



An
Coimisiún
Pleanála

Inspector's Report ABP-322520-25

Development	Demolition of existing derelict buildings together with all associated site development works.
Location	Parkville, Clonmel, Co. Tipperary.
Planning Authority	Tipperary County Council
Planning Authority Reg. Ref.	2460790
Applicant(s)	Melclon Unlimited Company.
Type of Application	Permission
Planning Authority Decision	Grant with Conditions
Type of Appeal	Third Party
Appellant(s)	Alan Moore
Observer(s)	Neil Jackman An Taisce
Date of Site Inspection	5 th of August 2025
Inspector	Caryn Coogan

Contents

1.0 Site Location and Description	3
2.0 Proposed Development	3
3.0 Planning Authority Decision	4
3.1. Decision	4
3.2. Planning Authority Reports	4
3.3. Prescribed Bodies	7
3.4. Third Party Observations	9
4.0 Planning History.....	10
5.0 Policy Context.....	11
5.1. Development Plan.....	11
5.2. Natural Heritage Designations	12
5.3. EIA Screening	12
6.0 The Appeal	13
6.1. Grounds of Appeal	13
6.2. Applicant Response	16
6.3. Planning Authority Response	16
6.4. Observations	16
7.0 Assessment	18
8.0 AA Screening.....	26
9.0 Recommendation.....	27
10.0 Reasons and Considerations	27
Appendix 1 – Form 1: EIA Pre-Screening	

1.0 Site Location and Description

- 1.1. The subject site, 0.185Ha, is located in the townland of Parkville, north of Clonmel town, along the western side of the Fethard Road (Regional Road R689).
- 1.2. The setting is rolling countryside and the structures are on a slightly elevated part of the landscape as the road approached the north. The remainder of the landholding where the site is located, is currently used for grazing.
- 1.3. On the opposite side of the Regional Road to the site, there are a group of houses. These houses include a commercial childcare facility and another property has a garage. Further north located in a dip on the road to the east of the R689, is a petrol filling station
- 1.4. The site includes an old dwelling and farmyard laid out in a courtyard formation, 180sq.m.. The structures on site are all single storey and low profile. The eastern buildings include three bays, consisting of a labourers cottage, a stable and a cow shed. The western building also includes three bay of agricultural stores. The structures are constructed of stone with slate roofs. I noted the roof as collapsed on two units within the western block.
- 1.5. The site is currently overgrown and inaccessible. The overall layout is within a courtyard created by old rubble stone walls. The original access appears to be from the southern site boundary where there is an old gate from an enclosed passage. The site can only be accessed from the fields north and south of the site.
- 1.6. I note the site was partially cleared to prepare the planning application as evidenced by the photographs accompanying the planning application, which also include drone imagery. The overgrown nature has returned to the site during my inspection.

2.0 Proposed Development

- 2.1. The demolition of all derelict buildings on the site and associated site development works. The buildings are in poor structural condition. The applicant considers them to be dangerous. The proposal is to remove the structure for health and safety purposes and include the site area, 0.18Ha, into the surrounding pasture.
- 2.2. The applicant was requested to provide the following further information:

As the existing structures proposed for demolition may have potential for roosting bat species the applicant is requested to arrange for a bat survey to be carried out by a suitably qualified bat expert/ecologist and to submit a copy of same for consideration by the Planning Authority. The survey shall be in accordance with the Bat Mitigation Guidelines for Ireland, (National Parks and Wildlife Service, DoEHLG, 2006). The applicant is advised that all bat species are protected by the Wildlife Amendment Act 2000 (as amended) and are listed in Annex IV of the EU Habitats Directive.

- 2.3. A Bat Survey of the site was received on the 20th of February 2025, prepared by Russell Environmental and Sustainability Services. The survey notes that there was no evidence of roosting sites in the two buildings or associated stone walls. The survey was carried out in December 2024 during the bat hibernation period.

3.0 Planning Authority Decision

3.1. Decision

Tipperary County Council granted planning permission for the demolition of buildings on the 16th of April 2025.

The bespoke conditions are listed in Section 3.2.3 of this report.

3.2. Planning Authority Reports

3.2.1. Planning Reports

07/11/2024

- The applicant has submitted a cover letter setting out a rationale for the demolition of the structures on site. The applicant has argued that the structures on site are in a poor state of repair, with notable structural defects in parts of the buildings. As such the applicant is proposing to demolish the buildings and restore the lands to agricultural use. A photographic record of the structures is included in the cover letter.
- The Planning Authority is of the opinion that the architectural heritage significance of the subject site would be rated as being Local or Record Only.

