



**Chief Executive's Report under Section 13(4) of the Planning
and Development Act 2000 (as amended)
in Respect of**

**Proposed Variation No. 3
of
Monaghan County Development Plan 2019 – 2025**

March 2022

Contents

<u>Section</u>	<u>Page</u>
Introduction	3
Proposed Variation	3
Legislative Context	3
Consultation, Submissions and Observations Received	4
Conclusion and Recommendation	23

1.0 Introduction

The Dublin Street North Regeneration Plan has been prepared by Sheridan Woods Architects and Urban Planners Ltd. on behalf on Monaghan County Council.

The purpose of the Plan is to provide guidance on the regeneration options for future development of the Dublin Street North Regeneration Plan area. A variation to the Development Plan is required to give statutory basis to the Regeneration Plan.

2.0 Proposed Variation

The proposed variation includes a new objective within the Settlement Plan for Monaghan Town within the Monaghan County Development Plan 2019-2025,

Objective MPO 15 to, *'Ensure that all development proposals within the Dublin Street North Regeneration Plan area have regard to the regeneration strategy and development objectives of the Dublin Street North Regeneration Plan.'*

Reason: To provide a strategic framework to promote development in a coordinated and sustainable manner in this town centre area that has considerable development potential.

3.0 Legislative Context

Section 13(1) of the Planning and Development Act 2000 (as amended) states that, *"A Planning Authority may at any time, for stated reasons, decide to make a variation of a development plan which for the time being is in force."* Where a planning authority proposes to make a variation in a development plan, it shall-

- a) *Send notice and copies of the proposed variation of the development plan to the Minister, the Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media, the Office of the Planning Regulator, the Board, the relevant regional assembly, and, where appropriate, to any adjoining planning authority, the prescribed authorities, and any local community development committee within the area of the development plan.*
- b) *Publish notice of the proposed variation of the development plan in one or more newspapers circulating in that area.*
- c) *Not later than 8 weeks after giving notice under subsection 2 (b), the Chief Executive of a planning authority shall prepare a report on any submissions or observations received under that subsection and shall submit a report to the members of the authority for their consideration.*
- d) *A report shall list the persons or bodies who made submissions or observations, provide a summary of the recommendations, submissions or observations made by the Minister, where the notice under paragraph (a) of subsection (2) was sent before the establishment of the Office of the Planning Regulator, the recommendations, submissions and observations made by the Office of the Planning Regulator, and the submissions and observations made by any other persons, in relation to the draft development plan in accordance with this section, give the response of the chief executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.*
- e) *The Members of a planning authority shall consider the proposed variation and the report of the chief executive, and may as they consider appropriate, by resolution make the variation, with or without modifications, or they may refuse to make it. A further modification to the variation may be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site shall not be made where it refers to an increase in the area of land zoned for any purpose, or an addition to or deletion from the record of protected structures.*

The proposed variation to the development plan was advertised in the Northern Standard newspaper on Thursday 13th January 2022. Submissions and observations from the public were invited on the proposed variation, up to, and including 11th February 2022.

An Appropriate Assessment screening exercise in respect of the potential impacts of the proposed variation upon Natura 2000 sites (Special Areas of Conservation and Special Protection Areas) was carried out. The Planning Authority concluded that the proposed variation would have no impacts upon designated sites within or adjoining the County and therefore no Appropriate Assessment was required.

A screening exercise in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 was carried out. The Planning Authority concluded that the proposed variation is not likely to have any significant impacts on the environment and therefore a strategic environmental assessment report is not required.

4.0 Consultation, Submissions and Observations Received

The proposed variation to the County Development Plan was advertised in the Northern Standard newspaper on 13 January 2022, with submissions and observations from the public invited on the proposed variation, up to and including, 11 February 2022. The documentation was available on the Council website. Public notification of the proposed variation was also promoted on the Council's social media platforms. An online public meeting and presentation of the Draft Dublin Street North Regeneration Plan and the Draft Roosky Lands Master Plan was held on 18 January. The consultation was attended by 35 participants. The presentation was recorded and made publicly available on the Council website.

Consultations were issued to prescribed bodies as set out in the Planning and Development Act (as amended) and submissions and observations were invited on the proposed variation up to 11 February 2022.

A total of 22 submissions were received from the following:

1. Anne Marie O'Connor, Deputy Planning Regulator, Office of the Planning Regulator
2. David Minton, Director, Northern and Western Regional Assembly
3. Alan Hanlon, Statutory Plans, Forward Planning Section, Department of Education
4. Department of Transport
5. Michael McCormack, Senior Land Use Planner, Transport Infrastructure Ireland
6. Conor Galvin, Flood Relief and Risk Management Division, Office of Public Works
7. Cian O'Mahony, SEA Section, Office of Evidence and Assessment, Environmental Protection Agency
8. Trish Smullen, Geological Survey Ireland, Department of the Environment, Climate and Communications
9. Elaine Heneghan, Regional Forward Planning Specialist, Asset Strategy, Irish Water
10. Louth County Council
11. Pdraig Maguire, Senior Planner, Meath County Council
12. Robert McLoughlin, Principal, Avison Young Planning and Regeneration Limited on behalf of Tesco Ireland Limited
13. The Monaghan Family, Ashleigh Guest House, Dublin Street, Monaghan
14. Eddie O'Gara
15. Marie Macklin
16. Miriam McQuaid Cadden
17. Gerard Cadden
18. Paddy Boyle
19. Mary O'Donnell
20. Michael Mullen
21. Ian Lumley, Head of Advocacy, An Taisce
22. Monaghan Town Football Club

(Submissions 18 – 22 received after the closing time for submissions of 5:00 p.m., 11 February 2022)

Table 1. Summary and assessment of submissions and responses

Ref.	Name	Organisation/Body
1	Anne Marie O'Connor, Deputy Regulator and Director of Plans Evaluation	Office of the Planning Regulator
Matters raised		
<p>- Strongly commends pro-active approach of local authority to the regeneration of Monaghan Town</p> <p>- Both draft Dublin St. N. & Roosky plans provide strong basis for plan-led approach to redevelopment of strategically located sites in a manner which supports the vibrancy and vitality of the existing town centre</p> <p>- Consistency with National Planning Framework (NPF): strongly aligned, includes urban regeneration (Policy NPO 6), improving quality of life and the attractiveness of our key towns as places to live and work (Policy NPO 4), compact growth (Policy NPO 3), making better use of underutilised land (Policy NPO 11).</p> <p>- furthermore, having regard to the Climate Action Plan 2021 and to the objectives of the NPF to support the transition to a low carbon economy (Policies NPO 53 & 54), welcomes and acknowledges that the town centre regeneration will make a positive contribution to sustainable travel patterns by facilitating modal shift to walking, cycling and public transport</p> <p>- Consistency with the Regional Spatial and Economic Strategy (RSES): notes designation of Monaghan as a Key Town, key future priorities for the development of the town include achieving 20% of projected growth through the regeneration and renewal of the town centre, and delivering compact growth within Monaghan Town by providing for a mix of housing densities – proposed variations are consistent with these priorities.</p> <p>- Proposed variations also provide a framework to support a sustainable pattern of development through the location of housing and employment where people can choose to use sustainable transport options, thus reducing car dependency. Provides a framework consistent with Policies RPO 5.1 and RPO 6.33.</p> <p>-Focus on town centre uses also provides for enhanced economic development opportunities, especially within the context of the Ulster Canal Greenway and tourism development generally, consistent with Policies RPO 5.20 and RPO 6.24.</p> <p>-Consistency with Monaghan County Development Plan 2019 – 2025: Monaghan designated as Tier 1 Principal Town (Policy SHO 1) – proposed variations facilitate future development of the town consistent with its position at the top of the settlement hierarchy.</p> <p>-Section 28 Guidelines: key emphasis of the Retail Planning Guidelines for Planning Authorities (2012) is to protect and enhance the historic core, make improvements to town centre public realm as this will contribute to vitality and vibrancy of town centre and reinforce the positive image of the town as a place to live, work and visit. Welcomes recognition of the importance of linkages between the regeneration sites and the established town centre which encourage permeability and connectivity within the town to the benefit of the existing town centre.</p> <p>- Proposed variations provide a framework to bring vitality to underutilised areas and will facilitate a broadening of the range of facilities and services on offer in the town centre which will in turn act as a focus for the wider region.</p> <p>- Strongly welcomes the design-led approach to development followed by the local authority. This will contribute to a sense of place and identity, making the urban area more pleasant for people to work in, live in, to shop in, or pass through, consistent with the Retail Planning Guidelines.</p> <p>Summary: no recommendations since the proposed variations are generally consistent with national and regional and regional policies and the Monaghan County Development Plan</p>		
Planning Authority response: Noted		
2	David Minton, Director	Northern and Western Regional Assembly (NWRA)
Matters raised		

