

# Submission to Carlow County Council

*On behalf of*

**Greencore plc**

*To*

**Draft Carlow County Development Plan 2022 – 2028**

**September 2021**



39 Fitzwilliam Place,  
Dublin 2.  
Telephone: (01) 662 5803  
Web: [www.jsaplanning.ie](http://www.jsaplanning.ie)

## **1.0 INTRODUCTION**

- 1.1 We refer to the preparations of a draft Carlow County Development Plan 2022-2028 which was put out on public display over the period 21<sup>st</sup> July -1<sup>st</sup> October 2021.
- 1.2 Our client Greencore plc has instructed John Spain Associates to prepare this submission on their behalf. Greencore are the owners of the extensive landholding previously occupied by the former sugar factory at Straw Hall, Carlow town.
- 1.3 This submission is limited to one issue, which relates to the Record of Protected Structures.

## **2.0 RECORD OF PROTECTED STRUCTURES**

- 2.1 Under the current Record of Protected Structures contained in the County Development Plan 2015-2021 there is one structure which was previously listed as a Protected Structure in a previous development plan but which was deleted as such when the Carlow County Development Plan 2015-21 was adopted in August 2015. This is the former sugar factory lime kiln cooling tower (see Figure 1 below). However, by resolution of Council dated the 10th April, 2017 the structure was restored to the Record of Protected Structures (Ref.CW77), contrary to the professional advice provided to the Council at the time.
- 2.2 At the time of the preparations for the current development plan we submitted a detailed report on behalf of Greencore setting out the reasons as to why it was inappropriate to include this cooling tower on the record of Protected Structures, and these reasons remain even more valid today. We attach a copy of this 2017 submission, which also includes a detailed heritage assessment of the cooling tower prepared by John Cronin & Associates, and a legal opinion prepared by Eamon Galligan S.C., and would ask you to have consideration of same.
- 2.3 This 2017 submission clearly demonstrated that the Limekiln Cooling Tower is not a structure of architectural heritage which warrants protected structure status based on their 'special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest' as required by Section 51 of the Planning and Development Act 2000 (as amended).
- 2.4 The Limekiln Tower is a steel tower-like structure about 6m in diameter, standing 61m high. It was erected in 1988 and is the third such Limekiln tower on the site since the factory was built in 1926. It is submitted that based on the fact that the Limekiln Tower was constructed in 1988 it is of little historic value, and we would also question the scientific, social or cultural significance to merit the inclusion of the structure as a protected structure.



**Figure 1: Former Lime Kiln Cooling Tower**

- 2.5 In addition, it is requested that the Council acknowledge that Limekiln Tower was not referenced in the NIAH survey of buildings in Carlow and therefore there is little basis for the inclusion of this tower in the Record of Protected Structures. Furthermore, the Council should acknowledge the fact that there were similar structures in Tuam, Thurles and Mallow, which have all since been demolished, and none of these were seen to be of any particular special interest and never warranted consideration for inclusion in the Record of Protected Structures for these counties or within the NIAH surveys for these counties.
- 2.6 The RPS description of the Lime Kiln states that “there may be similar structures in Mallow & Tuam but this was the first sugar factory in Ireland and led the way in the technology of sugar beet refining”. It is respectfully submitted that to include the Lime Kiln on the Record of Protected Structures based on the fact that the Carlow site is the oldest sugar factory in Ireland and not taking into consideration that the Lime Kiln only dates from 1988 is inappropriate and does not take into consideration Section 51 and 54 of the Planning and Development Act 2000. Thus it appears that the cooling tower is classified as a protected structure for sentimental reasons connected to the Sugar Factory rather than impartial and objective analysis of its Scientific, Industrial and Historical importance it should be removed from the Record of Protected Structures.
- 2.7 Whilst the Limekiln has been retained on site to date, primarily due to its inclusion in the Record of Protected Structures, it is not considered to be of special architectural, cultural, social or technical interest and therefore should be removed from the Record of Protected Structures. This position is supported by the fact that it is not included in the NIAH survey of County Carlow. The RPS states that it has potential to be used as a viewing platform and as a centre for the recall of the industrial and historical past of Carlow. However, it is not feasible to use the cooling tower for either use and to adopt it for such use would require significant investment.
- 2.8 Over the last decade the structure has continued to deteriorate further, and a number of external pieces of the tower have actually fallen off, luckily without any loss of life or injury to anyone who strayed onto the site. However, as time goes on this cooling tower, which has long passed its design lifespan, will deteriorate further and will increasingly become a serious health and safety issue. In essence this cooling tower was never designed for or intended to be a permanent structure on site, and the only safe and appropriate long term solution is to have the tower taken down. In this regard, we wish to advise the Council that our client is both willing to undertake and fund the

taking down and dismantling of the tower, and to erect on some suitable part of the site a piece of outdoor artwork which would symbolise the former use of these lands as a sugar factory.

- 2.9 In light of same, we would respectfully request that the said limekiln cooling tower would be removed from the Record of Protected Structures (ref. RPS CW77) as set out in Appendix VIII, Volume 2 of the draft Carlow County Development Plan 2022-2028

### **3.0 CONCLUSIONS**

- 3.1 This submission relates to the review and preparation of a draft County Development Plan for Carlow 2022-2028, and in particular the Record of Protected Structures.
- 3.2 The key point of the submission is that it is respectfully submitted that the Record of Protected Structures should be amended by the omission of the Limekiln Cooler Tower (Ref. RPS CW77) as part of the new County Development Plan 2022-2028. As has been clearly demonstrated in this submission, this Cooling tower was never designed to be a permanent structure, and has long exceeded its working lifespan, to the extent that the structure is deteriorating and has become a health and safety concern. The tower itself does not have any intrinsic architectural, historical, cultural or technical interest, and this is reflected by the fact that it is not included within the National Inventory of Architectural Heritage, and that all other similar cooling towers which were located on the other former sugar factory sites in Ireland have long since been removed.
- 3.3 Accordingly, we would respectfully request that this cooling tower be removed from the Record of Protected Structures (Ref. CW77) when adopting the Carlow County Development Plan 2022-2028.
- 3.4 We would be happy to elaborate further on this submission if that would be of assistance.

Yours faithfully,



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**John Spain Associates**  
**Managing Director**