



26 June 2024

Senior Planner,  
Planning Section,  
Áras an Chontae,  
JFL Ave.,  
Portlaoise,  
County Laois

Dear Sir/Madam

**Re: Draft Portlaoise Local Area Plan 2024 - 2030**

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 control and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage. We welcome the opportunity to comment on the Draft Portlaoise LAP. Our comments below are a response to these questions, where they were relevant and will deal with both built heritage and natural heritage. Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways'.

*National and Local Policy Context*

It is important to state from the outset that the **National Planning Framework – Project Ireland 2040**, identifies “*Enhanced Amenities and Heritage*” as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in LAPs.

**Development Plans – Guidelines for Local Planning Authorities** was prepared for county and city councils in June 2022. Within these guidelines, there are detailed requirements for local forward planning objectives. Features of special architectural, historical, or natural value are our heritage assets, and mandatory objectives under the themes of 'heritage and landscape' have been identified throughout these guidelines. There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

The 4<sup>th</sup> edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that “local authorities play a key role in

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biodiversity conservation through the planning system”. There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity’s contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

**Heritage Ireland 2030** was published in February 2022 and details a number of action points relevant for local authorities and these should be included in local area plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the ‘Town Centres First’ policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

The Eastern & Midland Regional Assembly’s **Regional Spatial & Economic Strategy 2019-2031** is the current regional plan for County Laois. Whilst the RSES primarily deals with spatial planning matters at the regional level, there are several sections within the RSES that are relevant for local area plans. We would bring particular attention to Objective RPO 7.21, which aims to ensure that local authorities promote an ecosystem services approach to statutory land use plans, while Objective RPO 9.30 supports the sensitive reuse of protected structures.

The **Laois County Development Plan 2021 – 2027** has comprehensive chapters on Biodiversity and Natural Heritage (Chapter 11) and Built and Cultural Heritage (Chapter 12). Policies BNH1 to BNH16 establish robust policy provision for ecological connectivity, designated sites and specific biodiversity ambitions (i.e. the Great Heath). Whilst policy DM BNH1 and DM BNH2 details development management expectations for designated sites including proposed NHAs. Policies BNH25 to DM BNH5 also provide policy for the protection of trees and hedgerows. Matters of architectural and archaeological protection are clearly provided for through policies PS1 to DM ACA1 through to DM AH1, with further specific policies for landscaped demesnes and vernacular buildings also present in the county development plan.

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These pertinent national and local policies are emphasised to provide context to our comments. They should all be mentioned in the Draft LAP under section 2.5 *Plans and Guidelines*. Additional guidelines and policies are identified for specific sections of the draft LAP in the following paragraphs.

### *Specific comments on the Draft LAP*

#### **Section 3 Portlaoise in Context.**

The vision should capture the importance of balancing future development with the protection of the town's natural and built heritage. It is unfortunate that in the introduction to the vision that Portlaoise Train Station which is on the country's main trainline between Dublin and Cork is secondary, compared to motorway and secondary roads. This is a considerable asset in terms of proper planning and sustainable development and deserves more prominence. While a far more comprehensive key diagram (instead of Figure 3) showing such connectivity and other strategic assets should be provided.

The Heritage Council compliment and strongly support policy PCP 3 which is key to achieving compact growth. This needs to be achieved through proactive and good decision making. In this regard, there is also a need for the LAP to identify opportunity sites/ brownfield sites to maximise brownfield potential. This is the specificity that is needed from local areas plans. Whilst we recognise that it is unlikely that all the housing need of a local authority would be met on brownfield sites only, we do encourage the LAP to exhaust the potential for brownfield site locations before any greenfield expansion is pursued. We would also encourage Laois County Council to identify any further sites near the train station.

It does seem that Policy PC 4 has outdated guidelines. The *Sustainable Residential Development and Compact Settlements guidelines* were published in January 2024 and are the most recent and relevant guidelines for this policy. They specifically note the importance of responsive placemaking for existing heritage as well as expectations for the application of density and development management standards. We strongly recommend that Laois County Council consult in detail these guidelines with specific concentration on the relevant sections for the settlement size of Portlaoise. This guidance should then inform and be incorporated into this section of the LAP and the placemaking sections.

