An Chomhairle Oidhreachta The Heritage Council



Planning Ref: 2461042 22 January 2025

Planning Department, Tippery County Council

Dear Sir/Madam

Re: 2461042 - the redevelopment of existing 4-storey derelict building comprising of retail unit at ground floor and 3-storey living accommodation over, to renovate / refurbish same providing 2 no. independent living units at upper floors over ground floor retail unit, alterations to ground floor retail unit and all associated site development works and planning permission is also sought for the indefinite retention of existing rear stairwell to serve the upper floor living units AT 48 O'Connell Street, Clonmel, Co. Tipperary

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 management, and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council support refurbishment of existing buildings in our historic towns and settlements. We are growing increasingly concerned regarding vacancy and dereliction in Irish towns and villages. This unfortunate trend has been, and continues to be, a major threat to the country's built heritage. The historic environment of Irish towns is typically characterised by a formal linear street layout, public spaces, key junctions, and streetscapes. Within this arterial streetscape individual notable buildings (often important merchant, ecclesiastical or administrative) are interspersed within the uniform building rhythm. Clonmel, particularly this area of the town, is a good example of this.

Whilst 48 O Connell Street is not listed on the Record of Protected Structures (RPS) under the current Tipperary County Development Plan 2022-2028, nor identified on the National Inventory of Architectural Heritage (NIAH), it is located within the *Clonmel* (O'Connell Street) *Architectural Conservation Area*. An ACA is designated primarily for the ensemble of built heritage assets within it, rather than the individual exceptional value of each property. Although such exceptional buildings do make an important contribution.

The development property in question appears to be vacant, and the proposal seeks to establish a retail unit on the ground floor with a residential 'above the shop' element also envisaged. The proposed renovation appears to result in minimal alteration to the

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external building fabric, with no demolition being proposed. Demolition should be avoided in Architectural Conservation Areas, and therefore, refurbishment proposals that seek to bring uses back into such properties in the historic cores of Irish towns should be supported. This is in line with national policies on compact growth in the National Planning Framework Ireland 2040.

For the reason's described above, the Heritage Council support the proposal believing that conservation through use is the best method of protecting buildings which are integral to the built and cultural heritage of our towns and villages. We also recommend to Tipperary County Council that any development management standards i.e. parking standards, amenity standards etc, be applied flexibly to such proposals so as to not compromise strategic national town centre first objectives, and other local planning policy outcomes. We believe, that in general terms, the proposal would support Policy 13 - 2 of the Tipperary County Development Plan 2022-2028, which encourages new development that contributes to the enhancement of ACAs.

Yours sincerely

Virginia Teehan

Chief Executive Officer

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