- The Planning Authority is of the opinion that the preservation of same by record is sufficient. A condition shall attach in the event that Planning permission is granted requiring a comprehensive photographic record of all structures on site be submitted to the Planning Authority prior to the commencement of works.
- Article 8D of the Planning and Development Regulations, 2001 as amended, works consisting of the removal for the purposes of agriculture of field boundaries including stone walls, clay banks or wire or post fences are considered exempted development.
- Given the legislative protection afforded to bats, it would be prudent to seek the submission of a bat survey by way of Further Information.
- The Planning Authority is required to consider the flood risk associated with the development as proposed and cannot consider the risk associated with possible works outside of the red line boundary.
- The proposed development has been screened as to the requirement for AA and it has been determined that AA is not required. See Screening Report attached.

Planning Report 11/04/2024

- A bat survey, prepared by Russell Environmental and Sustainability Services. The survey notes that there was no evidence of roosting sites in the two buildings or associated stone walls. The survey was carried out in December 2024 during the bat hibernation period. It is recommended in the report that a further survey is carried out during the active season (28th February to November 10th) to rule out bats roosting in the area.

3.2.2. *Other Technical Reports*

Conservation Architect Report 5th of November 2024

- Site was inspected by the Council's Conservation Officer. The structures are described in detail in the report.

- The structures are not protected structure. The structures are not listed in the National Architectural Inventory, nor is the area within an Architectural Conservation Area.
- The built heritage assessment, the planned arrangement and the contemporary nature of the buildings and enclosed yard, suggest a typical estate development rather than a subsistence-driven vernacular site where buildings are constructed over a period of time as resources allow and agricultural needs dictate.
- While the buildings are of traditional, good-quality construction, there is no evidence of notable design input and no features of particular decorative richness or complexity that would constitute significant architectural special interest.
- In response to submissions to the present application calling for detailed assessment of the site, it is not a protected structure or within the boundary of a defined ACA, an objective record and analysis of the context and upstanding fabric of the site has been prepared by an experienced built heritage professional within the planning authority.
- Demolition of the subject farmyard comprising two mid or later nineteenth-century building ranges and enclosing walls along within a partially-enclosed passage north of the farmyard will result in loss of historic masonry structures that are of typically unremarkable but nonetheless traditional nature.
- Given its lack of legally protected status and its relatively unremarkable architectural significance, there is no clear built heritage policy which precludes the granting of permission to the applicant for demolition of structures on the subject site.

3.2.3. **Conditions**

The following are bespoke conditions attached to the planning authority's schedule of conditions:

Condition No. 2

Prior to commencement of development, the developer is required to carry out a bat survey, during the active season (28th February to November 10th), to confirm that no bats are present in the structures to be demolished. This survey is to be undertaken by a suitably qualified bat specialist/ecologist and the results of same shall be submitted to the Planning Authority for written agreement prior to the commencement of any works on site. The applicant is advised that all bat species are protected by the Wildlife Amendment Act 2000 (as amended) and are listed in Annex IV of the EU Habitats Directive. If any bat species are found to be roosting at the site, a derogation license must be obtained from the Wildlife Licensing Unit of the National Parks and Wildlife Service of the Department of Housing, Local Government and Heritage prior to commencement of development.

Reason: To protect the natural heritage of the area

Condition No. 3

A full architectural and photographic survey of all buildings or elements of buildings proposed for demolition shall be carried out, and drawings and photographs indicating details of these buildings, to a scale acceptable to the planning authority, shall be submitted to the planning authority prior to the commencement of development. Two copies of this record shall be submitted to the planning authority prior to the commencement of development.

Reason: In order to facilitate the preservation by record of the architectural heritage of the site.

3.3. Prescribed Bodies

3.3.1 Department of Housing, Local Government and Housing: (22nd October 2024)

The existing structures on site are traditional farm buildings, which are evident on the 25inch historic Ordnance Survey Map, therefore suggesting a date of construction in the second half of the nineteenth century. The complex exhibits numerous characteristics of traditional or vernacular farmsteads including single storey linear structures, a primary dwelling house and associated agricultural outbuildings, arranged around an enclosing courtyard.

The simplicity of these structures is an intrinsic part of their character, reflecting local and regional customs and patterns and contributing to the distinctiveness of the historic built environment.

It is noted that Tipperary County Council 2022-2028 has a specific policy (13-3) which states it will 'Seek the sympathetic restoration, appropriate re-use and maintenance of buildings/features which are considered to be of local and vernacular architectural importance.'

The Department recommends it requests as Further Information a detailed assessment of the farm complex to establish its architectural interest and its contribution to the historic built environment and to assess its potential for reuse in whole or in part.

3.3.2 *Department of Housing, Local Government and Housing: (21st March 2025)*

It is noted that the Request for Further Information issued by Tipperary County Council did not seek the submission of 'a detailed assessment of the farm complex to establish its architectural interest and its contribution to its historic built environment and to assess its potential for reuse in whole or in part', as outlined in the Department's submission dated the 22nd of October 2024.

As the requested information is not available to us, the Department is not in a position to make a recommendation on this application.