#### **Section 5 Climate Change**

The introduction to this section has rightly noted that "*efficient use of land with a focus on key urban centres, and to achieve development densities that can support vibrant, compact, walkable places that prioritise pedestrian and cyclist movement*" is important for climate change. The Heritage Council believe that at the level of first principles, together with the reuse of the embedded carbon in vacant buildings, that ensuring land use patterns and mobility are integrated, is the most important role the planning system

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has in reducing greenhouse gas emissions i.e. the cause of climate change. In this context it is important that the Portlaoise LAP:

- Ensures that any greenfield release makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities, that are conducive to public transport roll out, and cycling and walking.
- Seek out sites that have poor ecological potential, informed by habitat mapping.
- Existing brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development including any sites next to the train station.
- Active reuse of existing building stock, which does constitute much of our vernacular and urban heritage building stock.

Achieving this will reduce greenhouse gas emissions from the built environment but it will also ensure that land take is restrained and does not pose undue threats to cultural and natural heritage. With this in mind – we strongly support the key components diagram and the associated objectives in this chapter. Because Climate Change is an issue that threads through all forward planning policies, it is correct to link this section to the other sections of the LAP, which will ultimately have more specific objectives in terms of transport, housing, and biodiversity, for mitigating and adapting to climate change.

### Section 6 Town Centre Revitalisation

The Heritage Council commend the efforts of Laois County Council with regards to active land management and other initiatives to tackle dereliction (i.e. The Vacant Commercial Property Incentive Scheme). The proactive approach identified i.e. to *“utilise opportunities to facilitate attractive and vibrant environments designed at a human scale, with enhanced pedestrian permeability, visually engaging, secure and inviting public realms that promote and encourage passive and active recreation”* will undoubtedly aid the delivery of vibrant and active historic streets. This will bring benefits to the historic environment in Portlaoise, which like other towns in Ireland, is far too car dominated.

More specifically the most successful public realm proposals anchor off the heritage assets that exist, using them as the centrepiece in new public realm projects. This can successfully contribute to the perception and experience of the built historic environment. In this regard we would recommend that public realm and landscaping proposals do not only concentrate on hard landscaping (paving, stonework). Greater emphasis on soft landscaping, that incorporates native plant species, will not just make the built environment more pleasant, but will also aid local biodiversity ambitions

The Heritage Council note some very important policies and objectives in this Section. We particularly support policies that aim to protect historic streetscapes, shopfronts and seek out brownfield opportunities. While we would support the redesign of the Market Square area with the view to establish a more liveable, people centred urban environment. Furthermore, we would recommend that the following be worded into some of the policies where possible:

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- Flexible application of development management standards, in terms of residential amenity, set back distances, and parking standards for inner core sites
- Collaboration with other council departments i.e. Housing departments to seek out derelict and vacant sites in central locations to ensure the public sector lead the way for tackling vacancy in Irish towns by providing new uses.

As alluded to in the previous section, work on identifying sites in the town should be pursued based on a sequential town centre first approach. We note the identification of opportunity sites, which is welcome. However, we would emphasise that the primary rationale for identifying opportunity sites should be guided by identifying central core sites with access to good public transport and amenities. Whilst vacancy and underutilisation are a worthwhile criterion for identifying sites; at the level of first principles best practice planning should identify the most sustainably located sites. Given that only three opportunity sites have been identified in this section we would encourage Laois County Council to seek out any further sites that may be sustainably located.

At the same time, we recognise that identifying underutilised sites is also important. As an example, the excellent conservation-led construction work is underway at the former Presentation Convent in the centre of Portlaoise to develop housing for 50 families, managed by the approved housing body Sophia Housing in partnership with Laois County Council. This will bring new life and vibrancy to the historic town centre and is a model for other de-institutionalised historic building complexes.

Within any opportunity sites, it is key to identify natural and built heritage constraints/assets; and these should then inform the design/development approach to the site. We therefore welcome that this appears to have been done for the opportunity sites, although a view of the ecological constraints (i.e. existing hedgerows/ tree stands and bat roost potential) should also be detailed. In the first instance, development should not negatively impact the integrity or the setting of important features of natural, archaeological, and architectural interest. High quality design will be essential in this regard.

In addition, the traditional [Irish townscape](#) of linear townhouse development along arterial routes is an important part of our heritage. Protecting this heritage along with ensuring compact growth need not necessarily be conflicting objectives but can be achieved through a heritage led design approach that should be reflected in this section. Often historic linear terraced houses have a relatively high density-high coverage efficient use of land typology that accommodates family homes. The more sustainable aspects of this design can be combined with more modern development typologies to achieve efficient use of land in settlements such as Portlaoise. Many of these comments will relate to the placemaking chapter also.

