

An Bord Pleanála Reference: Case reference: JA18.314501
314501: Properties at 7- 13 Dublin Street, lands to the rear of 1-9 The Diamond and 1-26 Dublin Street, the Courthouse car park, Lower Courthouse car park, Castle Road, and N54 Macartan (Broad) Road, townlands of Roosky and Tirkeenan, Co. Monaghan

Eddie O’Gara
&
on behalf of Love Monaghan Save Dublin Street

Issued Oct 2022

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Monaghan County Council

Submission: Eddie O'Gara CMLI MILI

Grounds for my observation

The ground for my observations covers over a number of chapters within the EIAR, namely Chapter 2 Project Description, Chapter 3 Scoping and Consultation, Chapter 9 Traffic and Transportation Chapter 14 Townscape and Visual and Chapter 15 Cultural Heritage & Architectural Heritage. I will expand on each chapter in the pages which follow. I contest that there are technical errors within this application which are in breach of planning law, the spirit of the planning process or best practice and which therefore make the granting of planning approval inconceivable. I also wish to formally request an oral hearing, preferably on site in Monaghan.

Executive Summary.**Chapter 2 2.6.3 Alternative Designs and Layouts.**

1. I contest that this planning application failed to consider alternative design options for the removal of the 4No. Buildings on Dublin Street. For Example the removal of 1No building to improve pedestrian and cycle access, or the removal of 2No. Buildings to improve pedestrian and cycle access. Such alternative options were not considered for this planning application and therefore this section of the EIAR cannot be considered complete.

2. I contest that the designers have failed to consider in the options process

whether there is an economic, transport or social need to demolish the 4No. Buildings on Dublin Street. It is obvious that the 'back lands' ie the car park area and gardens could be developed and serviced via the existing transport network.

3. I contest that there is no technical basis for the assumption that the removal of buildings 8,9,10 and 11 Dublin Street would not adversely impact the streetscape.

"The demolition of these buildings would not adversely impact upon or result in the loss of distinguishing features along the streetscape." EIAR South Dublin Street and Backlands Regeneration Project

This statement is unsubstantiated and fails to consider the entire visual envelope of the street which is viewed from areas within an Architectural Conservation Area.

4. I contest that number 10 Dublin Street should not be demolished due to the historic and social significance of this location as the birth place of Charles Gavan Duffy, including this buildings' listing on the National Inventory of Architectural Heritage. This building has local cultural importance. Charles Gavan Duffy is arguably Monaghan Towns most notable Son.

Chapter 3 Scoping and Consultation 3.3.3 The Community and Stakeholder Response

5. I contest that the entire chapter within the EIAR fails to capture the responses to the public consultation and is not an example of an inclusive planning application. The report fails to note the names of the community who responded and fails to mention the group 'Love Monaghan Save Dublin Street' It fails to note the large number of respondents who cited 'Love Monaghan Save Dublin Street' in their response. The comments raised by the 'Love Monaghan Save Dublin Street' respondents is not accurately reflected in the EIAR report. It should be noted here that of the 48No submissions 37No raised concerns about the demolition of 10 Dublin Street and 22No referenced 'Love Monaghan Save Dublin Street' A copy of the 'Love Monaghan Save Dublin Street' submission is included in the appendix for your review.

6. I contest the statement within the EIAR

"The enhancements proposed to the public realm, cycle infrastructure, and pedestrian links will also encourage a modal shift away from the car and provide greater travel choices, in line with Government policies on sustainable travel. The Council is working towards improving active travel measures throughout the town and is in discussions with the National Transport Authority on further measures to facilitate and promote walking, cycling and public transport throughout the town"

and wider County."

The proposals seek to increase vehicle movement within the town centre and result in the severance of pedestrian priority along the South Side of Dublin Street.

Chapter 9 Traffic and Transportation

7. The first contention on the Traffic and Transportation chapter is that the knocking of 4No buildings to build a new road into the car park area when it is only 1min drive to the existing vehicle entrance off Macartan Road. The need for this new vehicle movement junction / road off Dublin Street into the car park has never been justified in Urban Planning, Transport Planning, Economic Impact, Landscape or Public Realm reasons. It appears to have been the whim of a Designer who failed to consider the overall negative impacts, a first sketch produced in isolation many years ago without any impact studies or basis of design.

8. I contest the general statements within this chapter which portray an improvement to pedestrian circulation and accessibility into and out of the site. The key junctions around the site are all vehicle movement dominated. This along with the severing of pedestrian priority along Dublin Street will discourage people to walk and cycle into the site and around the wider town.