3.3.3 *Transport Infrastructure Ireland* requests that the planning authority has regard to the provisions of official policy for development proposals as follows: proposals impacting national roads, to the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities and relevant TII Publications and proposals impacting the existing light rail network, to TII's "Code of engineering practice for works on, near, or adjacent the Luas light rail system.

3.3.4 *An Taisce* made two submissions:

1st Submission (21/10/2024)

The buildings proposed for demolition are of vernacular architectural heritage value and occupy a prominent roadside location. They have potential for restoration and repurposing for a variety of uses, representing a good example of a vernacular farmyard complex. The proposal fails to address the provisions of the Tipperary

County Development Plan's 'Respecting Vernacular Buildings section (p.195, Section 13.6, paragraph 2)

3.3.5 2nd Submission (7th of April 2025)

We note that the bat survey conducted by Dr. Jane Russell-O'Connor has stated that further observation is required until November of this year to rule out the presence of summer roosting bats.

We refer to the extracts below:

"4.1 Indication of Significance of Site for Bats. Upon close inspection of possible roosting and hibernation spots at this site, there was seen to be no evidence of the presence of bats. However, to rule out roosting sites, a dusk and dawn survey should be completed during the active season as the buildings provide a suitable environment for roost sites for a number of species.

6.0 Due to the fact that the survey was conducted during the hibernation period (November 10th to 28th February), it should be considered that there is still a possibility of bat activity and roosting at the site during the active season.

To conclusively determine the absence of bat fauna, a dawn and dusk survey must be completed during the active season"

We are further concerned that the Further Information request did not address the built heritage significance of the site, in view of the submission from the Department of Housing, Local Government and Heritage (dated 22nd October 2024) which recommended:

3.3.5 *Tramore House Regional Road Design Office*

The overall landholding encroaches the corridor to the Clonmel Road Link 3, however it is not close to the proposed works.

3.4. Third Party Observations

There were a large number (29No.) of third party submissions opposing the demolition of the farmstead. A summary of the salient issues raised in the submissions is as follows:

- The Planning Department has completely ignored an explicit recommendation from the Department of Housing, Local Government & Heritage, dated 22 October 2024. This Government department requested: '...a detailed assessment of the farm complex to establish its architectural interest and its contribution to the historic built environment and to assess its potential for reuse in whole or in part.'
- The building is an architectural exemplar of a farmhouse with courtyard and adjoining buildings, surrounded by a wall, of the late 18th century. The current Tipperary County Development Plan, 2022 – 2028, describes the courtyard layout as being of 'local architectural importance.'
- If demolition were to proceed on the site, significant amounts of carbon which would be released into the atmosphere. Moreover, the subsequent construction on the site would contribute to further carbon emissions, as the building & construction sector in general is by far the largest emitter of greenhouse gases, accounting for a staggering 37% of global emissions (UN Environment Programme).
- The buildings are over 150years old. A formal request has been made to include them onto the Record of Protected Structures.
- Signature of landowner is not accepted and application is invalid.
- Contrary to Clonmel and Environs LAP page 81, sections 7.2.1
- Removing these buildings appears to contravene Tipperary County Development Plan 2022-2028 with regards to its Respecting Vernacular Buildings (Co Tipp Dev Plan page 106, 6.7; p 195, 13.6.2)
- Loss of hedgerows and habitats
- Incomplete bat survey
- Loss of heritage
- Flood risk if the structures are demolished

4.0 Planning History

There is no relevant planning history associated with the subject site.

5.0 Policy Context

5.1 National Policy

National Planning Framework 2040

Planning for Diverse Rural Places

National Policy Objective 14

Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape that make Ireland's rural areas authentic and attractive as places to live, work and visit. The Action Plan for Rural Development will support this objective up to 2020; thereafter a review of the Action Plan will be undertaken to ensure continued alignment and consistency with the National Policy Objectives of this Framework.

Planning Framework Objective 17

Enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive use now and for future generations.

A Living Tradition: A Strategy to Enhance the Understanding, Minding and Handing on of Our Built Vernacular Heritage, (Department of Housing, Local Government and Heritage, 2021)

An excellent government publication on vernacular heritage in Ireland and is relevant to the current proposal.

5.2 Development Plan

5.2.1 ***Tipperary County Development Plan 2022-2028 Volume 1***

Chapter 5 Housing

Policy 5 - 16

Support and encourage the appropriate refurbishment, conversion and adaptation of existing rural building stock, such as vernacular school houses, coach houses, farm buildings, where feasible, as sustainable alternatives to new build.

Chapter 13 Built Heritage

Policy 13 - 3 Seek the sympathetic restoration, appropriate re-use and maintenance of buildings/features which are considered to be of local and vernacular architectural importance.

