argument applies in the instance of St Colman's Cathedral.

Lack of Information on Congregation and Public Consultation

This is a major proposal affecting the cathedral. There is no reference to any consultation or the results of any such consultation between the congregation or the people, the population of Cobh or the Coyne Diocese. The only reference to “pre-application consultations” referred to in the letter of 15 July 2005 from McCutcheon Mulcahy are with the Planning Authority. We have been forwarded a letter dated 5 August 2005 from “Friends of St Colman's Cathedral” stating that the current “*plans are being strongly opposed by the overwhelming majority of the people of Cobh and the Diocese of Coyne. 24,124 signatures were collected in opposition to these radical changes to a beautiful cathedral which is a heritage and listed building protected under the 1999/2000 Local Government Planning Act*”.

Legal Status of Grant Funding with regard to Proposed Works

The pro cathedral is subject to extensive grant funding from the Heritage Council which restricted alterations to the cathedral. The application particulars fail to address the legal issues arising from this.

Recommendations

We consider that this application has not been justified and would contravene the Department of Environment, Heritage and Local Government Architectural Heritage Protection Guidelines 2005 on the grounds that it would radically diminish the special interest of the interior of Cobh Cathedral as an internationally significant Gothic revival cathedral interior.

We recommend that the application be refused. Please acknowledge our submission.

Yours sincerely,

Ian Lumley
Heritage Officer