9. I contest Figure 9.8 Example of Enhanced Pedestrian Facilities off Dublin Street via Charles Gavan Duffy Place. The pedestrian priority along that side of the street has now been broken with a new vehicle road severing the pedestrian priority. The justification for the need of a new road in this location has not been provided.

10. I contest figure 9.9 the proposed cycleway along Farney Road will help facilitate cycle moments as its not connected, its only along one side of the road (single direction) for little more than 100m and will require cyclists to pass over a dangerous 3 lane junction into the Shopping Centre Car Park. It also results in the loss of Green Infrastructure, making the rear boundary wall of the Tesco Service yard even more visually prominent as a first impression of the site. There are wildflowers and tree planting in that verge currently, so it also negatively impacts on bio diversity.

11. Item 9.3.2.4 regarding Private Vehicle Access is the correct assessment. *"Vehicular access to the site will continue to be provided via a modification of the existing priority junction on the N54 Macartan (Broad) Road and via a new priority junction off Dublin Street as discussed earlier."*

They correctly identify that the new junction off Dublin Street is a vehicle priority junction. This conflicts with their comment in Figure 9.6 namely

"The provision of dedicated pedestrian facilities within the site and improvements to the pedestrian access on Dublin Street will enhance pedestrian accessibility to and within the site, as shown in Figure 9.7 and 9.8."

I contest that these plans are paying lip service to pedestrian access and sustainable modes of transport, the plans prioritise vehicle movement at the expense of other users, especially vulnerable users, who walk on the southern side of Dublin Street to avoid the hostility of the vehicles.

12. Under Item 9.5.3.1.6.2 The report states that

"The modelling results presented in Table 9.5 demonstrate that the N54 Macartan Road / Farney Road site access junction operates well within capacity at present."

This reinforces the position that there is no vehicle transport need to create a new access road off Dublin Street to access the site.

Chapter 14 Townscape and Visual

13. As a Chartered Landscape Architect I contest that the Townscape Character and Visual Impact Assessment has been carried out in line with the methodology. The section 14.2.10 Photomontages/Visualisations is not implemented as per methodology and therefore the findings of the visual impact assessment must be considered void. There is no way that the magnitude of change and the significance of the effects can be substantiated based on issued photomontages.

14. I contest that the visual receptors in Dublin Street are in fact High, that the sensitivity of the streetscape is High and the Magnitude of impact is High. The Magnitude of Visual Impact is Large and the Significance of the effect is Major. This application seeks to play down the impact on Dublin Street but is unable to justify its findings.

15. The Visual Impact Assessment fails to consider the direct view off Dublin Street into the Back Lands / Car Park Area. It has therefore failed to consider all the visual receptors and cannot be considered complete in its assessment. Its findings can therefore not be considered justifiable.

16. The section 14.5 Proposed Development is biased, it fails to mention that the buildings are proposed for demolition in order to create a new road/vehicle

entrance into the car park. It describes it as a civic space. A 'civic space' with a two way road is a road not a 'civic space' Its a road!

17. The section 14.6.1 within Table 14.7 Urban Residential TCA - Magnitude of Change, it states that *"The proposal will positively contribute to the redevelopment of the southern side of the Dublin Street in this TCA and it is envisaged that the proposed development will act as a positive catalyst for future regeneration initiatives in this TCA."* We know that any increase in vehicle moments will have a negative impact especially for pedestrians on Dublin Street therefore this statement is clearly biased.

18. Section 14.10 Conclusion is biased and contradictory, it states that *"Part of Dublin Street is defined an Architectural Conservation Area due to its historic streetscape quality."* But then goes on to state *"The proposed public realm improvements will have a beneficial impact on the character of the designated ACA."* How can proposals which include demolishing 4 No Buildings and creating a new road be considered beneficial on the ACA?

19. Within section 14.10 Conclusion it states, *"Of the five viewpoints assessed for impacts during the operational phase, three viewpoints are considered to experience positive visual effects as the underutilised backlands are replaced with a new public space, streetscape and public realm improvements that will regenerate this area."* none of the proposals at the viewpoints are verified CGI's and therefore this statement cannot be substantiated

Chapter 15 Cultural Heritage & Architectural Heritage

15.3.3 Architectural Heritage

20. This section is influenced and supported by the CONSARC "Architectural Heritage Impact Assessment South Dublin Street & Backlands Regeneration Scheme, Monaghan Gavan Duffy Place Heritage Report" It is notable and critical to note that this report was issued in May 2020 and predates this planning application and the details within it. In this Consarc report section 4.4 it states.