13.6 Respecting Vernacular Rural Settlements and Buildings

Many villages, whilst not warranting the designation of a formal ACA, are still interesting and unique in their village form, character and scale. The Council will seek to promote the reuse of disused or unoccupied buildings, and ensure that developments proposed within or adjacent to villages respect and enhance their spatial character, building forms, features, details and materials.

The Council recognises that structures of architectural and vernacular merit, not included in the RPS, may contribute to the built fabric of local areas. These structures include the many examples of vernacular architecture, or traditional building forms, and types which have been built using local materials, skills and techniques, and methods which have been since lost. These buildings contribute, both individually and collectively, to the character, heritage and identity of the county, and their reuse is often a low-carbon alternative to demolition and reconstruction. There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.

5.3 Natural Heritage Designations

The subject site is not located within a designated site. However, the following are in close proximity: within 15kms of the subject site:

Lower River Suir SAC (Code 002137) 2.5km south of the site.

Nire Valley Woodlands (SAC 000668) 13km south of the site.

Comeragh Mountains 13km south of the site.

5.4 EIA Screening

The proposed development is not a class for the purposes of EIA as per the classes of development set out in Schedule 5 of the Planning and Development Regulations 2001, as amended (or Part V of the 1994 Roads Regulations). No mandatory

requirement for EIA therefore arises and there is also no requirement for a screening determination. Refer to Form 1 in Appendix 1 of report.

6 The Appeal

6.2 Grounds of Appeal

The appeal is summarised as per the headings of the appeal submission.

6.1.1 Introduction:

- Parkville farm buildings sits on the slightly elevated and prominent site on the main Clonmel-Fethard Road (R689). The structures are arranged in an attractive courtyard formation and are a well-loved landmark.
- The refusal is in conflict with aims and recommendations of the Tipperary County Development Plan 2022-2028 where it says there will be a presumption against the demolition of derelict vernacular buildings where restoration or adaptation is feasible. Policies 13-3, 5-16 and 13-6 (cited above under Section 5 of this report).
- There is no evidence of a presumption against the demolition in the planning report. There has been no assessment of the feasibility of restoring the structures.
- The structures contribute to the fabric of the local area.
- The Conservation Officer did not examine Parkville farm against the test. He indicates that the buildings of such architectural importance using the NIAH criteria.
- The policies are to protect and safeguard structures such as the Parkville buildings which are not included on the RPS.
- The development plan also seeks the appropriate reuse and maintenance of buildings.
- The scope of the Conservation Officers report falls short of requirements set out in the government strategy in the area of vernacular buildings published in 2021.

6.1.2 Submissions by the Department of Housing, Development Applications

- There was a submission from the Department to the planning authority dated 22/10/2024 who quotes Tipperary' Co. Co. policy 13.3. The Conservation Officer's Planning Report was not shown to the Department.
- The letter comments on the quality of Parkville farmyard and states their current condition does not preclude their potential re-use.
- The Department recommends a detailed assessment of the farm buildings to establish architectural interest and its contribution to the historic built environment, and to assess the potential for re-use.
- The planning authority did not give the Department access to the Conservation Officer Report on file. The case was not objectively assessed.
- The Conservation Officer's report was not available on the P.A's website until after 08.04.2025 whereas the deadline for submissions was 20.03.2025 This had the effects of preventing the third parties and prescribed bodies from assessing or commenting on the documents.

6.1.3 Serious concerns relating to due process

- The Planning Report and the Planner's Report were unavailable after the submission deadline as evidenced by the letter from the Dept of Housing, Local Government and Heritage in its letter dated 21.03.2025 stating the further information issued did not include a request of the assessment of the farm complex its architectural interest and its contribution to the historic built environment. As outlined in the Departments' letter of the 22nd of October 2024.
- The unavailability of the Conservation Officer's Report and the planner's report has had a serious effect on preventing members of the public to respond to the documents in their submissions.

6.1.4 Issue of Local Importance

- The Conservations Officer's views that the buildings are unimportant and are considered to have a 'modest cultural and social interest' are untrue. There were 30 No. of submissions from the public objecting to the demolition of the

structures. There was a local demonstration at the site on the 3rd of October 2024 with 75No. persons attending and it attracted media coverage. There are suggestions in the Appendix of the appeal for the practical use of the buildings.

6.1.5 Interpretation of the Date of the Buildings

- The Conservation Officer stated in his report that the buildings date from the nineteenth century though he concede the evidence does not provide the construction date. He further states all of the buildings shown on the 1843 OS maps were later replaced in the nineteenth century or removed during road widening along the R689.
- The comparison of the 1843 and 1906 OS maps indicates the dwelling, the eastern element, may have dated to the eighteenth century. The position of the dwelling to the road is different in each map and may be explained by the change in position of the road or by different readings of the footpath.

6.1.6 Owners Plans for the Site

- The applicant intends to demolish the buildings and incorporate the land into the adjoining pasture. No alternative use for the buildings is suggested.
- The new owners also suggest health and safety concerns but the option of fencing off the farmyard as a means of safely preserving it for future restoration and not reuse was not addressed. This issue was not addressed in the Planner's report.

