

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Friday 10 April 2026 15:55
To: LAPS <laps@pleanala.ie>
Cc: SIDS <sids@pleanala.ie>
Subject: ACP-323950-25 Graiguenamnagh Tinnahinch Flood Relief Scheme

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Good afternoon,

Attached are Built Heritage observations/recommendations for the above-mentioned consultation. Please acknowledge receipt.

Regards,

Brian Bone
Executive Officer

An Roinn Tithíochta, Rialtais Áitiúil agus Oidhreacht
Department of Housing, Local Government and Heritage

Aonad na niarratas ar Fhorbairt
Development Applications Unit

Oifigí an Rialtais, Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Government Offices, Newtown Road, Wexford, Co Wexford, Y35 AP90

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage



Your Ref: ACP-323950-25

Our Ref: S177AE Graiguenamnagh Tinnahinch FRS

(Please quote in all related correspondence)

10 April 2026

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Via email to: laps@pleanala.ie

Re: Notification under Section 177AE (4) (a) of the Planning and Development Act 2000 as amended (as inserted by Section 5 of the Planning and Development (Amendment) Act 2010.

Re: Section 177AE application by Kilkenny County Council for Graiguenamnagh Tinnahinch Flood Relief Scheme

A chara,

I refer to correspondence received in connection with the above. Outlined below are heritage-related observations/recommendations co-ordinated by the Development Applications Unit under the stated headings.

Architectural Heritage

The following submission by the Department provides An Coimisiún Pleanála with observations and recommendations that seek to align the proposed development of the Graiguenamnagh Tinnahinch Flood Relief Scheme with State policies and legal codes for the protection of architectural heritage. The Department has visited the site/architectural conservation area, archaeological sites and zone of potential, reviewed and commented on the Environmental Impact Assessment Report (EIAR) documentation submitted in support of the proposed development area. The following extract from the planning documentation identifies the extensive cultural heritage, the key sites and the historic setting of the town which form the basis for this application.



Archaeological Heritage

There is one national monument within the proposed development area, Duiske Abbey (RMP KK029-01800, National Monument No 620). It is the physical and visual focal point of the town. There are sixteen recorded archaeological monuments (RMP sites) within study area, all relating to the medieval heritage and industrial character of the area:

- *Castle - tower house, Tinnahinch.*
- *Church, Tinnahinch.*
- *Graveyard, Tinnahinch.*
- *Ritual site - holy well, Tinnahinch.*
- *Bridge Tinnahinch, Carlow Brandondale.*
- *Historic town, Graiguenamanagh.*
- *Religious house - Cistercian monks, Graiguenamanagh.*
- *Cross - High cross (present location), Graiguenamanagh.*
- *Tomb – effigial, Graiguenamanagh.*
- *Wall monument, Graiguenamanagh.*
- *Cross, Graiguenamanagh.*
- *Burial, Graiguenamanagh.*
- *Ritual site, holy well Graiguenamanagh.*
- *Clapper bridge, Graiguenamanagh.*
- *Water mill – unclassified, Graiguenamanagh.*
- *Cross - High cross, Graiguenamanagh, Kilkenny.*

There is a designated Zone of Archaeological Potential (ZAP) in the Record of Monuments and Places around the historic town of Graiguenamanagh (KK029-018). Any development within this zone is considered to be of archaeological potential and is likely to reveal medieval or later archaeological remains, features finds or soils.

Architectural Heritage

Graiguenamanagh town is an Architectural Conservation Area (ACA). The boundary encompasses the medieval core of the town, it incorporates the Turf Market, the bridge and the historic quay. There are thirty-five RPS sites within the constraints study area, of these seven are outside of the ACA. These structures/features should be considered as cultural heritage constraints during the design of the proposed flood relief scheme and avoided where possible.

