



12 April 2024

Senior Executive Officer

Planning Department
Carlow County Council
Athy Road
Carlow
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Dear Sir/Madam

Re: Tullow Local Area Plan 2024-2030 Issues Paper

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 Tullow (LAP) Issues Paper. We have considered the questions provided under each section of the Issues Paper, and our comments below are a response to these questions, where they were relevant. Our comments will deal with both built heritage and natural heritage, as the matters appear in the Issues Paper. 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 onset 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.

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There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

The 4th 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 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 **Carlow County Development Plan 2022 – 2028** has a comprehensive chapter on natural and built heritage. Policies NH. P1 and NH. P2 place strong emphasis on the protection and enhancement of natural heritage, with no net loss of biodiversity envisaged. Policy ND. P1 also seeks the protection of ecological networks and corridors. While policy WT. P1 places strong emphasis on the protection of hedgerows and trees when considering new development proposals. Built heritage policies within the Carlow CDP 2022-2028, namely BH. P1 and BH. P2 seek to position heritage at the heart of planning in Carlow, including in relation to regeneration, while Policy PS. P1 identifies the role of protected structures, including architectural conservation areas in promoting the heritage of Carlow.

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Specific comments on the Issues Paper

4. Future Vision for Tullow

The current vision captures well the importance of balancing future development with the protection of the town's natural and built environment. We recommend that this heritage emphasis be carried through to the new plan. The existing heritage of towns such as Tullow cannot be replicated and should be the point off which new future development pivots. In this regard, the traditional [Irish townscape](#) of linear townhouse development along arterial routes is an important part of our heritage. Tullow's main avenue from Bridge Street to Church Street is a good example of this, with attractive views towards the spire of Saint Columba's Church evident. The town also benefits from the river Slaney which is an important natural heritage feature (designated a Special Area of Conservation) in the town.

We would recommend that the positive elements of the current vision be brought forward into the new vision for Tullow. The LAP could assist this vision, by ensuring infill development which mirrors this linear townscape. A consolidated urban form that amplifies this 'townscape' character should be pursued. Collaboration with other departments in the council, insofar as supporting the repurposing of vacant/ derelict buildings particularly for residential uses, is needed in this regard. This should be pursued with the same rigor that regeneration/consolidation sites are pursued during the lifetime of the plan.

4. Strategic Planning

Policies CS P8 and Policies CS P9 from the CDP have rightly been identified as important policies for Tullow. Decision making at county level will also be relevant here to ensure that these policies are successful. In relation to the area of focus of the LAP, there is 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.

A proactive effort is required in this regard. LAPs should go deeper in terms of a greater expression of detail of their county development plans. Further work on identifying small sites in the town should be pursued based on a sequential town centre first approach. Within regeneration/consolidation sites, it is key to identify natural and built heritage constraints/assets; these should then inform the design/development approach to the site. In the first instance, development should not negatively impact the integrity or the setting of important features of natural, archaeological, and architectural interest.

6. Population and Housing

See points in following sections, which are relevant for this section.

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8. Compact Growth Urban Design and Regeneration

The most successful public realm proposals anchor off the heritage assets that exist, using them as the centrepiece in new public realm projects. This should be actively pursued in this LAP. There are examples throughout the country where this exists, including some proposals in this Issues Paper. We also strongly recommend that the LAP maximise opportunities for public realm/pedestrianisation in the town. This can successfully contribute to the perception and experience of the built historic environment, which is all too often car dominated. It is with this in mind that we strongly support and commend the proposed public realm works identified in the LAP for the Market Square area. The other areas identified for civic amenity improvements are also welcomed. In terms of the Market Square proposal, we would recommend that a more shared space material palette be pursued for the road element. The example of the Parade in Kilkenny would be a good benchmark for this proposal.

An initial view of the town gives the impression that there are large areas of surface car parking. This is particularly evident on the approach roads of Mill Street, Tullow Street (although it is noted that one site here is identified as a regeneration site), and Barrack Street. Whilst some of these parking areas may be unsuitable for development due to flood risk from the River Slaney, others may be conducive to brownfield development. The Issues Paper currently identifies some good initiatives in this regard, and it appears that good preliminary work, via the *Tullow Town Centre First Plan*, has been undertaken with the overall ambition to create a more attractive town. We encourage Carlow County Council to continue to pursue such initiatives and to integrate the ambition of the Tullow Town Centre First Plan into this LAP.

In addition, public realm and landscaping proposals can too often 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 aid local biodiversity ambitions. This opportunity is particularly acute in smaller towns with a large rural hinterland such as Tullow, where there already exist hedgerows in the surrounding environs, as well as riparian habitats on the Slaney. We welcome the emphasis on biodiversity walks and other heritage themed initiatives identified in the *Tullow Town Centre First Plan* and recommend that such endeavours receive formal planning provision in this section of the LAP.

In relation to achieving compact growth, it is essential that CDP development management standards, in terms of residential amenity, set back distances, and parking standards are not automatically assumed for inner town sites. It is likely that some of these standards are excessive and not conducive to compact growth or regeneration, particularly with regards to the reuse of buildings of heritage value. We have also noted the need for new development to respect townscape character. The Irish townscape is unique and recognisable, and has a relatively high density – high coverage development form, that simultaneously achieves compact growth and good design. The relatively recent development on Barrack Street adjacent to NIAH protected structure – Tullow

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Courthouse - is an example of where this was poorly understood, leading to an unsuccessful design. The properties along Barrack Street, including the Tullow Courthouse, are an attractive ensemble of buildings reflecting well a typical linear Irish townscape. It would have been preferable to replicate a terrace design here which may have achieved a similar density as the building that was eventually constructed. The large amount of surface parking that was then provided with this building would have significantly lowered the development density of the site. The LAP should establish policies that will avoid this design approach in future.

