



Planning Ref: 2560187

11 April 2025

Planning Section  
Limerick City and County Council

Dear Sir/Madam

**Re: 2560187 - A) Demolish existing retail/commercial premises at ground floor and apartments at first floor, B) Demolish dwelling house, C) Construct a new 4 storey development consisting of 10 no. one bedroom apartments, 10 no. 2 bedroom apartments with bicycle storage, bin storage, together with all ancillary site works and services AT Old Church Street/Sraid Na Heaglaise, Abbeyfeale.**

Comment

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 proposed development is located in the historic core of Abbeyfeale and the site is partially within the Abbeyfeale Architectural Conservation Area [ACA 12 in the adopted Limerick City and County Development Plan 2022-2028]. The Heritage Council are of the opinion that the design of the proposed scheme should be better informed by the surrounding historical context, most notably the character brief for the pertinent Architectural Conservation Area.

Objective EH O53 of the Limerick City and County Development Plan 2022-2028 sets out the expectations for proposals in ACAs. Of particular note are the following requirements:

- b) Ensure that all development proposals within an ACA be appropriate to the character of the area having regard to the Character briefs for each area.*
- c) Ensure that any new development or alteration of a building within an ACA or immediately adjoining an ACA, is appropriate in terms of the proposed design, including scale, height, mass, density, building lines and materials.*
- d) Seek a high quality, sensitive design for any new development(s) that are complementary and/or sympathetic to their context and scale, whilst simultaneously*

**Baill na Comhairle | Council Members**

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Michael Farrell, Dr. John Patrick Greene, Fionnuala May,  
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Pierce, Sheila Pratschke, Prof. Mark Scott,  
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*encouraging contemporary design which is in harmony with the area. Direction can also be taken from using traditional forms that are then expressed in a contemporary manner, rather than a replica of a historic building style.*

The Heritage Council encourage the use of existing building stock from both a re-use and an embodied carbon point of view, although we recognise that occasionally demolition and rebuild may be justified. In addition, the Heritage Council strongly support compact growth, and proportionate and well considered brownfield site development, particularly in our rural towns and villages.

Ensuring that opportunity sites in our towns and villages are pursued reduces the need for development in less sustainable locations. Such development, however, needs to be of high-quality design to ensure that attractive places are established so as to entice people back into town and village living. In this regard scheme design needs to pivot off, and be informed by, the positive attributes of the existing historic character.

In design terms, the buildings earmarked for demolition do not particularly make a marked contribution to the quality and integrity of the ACA. However the proposed new development injects a stark addition to the historic townscape, which cannot be described as either sensitive or sympathetic. This is due primarily to the height of the building, and the material palette chosen. This is symptomatic of an approach that has failed to consider the existing historic context sufficiently.

The proposed building is a sudden and abrupt addition and is out of scale with the streetscape and ACA. The white render choice selected amplifies this, which is out of character in the context of the typical varied colour palette that exists in an Irish rural town such as Abbeyfeale. A greater overview of the historic context, and the character brief for the ACA would have aided the development of a more sympathetic design as well as a more suitable choice of materials.

In addition, how the building meets the ground needs further consideration e.g. a plinth etc. The proposed white render will not weather well and will stain easily because of splash up etc at ground level. More sensitive solutions need to be considered in this aspect also. The use of brick particularly on the lower floors or a drop in the building height/a three-story set back, could be considered. This may also provide the opportunity to have some own-door ground floor units, that may be more conducive to family living and would provide a more active street frontage, which would reflect the established rhythm in historic towns.

However, in general terms the Heritage Council believe that any urban design improvements need to be informed by a description of the existing receiving environment, so that heritage and placemaking are strongly intertwined. Therefore, the fundamental issue is the lack of consideration given to the ACA in which the development is partially located. This is evident in the design of the scheme, and further information is required in this regard.

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Accordingly, we recommend that a full review be undertaken in the Architectural Design Statement that includes an Architectural Heritage Assessment, which demonstrates how the scheme has been informed by the surrounding historic fabric and built form, particularly with reference to the Character Brief for the Abbeyfeale ACA. Subsequently this should require a re-design of the scheme in a manner that responds more positively to context in order to demonstrate how the proposed development complies with Objective EH O53 of the Limerick City and County Development Plan 2022-2028. This should result in an approach that enables a better designed scheme for much needed residential development in rural towns such as Abbeyfeale.

I trust these views will inform Limerick City and County Council's decision on the application.

Yours sincerely

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Virginia Teehan

Chief Executive Officer

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