There are twenty-seven NIAH sites in the study area that have not been added to the RPS, however there is a potential that they may be added in the future. Every care should be taken



in these locations to avoid direct impacts on protected structures or by means of careful design or by the application of appropriate mitigation measures. This includes development that might adversely affect the setting of the protected structure. Any design proposals in the vicinity of protected structures vicinity should be carried out in a way that will not materially affect the character, integrity, amenity and setting of these sites. An architectural conservation specialist may be required advise on appropriate measures mitigate any potential impact on this.

Views to be preserved and protected in the vicinity of Graiguenamanagh, as identified in the Kilkenny development Plan 2014 – 2020 and the Graiguenamanagh Local Area Plan 2009 are:

- *V1 View east and south over the Barrow valley on the Thomastown / Graiguenamanagh Road, R703 from Coppengh Hill between the junctions with road numbers LP 4203 and LT 82152.*
- *V2 View East over the Barrow Valley on the Graiguenamanagh / New Ross Road and in particular the views overlooking St. Mullins, between the junctions with road numbers LP 4209 and LT 82463.*
- *V3 View east over the Barrow Valley on the Graiguenamanagh / Ullard Road just North of Graiguenamanagh, Road No. LS 8221 between the junctions with road numbers 438 and LS 8222.*

Historic Character and Setting

- *Duiske Abbey commands a focal point at the centre of Graiguenamanagh. The narrow and winding medieval streets of the town centre, their interconnection with the Abbey, and the relationship with the River Barrow, and the Duiske River gives Graiguenamanagh its unique visual and aesthetic character.*
- *The River Barrow, with its historic quays, mill buildings, mill races, bridges, canal, canal lock and weirs, is a rich and highly significant cultural, historical industrial and social amenity of Graiguenamanagh- Tinnahinch. It is also a defining character, its visual relationship to the town and the Abbey should be retained. Every effort should be made to retain or enhance this amenity.*



Observation on the Planning Submission, Cultural Heritage Chapter EIAR

The above extracts are made from the Final Report 16 April 2025 provided by AYESA, and indicate the layered nature and cultural significance of the place. The archaeological and built heritage have been dealt with as separate entities/individual basis rather than as an understanding of the evolution of the place, its prominent features and organising elements. The desktop study approach understates the overall cultural significance of the place, and falls short of establishing a statement of cultural significance for the town dealing with its topographical setting, evolution and built form, historic spaces and opening to the river for trading purposes, its surviving authenticity and overall integrity as the basis for future development in particular a major flood relief scheme that will have significant impact on its overall character.

The Department has provided considerable information regarding the prominent and organising sites of the town, namely the Duiske Abbey and the Tinnahinch Castle, interrelated by their setting to the river and bridge, which informed the distinctive layout and character of the town. The Department concurs with the assessment regarding the prominence and cultural significance of Duiske Abbey, which has been the recipient of significant Community Monument Funding in recent times from the Department, to consolidate and present the surviving fabric of the abbey, noting the consolidation of outer precinct masonry walls and structures immediately to the Spar car park along the riverside. The site visit to Graiguenamanagh undertaken as a pre-planning consultation suggested considerable potential for further discovery of early urban fabric, noting that Graiguenamanagh, layered over time, retains authenticity and distinctive archaeological and architectural character, which has become the valuable backdrop to an emerging recreational and cultural tourism offer. The route of the Duiske River forms the curtilage to the early C18th streetscape of the Main Street, the area to the rear of the historic courthouse and Hotel retain masonry lined historic water courses, laneways, culverts etc. which require full appraisal and carefully considered design as part of the wider scheme.

Appended to this report is the myriad of walls and new elements flood relief barriers proposed within the historic centre. Whilst it can be accepted that flood relief is of the utmost importance to the future sustainability of the town and that the areas identified for engineered intervention have been selected to avoid adverse archaeological impact, the level of detail provided by a stage 2 submission doesn't adequately deal with the coherence and overall design of the proposed flood relief barriers, the quality of materials and craftsmanship necessary to mitigate the scale of the flood relief barriers in this unique historic setting. The stage 2 scheme as presented proposes rudimentary concrete barriers in some instances, new areas of raised ground and unfortunately, quite extensive new masonry barriers for the full expanse of the



