



**Heritage Council - Celebrating 25 Years**

**Submission on the Tipperary County Development Plan 2021-2028 Issues Paper<sup>1</sup>**

***'Putting Town Centres First!'***

**Key Priorities for the plan in order to support the delivery of the NPF and RSES:**

1. Ensure the UN Sustainable Development Goals are at the heart of the new county development plan in order to acknowledge and appropriately respond to Dáil Éireann's declared National Emergency on Climate Change & Biodiversity Loss<sup>2</sup> in May 2019 and the *Climate Action and Low Carbon Development (Amendment) Bill 2020*;
2. In accordance with the UNECE Aarhus Convention, the EC's Urban Agenda and the European Landscape Convention (ELC), formulate and deliver a *Town Centre First Policy* for the designated key towns of the county (and other villages) within the county – direct all new development to the historic town core or edge of historic core<sup>3</sup>;
3. Embrace the key tenets of the Programme for Government (#PfG), which was published in June 2020, including the need for a national policy focusing on Town Centres First, the enhancement of the built heritage in our towns and villages, and the reuse and repurposing of vacant buildings in historic town centres;
4. Adopt the **Tipperary Town Heritage Action Plan 2020-2022** launched by Minister Noonan TD in August 2020 as part of the county development plan – introduce the concept of heritage action plans (HAPs) for other historic towns throughout the county;
5. Ensure that the Tipperary County Heritage & Biodiversity Action Plan is updated to support the county development plan's heritage objectives and to achieve stated government policy as set out in the National Heritage Plan 2002 and a key action under *Heritage Ireland 2030*;
6. Seek to enhance Tipperary's biodiversity knowledge and information base, through the recruitment of a County Biodiversity Officer to aid and support future planning and development within the county, in line with the current PFG.
7. Assess the impact of Climate Change on current heritage and future development in the county – potential development land within town and village boundaries may have to be reassessed to facilitate expected sea level rise and inform proposed flood relief schemes – this would not preclude uses such as greenways or similar – any assessment should include opportunities for green-ecosystem services;

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<sup>1</sup> Please note that this submission is in final draft format (on the public file) until it has been presented to the Heritage Council's new Board at their first meeting, which takes place in December 2020.

<sup>2</sup>

[https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint\\_committee\\_on\\_climate\\_action/reports/2019/2019-03-28\\_report-climate-change-a-cross-party-consensus-for-action\\_en.pdf](https://data.oireachtas.ie/ie/oireachtas/committee/dail/32/joint_committee_on_climate_action/reports/2019/2019-03-28_report-climate-change-a-cross-party-consensus-for-action_en.pdf)

<sup>3</sup> Further retail development in out-of-town locations should not be permitted until vacancy rates in town/village centres in County Tipperary have reduced to more sustainable levels i.e.5-7%.

8. Ensure that Tipperary County Council has sufficient technical staff to support the revitalisation and regeneration of town and village centres within the administrative area, as per the Programme for Government – i.e. the post of LA Architectural Conservation Officer (ACO) needs to be filled as soon as possible - see map below;



(Source: Heritage Council, 2020.)

9. Establish sustainable key indicators and monitoring processes through Strategic Environmental Assessment (SEA) to ensure that a county-wide Town Centre First Policy is working, i.e. commercial vacancy rates in town centres should be targeted at 5-7% (not 25% which is the present ground floor [commercial] vacancy rate in Tipperary Town<sup>45</sup> (Source: HC CTCHC Programme, November 2020);
10. It is recommended that the local authority and its partners could involve international peer reviewers on town centre matters and network within the CTCHC Programme to ensure that this recommended monitoring takes place;
11. Undertake *Collaborative Town Centre Health Checks (CTCHC)* for towns in county Tipperary every two years and throughout the plan period – create a bi-annual monitoring system in partnership with local chambers, civic groups/leaders, etc;
12. Support the ongoing Tipperary Town CTCHC Project, which has been significantly impacted upon by ongoing Covid-19 restrictions;

<sup>4</sup> <https://www.heritagecouncil.ie/content/files/Sligo-Collaborative-Town-Centre-Health-Report-2020.pdf>

<sup>5</sup> <https://www.heritagecouncil.ie/content/files/Dundalk-Collaborative-Town-Centre-Health-Check-Report-2019.pdf>