Proposed variation appropriately reflects the Urban Renewal and Compact Growth aims of the RSES, as set out in section 3 of the Strategy, including specifically regional development objectives as expressed in Policies RPOs 3.1, 3.2 and 3.9.

Consistent with the RSES in advocating Place-making elements to increase the attractiveness and vibrancy of Monaghan Town centre, and should contribute in bringing a number of underutilised properties along the street front back into use.

Variation is considered consistent with the provisions of the RSES and the Assembly welcome it.

Planning Authority response: Noted

3	Alan Hanlon, Statutory Plans, Forward Planning Section	Department of Education
---	---	-------------------------

Matters raised

Department queried if proposed variations would alter the population projections as outlined in the County Development Plan 2019-2025. Dept notes the confirmation from Monaghan County Council that the projections remain unchanged. Dept has nothing further to add to the matter at this time.

Planning Authority response: Noted

4		Department of Transport
---	--	-------------------------

Matters raised

Policy developments relevant to accessible and integrated public transport be reflected in the proposed plan:

- the publication of the “whole of Government” National Disability Inclusion Strategy (NDIS) 2017-2022, which includes specific actions assigned to Local Authorities. E.g. action 108 relates to the dishing of footpaths and action 109 relates to accessible infrastructure, including bus stops, ‘Dishing’ is where the footpath is sloped for wheelchair access and lack of the same, is often cited as a major concern for wheelchair users.
- the ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). The UNCRPD puts obligations on State parties to ensure access for persons with disabilities to, inter alia, the physical environment and transportation in both urban and rural areas.
- the DMURS Interim Advice Note – Covid 19 Pandemic Response which was published on the DMURS website in 2020. It includes guidance that designers should ensure that measures align with the principles of universal design, consider government policy on accessibility for people for disabilities and consult people with disabilities to further appraise matters. References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid 19 Pandemic Response. DoT notes the section on DMURS on page 10 of ‘Proposed Draft Dublin Street North Regeneration Plan.’
- To make public transport fully accessible to people with disabilities requires a ‘whole journey approach’ which refers to all elements that constitute a journey from the starting point to destination. Local Authorities are a key stakeholder in this regard in the context of ensuring a universal design approach to the built environment, including footpaths, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.
- the publication by the National Transport Authority (NTA) of its ‘Local Link Rural Transport Programme Strategic Plan 2018-2022.’ Its mission statement is “to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs.” Its key priorities include the reduction of social exclusion and the integration of rural transport services with other public transport services. In addition, one of its key objectives is greater interaction/coordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas.

Planning Authority response: The Plan has been amended to reflect the policies relating to accessible and integrated transport. Amendments to the text of the Plan made to reflect this (Refer to Recommendations in section 5).

5	Michael McCormack, Senior Land Use Planner	Transport Infrastructure Ireland
---	--	----------------------------------

Matters raised

-Acknowledge Regeneration Plan area is an inner-urban location. Government policy related to planning and national roads would seek to facilitate such development in urban areas subject to normal road safety, traffic management and urban design criteria for built up areas.

-The Regeneration Plan lands adjoin the N54, references National Strategic Outcome 2 of the National Planning Framework includes the objective to maintain the strategic capacity and safety of the national roads network & Chapter 7 ‘Enhanced Regional Accessibility’ of the National Development Plan 2021-2030 which sets out key sectoral priority of maintaining Ireland’s existing national road network to a robust and safe standard for users. This requirement is further reflected in the National Investment Framework for Transport in Ireland and Statutory Section 28 Spatial Planning and National Roads Guidelines for Planning Authorities.

-**Transport Analysis** - No information relating to transport assessment or traffic analysis undertaken to support the Regeneration Plan proposals. In accordance with the provisions of official policy, development proposals should be progressed complementary to safeguarding the strategic function of the adjoining national road network.

-**Design Standards** – proposed interventions to the N54, national road, within the Monaghan Town urban area including potential new road access connectivity. Regeneration Plan also proposes DMURS principles will be applied to the design of streets in the Masterplan areas.

-In relation to works to the N54 national road, refers to TII Publications DN-GEO-03084 (The Treatment of Transition Zones to Towns and Villages on National Roads). The design standard supplements the information provided in DMURS and provides that within the Centres of towns and villages that lie on National Roads, the treatments described in DMURS shall apply. However, it should be noted that throughout the entire length of national roads through towns and villages the designer is also required to comply with the requirements within TII Publications (Standards) for National Roads.

- In that regard, works impacting a national road require a Preliminary Design Report (PDR) in accordance with TII Publication DN-GEO-03030 (Minor Improvements on National Roads). A Road Safety Audit (RSA) in accordance with TII Publication GE-STY-01024 (Road Safety Audit) may also be required.

-Prior to adoption, TII would welcome the proposed variation/Dublin Street Regeneration Plan updated to reflect the following requirements:

- Subject to appropriate transportation analysis, such as NTA/TII Area Based Transport Assessment (ABTA) Guidance, confirmation within the text of the proposed Variation/Regeneration Plan that development proposals will be progressed complementary to safeguarding the strategic function of the adjoining national road network, and

- Works to the national road network in the urban area will be undertaken in accordance with DMURS and TII Publications including TII Publications DN-GEO-03084) The Treatment of Transition Zones to Towns and Villages on National Roads), and PDR and RSA requirements, in the interests of safeguarding road user safety.