"THE IMPACT OF THE DESIGN OF THE PROPOSED STRUCTURE ON THE ACA The proposed public realm scheme and creation of Gavan Duffy Place is predicted to enhance the special character of the ACA more than the retention of the existing through the quality of the design and the positive introduction of public artwork and social history information to tell the story of Gavan Duffy."

The Consarc report also states in section 5.0 Conclusions

"5.3 The proposal to demolish the historic structure of Dublin street within the ACA of Dublin street is based on a thorough investigation of the site and the existing buildings within it."

And again the Consarc report states

"5.6 The erosion of character does not provide sufficient grounds for demolition, only where the replacement is of more benefit than their retention. The replacement proposal of creating Gavan Duffy place and new access to the Backlands areas of the South Dublin Street will in this case be of more benefit than the retention of the existing buildings."

Yet this report was issued in May 2020 it therefore predated this application and was based only on sketch masterplan proposals by Sheridan Woods and not the detail analysis required of a planning application. This therefore brings into question how biased this report's findings are and if they can be used for this application. Almost 2 and half years in advance of detail drawings been produced for planning by RPS, Consarc were able to state that the proposals will be more benefit than the retention of the existing buildings, this statement was produced without any townscape or visual impact assessment or detail plans and therefore must be considered biased and therefore dismissed as creditable. By extension section 15.3.3 of the EIAR report Architectural Heritage must be dismissed.

21. Regarding Sherry's NIAH No. 41303130 RPS No. 41001056 Works are proposed to the building read and outbuildings are these buildings not also part of the protection. There appears little text relating to these works.

Climate Change

The National Climate Action Plan. I believe the creation of a new vehicle road into the back lands is not in keeping with the Climate Action Plan and therefore should not be recommended for approval.

In planning for how we adapt to and mitigate climate change, the UN IPCC AR6 report summarised the state of research globally and modelled nearly 3000 scenarios. The scenarios that kept us below 2 degrees of warming (our Paris agreement commitments) overwhelmingly depended on a move away from car-dependent societies and relied on car-free cities (Urban Environments). This report was signed off by every world government.

All EU and national modelling agrees. Accordingly our national Climate Action plan prepares for this global move from cars. It involves a reduction in car traffic, and investment of public transport and active travel (this includes walking). This is essential and as the research shows this works, and takes up to 84% less energy for transport in cities/urban environments.

These plans ignore this, and allow for continued dominance of car traffic and in some locations an increase. This locks us into car dependency when we don't expect there to be enough materials (lithium, etc for batteries) or energy to support the number of cars on the road. In addition we know from the Sheridan woods masterplan report that the dominance of vehicle movement in the centre of the town is having a negative impact on our streets.

Across Europe and the world we have seen how to move from cars in cities and Urban Environments with the "10 minute town" or "15 minute city" concept. These plans ignore this movement.

These plans are stuck in outdated thinking, assuming that traffic needs to access all areas of towns and that traffic cannot be reduced and that it should be allowed to remain at current levels or increase. There is overwhelming evidence which shows this is not the case and we need to develop the back lands / car park area to encourage the '10 minute town' concept and not build the new road off Dublin Street.

I respectfully request the inspector acknowledges the National Climate Action Plan and its requirements in its recommendations to the board. I also respectfully request you acknowledge that this is primarily a transportation application with little information on the built form of the suggested plots.

The following pages provide more details and visual representation of the comments.