river front setting along. The stage 2 proposal omits architectural/conservation input as part of the multi-disciplinary practice in terms of guiding contemporary design, sustainability of materials, conservation upgrading, nature based solutions and quality outcomes, including coordination as necessary with new public realm, lighting etc. to unify and revitalise the character of the place – Graiguenamagh and Tinnahinch. Reference to Clonakilty 400, Phase 3 with OPW, the EU exemplar for community engagement, flood relief and public realm enhancement - featured in the OMC report European Commission 2021 - Towards a shared culture of architecture – investing in a high-quality living environment for everyone <https://op.europa.eu/en/publication-detail/-/publication/bd7cba7e-2680-11ec-bd8e01aa75ed71a1/language-en/format-PDF/source-search>

The following information provided in the final planning report establishes the scale of concern regarding design options that need to be informed by built heritage appraisal. Opportunities to enhance, repair and consolidate need to be determined and included as part of the overall scheme, following good conservation practice of minimal intervention. The Department supports the protection of key sites during the works and recommends the input of a Grade 1 Conservation Architect is sought to inform detailed methodologies for enabling works and repairs.

- *While change within the setting of an historic site or landscape may be acceptable, in certain instances development will be considered intrusive and inappropriate (such as large embankments, walls or similar permanent infrastructure). This effect on the setting of archaeological and architectural heritage sites requires an assessment to be made on a case-by-case basis according to the type of development, its location and landscape setting by means of objective analysis based on a set of predefined criteria and professional judgement, supported by appropriate descriptive material.*
- *Specific mitigation requirements can only be identified as issues for development once the design options are defined. Further assessments such as archaeological testing, underwater archaeological assessments, structural architectural heritage appraisals or structural surveys etc. may be required in the next phases of the assessment or as mitigation measures for the scheme.*
- *It should be noted, however, if flood relief measures impact any areas in proximity to an RMP, or in the ZAP of the town, the judicious use of archaeological assessment techniques may be required in these areas in order to understand the implications for the proposed scheme.*



- *In accordance with the Architectural Heritage Guidelines any work to or in the vicinity of a Protected Structure, NIAH site or the ACA requires a conservation heritage impact assessment by a conservation architect.*

As set out by the Department, the *Archaeology and Flood Relief Schemes: Guidelines* (NMS 2023) support the efficient planning and development of Flood Relief Schemes and the protection of archaeological heritage. The Guidelines provide a framework for the effective integration of archaeological heritage and architectural heritage into the design and construction of Flood Relief Schemes. The National Built Heritage Service of the Department works in collaboration with the National Monuments Service of the Department to enable FRS at pre-planning, design and construction stages and to encourage, where necessary, multi-disciplinary inputs throughout to ensure positive conservation outcomes for cultural heritage are achieved. This submission comments solely on the architectural heritage aspects of the proposal and is regarded as complementary to the submission by the National Monument Service of the Department.

Architectural Heritage Recommendations

For this project, the Cultural Heritage impact assessment has been helpful in considering the number, location and type of impacts likely requiring a Grade 1 Conservation Architect i.e. the careful consideration of surviving historic fabric, cultural significance and capacity for repair and reuse where possible.

The Grade 1 Conservation Architect is to design mitigation measures to reduce the impact identified and to develop specifications in accordance with the project/mitigation measures. Provision to allow reuse of existing fabric, where possible to be considered/included for. Regard to the salvage of existing materials and their reuse should be a consideration. Nature based solutions and more sustainable adaptation measures to be explored where possible. For example, the design of large attenuation areas or swales rather than fast moving culverts.

A Grade 1 Conservation Architect to evaluate the historic architectural character, condition and surviving significance of the urban form, spaces and streetscapes, views and vistas of the historic town centre in order to provide guidance on mitigation of adverse impact, protection during the course of the construction and inform subsequent reinstatement appropriate to its architectural conservation area status, noting the importance of the Market/courthouse and the historic quayside buildings and their relationship to the river.