Planning Authority response: By having regard to the Monaghan Land Use and Transportation Study, future developments will be progressed complementary to safeguarding the strategic function of the adjoining national road network. In addition, works to the national road network in the urban area will be undertaken in accordance with DMURS and TII Publications, including TII Publications DN-GEO-03084 (The Treatment of Transition Zones to Towns and Villages on National

Roads), and PDR and RSA requirements, in the interest of safeguarding road user safety. Amendments to the text of the Plan made to reflect this (Refer to Recommendations in section 5).		
6	Conor Galvin, Flood Relief and Risk Management Division	Office of Public Works
Matters raised		
Notes the continued commitment to adhere to the appropriate application of the Planning System and Flood Risk Management Guidelines (2009) and Circular PL02/2014. Should any changes to the zoning designations in areas of flood risk be implemented in future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.		
Planning Authority response: Noted		
7	Cian O'Mahony, SEA Section, Office of Evidence and Assessment	Environmental Protection Agency
Matters raised		
Refer to guidance document 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' and suggest local authority takes this guidance document into account and incorporate the relevant recommendations as relevant and appropriate to the Plan. Proposed SEA Determination - Notes the SEA Determination that SEA is not required. Sustainable Development – In proposing and in implementing the variation, MCC should ensure that the Variation is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan. - should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans. - should ensure alignment with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Northern and Western Regional Spatial and Economic Strategy. State of the Environment Report – Ireland's Environment 2020 (EPA) – should be taken into account in preparing the variation. Available Guidance & Resources – <ul style="list-style-type: none"> - SEA process guidance and checklists - Inventory of spatial datasets relevant to SEA - Topic specific SEA guidance (including Good Practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Integrating Climatic Factors into SEA (EPA, 2019), Developing and Assessing Alternatives in SEA (EPA, 2015), and Integrated Biodiversity Impact Assessment (EPA, 2012) Environmental Sensitivity Mapping (ESM) WebTool – for creation of plan-specific environmental sensitivity maps, to examine environmental considerations, anticipate potential land-use conflicts, and help identify suitable development locations while also protecting the environment. EPA SEA WebGIS Tool – to produce indicative reports on key aspects of the environment in a specific geographic area, intended to assist public authorities in SEA screening and scoping exercises. EPA WFD Application – access to water quality and catchment data from the national WFD monitoring programme Future Amendments to the Plan – where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria, Schedule 2A of the SEA Regulations (SI No. 436 Of 2004).		

Appropriate Assessment – should ensure the Variation complies with the requirements of the Habitats Directive. Where Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the Variation.

EPA AA GeoTool – developed in partnership with NPWS, to search and gather information for each European site within a search area

Environmental Authorities – under SEA Regulations, prior to making SEA Determination, should consult with EPA, Minister for Housing, Local Government and Heritage, Minister for Environment, Climate and Communications, Minister for Agriculture, Food and Marine, any adjoining planning authority

SEA Determination – copy of SEA Determination, reasons for not requiring environmental assessment, available for public inspection, and relevant environmental authorities consulted.

Planning Authority response: Noted

8	Trish Smullen, Geological Survey Ireland,	Department of Environment, Climate and Communications
---	---	---

Matters raised

No specific comment or observation to make since last response (recommendations in terms of SUDS, drainage mitigation, protection of groundwater, drinking supplies).

Planning Authority response: Noted

9	Elaine Heneghan, Regional Forward Planning Specialist, Asset Strategy	Irish Water
---	---	-------------

Matters raised

Welcome proposed variation which will support the achievement of urban renewal and compact growth objectives in local, regional and national planning policy.

Monaghan Town is served by the Monaghan water resource zone, which has water supply availability.

Masterplan area is within a groundwater source protection area, development proposals should not conflict with the protection guidelines set out in the County Monaghan Groundwater Protection Scheme.

Currently ample potential spare wastewater treatment capacity (to at least Urban Wastewater Treatment Directive standards).

Area is well served by 100mm, 150mm and 200mm diameter watermains on Dublin Street, Glaslough Street and within the Master plan area.

225mm diameter sewers along Glaslough Street and Dublin Street, while capacity is available for some development, localised upgrades of the wastewater network likely required to service the full development of the plan areas. To maximise capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted. SuDS and Green-Blue infrastructure are encouraged in new developments including the public realm and retrofitted in existing developed areas as an effective means of keeping surface water out of the foul network.

Third party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g. servicing backlands sites.

New connections – all new residential and commercial developments wishing to connect to Irish Water network are to be assessed on a case by case basis through Irish Water’s New Connections Process.

Protecting Irish Water Assets – essential that Irish Water assets are protected and access is maintained. There are 150mm diameter watermains in Diamond Centre car park and a 200mm diameter watermain within the master plan area backlands, as well as other Irish Water network assets within the road and public realm at Old Cross Square. It is likely that the 200mm diameter watermain will need to be diverted to accommodate the proposed developments.

Developments in the vicinity of Irish Water assets must be in accordance with Standard Details and Codes of Practise. Where protection or diversion works are necessary, a Diversion Agreement shall be required.

Early engagement in relation to planned projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.

Planning Authority response: Noted

10	Louth County Council
----	----------------------

Matters raised

Variation seeks to facilitate sustainable compact urban development within Monaghan Town centre, consistent with National, Regional and County policies and guidance including the National Planning Framework, Regional Spatial and Economic Strategy, Our Rural Future Rural Development policy, Town Centre First Policy and County Development Plan – no objections

Planning Authority response: Noted

11	Padraig Maguire, Senior Planner	Meath County Council
----	---------------------------------	----------------------

Matters raised

No comments

Planning Authority response: Noted

12	Robert McLoughlin, Principal, Avison Young Planning and Regeneration Limited	on behalf of Tesco Ireland Limited
----	--	------------------------------------

Matters raised

Tesco Ireland operates a store at Monaghan Shopping centre. The retail sector makes a major contribution to Monaghan Town by increasing the vitality and viability of the town centre, acting as an economic anchor, creating significant employment and generating indirect economic and social activity. In this regard, Tesco welcomes this engagement, and encourage the local authority to continue to engage with stakeholders to ensure the success of the overall scheme.

Highlight Tesco’s overall support for the proposed Regeneration Plan, the delivery requirements needed to operate the Tesco store, and potential impacts on same. Suggest Monaghan County Council continues to engage with relevant stakeholders and have regard for Tesco’s requirements when implementing the proposed scheme.

Tesco Delivery Route – Tesco service yard is currently accessed off Castle Road via Broad Road with deliveries entering the service yard at the southern end and exiting the service yard at the northern end. Vehicles exit by turning right on to Castle Road and left on to Broad Road and through the roundabout at Old Cross Square, which has been identified as future public realm scheme within the Regeneration Plan, onto the N2.

Tesco operates a central distribution system, which not only ensures consistent product quality and availability, but also reduces the number of delivery trucks on the road network at peak times, when traffic congestion is at its highest. In order to accrue all the benefits of the central distribution system, from product availability to a reduction in the number of delivery vehicles on the roads, these deliveries should be protected, and access maintained, especially regarding the Old Cross Square roundabout.

Additionally, adequate loading bay facilities and access routes shall be maintained, to ensure the commercial viability of retail premises. A failure to accommodate deliveries could have a detrimental impact on such premises.

Tesco is in favour of and supports the proposed works and public realm improvements proposed in the Regeneration Plan, which will contribute to the renewal, regeneration and increased vibrancy in the town centre. However, request that the local authority be aware of the established routes

when carrying out public realm improvements, and that such public realm works do not impact on the accessibility through town for vehicles serving commercial premises.

Planning Authority response: The public realm will be further developed through detailed design processes and will have regard to protecting the carrying capacity of the national road.

13	The Monaghan Family	Ashleigh House
----	---------------------	----------------

Matters raised

Family and antecedants, have occupied as both home and successful B&B business at nos. 36-37, and in more recent years the private dwelling, no. 35 Dublin St.

Aware for most of two decades the Council were considering plans to create new development opportunities at the rear of Dublin St. Have previously met with Council officials by appointment on our property over those years for the purpose of acquiring updates and ideas as to what was being considered, however, the years passed with little progress. Welcome this latest engagement, however, continue to have serious concerns and reservations for how their property, especially the amenity aspect that the family have enjoyed over seven decades, will be jeopardised. Over the generations, have been fulfilling the words of the Plan Vision that seeks to ‘create a desirable and convenient place to live,’ and in a further line, ‘to create ... a strong sense of place and identity.’