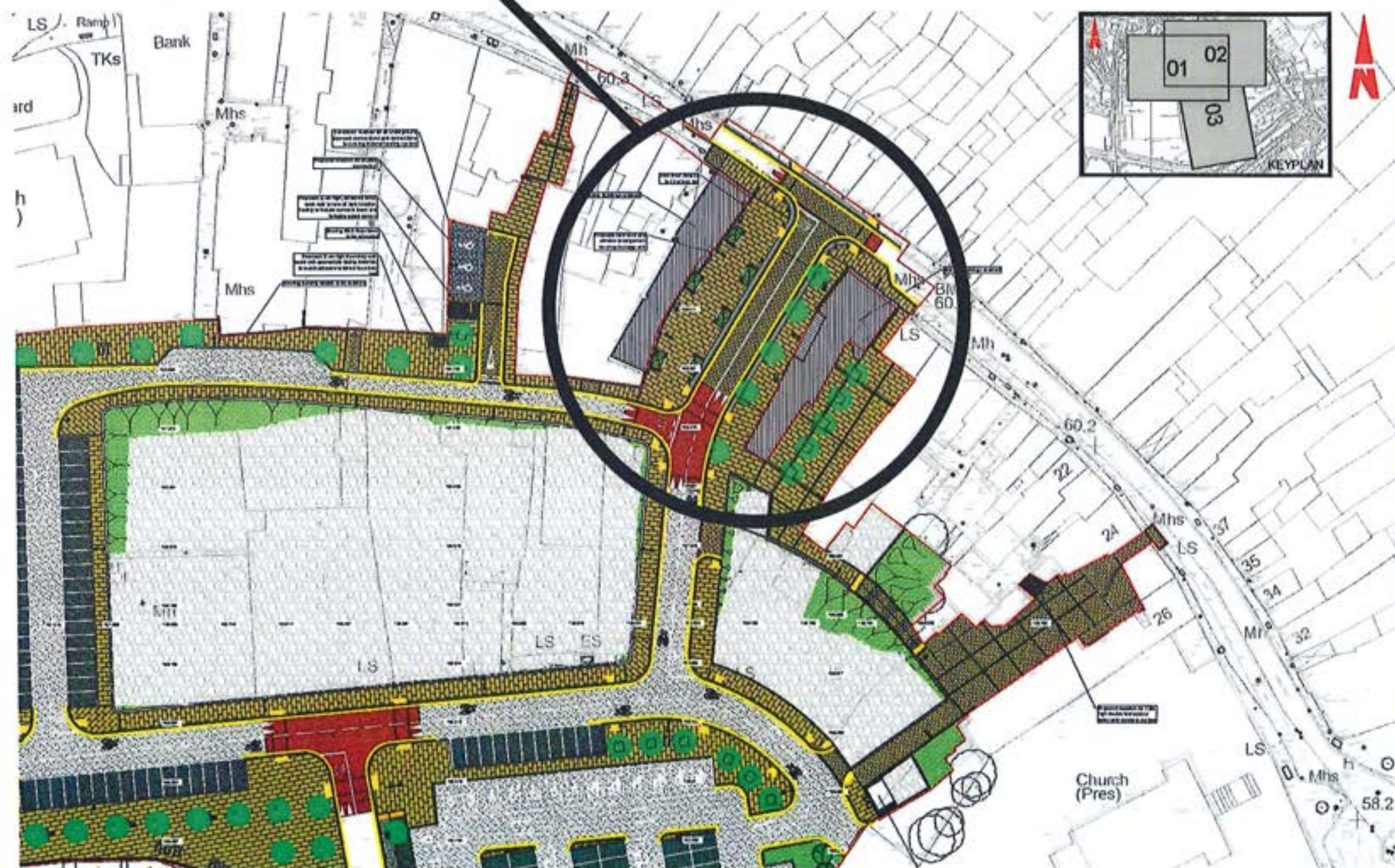
Chapter 2 2.6.3 Alternative Design and Layouts

Nowhere in the application was consideration given to not demolishing the 4 building or only removing 1 or 2 to improve pedestrian circulation.

2.6.3 States

"One of the key aspects of the Dublin Street Regeneration Plan 2017 is to improve accessibility and a sense of place. Although the area is linked to Dublin Street by alleyways and pedestrian links, these are limited in scope and function and do not act as a focal point or visual attraction for pedestrians into the plan area."

This is caused by access to a car park and narrow alleyways. reducing the length of alleyways and developing the car park area would create the visual attraction and footfall. It does not require the creation of a vehicle road, to increase footfall.



Chapter 3 Scoping and Consultation 3.3.3 The Community and Stakeholder Response

The entire chapter 3 within the EIAR fails to capture the responses to the public consultation and is not an example of an inclusive planning application. The report fails to note the names of the community who responded and fails to mention the group 'Love Monaghan Save Dublin Street'. It fails to note the large number of respondents who cited 'Love Monaghan Save Dublin Street' in their response. The comments raised by the 'Love Monaghan Save Dublin Street' respondents is not accurately reflected in the EIAR report.

It should be noted here that of the 48No submissions 37No raised concerns about the demolition of 10 Dublin Street and 22No referenced 'Love Monaghan Save Dublin Street'. A copy of the 'Love Monaghan Save Dublin Street' submission is included for your review.

