



Planning Ref: 2460038

06 March 2024

**Planning Department**

Áras an Chontae,  
Charleville Road,  
Tullamore  
Co. Offaly  
R35 F893

Dear Sir/Madam

**Re: 2460038: LARGE SCALE RESIDENTIAL DEV. (LRD) RESIDENTIAL, COMMERCIAL (CAFÉ/RESTAURANT & RETAIL) & CHILDCARE USES ALL CONTAINED IN A NO OF BUILDINGS at D.E. WILLIAM'S HOUSE (PROTECTED STRUCTURE) PATRICK STREET, DE BRUNS PATRICK STREET, NOS. 1-4 DE BRUNS PATRICK STREET, NOS. 1-6 THE CORN LOFT PATRICK STREET AND CAR PARK/QUINNSWORTH KILBRIDE STREET, TULLAMORE**

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.

**GENERAL**

The Heritage Council support efforts to achieve more sustainable patterns of development, via more consolidated growth in rural villages, market, and county towns. The redevelopment of inner urban core sites, particularly those dominated by surface car parking, can bring benefits to the living and historic environment of towns such as Tullamore. However, there is a need to ensure that there is not a misguided conflation between high density and high buildings in terms of achieving compact growth. It is clear that this conflation is being made in relation to the approach to the design of this proposed scheme. High density compact growth does not necessarily mean high buildings. The latter inevitably has significant impacts on the heritage of historic townscapes. Relatively high density can be achieved by high site coverage, rather than by building height. Accordingly, the Heritage Council have several concerns regarding this scheme and cannot support it in its currently form.

**Baill na Comhairle | Council Members**

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We have studied the application documentation, with particular emphasis on the Architectural Design Statement, Townscape Visual Impact Assessment, Architectural Heritage Impact Assessment, Ecological Impact Assessment and Bat Survey Report. Our comments are therefore confined primarily to architectural and townscape heritage, and the biodiversity aspects of the scheme. They are divided as per the following:

1. Built Heritage
  - Architectural Heritage (Townscape and Visual Impacts)
  - Architectural Heritage (Protected Structure)
2. Natural Heritage
  - Ecology

## **BUILT HERITAGE**

### **Architectural Heritage (Townscape and Visual Impact)**

Tullamore is a typical county town in an Irish context. Irish towns characteristically emerged in a sequence of historical stages between the thirteenth century and the present. The survival of these historic stages is generally recognisable and plays an important part in the visual and [historic heritage](#) of most towns. The linear or axial Irish townscape is a key feature of our national built heritage, typically characterised by a formal linear street layout, public spaces, key junctions, and streetscapes. It is then, regarding how these components are arranged, that the uniqueness of this townscape emerges.

Tullamore is typical of a linear/ crossroads character streetscape characterised by two to three story buildings with a vertical emphasis in terms of proportions and fenestration. Although historically it would also have been viewed as an 'axial' townscape insofar as the Barracks (no longer present) would have formed a special feature at what is now the punctuation of Patrick Street. Within this streetscape individual notable buildings (often important merchant, ecclesiastical or administrative) are interspersed within the uniform building rhythm. Examples in a Tullamore case include the DE Williams House and the Bridgehouse Hotel (both identified as *regionally significant* in the National Inventory of Architectural Heritage). Collectively the buildings along Church Street, Bridge Street, Columcille Street, and Patrick Street provide an excellent ensemble of this historic streetscape which is strongly associated with county/ rural market towns in Ireland.

It is with this in mind that the Heritage Council notes the opening line in the Vision (Section 1.5 of the Architectural Design Statement) which we believe encapsulates the issue with the approach to the redevelopment of this site. It states that "*the development represents an exciting redefinition of the city centre through a series of new buildings. ...*". Tullamore is a typical county market town with a strong rural hinterland; therefore, it is not a large urban 'city centre' and a 'redefinition' of one of the midlands' traditional streetscapes is not warranted or welcomed.