6.1.7 **Addenda** (brief summary of main points)

- ***Tom Pollard, Conservation and Historian:*** Parkville is a pleasing and professional example of successful farm practices. The development is a stunning example of advancement in land management during a certain period. The structures are in excellent and repairable condition. Demolition is a very serious act. We have a responsibility to pass on our structures to future generations.
- ***Dr. Patrick Quinlan :*** The Parkville buildings have sat quietly for half a century, their survival is increasingly exceptional. They represent an unchanged exemplar of a type of building which was once ubiquitous

and now very rare. By declining to instruct a survey of the buildings the local authority is failing to uphold even the lowest standard of architectural conservation.

- ***The Department Housing, Local Government and Heritage*** submissions
- ***Hedgerow Ireland*** : The built structures date back 150 years and are a wonderful testament to the craftsmen who used local quarried limestone and lime mortar to create irreplaceable reminders of an earlier era. There is a formal request lodged with Tipperary Co. Co. to have the structures listed as 'protected structures'.
- ***Submissions from*** Louise Lalor, Paul and Mary Moore John Hurley (former stewards of Parkville) opposing the demolition. These did not form 'observations' on the appeal). Of note Mr. Hurley was the runner up bidder for the property when it was sold in recent times. He and his father leased and maintained the property at Parkville for many years. He has submitted letters he wrote to the new owners asking to respect the heritage and beauty of the property.
- ***OS mapping***
- ***Photographs***

6.3 Applicant Response

There was no response from the applicant to the appeal

6.4 Planning Authority Response

The planning authority had no further observations or comment to the issues raised in the appeal.

6.5 Observations

Neil Jackman made an observation who is an archaeologist and director of a heritage consultancy firm based in Clonmel.

Tipperary Co. Co. has disregarded the provisions in the Tipperary County Development Plan 2022-2028

The Council recognises that structures of architectural and vernacular merit, not included in the RPS, may contribute to the built fabric of local areas. These structures include the many examples of vernacular architecture, or traditional building forms, and types which have been built using local materials, skills and techniques, and methods which have been since lost. These buildings contribute, both individually and collectively, to the character, heritage and identity of the county, and their reuse is often a low-carbon alternative to demolition and reconstruction. There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option.

There is a strong potential to restore and repurpose the buildings. This also provides an opportunity to develop and enhance traditional skills. The buildings visually enhance the landscape and are a strong link to our rural tradition. The vernacular farmsteads have a unique character and are so distinctive.

In South Tipperary these features are being removed at an alarming rate where traditional farming practice has given way to large scale intensive agriculture, with the loss of hedgerows and farm buildings. The character of the countryside is being eroded, and these buildings should be preserved.

6.6 Prescribed Bodies

An Taisce responded to the appeal stating the dwelling and the farm buildings have remained unaltered over time, making it all the more significant as a site of vernacular architectural heritage conservation. The enclosing walls and masonry structures remain substantially sound. The roof structure of the triple agricultural building remains in tact and is capable of re-use. It is acknowledged the residential building and eastern sheds requires more substantial intervention with a replacement roof required and chimney rebuilt.

7 Assessment

7.2 Having examined the application details and all other documentation on the appeal file, including all of the submissions received in relation to the appeal, the report/s of the local authority, the prescribed bodies submissions and having inspected the site, and I consider that the substantive issues in this appeal to be considered as follows:

- Applicant's Submission Documentation
- Planning Policy Context
- Consideration of the Vernacular merit of the structures
- Other Matters
- Appropriate Assessment

7.3 Applicant's Submission Documentation

7.3.1 According to the planning application documentation, the landowners wish to demolish an old derelict farmyard, which is positioned on the western side of the Clonmel-Fethard Road (Regional Road R689) at Parkville. The reason for the demolition given by the applicant is the site is in serious neglect, it is heavily overgrown and crumbling and is now considered to be a serious health and safety concern.

7.3.2 According to the applicant's submission documents the buildings consist of an abandoned dwelling and an open store within a courtyard. There was some site clearance by the applicant before the planning application to demolish was lodged. This was to facilitate an inspection of the site and to examine the buildings internally and to prepare drawings.

7.3.3 It is submitted the abandoned dwelling on site (eastern building) appears to have been split into three units, one small living quarters and two sheds/ stores. The roof has collapsed on two of the three units, and the remaining roof is in very poor condition. It is stated the open store walls were built from random rubble stone, however these have been pushed out from the weight of the roof, and there are substantial cracks in the walls. Furthermore, the vegetation has interfered with the structural integrity of the buildings. It is submitted the buildings are dangerous and

the demolition of them will facilitate the grounds (0.18Ha) being incorporated into the adjoining pasture.