A Grade 1 Conservation Architect to provide guidance and methodologies, for careful dismantling, recording and re-making features referencing salient architectural character, materials and details for agreement with the Department.

A Grade 1 Conservation Architect to advise on surviving features such as masonry thresholds, benches, stiles and historic routes, to inform appropriate conservation strategies and measures for agreement with the Department to preserve in-situ or to relocate the feature.

A Grade 1 Conservation Architect to address previous maladaptation of architectural heritage structures as part of any upgrading or renewal works, to inform the historic urban context and to identify opportunities to enhance extant amenities as part of the FRS.

The Department recommends that:

1. The services of a Grade 1 Conservation Architect or equivalent to guide and advise on areas of historic fabric intervention, design, remaking, repair and renewal in order to achieve a high-quality design and conservation outcome in accordance with the architectural heritage protection guidelines, 2011, best practice and conservation principles.
2. The Grade 1 Conservation Architect to oversee site operations and work closely with the Project Archaeologist, in order to ensure quality on site and advise on any unforeseen heritage related queries. The Grade 1 Conservation Architect is to record, as necessary, all conservation works to locally important heritage as necessary undertaken as part of the project to maintain a permanent record.
3. Interventions to the cultural landscape, including new infrastructure, signage etc. are to have regard to the protected views and vistas and carefully considered as part of a fully coordinated approach to the overall urban character/landscape design and understanding of the Architectural Conservation Area.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.dau@npws.gov.ie, or to the following address, The Manager, Development Applications Unit (DAU), Government Offices, Newtown Road, Wexford, Y35 AP90.