13. Formulate and deliver a *Tipperary Town and Buildings Renewal Plan* as soon as possible, working in partnership with the Tipperary Town Revitalisation Taskforce and the Department of Housing, Local Government and the Heritage Council. This plan should also promote the historic town centre as a Strategic Energy Zone (SEZ);
14. Tipperary County Council should seek to ensure that all data, which is geospatial in nature is processed, so as to maintain and preserve its original meta data i.e. therefore it may be queried and sorted accordingly;
15. Progress a single source of geospatial truth for the whole of the county. All public authority information needs to be further supplemented and enhanced to provide the appropriate level of detail. The *Planning and Development Regulations, 2001*, clearly specify:
  - Site or layout plans shall be drawn to a scale of not less than 1:500 (which shall be indicated thereon), the site boundary shall be clearly delineated in red, and buildings, roads, boundaries, septic tanks and percolation areas, bored wells, significant tree stands and other features on, adjoining or in the vicinity of the land or structure to which the application relates shall be shown, land which adjoins, abuts or is adjacent to the land to be developed and which is under the control of the applicant or the person who owns the land which is the subject of the application shall be outlined in blue and wayleaves shall be shown in yellow; and
  - Other plans, elevations and sections shall be drawn to a scale of not less than 1:200 (which shall be indicated thereon), or such other scale as may be agreed with the planning authority prior to the submission of the application in any particular case;
 It is important that our public planning system is advanced to incorporate this detail and make full use of it.
16. The county development plan should support an audit of embedded carbon in existing buildings in historic town and village centres within the plan area – this audit could link to the ongoing work of the CTCHC Programme and the proposed Town and Buildings Renewal Plan<sup>6</sup>;
17. An audit is required to include the management, conservation and management of Tipperary’s peatlands. It should be a target of the local authority to hold these already stable carbon sinks that pertain in Tipperary’s fens and bog habitats, these should be looked to in terms of re-wetting programmes, where feasible, thus creating carbon sinks from carbon sources;
18. Include specific policy to support *Collaborative Town Centre Health Checks* for towns in the county following the Heritage Council and Partners’ award-winning programme methodology i.e. the 15-Step CTCHC process. Please see Tralee and Letterkenny CTCHCs - both towns are recipients of the Bank of Ireland’s National Most Enterprising Town in Ireland Award in 2017 and 2018;
19. Ensure that all Strategic Housing Development (SHD) proposals are within or adjacent to the town centre – e.g. Tipperary Town’s vacancy rates are currently well above the EU average. Undertake full review of existing opportunity sites in town centres as part of a much-needed switch to a Town Centre First policy in line with government policy;
20. Prioritise the establishment of an *Investment One-Stop Shop* for County Tipperary in partnership with relevant private and civic partners and other international and national partners;

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<sup>6</sup> [https://www.buildup.eu/sites/default/files/content/worldgbc\\_bringing\\_embodied\\_carbon\\_upfront.pdf](https://www.buildup.eu/sites/default/files/content/worldgbc_bringing_embodied_carbon_upfront.pdf)

21. In line with EC policy, formulate a *Town Centre Living Strategy* for the designated key towns as soon as possible in partnership with the EIB and other private investment and social enterprise partners;
22. Prepare a sustainable regeneration plan for publicly-owned land banks - focus on town centre sites, in line with recommended Town Centre First Policy (see above) – liaise with the Land Development Agency in this regard;
23. Develop robust *Enabling Policy* and *Streetscape Design Guidelines* to support infill development in Town Centres;
24. Formulate and deliver a *Strategic Development Plan to set up Business Improvement Districts (BIDs) in the county* i.e. see Dundalk BID – highlight the need for National and Regional Strategies for the development of BID Companies in Ireland e.g. Scotland has 40 no. BID companies and Ireland currently has four town centre BIDs, including the recently established Drogheda BID;
25. Undertake *Riverscape Studies* in partnership with the NPWS and the Heritage Council for the designated key towns and examine the feasibility of creating greenways and blueways along the rivers/lakes, etc;
26. Undertake Noise and Air Quality/Pollution Mapping for the county’s historic towns in order to inform strategies for enhancing and encouraging town centre living;
27. Set up a Public Transport Stakeholder Group in Tipperary Town and liaise with relevant partners including Irish Rail;
28. Create a Priority Bus Corridor from the railway station in Tipperary to the town centre, connecting work and town centre living;
29. Establish a priority Greenway linking the town centre to the railway station and establish a Heritage Loop walk in the town environs;
30. Work with University of Limerick and IT Limerick to identify and develop a vibrant Student Quarter within Tipperary Town Centre;
31. Tipperary County Council should audit their land banks, giving particular consideration to opportunities for all ecosystem service provision, this can be as basic as applying less chemical herbicides to roadway management and / or facilitating more natural vegetation to establish for pollinators;
32. The larger towns in the county should be enhanced by a range of biodiversity key species, which can play a significant role in enriching the users/consumers’ experience – a softening of a rich built environment by means of pocket parks, orchards, pollinators, and swift box enhancement etc can all go a long way to enhance the urban fabric as well as functioning as an ecosystem service;
33. Just as many Irish towns turned their backs to waterways dissecting these urban centres in the past, Tipperary’s fresh-water river environment also calls to be acknowledged, supported and developed. These sensitive habitats and communities, if sustainably managed will be a constant draw to tourists, the basis for high-end locally produced food and a backdrop to Tipperary’s rural landscape for generations; and
34. It is recommended that a detailed *Public Communications Strategy* is formulated to ensure that the county development plan is successfully monitored and delivered.

Submitted on behalf of the Heritage Council

13<sup>th</sup> November 2020

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