- 7.3.4 The original application documents include drawings of the site, the structures, the and photographs. There was no supporting reports submitted regarding the justification for the demolition other than to state there are health and safety concerns regarding the property. There were no structural reports or conservation reports submitted as part of the planning application justifying the demolition of the structures. There were no reports submitted regarding the consideration of the structures for re-use, refurbishment, preservation or adaptation as required under the development plan policy as detailed below.

7.4 Planning Policy Context

- 7.4.1 Vernacular heritage forms an intrinsic part of our rural landscapes. In this instance it comprises of a former dwelling, structures, outbuildings, walls and other features laid
- 7.4.2 The Department of Housing, Local Government and Heritage has produced a strategy entitled '*A Living Tradition: A Strategy to Enhance the Understanding, Minding and Handing on of Our Built Vernacular Heritage*' (2021). In addition, a publication called '*Caring for our Vernacular Heritage*' has been published which provides guidance to owners or custodians of vernacular heritage. I found no reference to these two documents in the Tipperary County Development Plan 2022-2028. Furthermore I found no reference to these publications in the planning application documentation or internal reports on the planning file.
- 7.4.3 In short and to quote the Executive Summary of *A Living Tradition: A Strategy to Enhance the Understanding, Minding and Handing on of Our Built Vernacular Heritage*' (2021), 'These things are, or were, conceived and built by 'ordinary' people, their families and their neighbours. Vernacular builders worked within traditional societies, using ideas and techniques passed down within the family and local community. Thus, the built vernacular heritage is a significant part of our intangible cultural heritage.'
- 7.4.4 The publication recognises that some vernacular buildings and structures are recognised as protected structures under the Planning and Development Acts. The

National Inventory of Architectural Heritage (NIAH), established in 1999, increasingly includes the built vernacular heritage in its surveys and ministerial recommendations to local authorities. At the present time there are more than 2,000 vernacular structures feature in the Inventory, but their inclusion in local authority development plans has been variable.

- 7.4.5 However, it is acknowledged that a vast number of vernacular structures and features are neither recorded nor protected nationwide. Every year more vernacular buildings/ structures/ items are lost or unsympathetically altered, and the publication states it is increasingly urgent that we identify and protect those that survive. It is stated that is no large-scale countrywide recording has ever taken place of the built vernacular heritage, and sometimes their significance only comes to light when they are become in a state of collapse or being demolished.
- 7.4.5 The National Planning Framework under objective 14 focuses on protecting and promoting the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape that make Ireland's rural areas authentic and attractive as places to live, work and visit.
- 7.4.6 The planning authority's assessment and decision focused on the planning policy contained in the *Tipperary County Development Plan 2022-2028*. Chapter 13 relates to the Built Heritage. The subject development is not a Protected Structure. It is not located in an Architectural Conservation Area. The landscape is not designated for it's amenity value nor is the property located on a scenic route.
- 7.4.7 The relevant section of the development plan is **13.6 Respecting Vernacular Rural Settlements and Buildings**, in particular the second element:
- The Council recognises that structures of architectural and vernacular merit, not included in the RPS, may contribute to the built fabric of local areas. These structures include the many examples of vernacular architecture, or traditional building forms, and types which have been built using local materials, skills and techniques, and methods which have been since lost. These buildings contribute, both individually and collectively, to the character, heritage and identity of the county, and their reuse is often a low-carbon alternative to demolition and reconstruction. There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option. (My emphasis).*

The policy statement acknowledges that there are structures of architectural and vernacular merit that are not included on the Record of Protected Structures which may contribute to the character, heritage and identity of the county, whereby there is a presumption against demolition where restoration or adaptation is not a feasible option. There has been no consideration provided by the applicant of the feasibility of restoration or adaptation of the structures.

7.4.8 I note Policy 13-3 of the Tipperary County Development Plan:

It is the policy of the Council to seek sympathetic restoration, appropriate re-use and maintenance of buildings/ features which are considered to be of local and vernacular architectural importance.

The applicant has prepared no reports or not submitted any evidence to comply with the stated development plan policy. Furthermore, the proposed demolition is contrary to Policy objective 5-16:

It is the policy of the Council to Support and encourage the appropriate refurbishment, conversion and adaptation of existing rural building stock, such as vernacular schoolhouses, coach houses, farm buildings, where feasible, as sustainable alternatives to new build.

I do accept the buildings present a significant structural challenge, however, no evidence has been provided in the planning documentation by a conservation architect or conservation engineer regarding the restoration or re-use of structures to comply with the relevant development plan policy cited above. This omission was raised in two submissions by the DAU unit of the Department of Housing, Local Government and Heritage on the planning application. I note the relevant items requested by the Department were not requested by the planning authority (the issue regarding bats was requested). In the absence of the relevant required documentation under the policies cited above, the planning authority relied on its own internal reports to come to a decision to grant permission for the demolition.