Is mise, le meas,

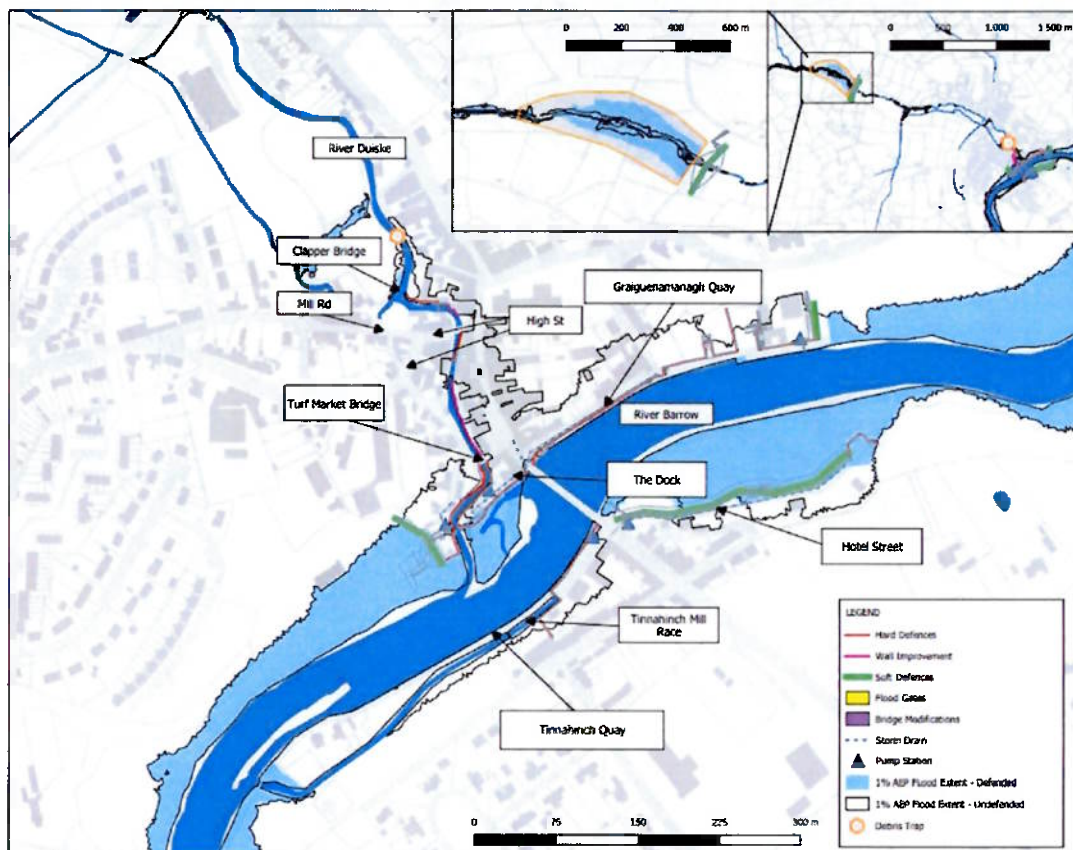
Cormac O'Flaherty

Cormac O'Flaherty
Higher Executive Officer
Development Applications Unit
Administration