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## Section 11 Transport and Movement

To reduce car dependency, we would recommend that Laois County Council ensure that non-car-based alternatives are viable. On this point there is a need for safety during the journey and secure storage at both ends of the journey for cyclists. Cycle parking standards are needed for all development and for all uses, while active route planning for cycle lanes (number of km to be provided) needs to be carried out for the LAP. This is imperative to provide alternatives to the car, reducing GHG emissions, thus reducing climate change impacts on our natural heritage, habitats, and ecosystems.

## Section 13 Built Heritage

Portlaoise town benefits from a rich built and cultural heritage. We strongly believe that conservation through use, and the refurbishment of existing historic buildings (designated and non-designated) should be a significant part of every settlement's local area plan. Heritage led regeneration can build on the existing character, which is unique, and cannot be recreated. Again, we would emphasise that regeneration and the need to bring life back into inner towns respond in a positive way to the established pattern of development.

It is important to note in this context that heritage protection is essential for a viable tourism product. The aspirations for the Fort Protector are also noted. The Heritage Council was the national funder of the 2015-2017 conservation plan for the 16th century plantation Fort Protector. Building on this plan, in 2018 Laois County Council was successful in obtaining HTI funding from the Heritage Council to transform Fort Protector and Fitzmaurice Place at the historic core of the town into successful public spaces. This in turn led to the conception of the Portlaoise Cultural Quarter project, which was allocated over €7 million from the URDF in 2019, to support further public realm works; conservation of the old Fort; refurbishment of a derelict primary school to house the Laois School of Music, and conservation of Old St Peter's Graveyard.

The conservation of Old St Peter's graveyard which is intrinsically part of the plantation period settlement was initially supported by a Heritage Council's Adopt a Monument programme and Community Heritage grant scheme. This was followed by funding from the Community Monuments Fund and further URDF investments. Key inputs from the Local Authority Heritage Officer and the Heritage Council have been crucial in building the capacity of local groups, including Portlaoise Tidy Towns and the Laois Heritage Society.

This is just some examples of how initial Heritage Council funding has stimulated revitalisation of a historic town centre. Projects like this illustrate how small-scale investments in heritage conservation can act as a catalyst for larger development projects. These initiatives not only conserve important historical sites but also contribute to the local economy by enhancing the town's appeal to both residents and visitors, creating a cycle of investment and redevelopment that benefits the broader community. We urge Laois County Council to build upon this heritage-led regeneration approach

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within Portlaoise with regards the other key spaces within the town, in particular Market Square, through further investment in the legibility and interpretation of Fort Protector, and by prioritising the re-use or continued use of historic buildings.

We therefore recommend that this important work get commensurate policy recognition within this section of the LAP, reflecting the considerable work that has been undertaken already.

The Record of Protected Structures (RPS) and Architectural Conservation Areas (ACA) designations are important policy and legislative provisions that protect our built heritage in Ireland. We note that the central area of Portlaoise is an Architectural Conservation Area (ACA), and the Heritage Council commends this. There are several good policies noted in this section. We have the following comments/suggestions:

- BH07 is rather restrictive in its drafting. The use of protected structures has changed over time, and it is the building's architectural merit, not its use that is primary means for its designation as a protected structure. The need to demonstrate the need for a new use is a peculiar requirement. The objective should retain the caveat "*provided that it can be shown that the structure, character, appearance and setting will not be adversely affected*" however the rest of policy should be more encouraging of new uses which are often needed for the long-term protection of heritage assets.
- Policy BH P2 should include "establishment of public rights of way, where necessary"
- Through BH 03 or through another policy, identify the need for the flexible application of development management standards to facilitate the continued use of historic buildings. We consider this essential for reducing vacancy and dereliction.

## Section 14 Biodiversity and Natural Heritage

In terms of natural heritage, the new NBAP 2023-2030 has a list of targets that are relevant for planning authorities regarding their statutory plan making functions. We would strongly recommend that all local authorities, through their biodiversity officers, audit this document to identify the relevant actions/ targets for land use statutory plans, and subsequently reflect them in their LAPs. Each local authority will also have its own biodiversity action plan in due course which needs to be incorporated into the LAPs if timelines align.