The term Love Monaghan Save Dublin Street was set up within a week before the deadline for the public consultation in May 2021, it was created by myself and wife Anne Kuhnert in an attempt to get support, influence and change the proposals at a pre planning stage. We were assisted by a number of people who have an interest in Dublin Street and over night a facebook group was set up which has over 690 members, a twitter account was set up and I was interviewed on local radio station Northern Sound a number of times. The web site <https://lovemonaghansavedublinstreet.wordpress.com/> was created to generate support and provide information.

However it is evident that the public consultation was taken as a tick box exercise as not only were the comments ignored but we were not even mentioned in the consultation report or this application.

45% of respondents to the public consultation cited Love Monaghan Save Dublin Street and 77% raised concerns about the demolition of 10 Dublin Street.

This along with the comments raised in the Love Monaghan Save Dublin Street report are not captured in the EIAR

7th October 2021 @3.11pm via email from Info@monaghancoco.ie

Dear Mr O'Gara
Re: Dublin Street Public Consultation Process.

I refer to your query in respect of the above matter and have included the related responses below. Please note that the responses have been numbered to correlate with the questions raised in your correspondence.

The Council received 48 submissions in total.

37 of these submissions raised concerns in relation to the proposed demolition of buildings on Dublin Street, including No10.

22 of the submissions received referenced the Love Monaghan Save Dublin Street document

9 of the submissions received indicated that they were in support of the proposal or offered neutral views.

RPS are currently finalising a report on the submissions made to the Council during the public consultation process. This report, when completed, shall contain a summary of the issues raised, a consideration of those issues, and where appropriate, recommendations for amendments to the proposed scheme.

When completed, the report shall be made available to view on the Monaghan County Council website. In addition, anyone who made a submission to the consultation process shall be informed that the report has been completed and is available for viewing.

A hard copy of the report can be forwarded to you if required

The Council does not have more detailed minutes or a recording of the Municipal District meeting of the 17 May 2021, other than those referenced in your correspondence.

I trust that this information will prove satisfactory.