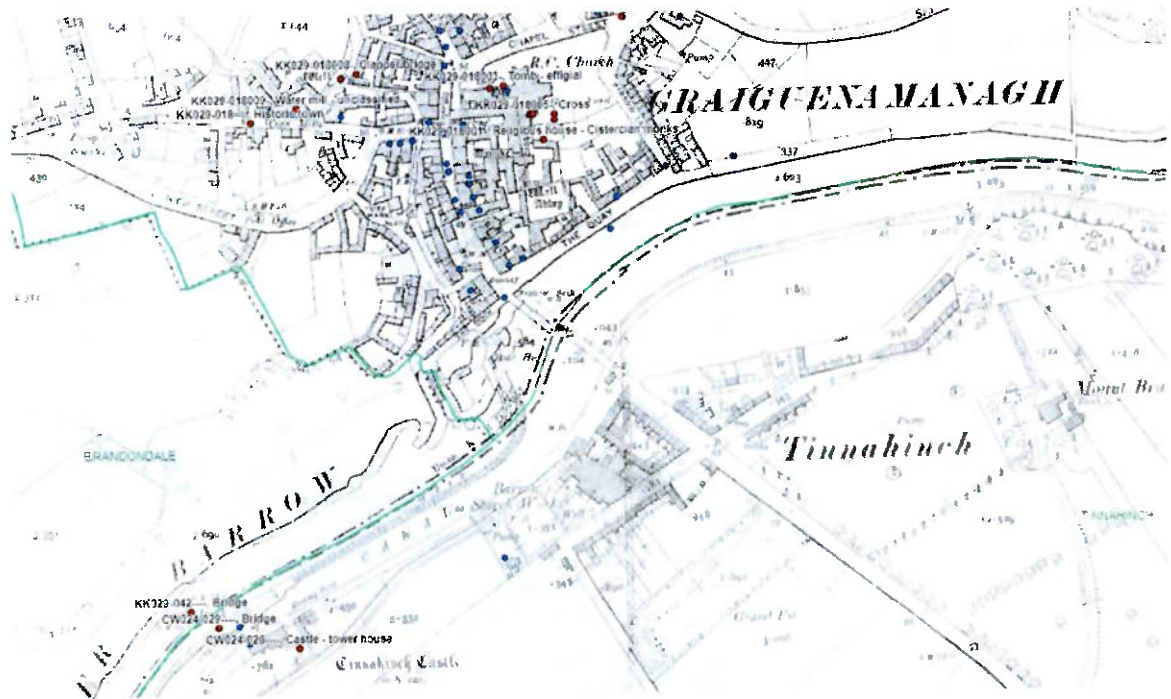
Appendix 1

Preferred Option Graiguenamanagh FRS





Historical mapping – Extract from the Historic Environment Viewer

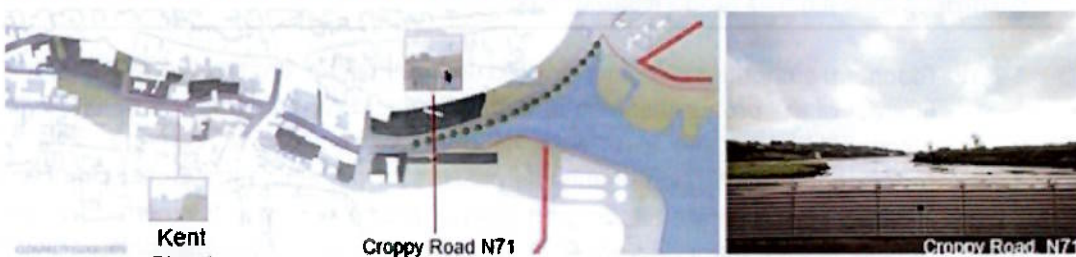




NEIGHBOURHOOD AND COMMUNITY DESIGN APPROACH TO FLOOD RELIEF SCHEMES

Clonakilty 400 Phase 3 of Urban Design plan

LOOKING AT ENGINEERING INFRASTRUCTURE TO DELIVER BETTER SOCIAL ECONOMIC OUTCOMES FOR THE LOCAL COMMUNITY **Clonakilty FRS**



Through quality architectural detail design it is possible to rational on material selection to deliver cost effective and attractive flood barrier finishes which in turn address strong sense of place and community



OPW Office of Public Works

Croppy Road, a new Avenue with sense of place and diversity

Flood Relief Infrastructure can be designed to look lightweight and transparent to trade views and areas of environmental and historical significance. A lightweight timber clad flood barrier with integrated planters within the street paving is proposed along the N71 with the added value of a new tree lined Avenue.



https://data.oireachtas.ie/ie/oireachtas/committee/dail/33/joint_committee_on_housing_local_government_and_heritage/submissions/2022/2022-01-25_opening-statement-giulia-vallone-senior-architect-cork-county-council_en.pdf#:~:text=%E2%80%9CClonakilty%20400%E2%80%9D%2C%20the%20urban%20regeneration,studie%20as%20it%20demonstrated%20the



Appendix 2

Architectural Heritage Protection Guidelines for Planning Authorities 2011

<https://www.buildingsofireland.ie/app/uploads/2019/10/Architectural-Heritage-Protection-Guidelines-for-Planning-Authorities-2011.pdf>

- 1.7.1 Planning authorities are empowered to protect the architectural heritage, in the interest of the proper planning and sustainable development within their respective functional areas, and to prevent its deterioration, loss or damage. This will be reflected in the adoption of suitable policies for protecting the architectural heritage in their development plans and giving practical effect to them through their development control decisions, generally by liaison between planning officers and conservation officers.
- 1.7.2 The duties of a local authority apply across all its functions, for example as a planning authority, a building control authority, a fire authority and so on, to act positively to protect the architectural heritage when exercising their functions.

- 7.2 Conservation Principles
- 7.3 Keeping a Building in use
- 7.4 Researching and Analysing
- 7.5 Using Expert Conservation Advice
- 7.6 Protecting the Special Interest
- 7.7 Promoting Minimum Intervention
- 7.8 Respecting Earlier Alterations of Interest
- 7.9 Repairing Rather than Replacing
- 7.10 Promoting Honesty of Repairs and Alterations
- 7.11 Using Appropriate Materials and Methods
- 7.12 Ensuring Reversibility of Alterations



7.13 Avoiding Incremental Damage

7.14 Discouraging the Use of Architectural Salvage from other Buildings

7.15 Complying with the Building Regulations

7.2.1 Conservation is the process of caring for buildings and places and of managing change to them in such a way as to retain their character and special interest. Historic structures are a unique resource. Once lost, they cannot be replaced. If their special qualities are degraded, these can rarely be recaptured. Damage can be caused to the character of a historic structure as much by over-attention as by neglect. Over-restoration can harm the special qualities of a building with the loss of details, materials and craftsmanship which, while sometimes seeming of little significance in themselves, can contribute to the character of the building and make it special. For this reason, it is vitally important that proposals for works to protected structures, and within ACAs, be examined at a detailed level. It is intended these detailed guidance notes will draw attention to the importance of the seemingly minor details of a historic building that nonetheless play an important part in establishing its character.