From both a personal and commercial perspective, the rear garden which is relatively large for a town centre location has provided a private oasis for themselves, extended family, friends, and customers, all over the years, enjoying the outdoor environs with little or no intrusion, relatively unique in a town centre. Many customers have returned to enjoy the vibrancy of the town as well as avail of the peaceful solitude of the extensive garden space. It is far from a ‘redundant backlands’ as the Plan refers.

Garden also serves to dry bed linen and towels on clothes line to reduce electricity costs. A storage shed, recently replaced with a new one, has been in place to serve additional storage for the business.

Have genuine concerns as to the proposed plans and the negating impact that will be created as a result. Of particular note is the loss of recreational/leisure amenity that will be entirely eliminated. New proposed development will boundary only a few metres from their existing building line, resulting in the almost complete loss of the garden. Peace and quiet of this cherished amenity will be lost with the development of Russell Row and adjacent parking.

With the substantial acreage that exists within the overall development footprint, why such considerable encroachment into their property occur?

Seek of planners to consider this key issue and request meeting with planners in the time ahead to consider additional points they may wish to raise.

Planning Authority response: The Planning Authority confirms that the Plan would result in the severance of the rear garden area. The achievement of the regeneration of the area requires access and the opportunities to create new development areas, including the potential for new development to front on to the new street, Russell Row. There are opportunities to provide new development fronting on to the new street for the Monaghan’s property also. The Plan allows for additional amenity space to be provided within the Plan area and for connectivity to other amenity areas within the town.

14	Eddie O’Gara	
----	--------------	--

Matters raised

Summary - While the plans objectives, goals, vision and background research is generally very agreeable and is everything that a progressive Master Plan should contain, unfortunately the manifestation of this vision into both the Master Plans fails badly. The end result is something that looks more like a vehicle transport plan leading to car parks with various types of building as opposed to a Master Plan which was developed from the person first. The end result will be an increase in the traffic through the town, a significant increase in the traffic through Old Cross Square

and no uplift for the regeneration of Dublin Street. The Master Plan falls flat and is a major disappointment from its potential to be a blueprint not just for Monaghan but for other towns of similar size in the Country. What is drawn is outdated and not in keeping with the vision of 10 minute towns or people centred design. – When you look at the amount of roads, the amount of parking at each building and the potential proposed additional roads you will see that this plan most defiantly still falls under the ‘User Hierarchy For Irish Towns.’

- Car parking and car dependency – to allow unrestricted vehicle movement around all the development is the fundamental failure of this masterplan and one which ultimately has an extremely negative effect on it, absence of rail infrastructure, and poor level of bus service has resulted in high level of car dependency.

- Notes the Development Plan recognises reduced car parking demand where there is a more sustainable mix of residential and employment generating uses. Master plan will end up as an urban road scheme with some mix use / residential blocks in between as opposed to the high ideals in the project vision and introduction. This will increase vehicle movement and do nothing to help regenerate Dublin Street due to increase in traffic. Don’t need to balance car parking with public realm, put public realm first at all times and force car parking (and as a result vehicle movement) to be accommodated away from these areas.

- Russell Row – connecting the Diamond and Old Cross Square will increase vehicle movements – existing buildings in Dublin Street North will become a traffic island

- Objective 8 – *pedestrian priority, shared surfaces* – if vehicle movement has been accommodated to such an extent then pedestrian movement will be compromised. Shared surface over two-way traffic does not encourage pedestrian movement.

- Objective 10 – *Phase 1 – short term parking area, to be developed in long term as Phase 2 – residential or mixed use* – Referencing middle development zone as temporary event space is a cover. The front of the Courthouse is the event space for Christmas lights, and the Diamond for Country Music festival. Also, proposals to demolish buildings on Dublin Street South and create multi-use event space. Questions how many event spaces are needed and why would they not be within the existing historic core.

- Objective 13 – *Support low carbon development through reuse and adaptation of existing structures, energy efficiency, SuDS, sustainable travel, car sharing, ..* – what is proposed with car parking and roads is polar opposite to low carbon and no amount of SuDS, car sharing, electric charging points will green wash that.

- Objective 16 – *provide new residential development to make sustainable use of existing community facilities to reduce reliance on car, while creating healthier, active community* – appears to be an attempt to create a vehicle movement and parking dominated public realm, and an attempts to state that facilities of Greenway and St Davnet’s facilities will fill the void. Negative impacts on existing senior citizens living in Roosky by proposed Quarry Walk road, marooned by vehicles dominated roads on all sides.

- Objective 18 – *mixed housing type and tenure to ensure a mix of demographics groups* – housing mix appears mostly apartments with a small number of townhouses, none of which cater for huge mix demographic groups

- Objective 19 – *to provide for multi-generational homes, starter, family, elderly* – With a car parking and car movement dominated public realm, which families will seek to live there as opposed to out of town options and increase car dependency?

- Principle 6 – *to create appropriate entrance to town from east and Roosky Master plan area;* Objective 27 – *enhance public realm of Old Cross Square and traffic management;* Objective 28 – *create strong building line to north western edge of Old Cross Square* - fallacy to improve public realm by creating 2 new roads (Russell Row & Infirmary Hill) into already congested vehicle dominated space. Hostile in particular for vulnerable pedestrians.

- Priority 7 – *provide high quality public realm and attractive public spaces adopting a people first priority;* Objective 29 – *improve pedestrian environment along Dublin Street, widened footpath, shared surface, reduced carriageway width, relocation of on street parking to backlands, tabletop*

pedestrian crossings – increasing vehicle movement to east and west of Dublin Street will sever it further from the town, Shared surface is vehicle priority.

- Objective 30 – *improve pedestrian environment and public realm of Old Cross Square through rationalised carriageway to provide for routes through to Infirmary Hill, Russell Row and Dublin Street, enhance pedestrian environment of Old Cross Square, appropriate location for monument, signage* – can't improve pedestrian environment of Old Cross Square, already destroyed by dominance of vehicle movement and plans to increase this dominance, won't see proposed entrance signage or monument due to high volumes of HGVs.

- Objective 31 – *Improve pedestrian environment and public realm of Diamond Place, realignment of parking, pedestrian areas, landscaping* – impossible to improve pedestrian environment by creating a new road

- Objective 32 – *high quality public realm improvements at proposed entry points, including paving, lighting, pedestrian priority, table top, shared surface* – if public realm is designed from a people first perspective, table top, shared surfaces are not needed. It's one thing to retrofit them but to design them into an implied street tells you everything about that 'street' – it's a road.

- Objective 33 – *provide positive interaction between spaces and the built form, e.g. building frontages, windows, entrances face and overlook the street, public spaces* – positive intention that will be undone by hostility of the public realm by vehicle movement

Roosky Master Plan

- Objective 10 – *provide car parking to meet demands of proposed development, car sharing clubs, integrated car parking with topography, landscaping and pedestrian routes to ensure pedestrian priority* – need to bring roads and parking to all buildings is incorrect. In a 10-minute town situation there should be very little parking within the public realm, could be located in 1 or 2 locations only.

- Principle 3 – *create attractive desirable place*; Objective 11 – *create new spaces, sense of place and identity and character areas* – 3 out of 4 spaces are car parks, extremely poor use of space

- Objective 16 – *to facilitate access from St Davnet's Row to Glaslough Street as a long-term future objective*; Objective 17 – *facilitate access from Roosky Square to the PEACE Campus* – future knocking of buildings to create roads into the development. Major concern, creates another ring road around the town.

- Objective 20 – *provide for pedestrian priority zone, use of shared surface, designated pedestrian zones* – it is a contradiction to have pedestrian priority on a shared surface.