Monaghan County Council
info@monaghancoco.ie

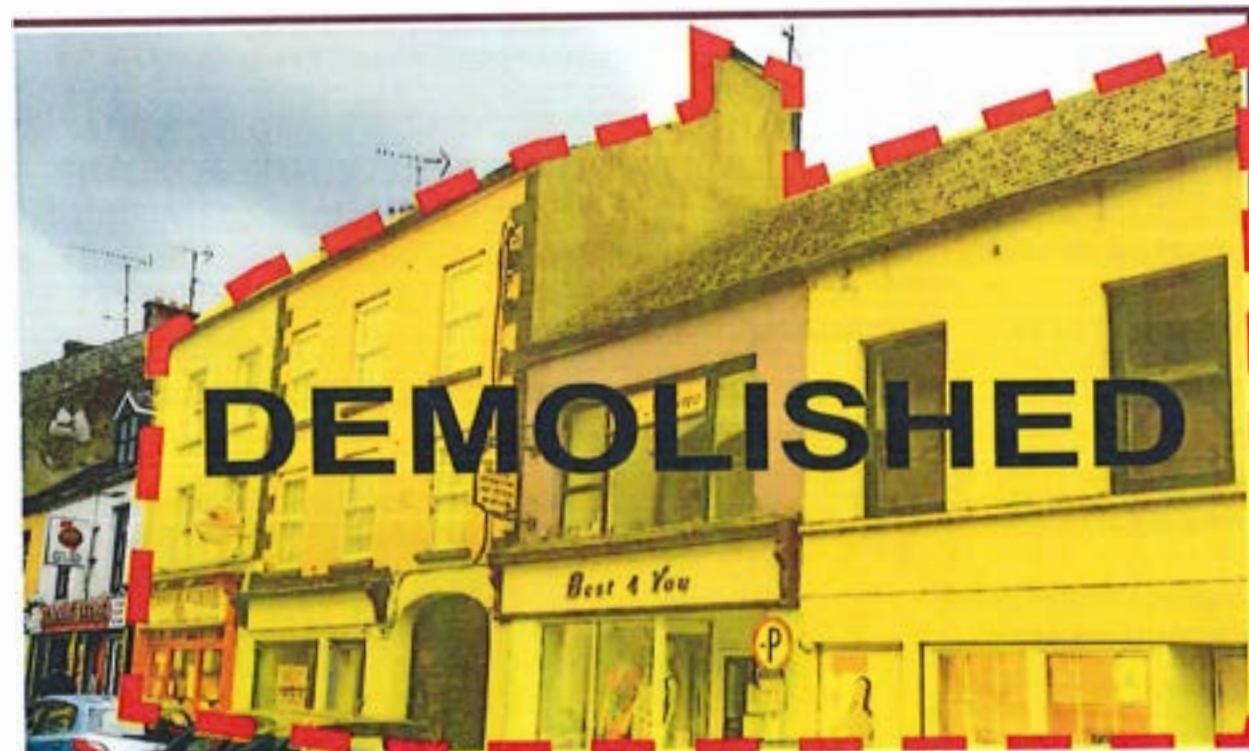


Sign on approach road to Moanaghan Town

Failing to get timely and satisfactory answers from Monaghan County Council. I decided to organise a public meeting to discuss the plans

The function of the meeting was to inform more people as speaking with many local people they still did not know about the plans and to create a group which could act and respond on one voice. At this meeting I was nominated as the spokesperson for the group and it is within this capacity that I request and opportunity of an oral hearing.

Following the meeting we wrote to the elected representatives and also issued a press release to the Northern Standard News Paper which was printed the following week.



Have your say! Please share with friends and neighbours

Public Meeting

"Monaghan County Council intends to demolish 4 No. Buildings on Dublin Street. These buildings include the historic home of Sir Charles Gavan Duffy. This destruction of our cultural & built heritage will have a negative impact on the entire town and impact Monaghan as a place to live, work and visit." Eddie O'Gara, Tirkeenan.

Come along to learn more

Where: Hillgrove Hotel
When: Thursday May 26th 8pm

Come along to learn more & to have your say! Organised by: **Eddie O'Gara**, of **Love Monaghan Save Dublin Street**

#LoveMonaghanSaveDublinStreet

THURSDAY, 12th May, 2022

News

"Save Dublin Street" public meeting

An organisation called Love Monaghan, Save Dublin Street are holding a public meeting in Monaghan's Hillgrove Hotel on Thursday May 26 next at 8 pm.

In a statement to the Northern Standard this week, the meeting organisers said:

"The meeting is organised in response to Monaghan Co Council's intentions to demolish four buildings on Dublin Street to build a road. These buildings include the historic home of Sir Charles Gavan Duffy.

"This destruction of our cultural and built heritage will have a negative impact on the entire town and impact Monaghan as a place to live, work and visit. The group would welcome the view of all people with an interest in the town including those who live or work in the area, so come along to learn more and to have your say."

Monaghan student

Dublin Street group holding public meeting tonight

The "Love Monaghan Save Dublin Street" lobby group are holding a public meeting tonight, Thursday May 26 at 8 pm in the Hillgrove Hotel.

The group said that the meeting had been organised "in response to Monaghan Co Council's intentions to demolish four buildings on Dublin Street to build a road.

"These buildings include the historic home of Sir Charles Gavan Duffy. This destruction of our cultural and built heritage will have a negative impact on the entire town and impact Monaghan as a place to live, work and visit.

"The group would welcome the views of all people with an interest in the town including those who live or work in the area, so come along to learn more and to have your say."

Monaghan councillor Rayma submitted a query May meeting of Co Council

Council's policy to providing play and play opportunities for community for including those and/or sensory challenges.

"What steps have to support those Councillor Aughey The written reply stated: "Monaghan is one of a number of Councils to have play policy, which

Garra Theatre

News paper cuttings and flyer which was issued around Monaghan Town

15th June 2022
Dear Councillors

On Thursday the 26th of May at 8pm an open public meeting was held in the Hillgove Hotel in relation to the South Dublin Street (Charles Gavan Duffy Home) proposals. The meeting was well attended by local people with broad backgrounds and all with a keen interest in the well being of Monaghan and its people. There are also a number who have contacted us who were unable to attend the meeting but wish to remain informed.

I made a short presentation on the proposals and why my wife Anne and I created the phrase 'Love Monaghan Save Dublin Street' in attempt to get support, influence and change the proposals at a pre planning stage last year. Following group discussion the meeting concluded with the formation of 'Love Monaghan Save Dublin Street' as a formal pressure & campaigning community group to stop the demolition of the 4No. buildings on Dublin Street. It was agreed by all present that we formally write to you the Councillors and ask you to instruct the executive that you do not now support the current proposals to demolish the 4No. Buildings on Dublin Street and that effort should be made to develop the car park area without interfering with the built structures on Dublin Street. It is not too late to make this change, however it would require changes to the EIAR and the plans. Changes such as these are common as part of the planning application process.