We strongly recommend that that Carlow County Council consult in detail, the *Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities*, published in January 2024, with specific concentration on the relevant sections for the settlement size of Tullow. This guidance should then inform and be incorporated into this section of the LAP. These guidelines relate to density, placemaking, and development management standards insofar as how they should be applied in specific contexts.

9. Sustainable Transport and Infrastructure

One of the key fundamentals of proper planning, identified in the development plan guidelines for local authorities, is the integration of land use (patterns of development) and transport (mobility). Please note again here our comments in relation to the identification of potential development sites in core areas.

To reduce car dependency, we would recommend that Carlow 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.

10. Climate Change and the Environment

Policies to reduce car reliance are essential. We have already noted this under the compact growth and transport sections. The *development plan guidelines* rightly emphasise that objective 10(2)(n) is to promote sustainable settlement and transportation strategies in urban and rural areas, in relation to the location, layout and design of development. At the level of first principles, together with the reuse of the embedded carbon in vacant buildings, this is the most important role the planning system has in reducing greenhouse gas emissions i.e. the cause of climate change. In this context it is important that the Tullow 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.

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- Existing brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development.
- 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.

In terms of adaptation there naturally will be flood plains along the Slaney, adjacent to the town. Development should be avoided in these locations, while we would recommend to Carlow County Council that any flood defence measures should be considered at the entire catchment level in the first instance. There is opportunity to manage flood risk via nature-based solutions, whereby lands liable to flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish in these flood plains. Flood plains should be the “low hanging fruit” for ecological restoration measures given their unsuitability for development. While it is recognised that in urban areas where development has occurred, flood relief schemes may be needed; in the first instance, a whole river basin catchment approach to managing flooding should be pursued (as noted under actions 2D6 and 2D7 of the NBAP 2023-2030). Any flood alleviation measures for the town should include an assessment of solutions upstream before moving onto hard physical infrastructure in the built environment.

12. Heritage and Green infrastructure

We strongly support the statement that the “Draft LAP will seek to protect and preserve the town’s unique built, natural and archaeological heritage while guiding new development in a sympathetic manner or re-development “. The identification of assets is good practice and should be borne in mind when considering developments within the town and its environs. The *Development Plan guidelines* also identify mandatory objectives for architectural heritage which include Architectural Conservation Areas, and the Record of Protected Structures. These need to be included in the LAP.

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 replicated or recreated. Again, we would emphasise that regeneration and the need to bring life back into inner villages and towns respond in a positive way to the established pattern of development. Similarly, the *Sustainable Residential Development and Compact Settlements guidelines* specifically note the importance of responsive placemaking for existing heritage, and we suggest that this informs the strategic ambitions for this LAP.

We would also recommend that the LAP seeks to identify any ensemble of linear townhouses that portray well the character of the typical Irish town in Tullow. In this vein, and in line with Policies PS. P1 to PS. P4 in the CDP, we recommend that any such

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ensemble in the town centre be considered for an ACA designation. The Council's Heritage Officer/ Conservation Architect could be consulted on this endeavour.

It is important to note in this context that heritage protection is essential for a viable tourism product. In this regard we also encourage Carlow County Council to protect existing traditional shopfronts. There are several attractive traditional shopfronts in the town that are worthy of protection. Finally, a hillfort was identified immediately east of the town on Tullow Hill based on aerial imagery from 2018, which will be identified in the Record of Monuments and Places during the drafting of this plan. Please see paper by *Becker and O Driscoll 2022 in Archaeology Ireland, Winter 2022, Vol. 36, No. 4 (Winter 2022), pp. 30-35, Wordwell.*

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 Tullow LAP ensures that there is 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. 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.

It is with this in mind that The Heritage Council strongly supports measures that enhance biodiversity in Tullow. 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. From an ecological view these linear features are one of few ecological corridors/hotspots in and around settlements. Opportunity sites within the town or any phased greenfield release should have stringent design standards for retention of natural features.

We would also remind Carlow County Council that this 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 Carlow CDP 2022-2028 re-enforce this ambition.

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In Tullow the riparian zone along the Slaney River (Special Area of Conservation) would be particularly important. Specific actions could be taken here to amplify its importance for the town as well as placing obligations on the plan to take actions to protect and enhance its ecological integrity. We recommend that Carlow County Council familiarise itself with the qualifying interests and the site synopsis for this SAC, which is available via the NPWS, and to include reference to the relevant guidance documents from Inland Fisheries Ireland, namely “Planning for Watercourses in the Urban Environment”, in the LAP.

The *development plan guidelines* also specifically seek the protection of areas of amenities (natural features) namely (i) Special Amenity; (ii) Landscape Conservation Areas; (iii) Tree Preservation Orders; and (iv) Public Rights of Ways. Within an urban area not all such natural features will be relevant, however public rights of way are often essential for not just the experience of the landscape, but also the experience of local heritage, in both towns and rural areas. We would recommend that public rights of way are maintained or expanded where necessary.

The Heritage Council 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 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 should also consider the inclusion of a green network strategy, or similar.

Finally, we would caution against the blanket use of the term green infrastructure from an ecological perspective, particularly in relation to recreational areas and domestic gardens. While both features may be ‘green’ they may have limited ecological potential. The maintenance regimes in public parks, recreational areas and indeed private gardens determine the ecological baseline significantly.

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 that Carlow County Council continue to acknowledge the primacy of Tullow’s heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. This was rightly identified in the vision for the current LAP and we recommend that this important heritage and character continues to guide a sustainable future development trajectory for the town and its environs.

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I trust these comments will be considered carefully as Carlow County Council progresses the Tullow Local Area Plan.

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