- Principle 6 – *adopt a people first approach in street design*; Objective 21 – *facilitate active travel, walking and cycling* - contradiction of people first approach, wider footpaths do help as does cycleways (none indicated within the plan), and reduced carriageway widths, but these can be designed out if the design is based on a people first approach.

- Streets, Routes and Links – you know your plan is fundamentally flawed when you have to identify pedestrian access routes, the rest is vehicle prioritised.

General notes:

- no cycle lanes or cycle priority indicated but lots of two way roads (cars, vans, HGVs)

- extent of roads will have detrimental effect on Ulster Canal Greenway as interface with it to get into town will result crossing at least two busy roads

- master plan is located on a hill, visual impact to what is likely quite architecturally poor apartments. View of these and other buildings within this development in particular from the Cathedral is a worry. Nothing in the master plan is nestled into the landscape in a sensitive manner, it's a building, a car park and a road. No point in claiming high architectural quality and finish of any proposed buildings because that does not exist anywhere in the town for new developments.

- Potential extension of roads into Glaslough Street will almost certainly happen and result in an internal ring road within the town – more traffic, less people walking and cycling, loss of footfall on the existing streets, less attractive place to live, work and visit.

- Can't see benefit of master plan to Dublin Street in terms of footfall and liveability (accepting if there is Council offices that will bring some footfall but its indirect not targeted at the regeneration of Dublin Street)

- Know what state high street retail is in, so apart from office from perhaps HSE or similar next to the proposed civic offices, can't see this development being anything other than apartments and office, it's certainly not mixed.

Master Plan has so much potential but what has been developed is not anywhere near good enough and should be rejected as a result.

Planning Authority response: Refer to Table 2

15	Marie Macklin	
----	---------------	--

Matters raised

While the plans objectives, goals, vision and background research is generally very agreeable and is everything that a progressive Master Plan should contain, unfortunately the manifestation of this vision into both Regeneration and Master Plans fails badly. The end result is something that looks more like a vehicle transport plan leading to car parks with various types of building as opposed to a Master Plan which was developed from the person first. The end result will be an increase in the traffic through the town, a significant increase in the traffic through Old Cross Square and no uplift for the regeneration of Dublin Street. The Master Plan falls flat and is a major disappointment from its potential to be a blue print not just for Monaghan but for other towns of similar size in the Country.

What is drawn is outdated and not in keeping with the vision of 10 minute towns or people centred design. – When you look at the amount of roads, the amount of parking at each building and the potential proposed additional roads you will see that this plan most defiantly still falls under the 'User Hierarchy For Irish Towns.'

Planning Authority response: Refer to Table 2

16	Miriam McQuaid Cadden	
----	-----------------------	--

Matters raised

While the plans, objectives, goals, vision and background research is generally very agreeable and everything that a progressive Master Plan should contain, unfortunately the manifestation of this vision into both the Master Plans fails badly. The end result is something that looks more like a vehicle transport plan leading to car parks with various types of building as opposed to a Master Plan which was developed from the person first. The end result will be an increase in the traffic through the town, a significant increase in the traffic through Old Cross Square and no uplift for the regeneration of Dublin Street. The Master Plan falls flat and is a major disappointment from its potential to be a blue print not just for Monaghan but for other towns of similar size in the Country. What is drawn is outdated and not in keeping with the vision of 10 minute towns or people centred design. When you look at the amount of roads, the amount of parking at each building and the potential proposed additional roads you will see that this plan most defiantly still falls under the 'User Hierarchy For Irish Towns.'

Planning Authority response: Refer to Table 2

17	Gerard Cadden	
----	---------------	--

Matters raised

While the plans objectives, goals, vision and background research is generally very agreeable and is everything that a progressive Master Plan should contain, unfortunately the manifestation of this vision into both the Master Plans fails badly. The end result is something that looks more like a vehicle transport plan leading to car parks with various types of building as opposed to a Master Plan which was developed from the person first. The end result will be an increase in the traffic through the town, a significant increase in the traffic through Old Cross Square and no uplift for the regeneration of Dublin Street. The Master Plan falls flat and is a major disappointment from its potential to be a blue print not just for Monaghan but for other towns of similar size in the Country. What is drawn is outdated and not in keeping with the vision of 10 minute towns or people centred

design. When you look at the amount of roads, the amount of parking at each building and the potential proposed additional roads you will see that this plan most defiantly still falls under the 'User Hierarchy For Irish Towns.'

Planning Authority response: Refer to Table 2

SUBMISSIONS RECEIVED AFTER CLOSING TIME FOR SUBMISSIONS (5:00 p.m. 11 February 2022)

18	Paddy Boyle
----	-------------

Issue raised:

Title of email: 'Objection to Monaghan development plans' – no text with email

Planning Authority response: Noted

19	Mary O'Donnell
----	----------------

Matters raised

Just adding voice to the existing doubts regarding the plan for redevelopment.

While the plans objectives, goals, vision and background research is generally very agreeable and much that a progressive master plan might contain, there do appear to be problems. The end result may be an increase in traffic through the town, a significant increase in the traffic through the Old Cross Square segment and no uplift for the regeneration of Dublin Street. The proposal, for me, is weakened fails through having a large surface carpark rather than an underground OR multistorey one.

I do like much of the pedestrianisation and have no doubt that there's a sound urban vision underpinning these plans. Balancing and including what is good for humans, rather than traffic, strikes me as important. It would be a shame if the clutter, clamour and heavy traffic of Old Cross Square were to increase as a result.

Planning Authority response: Refer to Table 2

20	Michael Mullen
----	----------------

Matters raised

- Rejects the presentation of Monaghan Town as presented in public consultation and the desire to 'create an attractive place to live and work.' Monaghan Town is already an incredibly attractive place to live and work, so perhaps 'enhance' would have been a more appropriate term.

- those that live in town already have the much vaulted 15 minute city/town, however, lack of public transport infrastructure means economic viability of many businesses overly rely on car parking. As need for the car is unlikely to change in future, the master plan is an opportunity to build on the many positives of the town, increase core population living in the town and the viability of many businesses and potentially negate the need for so much large format car parking in the long run.

- despite challenges posed by large format retail, the core of the town is still very strong and vibrant, support any plan which seeks to enhance it. Without strong guiding principles for the scheme, risk undermining the value of what we already have. Both variations have significant deficiencies which could potentially undermine the benefits of both schemes.

15 minute city – 10 minute Monaghan: designers have highlighted the work and theory of Carlos Moreno and his concept of the 15 minute city, however, have not presented any information to show his research and data have been applied to this project beyond lip service. Moreno is not a design led approach but a scientific data led approach, which clearly demonstrates that through a process of engagement with the public and stakeholders, an urban environment can be created with access to housing, work, culture, education, food, health all within 15 minutes by foot or bicycle. Key guiding tenants of ecology, proximity, solidarity and participation are absent. Process puts people first and is reliant on scientific data and engagement to back it up. The masterplan has taken opposite approach in trying to make their design fit in with his theory which is used as a great sound bite.

- The ultimate success within the 15-minute city premise is to reduce the need for cars and road infrastructure not to increase them, increase access to more green spaces, pedestrian areas and routes, not hinder them as is evident within this masterplan.

- **Dublin Street** – no evidence presented through data, precedents or drawings to show how the backland development would improve the situation of Dublin Street. To develop the green lands north of Dublin Street does not appear to address any of the issues of Dublin Street presented to the public.

- Unit size and building quality of existing buildings is a determinising factor in the vacancy rates throughout Ireland not just on Dublin Street. Existing historic buildings on Dublin Street are simply too small for quality housing, retail or effective commercial use. Alternative, more imaginative uses and incentives should be sought by the Council to increase the occupancy of these units whilst preserving them.