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The Architectural Design Statement notes that the intention is to create a landmark in this location whereby height “*represents new urban quarter character*”. The proposed development ranges in height from two storeys to 13 Storeys where the proposed buildings are intended to be of “*large scale compared to the small scale of some of the buildings surround the site*”. The approach is clear insofar as the development seeks to “*represent a new paradigm*”, and it will undoubtedly be visible from a long distance across the townscape. Whilst this forthrightness is acknowledged, the Heritage Council does consider the premise of the design approach for this inner town core development site to be fundamentally flawed. How this new development presents itself to the existing townscape, particularly in relation to the height, scale, and massing of the new build elements, cannot be supported on heritage grounds.

Although both assessments (the Architectural Design Statement and Townscape and Visual Impact Assessment) seek to identify townscape character, there does not appear to be an adequate understanding of the evolution of the historic townscape of Tullamore, and therefore the approach to the development of the site has not been fully informed by this uniqueness. For example, the townscape character section 1.10 in the Architectural Design Statement primarily notes infrastructure projects, such as the bypass, canal construction as well as a hot air balloon crash, rather than street and block townscape changes over time. Whilst not completely irrelevant, a more streetscape-centred description would have been expected in a section titled “*townscape character*”. While the Town and Visual Impact Assessment goes into more detail, it still lacks a detailed description of the evolution of the streetscape of Tullamore. The lack of this appreciation, at the very least, has conceived a misinformed design approach; or given the clear intention to create a new ‘paradigm’, indicates a complete disregard for the existing townscape character.

The Town and Visual Impact Assessment does detail the impact of the development on the key receptors with key views identified and illustrated by well-developed photomontages. Descriptions of key streets are provided. We do not agree with the statement regarding Columcille Street and Bridge Street that where there is “*such variety there is capacity to accommodate change*”. Subtle variation is of course inevitable but the stated intention to establish an “*exciting redefinition*” is not subtle but rather excessive in approach. We have studied **Table 1** - Visual Impact Assessment in this document, which details the impact of the proposal on key receptors. With the exception of three neutral effects, the assessment considers the proposal to have positive effects on the majority of receptors. We disagree with these conclusions.

The Assessment notes, in relation to some receptors, that the proposal’s effect is intentional i.e. “*The development objective is to change the townscape character....*”. Whilst it also states that “*some people will consider the change excessive and inappropriate for a town of Tullamore’s current character and status (in the urban hierarchy of Ireland)*” before going on to say – “*However, the design and material quality of the buildings (and the planning gains such as the intensified land use mix and the new*

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*network of public spaces, improving permeability and navigability) are such that, while dramatically changed, the quality of the built environment would be elevated”.*

It is clear that the intention is to change townscape character, rather than be informed by it, or show appreciation to it. Any positive effects of regeneration are seemingly justified by the introduction of a ‘contemporary high-density design’, which appears, according to the assessment, ‘logical’. We fundamentally disagree with the premise of this intention and therefore the conclusions of the visual impact assessment.

In addition, it is important to note that all too often assessments such as this allow the leaking of other planning considerations into the assessment. Other planning gains and their discussion do not belong in landscape/ townscape visual impact assessments. An objective visual assessment of the proposal on the townscape should be the sole objective of this assessment. Accordingly, we would criticise the inclusion of discussions in the LVIA on other planning issues such as the “strategic ambition for Tullamore”, “minimised residents requirements for use of private cars”, or “intensified land use mix”. With regard to the receptor “Western end of Patrick Street” the assessment notes that “*Considering Tullamore’s scale and diversity, its development history and the ambition indicated by the Development Plan, the effects can be classified positive*”. The Heritage Council would remind Offaly County Council that this is an assessment of townscape and visual effects from the proposal. The ambition of the development plan is not a material consideration for this specific assessment, yet it appears to have been part of the consideration to classify the visual effects as ‘positive’. Justification and wider planning considerations should be confined to planning supporting statements, not objective environmental assessments, whereby their inclusion undermines the integrity of the assessment.

