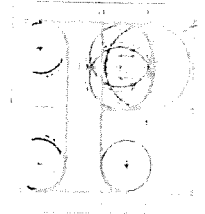


Case Number: ABP-322359-25



An
Bord
Pleanála

Development Applications Unit
The Manager
Newtown Road
Wexford
Co. Wexford
Y35 AP90

Date: 12 June 2025

Re: Dublin Street North and Backlands Regeneration Project
Dublin Street and back lands to the north, Old Cross Square and Diamond Centre Car Park,
Monaghan Town Centre, in the townlands of Roosky and Tirkeenan, Co. Monaghan.

Dear Sir / Madam,

An Bord Pleanála has received your recent submission in relation to the above mentioned proposed development and will take it into consideration in its determination of the matter.

Please note that the proposed development shall not be carried out unless the Board has approved it or approved it with conditions.

If you have any queries in relation to the matter please do not hesitate to contact the undersigned officer of the Board at laps@pleanala.ie

Please quote the above mentioned An Bord Pleanála reference number in any correspondence or telephone contact with the Board.

Yours faithfully,

Breda Ingle
Executive Officer
Direct Line: 01-8737291

JA03

Tel	Tel	(01) 858 8100
Glaos Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	bord@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

Lauren Griffin

From: LAPS
Sent: Thursday, 12 June 2025 12:24
To: Housing Manager DAU
Subject: RE: ABP-322359-25 177AE Old Cross Square, Monaghan

A Chara,

The Board acknowledges receipt of your email; official correspondence will issue in due time.

Kind regards,

Lauren

From: Housing Manager DAU <Manager.DAU@npws.gov.ie>
Sent: Wednesday, 11 June 2025 15:57
To: LAPS <laps@pleanala.ie>
Subject: ABP-322359-25 177AE Old Cross Square, Monaghan

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

A chara

Please find attached Archaeological and Nature Conservation observations/recommendations for the above mentioned ABP notification.

Kindly forward a copy of your decision to manager.DAU@npws.gov.ie as soon as it issues.

In addition, please acknowledge receipt of the attached letter (as required under Article 29(2) of the Planning & Development Regulations 2001).

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at: manager.DAU@npws.gov.ie

Kind regards,

David O'Connor
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
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

David.oconnor@npws.gov.ie
Manager.DAU@npws.gov.ie

David O'Connor
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

Government Offices

Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90

Newtown Road, Wexford, County Wexford, Y35 AP90

David.oconnor@npws.gov.ie

Manager.DAU@npws.gov.ie



Ref: ABP-322359-25

11 June 2024

The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902

Via email: laps@pleanala.ie

Re: Notification to the Minister for Housing, Local Government and Heritage under the Planning and Development Act, 2000, as amended.

**Proposed Development: Section 177AE Dublin Street North and Backlands
Regeneration Project**

A Chara,

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department co-ordinated by the Development Applications Unit under the stated heading:

Nature Conservation

Pollutions control measures during the construction phase

Groundworks and associated construction activities including demolition works, earth moving and cementitious works have significant impact potential on natural watercourses from the release of sediments and pollutants via surface waters and drainage channels. Vulnerable aquatic habitats can be negatively impacted as a result of poor on-site construction practises and unmitigated activities.

The findings of the NIS outlines the potential hydrological connectivity of the application site to the nearby Shambles River, a tributary of the Blackwater River and within the watershed of the Lough Neagh & Lough Beg SPA (UK9020091) in Northern Ireland. The WFDS Ecological Status of the Blackwater (Monaghan) 040 waterbody at this location is noted to be Poor and at risk of not achieving a good status. A significant pollution event could further undermine the waterbody status and result in negative impacts to aquatic fauna and flora.



Appropriate sediment and water contamination control measures, as detailed in the NIS and EIAR, should be incorporated in to the construction environmental management plan (CEMP) and implemented during the construction phase of works in order to mitigate against any potential deterioration of in-stream water quality.