- Creating new road and perimeter block connecting Diamond car park to Old Cross Square would hollow out Dublin Street by drawing people away to a location where there are superior housing and commercial units. Despite an uplift in pedestrian numbers and increased accessibility this would likely lead to the further dilapidation of Dublin Street.

- **Old Cross Square** – new entrance to Monaghan Town through Old Cross Square as a pedestrianised plaza – complete fantasy as it ignores the fact that Dublin Street is a one way vehicular street and both variations would significantly dramatically increase traffic congestion in that area.

- **Old Cross Square** area has gone from being an important open space within the town, historical context undermined through time with a series of poor interventions. It's now to a series of car parks and roundabouts which very conveniently appear to serve this development. Difficult to see how any of the current proposals will reverse this decline. Whilst vehicular access is incredibly important for a functioning town there needs to be a balanced approach to this. Too often, economics, commercial interests and roads designs have triumphed to the detriment of creating public spaces.

- **Traffic** – both variations by virtue of the roads created and number of residential units would increase the traffic congestion in the town particularly in the Diamond and Old Cross Square. Unless the Council is considering zoning buildings for demolition, it would be a significant engineering feat to achieve a road connection to the Peace Campus. Therefore, in real terms this development would have to be accessed solely through the creation of two access roads through Old Cross Square and the Diamond car park. Unless cars are removed entirely from the scheme, this would manifest itself in the requirement for a major traffic junction in Old Cross Square and further congestion in the Diamond. Entirely at odds with achieving an attractive place to live and work and the 10-minute town concept.

- **Proposed urban spaces** – Development principles and objectives are to be applauded but not evident on the drawings. These ideals are not being put into practice and benefits to Dublin Street and the town beyond the additional housing numbers are not clear. Designers talk about public realm but presented a series of car parks under the guise of public spaces. No single pedestrian space has been created in Monaghan Town in over 100 years, existing public spaces are constantly under threat and in danger of being turned into car parks. Opportunities lost in previous developments, shopping centre, Peter's Lake, The Diamond development to create genuine public space and contribute to the urban fabric. Instead we have series of buildings surrounded by car parks.

- **Landmarks, context** – historical development of town between the hills, high points reserved for landmark buildings, Cathedral, St Macartan's school, St Mary's school, with buildings tiered on roads leading to the high points. Exception to this is housing on Pound Hill and Killygoan which overlooks the town with a solid horizontal roofline, akin to a Napoleonic fort. The concentric circular road layout and design on the Roosky lands seeks to emulate the layout of Pound Hill, would create a second solid ridgeline ringing the town from the east. Hard to see how this could be entertained or justified.

- The historical precedent of Hill Street, Mill Street and High Street suggests that running the access points to the development up the slope would break down the massing of the development and make it less imposing. Also a single focal point building should be created at the top of the hill with all the surrounding building subservient to it, could easily be achieved by reorientation of the roads to radiate uphill to focus on the new civic offices.
- The Council should prevent the design drawings being carried forward as they are presented as finished designs, they are overly detailed and prescriptive and very rigid and could be considered as a fait complet. Scale of proposed blocks and building typologies are more appropriate for a higher density urban environment. Room should be provided for alternative mixed uses not evident in the designs.
- Scale of buildings, as drawn, would be disastrous and imposing on the town, section A-A indicates the floor level of a three-storey building higher than the Diamond Apartments, would lead to what looks like an eight-storey building.
- **Economics** – concerns about dependency on apartments. Text noted mixed use development, absent from design drawings. In principle, apartments will increase population and get density closer to town centre. However, in Monaghan, the construction costs of building apartments particularly on this site with underground and under croft car parking doesn't tally with sale price of apartments in town. Excluding land values or other ancillary costs, for a low rise (low quality) suburban development costs are currently starting at €1950 per sq. m. to build an apartment. To build a two-bed apartment in Monaghan would equate to construction costs of €126k alone, good quality €220k. (Costs taken January report into Analysis of apartment development costs and viability by SCSi and RICS)
- Concern that the successful development of the site is dependent on people buying apartments built by private developers.
- **Conclusion** – little or no regard to the existing historic town layout and streetscapes and how that has developed through time. How traditionally the town tackled the problems of building up a very steep hill and on top of the hill. Scale of 4/5 storey buildings on the hillside to overlook the town like a university campus, oversized, brutish, monolithic and will dwarf the town, demonstrated in the sections. The modern urban streetscapes between the buildings are poor quality and generic.
- Plans show no evidence of enhancing Dublin Street and will likely detract from it and the town centre as a whole. Despite the aspirations of the text no priority has been demonstrated on the drawings for pedestrians and cyclists. Little consideration given as to how pedestrians would access high parts of the site.
- The new roads will seriously compromise the already compromised integrity of Old Cross Square, proposed public spaces are in reality, car parks, proposed urban realms are roads, buildings lack character and any local context.
- In principal, zoning this land should be positive for the town, proposed design content does not match the vision, principles and objectives, numerous inconsistencies throughout which lack credibility upon closer scrutiny.

Planning Authority response: Refer to Table 2

21	Ian Lumley, Head of Advocacy	An Taisce
----	------------------------------	-----------

Matters raised

- An Taisce are dedicated to addressing the climate and biodiversity crises while promoting human health and wellbeing, the creation of sustainable communities and the protection of our rich built heritage. Wish to see a shift to more sustainable modes of transport, particularly walking and cycling, as is crucial for improving human health and wellbeing and reducing our impact on the environment.
- Support in principle, much of the project vision, objectives and the regeneration plan strategy, including the 10-minute Monaghan Strategy and the Town Centre First Approach, the adequate inclusion of these into the proposed plans unfortunately fails.

- Proposed plans foresee an increase of roads, many two-way and give provision of parking in nearly all available public open space. Naming of car parking locations as ‘Roosky Square’, ‘Farney Place’ or ‘Temporary Event Space’ does not hide the fact that they are predominantly car parking locations rather than civic spaces, which are needed for the creation of sustainable town centre communities.
- Layouts appear dominated and perhaps dictated by a road network that brings vehicles to car parking locations throughout the masterplan area. Will subsequently discourage sustainable modes of transport, walking/cycling, not only by those living and working in the space but also those from elsewhere in the town. The use of ‘shared surface’ does not mitigate this because the pedestrian is still at the mercy of the vehicle.
- Potential connection of some of the roads into the historic streetscape of Glaslough Street is of real concern, similar to what’s proposed for Dublin Street South, demolition of 4 buildings within an Architectural Conservation Area, including home of Sir Charles Gavan Duffy.
- Outside the red line boundary of the Roosky Master plan, road connecting ‘Infirmity Hill’ to the North Road/R135. Master plan sets out opportunities to significantly increase vehicle movement in and around the town centre and this area. Will create an internal ring road into an already vehicle dominated town centre.
- Proposed plans will see two new access roads from Old Cross Square, the ‘Gateway’ to the town from the south. In addition, the existing road, Roosky Vale, which enters Old Cross Square, will experience an increase in traffic. This makes it less accessible for those wishing to cycle or walk from the south into the town. Of particular concern is the potential of through traffic. The proposed ‘new public space with public realm design’ will not mitigate this. The Plan does not consider the Ulster Canal Greenway into the town, adjacent schools, or the impact on this important amenity as a result of the increased vehicle movement along Roosky Vale.
- In summary, if these plans were implemented, there would be no modal shift away from private vehicles, no increase in walking and cycling. The latter are critical if we are to address the climate and biodiversity crises. There is insufficient place making in the plans, which is needed for the creation of sustainable urban communities. The plans as currently presented should be reconsidered and revised before adoption.