We remind you of your responsibility as custodians of the town to respect our cultural and built heritage including the important and unique home of Charles Gavan Duffy, and to ensure it and the wider Dublin Street is left in a desirable state for future generations. Your decisions now will impact the unique heritage of Monaghan Town.

We also ask you to instruct the executive to concentrate on developing proposals for the regeneration of Dublin Street itself including making it more comfortable for pedestrians, addressing the volume of through traffic and seeking to regenerate the buildings within the street as a desirable location to live and do business. The public realm is all the area between the buildings including the road and every effort should be made to make this a destination street, a healthy, liveable and vibrant place to be and not a through road which it currently predominantly is. We recognise this is not without significant challenges, as Dublin Street has declined significantly in the last 20-30 years, however lessons can be learnt from other towns nationally and internationally. It is also not without challenges politically, however we ask you to step back, reflect, and ensure you are not doing something which would make the current situation on the street worse.

To be clear, should you allow the current proposals go to An Bord Pleanála, it would infer your support for the demolition of the historic, culturally important buildings and your disregard to the continued decline of Dublin Street. You cannot claim ignorance or that you were simply following what was presented to you by the executive. It is not too late to change the project direction as we have been calling for since last May.

There is an old motto on site, 'measure twice cut once.' This is your opportunity to 'measure' again, now that you have received additional information and know the opinions of many people, including the majority who responded to the Public Consultation.

We are keen to engage, assist and support the regeneration, development and enhancement of Monaghan with you and the executive. We do not seek to be a thorn in the side when proposals are getting lodged with An Bord Pleanála but rather an ally and a champion of those proposals.

As our elected representative we respectfully request your acknowledge receipt of this email by replying to all those copied in, we will share this email and reply with those that have requested to be kept informed

Kind regards

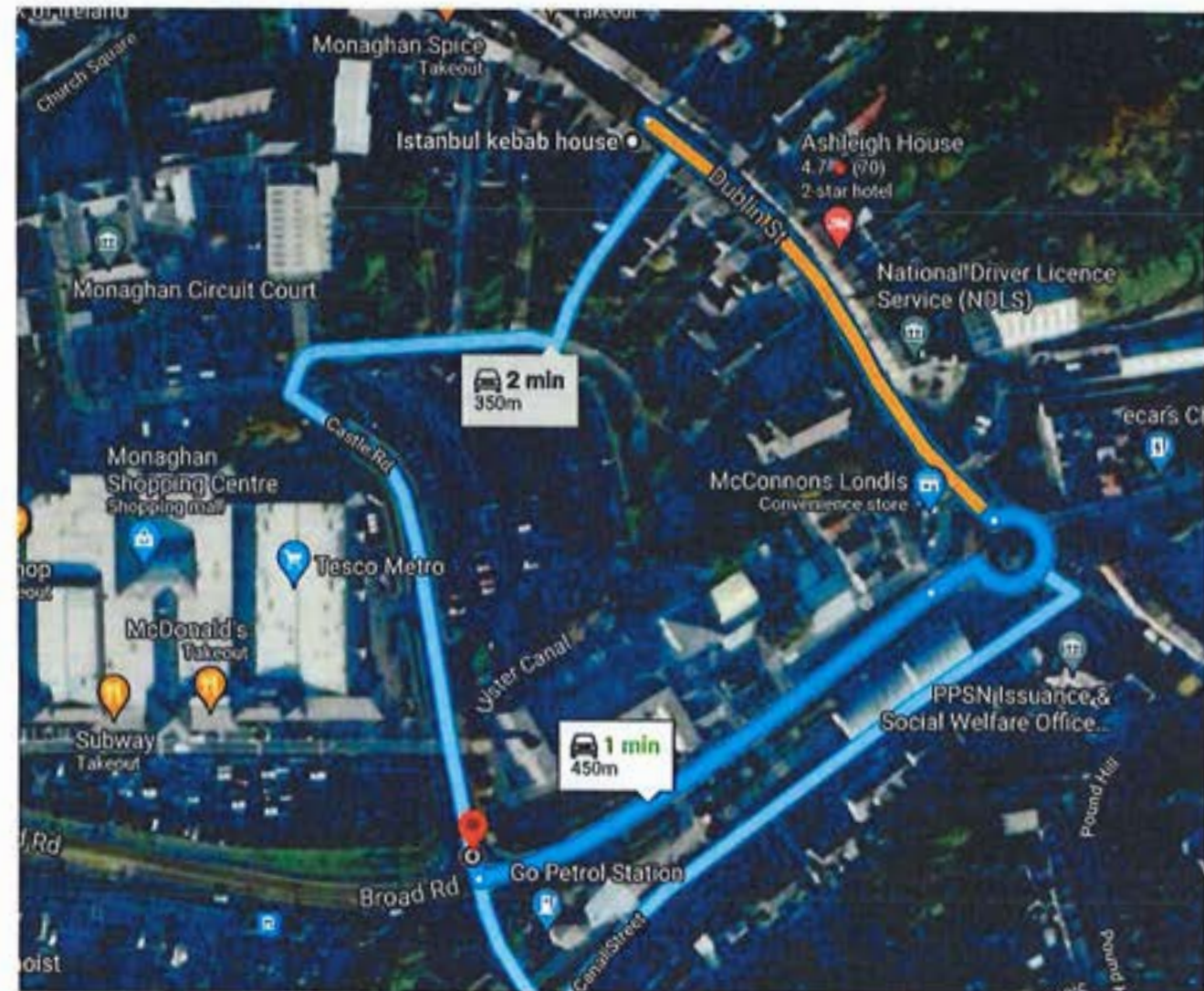
Eddie O'Gara
On behalf of Love Monaghan Save Dublin Street.