Invasive Alien Plant Species

The Department notes the findings of the invasive species survey and the associated invasive species management plan (ISMP), which highlights the presence of a number of non-native species within the project area including Japanese Knotweed, listed in the Third Schedule of the European Communities (Birds and Natural Habitats) Regulations, 2011 (S.I. No. 477 of 2011)¹.

The Department would like to highlight the threat of Invasive Alien Species (IAS) as one of the key pressures which increase biodiversity loss in Ireland. Regulations 49 and 50 of the European Communities (Birds and Natural Habitats) Regulations requires the preparation of an invasive species management plan on foot of the presence of Third Schedule species. It is recommended that the management plan be incorporated into the CEMP and precautions taken to not introduce new invasive species into the site.

Bats

Pre-commencement bat surveys are recommended to ensure that no roosting bats are present within the structures prior to demolition works being undertaken. Woodland areas within the project area identified as having potential to act as bat roosts alongside foraging habitat should be retained.

Appropriate lighting measures in accordance with guidance by Bat Conservation Ireland² are recommended to reduce the impacts on foraging and roost areas.

Swifts

The Swift (*Apus apus*) in Ireland is a bird commonly associated with older buildings that can provide suitable gaps and cervices in the external structure for nesting, and exhibit a high degree of site fidelity over many years. The Swift population in Ireland has experienced a 40% decline over the last 15 years due to the renovation of old structures and consequently are now a red-listed species in the Birds of Conservation Concern in Ireland (BoCCI)³.

¹ S.I. No. 477/2011 - European Communities (Birds and Natural Habitats) Regulations 2011
<https://www.irishstatutebook.ie/eli/2011/si/477/made/en/print>

² https://www.batconservationireland.org/wp-content/uploads/2013/09/BCIrelandGuidelines_Lighting.pdf

³ <https://birdwatchireland.ie/birds-of-conservation-concern-in-ireland/>



It is recommended that Swift nest box measures should be incorporated in to all urban realm regeneration projects in Ireland where known populations exist or have become locally extinct due to the loss of former nest sites. Nest box measures, as detailed by Swift Conservation Ireland⁴, include build-in Woodstone boxes that can be incorporated into new walls, and external Schwegler 17A triple entrance nest boxes.

Biodiversity measures

It is recommended that all clearance of vegetation or tree felling work is undertaken outside of the bird nesting season (1st March – 31st August) or where nests are identified within structures where demolition works are to proceed. Where works are undertaken during the bird-nesting season, pre-commencement breeding bird surveys are recommended to identify nests deemed to be active. All works involving breeding bird and nesting checks should be carried out under the supervision of a suitably qualified ecologist.

Common Ivy (*Hedera helix*) and Irish Ivy (*Hedera Hibernica*) can both provide important structural habitats for roosting bats and invertebrates, and as nesting habitat for certain bird species. Ivy flowers and berries are also an important source of food for pollinators and other wildlife where other sources are scarce at certain times of year. It is recommended that Ivy present on trees not identified as at risk of structural failure or at risk to public safety is retained as part of biodiversity measures at the site.

Old stone walls (Fossitt habitat BL1), particularly those of limestone, are an important substrate for some rare and legally protected moss species (Flora Protection Order 2015 (S.I. No. 356 of 2015))⁵. Such stone walls are a valuable habitat for saxicolous lichens and vascular plant species including ferns. Many species have as their preferred habitat such structures whilst a smaller, restricted number of rarer species are dependant solely on such structures (usually on the mortar between the masonry). Older and more neglected structures are generally of most importance for wildlife⁶.

Where suitable old stone walls exist within the project area, works may have the potential to impact negatively on biodiversity. The Department therefore advises that prior to any construction work commencing on potential old stone walls, a bryophyte (moss), lichen and vascular plant survey should take place. Should any rare or threatened species be found, mitigation measures must be agreed with An Bord Pleanála. In the case of legally protected species under the Flora (Protection) Order, 2015, a licence will be required from this Department in order to alter, damage, destroy or interfere with its habitat or environment.