Planning Authority response: Refer to Table 2

22	Darren Smyth, Secretary	Monaghan Town Football Club
----	-------------------------	-----------------------------

Matters raised

Club in operation since 2005 as a senior club and 2011 as a juvenile club. Club established to keep senior lads involved with soccer in local area, have one senior team playing in the Cavan Monaghan league and five underage teams in underage leagues. Ages from 5 to 40. Note successes of club with players representing at national level, achieved without own playing facilities, have been lucky to have use of Belgium Park.

- Strive to acquire own ground and have fundraised. However, finding suitable land to purchase has proved difficult and growing numbers in the club means financial strain, with renting facilities proving more difficult.

- Would appreciate Council’s help in identifying a suitable piece of land to build own home or else work with the Council in upgrading existing facilities at Belgium Park.

- Would like to be considered for some land usage when regenerating the land at St. Davnet’s complex. Understand there may be recreational space available and would help develop a portion of this. Club have some funds and hope to apply to the LCDC for further funding to help develop a football field of their own.

Planning Authority response: The Planning Authority notes the submission and will continue to work with the club in identifying suitable opportunities to enhance the availability of facilities.

Table 2. Responses to specific issues raised in submissions

Submissions Issues	Response
<p>1. Urban Spaces - Car Parking Provision</p>	
<p>With regard to the proposed urban space, it is considered that there is an over provision of car parking in the proposed urban spaces in both the Dublin Street North Regeneration Plan and the Roosky Master Plan that will undermine their benefit as public spaces for people.</p>	<p>The Regeneration Plan and Master Plan layout is a concept strategy only. The layouts included within the Regeneration Plan and Master Plan are indicative and subject to detailed design. The detailed design will be informed by the policies and objectives set out in Dublin Street North Regeneration Plan and the Roosky Lands Master Plan documents, and any evidence based data relating to the plan area, including consideration of traffic movement management, car parking requirements, and location and configuration of on street, and potential off street parking to ensure that meaningful public spaces are created. Given that Monaghan is a rural based town with poor public transport, it is acknowledged that transport is predominantly in the form of motor vehicles. Consequently, although the Plan encourages a modal shift, this must be in tandem with the development of transport alternatives to the motor vehicle. Although it is acknowledged that the new development envisaged by the Plan will generate a certain demand for vehicular access and parking such as deliveries and mobility impaired persons, flexibility is incorporated within the Plan to allow an incremental approach to the development of the Plan area and subsequent evolving pedestrian priority over motor vehicles. Achieving modal shift in a rural town is a process which will be delivered on an incremental basis that takes account of the emerging situation and prevailing policies and objectives.</p> <p>The Principles and Objectives in the plans support this approach.</p>
<p>2. Old Cross Square – Car Dominated Space</p>	
<p>With regard to Old Cross Square, it is considered that Old Cross Square will be dominated by cars and vehicular movement and the plan does not address this.</p>	<p>The Regeneration Plan and Master Plan layout is a concept strategy only. The layouts included within the Regeneration Plan and Master Plan are indicative and subject to detailed design. The detailed design will be informed by the policies and objectives set out in the plan documents, and any evidence-based data relating to the plan area, including consideration of traffic movement management, and the objective to create a high quality pedestrian environment in Old Cross Square (Objective 29). This is also supported with the inclusion of an additional objective to commit to re-evaluation of the design of Dublin Street to a pedestrian priority street, by reducing through traffic. The proposals in the Plan seek to improve pedestrian environment and it is considered that some traffic access will not prohibit the objective to ensure pedestrian priority. The final detailed design will have regard to the objective to ensure pedestrian priority in Old Cross Square.</p>

	The Principles and Objectives in the plans support this approach.
3. Plan Layout Building Form and Visual Impact	
There is concern that the master plan layout and development forms will create a solid ridge line that is not contextual or appropriate to the town context.	The Regeneration Plan and Master Plan layout is a concept strategy only. The layouts included within the Regeneration Plan and Master Plan are indicative and subject to detailed design. The detailed design and configuration of development blocks will be informed by the policies and objectives set out in Dublin Street North Regeneration Plan document, and assessment of the visual impact of development on views within and towards the town. The concept is to develop the Roosky Master Plan as a series of plateaus which is consistent with the approach adopted at the adjoining St. Davnet's campus. The Principles and Objectives in the plans support this.
4. 15-Minute City – 20-minute neighbourhood	
With regard to the 15-minute city – 20-minute neighbourhood concept, it is considered that the concept is not properly applied to the plans.	The 15-minute city – 20-minute neighbourhood concept is included to highlight the potential of the regeneration plan and master plan as a new area that can integrate the key elements that make a sustainable neighbourhood. Furthermore, the plan aspires to the ten-minute town concept which is more appropriate to this plan area. The detail design of the plans will be informed by this concept and evidence-based data relating to the plan area. The Principles and Objectives in the plans support this.
5. Dublin Street Regeneration	
With regard to the regeneration of Dublin Street itself, the benefit of the plans in supporting the regeneration of Dublin Street itself is questioned, considering the floor plate and configuration of existing structures on the street.	The Regeneration Plan promotes the enhancement of the public realm on Dublin Street. Opening the lands to the rear of Dublin Street North will facilitate greater potential to support commercial activity between Dublin Street and the proposed mews lane, Russell Row, as appropriate, and it is anticipated that increased footfall in the area is likely to stimulate economic activity in Dublin Street. It is considered that this can only but enhance the vitality and viability of Dublin Street in general. The Regeneration Plan also supports the reuse and adaptation of the existing structures as viable mixed commercial and dwellings formats, and the indicative layout also supports this. While existing rear gardens to the rear of Dublin Street North will be reduced in length, this is balanced with options for properties to benefit from the potential to provide additional accommodation in the form of an extension to the principal structure facing Dublin Street, or a mews type structure to the rear with independent access from the proposed new access lane to the rear (Russell Row), subject to detailed design. The Principles and Objectives in the plans support these approaches.

<p>6. Residential Mix and Tenure</p>	<p>The Regeneration Plan is not dependent on apartment formats only and supports mixed dwelling types that include own door town houses and duplex dwellings as well as apartments. The delivery of homes in the plan areas will be dependent on potential private developers, investors and the Local Authority anticipating tenure demand. The plan presented is indicative of the potential development sites that are available for residential and mixed-use development. The overall plan, and definition of potential development sites will be dependent on detailed site surveys, and detailed design, that will be subject to the Principles and Objectives of the plans.</p> <p>The National Planning Framework promotes Compact Growth in Town Centres. This is also supported in the Northern and Western Regional Spatial and Economic Strategy and Monaghan County Development Plan. This is also supported by the statutory ‘Section 28’ Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (the ‘Sustainable Residential Development Guidelines’ 2009), with a companion Urban Design Manual (best practice document), Sustainable Urban Housing: Design Standards for New Apartments 2020, and the Urban Development and Building Heights Guidelines for Planning Authorities, 2018.</p>
<p>7. Modal Shift</p>	<p>The Regeneration Plan and Master Plan layout is a concept strategy only. The layouts included within the Regeneration Plan and Master Plan are indicative and subject to detailed design. The layout of the Regeneration Plan and Master Plan are designed to ensure that the plans integrate with the existing street network and create interconnections within the plan areas. A hierarchy of routes are suggested, that facilitate pedestrian only, and pedestrian, cycle and vehicular movement. The design and layout of the proposed connections are indicative only. The Principles and Objectives support a modal shift and active travel within the plan area, and integration with the existing streets and the Ulster Canal. As previously stated, given that Monaghan is a rural based town with poor public transport, it is acknowledged that transport is predominantly in the form of motor vehicles. Consequently, although the Plan encourages a modal shift, this must be in tandem with the development of transport alternatives to the motor vehicle. Achieving modal shift in a rural town is a process which will be delivered on an incremental basis that takes account of the emerging situation and prevailing policies and objectives.</p>