- 7.4.9 The planning authority considered stated policy outlined above in making its decision to grant planning permission for the demolition of the structures, i.e.

It is the policy of the Council to seek sympathetic restoration, appropriate re-use and maintenance of buildings/ features which are considered to be of local and vernacular architectural importance.

I note, the planning authority considered the proposed demolition did align with the development plan policies based on its own internal assessment as outlined in the Architectural Conservation Officer Report dated 5th of November 2024. Essentially, the planning authority's technical reports concluded the structures were of not of local and vernacular architectural importance, therefore, the proposed demolition is considered to be in compliance with Policy 13-3, and a record of the structures would suffice. The report concluded that there was no legal protected status associated with the site, and *'the relatively unremarkable architectural significance, there is no clear built heritage policy which precludes the granting of permission for the demolition of the structures'*.

- 7.4.6 Having regard to government publications regarding vernacular architecture and having regard to the Councils own statement in the development plan that there will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option, in this instance, this has not been established. I believe the wrong precedent has been set by granting permission for the demolition of the structures without the proper consideration of the restoration or adaptation the buildings. In addition, the onus should be on the applicant to comply with the stated development plan policy. It is my opinion, it is not the role of the planning authority to justify the demolition of the structures.

7.5 Consideration of the Local and Vernacular Architecture merit of the structures

- 7.5.1 I acknowledge the comprehensive content of the Conservation Officer's Report, dated 5th of November 2024, prepared internally by the planning authority. The Report reviews the site in detail, which includes a desktop study of the historical context of the structures with the use of detailed photographs. The assessment of

the Built Heritage states the buildings are of traditional, good quality construction but there is no evidence of notable design input and no features of particular decorative richness or complexity that would constitute significant architectural interest. I would accept this assessment because the development according to the historic data, the site was a subsidiary to the main house at Parkville and included a stable, cowhouse, barn, shed and a small dwelling. Essentially the site is a basic farm labourers dwelling and enclosed yard built from local materials. The Report states the demolition of the subject farmyard, comprising of two mid or later nineteenth century building ranges and enclosing walls along with a partially enclosed passage north of the farmyard will result in the loss of historic masonry structures that are typically unremarkable but nonetheless, traditional in nature.

7.5.2 Given the local importance of the structures as determined by the National Inventory of Architectural Heritage (May 2024), the planning authority has indicated the structures would not be considered for inclusion on the record of Protected Structures.

7.5.3 I further note the Conservation Report did state the retention, conservation and appropriate re-use of the buildings to retain the maximum amount of original built fabric and historic character would be welcomed by the planning authority, in the absence of proposals for re-use, *'it is not the responsibility of the planning authority to suggest development rather to adjudicate on the application made to them'*. However, this sentiment does not comply with the statement in the development plan, *'There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option'*, whereby the option has not been investigated or presented by the applicant, which is a requirement under the development plan policy.

7.5.2 I would accept the Conservation Officer's report findings following a detailed assessment, that there is no evidence on the site of notable design input or features of particular decorative richness or complexity which would constitute an architectural special interest. I would also accept there is no remarkable historical significance associated with the site. However, the word 'vernacular', as applied to architecture, is used to describe buildings and structures that were conceived and built by 'ordinary' people, as distinct from rulers and others exercising authority. According to the government publication, *A Living Tradition*, *'these buildings are part*

of an informal approach to architecture and the landscape, largely operating outside formal architecture, being deeply rooted in traditional ideology and characterized by ideas and techniques passed down within communities and families’. The lives of ‘ordinary people’ in previous centuries are much less recorded and protected under the planning legislation than those of higher status in society. Again, from A Living Tradition, *‘It is no less valuable or important to our cultural heritage than our archaeological monuments or our formal architecture. Its loss in any particular place or district is detrimental to that locality’s sense of place’.*

7.5.3 I note the planning application attracted strong opposition from the local community to it’s demolition who consider the farmyard to be a notable feature and a much loved local landmark. Notwithstanding opposition to it’s demolition, I accept the site is in a state of disrepair and dereliction. The site is becoming more overgrown with destructive ivy and large vegetation, with the progressing decline of the site, there may be safety concerns associated with the site.

7.5.3 However, despite the fact the buildings are not listed in National Architectural Inventory or included on the Record of Protected Structures does not imply they are not important or not worth preserving in their own local setting. In my opinion, the dwelling farmyard complex is still very much intact, enclosed by rubble stone walls accessed by a wrought iron gate located along the northern wall of the enclosure from a walled passageway. Although the individual components of the structures may be considered unremarkable, as evidenced from the planning authority’s, Conservation report, I consider the legibility of the entire farmyard to be special in its own right. The stonewalled passageway to the north, the old wrought iron gates, both front and rear elevations of the agricultural building to the west, the sense of enclosure from the courtyard created by the traditionally and locally sourced rubble stone walls, and finally its setting on the landscape do create a vernacular feature on the landscape. I firmly believe there must be very clear and strong evidence presented to demolish these structures, because they are part of the local rural heritage. The application documents indicate the site will be incorporated into pastureland alongside the remainder of the landholding. Once gone, the vernacular structures are gone forever. Therefore it is my opinion, their demolition and removal has to be justified and warranted, because our built vernacular heritage is a key cultural and historical layer on our rural landscapes.