⁴ <https://www.swiftconservation.ie/wp-content/uploads/2024/04/Swift-Conservation-Building-Next-Boxes-Booklet.pdf>

⁵ Lockhart, N., Hodgetts, N. and Holyoak, D. (2012) Rare and threatened Bryophytes of Ireland

⁶ Fossitt (2000) A Guide to Habitats in Ireland, The Heritage Council

Archaeology

The Department acknowledges the findings in Chapter 13 Cultural & Architectural Heritage in Vol 1 Main Report and concur with the recommended mitigation in Table 13.14. The proposed development would involve groundworks within the area of archaeological potential around Recorded Monument MO009-060---- (Historic town), MO009-06004- (Town defences) and directly involving the relocation of MO009-060006- (Cross - Market cross) which are subject to statutory protection under the terms of the National Monuments (Amendment) Act, 1994. Extreme care should be taken to ensure that Recorded Monument MO009-060006- (Cross - Market cross), is not damaged during the proposed construction work and relocation. Potential for damage to the stone may be caused by, for example, vehicles entering or leaving the development site, the storage of material close to the stone, and the use of machinery and hand tools in proximity to the stone.

Additionally, we note the presence of the remains of the now demolished 18th century Old Infirmary Complex and wish to draw attention to the possibility of the discovery of buried human remains in the proximity of this building given the use of the building as a hospital and formerly an alms house.

This Department therefore recommends that archaeological monitoring, as described below, should be required as a condition of planning.

Archaeological monitoring shall be carried under the terms of a licence issued by this Department.

Archaeological Monitoring:

1. The applicant is required to employ a suitably qualified archaeologist to monitor and advise on the appropriate protection of Recorded Monument MO009-060006- (Cross - Market cross) during the course of construction work associated with the proposed development.
2. The applicant shall be advised by a suitably qualified archaeologist as to the appropriate handling and movement of Recorded Monument MO009-060006- (Cross - Market cross) including the temporary storage in a secure location and the protection of the cross from construction machinery, tools and materials for the duration of the development. All persons working at the site or visiting the site with materials for example, must be fully informed of the need to protect the cross and the temporary location of the stone to ensure no damage occurs to it.
3. The report of the archaeological monitoring should include photographs of the actions implemented in the protection of Recorded Monument MO009-060006- (Cross - Market



cross) before, during and after the construction works have taken place, as well as detailed photographs of specific areas including the final area for re-erection of the stone to ensure preservation *in situ*, as required.

4. The applicant is required to employ a qualified archaeologist to monitor all groundworks associated with this development.
5. The archaeologist is required to notify this Department in writing at least four weeks prior to the commencement of site preparations. This will allow the archaeologist sufficient time to obtain a licence to carry out the work.
6. The report of the archaeological monitoring should include photographs of the area before, during and after monitoring has taken place, as well as detailed photographs of specific areas, as required.
7. A key plan, clearly showing the location and direction from which photographs were taken should be included in the report. (An annotated site location map will suffice for this purpose).
8. Should archaeological material be found during the course of monitoring, the archaeologist may have work on the site stopped, pending a decision as to how best to deal with the archaeology. The developer shall be prepared to be advised by this Department with regard to any necessary mitigating action (e.g. preservation *in situ*, or excavation) and should facilitate the archaeologist in recording any material found.
9. The Planning Authority and this Department shall be furnished with a report describing the results of the monitoring.

Reason: To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

You are requested to send any further communications to this Department's Development Applications Unit (DAU) at manager.DAU@npws.gov.ie, where used, or to the following address:

The Manager
Development Applications Unit (DAU)
Government Offices

Newtown Road
Wexford
Y35 AP90

Is mise, le meas



David O'Connor
Development Applications Unit
Administration