The *Development Plans Guidelines* detail mandatory heritage and landscape objectives in Chapter 9. Whilst these may be more relevant for CDPs, there is a need to ensure that the Portlaoise LAP secures compliance with these objectives. These guidelines also rightly note that the majority of the country "*lies outside of the network of protected sites, and that there are many other sites which are of local importance for flora and fauna*". Local authorities have an important role to play in preventing the loss of such sites.

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Features such as hedgerows, river corridors, ponds and small stands of trees etc. provide important habitats, and land use plans can play an important role in protecting these assets. From an ecological view these linear features are one of few ecological corridors/hotspots in and around settlements. These ecological networks should have a level of protection in the LAP, and any forthcoming Biodiversity Action Plan can map and classify these features in order to provide a scientific evidence basis for their inclusion in the LAP.

It is with this in mind that the Heritage Council strongly supports measures that enhance biodiversity in Portlaoise and welcome the commentary regarding green corridors/ecological networks e.g. River Triogue and the park. However, this is unlikely to be the only potential corridor. As per the previous paragraph there is a need for an understanding of key habitats within the LAP boundary with the view to identifying key ecological corridors/local biodiversity hotspots. This could be mapped and captured in this LAP (with the aid of the Council's future Biodiversity Action Plan) and be provided for in policy. Policy NH015 aims to achieve this, however hedgerows and trees are only one habitat type that can function as an ecological corridor.

There is a need to protect existing hedgerows/ trees when new development is proposed. There is often needless removal of mature trees and hedgerows, of considerable character and ecological value, as part of site works to 'tidy' the site before construction commences. While opportunity sites within the town or any phased greenfield release should have stringent design standards for retention of natural features. We therefore note Policies NH 03 and NH 08 and welcome these. Regarding policies for the aquatic environment please include reference to the relevant guidance documents from Inland Fisheries Ireland, namely "*Planning for Watercourses in the Urban Environment*", in the LAP.

It is also important to note and provide policy for the proposed Natural Heritage Area (NHA) – *Ridge of Portlaoise*, an esker which is a linear feature to the south and north of the town and is considered one of the best examples of esker in County Laois. Nettle-leaved Bellflower and Blue Fleabane have been recorded in this site, both rare plants, the former being listed on the Flora Protection Order 1987. Part of the designation corresponds to the network envisaged for the River Triogue.

In general terms, the Heritage Council cautions against the assumed use of 'green infrastructure' in a chapter that makes policy provision for Biodiversity and Natural Heritage. It is indeed a multi-functional use but there are many uses within green infrastructure that have limited ecological potential. This is indicative of some of the policies/objectives in this section i.e. NH P2, NH 06, and NH 09, while the list of policies in this chapter, for the most part, appears copied from the built heritage section. Many of these objectives have more relevance for community and recreational sections of the plan, rather than natural heritage. While some policies appear repetitive.

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We would recommend that the objectives and policies of this section be reviewed to ensure that they are bespoke to biodiversity and natural heritage, and to avoid repetitive duplicated policy.

We would also remind Laois County Council that such biodiversity policymaking is a requirement of National Policy Objective 58 of the NPF, insofar “*as integrated planning for Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans*”; while National Policy Objective 60 (*Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance*) is also a requirement. In addition, policies noted previously in the Laois CDP 2021-2027 also place requirements on this LAP.

The Heritage Council commend the inclusion of a policy for TPOs, although ecological value should also be one of the reasons for designating a TPO. We would also encourage active TPO work in the form of a fresh ‘walk about town’ assessment of trees of important ecological and character value with the view to identify further TPOs. We also recommend that “*Amenity Trees and Woodlands – A guide to their Management in Ireland*” published by the Tree Council of Ireland, be identified as source in the relevant section of the LAP, which could also consider the inclusion of a green network strategy, or similar.

### **Strategic Environmental Assessment/ Appropriate Assessment**

There will be an SEA and Appropriate Assessment required for the LAP. There is a need to ensure that all future policies drafted are individually assessed against the SEA objectives, when the time comes. The Heritage Council recommends that the SEA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when preparing the SEA for the LAP.

### **Conclusion**

The Heritage Council strongly encourage Laois County Council to continue to acknowledge the primacy of Portlaoise’s heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development trajectory for the town and its environs.

I trust these comments will be considered carefully as Laois County Council progresses the Portlaoise Local Area Plan 2024-2030.

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