7.5.4 I re-iterate the proposed demolition as presented in the planning application, in the absence of specialist conservation appraisal and advise regarding the conservation of the structure for re-use, refurbishment or adaptation, is not technically feasible, does not comply with development plan policy, and is contrary to Department of Housing, Local Government and Heritage's publication *A Living Tradition A Strategy to Enhance the Understanding, Minding and Handing on of Our Built Vernacular Heritage*. On this basis, it is my opinion, to permit the proposed demolition as presented will set a highly undesirable precedent in the county and will lead to an unacceptable loss of vernacular architectural heritage, and would be contrary to the current county development plan policies.

7.6 Other Matters

7.6.1 The third-party claims the planning authority assessments did not have regard to the submission of the DAU of the Department of Housing, Local Government and Heritage requesting a detailed assessment of the farm complex to establish its architectural interest and its contribution to the historic built environment and to assess its potential for reuse in whole or in part. In addition, the third party expressed concern over the availability to view the internal reports on the planning application file during the assessment of same, in particular the Conservation Officer's Report. The appeal is also critical of a number of conclusions the Conservation Report made which ultimately determined the planning authority's decision to grant planning permission for the demolition of the structures.

7.6.2 Firstly, the planning authority was diligent in informing the prescribed bodies. I also note on appeal there has been no further comment on the case from the Department of Housing, Local Government and Heritage. There was a further submission to the Commission on appeal from An Taisce detailed earlier in this report.

7.6.3 As part of the further information a Bat Survey of the site was conducted and submitted to the planning authority on the 20th of February 2025. It was prepared by Dr Jane Russell-O'Connor. Although the Department of Housing, Local Government and Heritage had concerns regarding the timing of the site survey in December 2024, outside of the bat roosting season, I consider the site survey to be

comprehensive. The buildings were checked internally and the entire site was inspected. There was no evidence of roosting sites found within the two buildings. There was a lack of staining on the walls, faecal matter or insect exoskeletons on the ground. Furthermore the large amount of spiderwebs on the site indicated there was no recent bat activity on the site. The report did suggest a dawn to dusk survey during the active season (February-November) would be of benefit to rule out roosting activity completely on the site. The planning authority attached a bespoke condition relating to this issue. In the event the Commission decide to permit the demolition of the structures, I recommend attaching a similar condition (Condition No. 2)

8.0 AA Screening

- 8.1 I have considered the proposed development in light of the requirements of S177U of the Planning and Development Act 2000 as amended. The subject site is not located within or adjacent to any European Site. The closest European Site, part of the Natura 2000 network, is the Lower River Suir SAC 002137 is located c. 2.5km to the south of the proposed development.
- 8.2 Having considered the nature, scale and location of the proposed development I am satisfied that it can be eliminated from further assessment because it could not have any appreciable effect on a European Site.

The reason for this conclusion is as follows:

- the existing developed nature of the farmyard site,
- distance from the European site network and
- absence of ecological or hydrological pathways to a European site.

I consider that the proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on a European site and appropriate assessment is therefore not required.

9.0 Recommendation

I recommend planning permission be refused for the following reasons and considerations.

10.0 Reasons and Considerations

The Tipperary County Development Plan 2022-2028 includes policy and requirements in Sections 13.6, Policy 13.3 and Policy 5.16 to support and encourage refurbishment, conversion and adaptation of existing rural building stock which are considered to be of local and vernacular architectural importance, and there will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option. In the absence of specialised conservation appraisal and advice, the applicant has not provided sufficient evidence to show that the conservation of the buildings and farmyard is not technically feasible and therefore the demolition of the vernacular farm complex will lead to an unacceptable loss of vernacular architectural heritage in this respect. As such to permit the proposed demolition of the existing farmhouse, outbuildings and stone walled enclosure would be contrary to the Council's policy requirements for vernacular built heritage and would create a highly undesirable precedent. The proposed development would therefore be, contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Caryn Coogan
Planning Inspector

18th of August 2025

Form 1 - EIA Pre-Screening

Case Reference	ABP-322520
Proposed Development Summary	Demolition of existing derelict buildings and all associated site works
Development Address	Parkville, Clonmel, Co. Tipperary
In all cases check box /or leave blank	
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☐ Yes, it is a 'Project'. Proceed to Q2.
	☒ No, further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	State the Class here
☐ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☒ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road	

development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	State the Class and state the relevant threshold
☐ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____