In summary, we agree that the magnitude of change is high and significant, but we do not agree that it is positive. The visual change to Tullamore will be significantly negative, irrespective of the intention and shows little regard for the existing townscape character and its evolution; therefore setting an undesirable precedent, that if replicated, would significantly alter, and damage the historic integrity of our county towns and rural market towns.

**County Development Plan compliance:** The proposal does not comply with Policies RP-08, RP-11 BHP-02 of the Offaly County Development Plan 2021-2027, nor can it be said that the scheme, as currently designed, meet the principles of growth in the CDP 2021 -2027 namely with regards to (xvi) where Towns and villages are to become more attractive, well-designed, of high-quality design and ‘liveable’ through healthy place-making.

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### Architectural Heritage (Protected Structure)

Of primary interest is the protected Structure (D.E. Williams House, and its Stone Former Distillery), although the De Bruns Buildings is also of historical significance, albeit non designated. There is no significant change to the massing of the buildings, either the main House or the stone out building (former bottling structure). The refurbishment of these buildings, particularly the rear stone building is welcomed in principle. There is no objection to the new glazed section which will connect the main house to the former bottling structure, which if executed successfully could benefit the setting of both the house and this outbuilding. There are three points made in this regard:

1. The proposed glazed feature which connects the outbuilding to the DE William House, would demonstrate greater respect to each of these buildings if it was constructed to be lower than the eaves of either building i.e. two storey connection rather than a three-storey connection i.e. at the scale of the current concrete extensions.
2. Can access to the basement not be facilitated via the new glazed connection, rather than the removal of part of the wall and railings to the street facing front elevation?
3. Greater details for the alterations to the front door should be provided by means of condition, as well as the exact specification for the replacement sash windows.

**County Development Plan compliance:** Several further clarifications or design alterations are needed to ensure that the proposal complies fully with Policy BHP-01 of the Offaly County Development Plan 2021-2027.

### NATURAL HERITAGE

#### Ecology

Given the site is characterised mostly by hard standing in an urban environment, there will be limited ecological potential, except for the existing stone wall located to the west of the site, as well as any bat roost potential in the buildings earmarked for demolition. The stone wall may be small but is an example of the only habitat features present in urban areas and efforts should be made to retain it.

The disused buildings have naturally significant bat roosting potential, and this has been rightly identified in the bat roost survey report. We note the survey work that has been done including the species identified during such surveys. The conclusions suggest that small numbers of common pipistrelles and soprano pipistrelles are using the buildings.

However, the report notes in the concluding line that *“the hibernation survey found no bats but that it is still considered possible that the buildings within the site could also*

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*potentially support small numbers of hibernating bats, given the potential roost features which are available within the buildings*". However there appears to be confusion here.

The surveys indicated in the report (Tables 2, 4, 5) occurred between May and September, while, as the report rightly points out in Figure 2, the hibernation period is between November and February approximately. Therefore, it is not clear if a hibernation survey was actually done, which is suggested by the concluding statement. There is a need for the ecologists to clarify this. The mitigation recommendation does state that November surveying would be required before demolition.

Notwithstanding this, we strongly insist that the recommended mitigation (in full) identified in section 6 of the bat report, be enforced by condition for any demolition of these buildings.

**County Development Plan compliance:** Clarification on the hibernation survey requirements for bat roosting is needed to ensure full compliance with Policy BLP-05 and BLOP-06 of the Offaly County Development Plan 2021-2027.

## CONCLUSION

In conclusion, we consider the approach to this development flawed. There is disregard to existing townscape character resulting in a design that by virtue of its mass, height, bulk, and scale, is completely inappropriate to the county town context. The dynamic between high density and high buildings is conflated, resulting in a proposal that would set a very undesirable precedent for inner town core redevelopment in historic towns throughout Ireland. As such the Heritage Council does not support the scheme as currently proposed.

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