	<p>Furthermore, it is acknowledged that the new development envisaged by the Plan will generate a certain demand for vehicular access and parking such as deliveries and mobility impaired persons, and flexibility is incorporated within the Plan to allow an incremental approach to the development of the Plan area and subsequent evolving pedestrian priority over motor vehicles.</p> <p>In addition to supporting a modal shift and active travel the Plan will contribute to the objectives for the Monaghan Town Decarbonising Zone.</p>
8. Integration with historic streets	
There is concern that the plans do not integrate with the existing street layouts.	<p>The Regeneration Plan has evaluated numerous layouts during the design process, and the layout as presented is considered the optimum to ensure that the lands are accessible to pedestrians, cyclists, and vehicles, and that they integrate with the existing street layouts. The concept layout is informed by the town centre street pattern and the indicative layout mediates both. Notwithstanding that, the layouts are indicative only and subject to detailed design. It is considered that the indicative layout will not adversely impact on existing street layout as it comprises primarily the backlands and will not directly affect the existing buildings fronting onto Dublin Street. The detailed design and configuration of new connections, and the design and layout of new streets will be informed by the policies and objectives set out in Dublin Street North Regeneration Plan document, and the design objectives of the Design Manual for Urban Roads and Streets as updated (DMURS 2020).</p>
9. Building Height	
There is concern that the master plan proposes high rise building forms.	<p>The Regeneration Plan and Master Plan and accompanying illustrations are suggestive of up to four story building forms, that are consistent and integrate with the scale of buildings in Monaghan Town. The scale is indicative only and reflects Government Policy to support increased building height in town centre locations that integrate and contextualise with the existing context. The plans and illustrations are concept only, and the plan will be subject to detailed design, and accompanying visual impact assessments to ensure that development is of a scale that is consistent and enhances the character of the town.</p>

5.0 Conclusion and Recommendations

Following the public consultation in respect of the proposed variation all submissions were summarised and each matter raised has been provided with a comprehensive response. It was considered that there were issues raised that merited minor amendments to the Plan.

Having regard to the submissions made in respect of the proposed variation, it is recommended that the following minor amendments are made to the Plan by the elected members:

Matter	Recommended Amendment to Plan
Plan needs to reference 'Our Rural Future', 'Housing for All', 'Town Centre First' and UN Sustainable Development Goals	Addition of statements of policy within Section 1, Planning Policy Context, to include references to 'Our Rural Future' Rural Development Policy 2021-2025; Housing for All: A New Housing Plan for Ireland 2021; Town Centre First, A Policy Approach for Irish Towns; and UN Sustainable Development Goals (SDGs)
Plan needs to reference updated Monaghan Walking and Cycling Strategy 2021-2026	Update to current Walking and Cycling Strategy, Monaghan Walking and Cycling Strategy 2021-2026 within Section 1, Planning Policy Context
Plan needs to reference updated Design Manual for Urban Roads and Streets 2020	Update reference to Design Manual for Urban Roads and Streets 2020 (Interim Advice Note – Covid 19 Pandemic Response) within Section 1, Planning Policy Context
Plan needs to reference National Disability Inclusion Strategy	Inclusion of reference to National Disability Inclusion Strategy (2017-2022) within Section 1, Planning Policy Context
Plan needs to reference United Nations Convention on the Rights of People with Disabilities	Inclusion of reference to the United Nations Convention on the Rights of People with Disabilities within Section 1, Planning Policy Context.
Plan needs to reference National Transport Authority's 'Local Link Rural Transport Programme Strategic Plan 2018-2022	Inclusion of reference to the National Transport Authority's 'Local Link Rural Transport Programme Strategic Plan 2018-2022' within Section 1, Planning Policy Context.
Plan needs to reference Monaghan Land Use and Transportation Study (MLUTS) 2019-2035	Inclusion of reference to the Monaghan Land Use and Transportation Study (MLUTS) 2019-2035, and map Figure 8.2 Monaghan Proposed Walking and Cycling Routes within Section 1, Planning Policy Context
Plan needs to clarify that the concept strategy is indicative only and subject to detailed design.	Inclusion of statement within Section 1, Planning Policy Context, <i>"The Regeneration Plan layout is a concept strategy and indicative only. The regeneration of Dublin Street North will be subject to detailed design. The detail design will be informed by the policies and objectives set out in this document, and any evidence-based data relating to the plan area."</i>
Plan needs to advocate DMURS user hierarchy of pedestrians and cyclists over vehicles.	Insertion within Section 3, Regeneration Plan Vision of <i>"Policy Objective, A1: To investigate measures to reduce the volume of vehicular traffic movement on Dublin Street, having regard to the Monaghan Land Use and Transportation Study, in order to support Active Travel and pedestrian and cycle priority in the Regeneration Plan area."</i>
Plan is too car focussed	Insertion within Section 3, Regeneration Plan Vision of <i>"Policy Objective, A2: To promote a modal shift and active travel measures, noting CP 5 of the Monaghan County Development Plan 2019-2025, 'To provide for a reduction of up to 50% of the standards as required in Table 15.9 of the Monaghan County Development Plan 2019-2025 for developments or redevelopment or infill/brownfield/derelict sites located within the designated town centres, where appropriate.' Para. 15.28 MCDP 2019-2025"</i>
The proposal to use table tops to provide pedestrian priority in the	Amendment of Policy Objective 29, which states:- <i>"To improve the pedestrian environment along Dublin Street, through the following measures:</i>

<p>Plan is inadequate and inappropriate.</p>	<ul style="list-style-type: none"> · <i>Widened footpath.</i> · <i>Consideration of shared surface/narrowed carriageway width.</i> · <i>Relocation of on street parking to backlands of Dublin Street South and Dublin Street North.</i> · <i>Tabletop at pedestrian crossing points, on Dublin Street, Gavan Duffy Place entrances to the regeneration quarter at the junction with the Diamond/Old Cross Square.”</i> <p>To:- <i>“To improve the pedestrian environment along Dublin Street, by giving consideration to measures including:</i></p> <ul style="list-style-type: none"> · <i>widened footpath/narrowed carriageway</i> · <i>shared surface street</i> · <i>relocation of on street parking to backlands of Dublin Street South and Dublin Street North.”</i>
<p>Plan needs to clarify that the concept strategy is indicative only and subject to detailed design.</p>	<p>Insert text at Appendix A, <i>“The Regeneration Plan layout is a concept strategy and indicative only. The regeneration of Dublin Street North will be subject to detailed design. The detail design will be informed by the policies and objectives set out in this document, and any evidence-based data of the plan area.”</i></p>

It is considered that the above recommendations are in keeping with the place-making vision of the regeneration plan, refer to and detail current government policy and objectives, and have regard to local plans, strategies and policies, and thus are minor amendments to the variation. Consequently, public consultation is not be warranted.

Having regard to the above, it is considered that this proposed variation of the Monaghan County Development Plan 2019 – 2025 to incorporate Objective MPO 15 which states, *‘Ensure that all development proposals within the Dublin Street North Regeneration Plan area have regard to the regeneration strategy and development objectives of the Dublin Street North Regeneration Plan.’* would be in the interests of the proper planning and sustainable development of the County, and it is recommended that the proposed variation be adopted by the elected members, with the minor amendments to the Regeneration Plan set out above.



Adrian Hughes
Acting Director of Services

9th March 2022