Chapter 9 Traffic and Transportation

If I understand the traffic flows as per appendix 9e within EIAR Volume II correctly there will be 213 Traffic movement across the Southern facade of Dublin Street or over 3.5 a minute at PM peak in 2040. The AM peak in 2040 is estimated to be 106 traffic movements. Effectively severing the pedestrian priority and comfort along the southern side of Dublin Street. These numbers may not seem large but when it comes to active travel, encouraging children to walk through town to school etc this creates an other junction and another danger. It is the Antithesis to the development of a healthy street and the regeneration of the area.

The Need for a Road Access to Backlands from Dublin Street.

The especially curious 'need' to create a new vehicle entrance and exit onto Dublin Street from the backlands seems to ignore that it is only a distance of 450m from the main entrance into the same car park off the Broad Road. According to Google this is only a 1 minute drive. Therefore to save 1 minute drive time, the destruction of the historic street scape is proposed.



The existing vehicle entrance to the car park off the Broad Road is only 450m from the proposed entrance on Dublin Street. This means vehicle movements & crossing will increase on Dublin Street at the expense of the pedestrian.

Chapter 14 Townscape and Visual

It's important to understand what the methodology in the EIAR stated

14.2 Methodology

14.2.1 General Approach

The methodology and approach to the assessment contained within this chapter has been carried out in accordance with best practice guidance described in the following documents;

- *Guidelines for Landscape and Visual Impact Assessment, Third Edition (The Landscape Institute and Institute of Environmental Management & Assessment, 2013) (GLVIA3);*
- *Technical Guidance Note 06/19 Visual Representation of Development Proposals (The Landscape Institute, 2019).*

14.2.10 Photomontages/Visualisations

Images representing views available from the public realm at each of the selected viewpoints have been captured using a digital SLR camera with a full frame sensor in combination with a 50mm fixed focal length lens, mounted on a tripod for horizontal alignment.

Generally, the horizontal angle of view represented within photomontages accompanying this TVIA is 56.5 degrees and has been taken with a 50mm fixed focus lens. For each of the viewpoints represented a record is taken of the light, visibility conditions, camera height above ground, time of day, viewpoint coordinates and the bearing of each view towards the proposed development site.

A highly accurate 3D computer model of the proposed development is created directly from architectural drawings. All materials and finishes are modelled as realistically as possible. Rendering is the process by which the computer generates realistic images from the 3D model. All of the information recorded at the time the site photos were taken, that is, camera co-ordinates, angle of view, and direction of view, is used to generate matching renders for each view. Careful consideration is given to the direction of sunlight, time of day, weather conditions and distance of viewer, so that photomontages will match reality in terms of lighting, sharpness, density of colour etc.

At this stage the rendered image of the proposed development is superimposed onto its matching photograph. The mathematical accuracy is then double checked and verified by ensuring that existing prominent features which are also modelled line up exactly in the photo. Next, the photomontage specialist establishes, which existing features, such as buildings and trees are in the foreground of the proposed development and those that are in the background, i.e. which features will mask the development and which ones will appear behind the development. When it is found that the development is not visible due to foreground features, its outline is indicated with a red line.

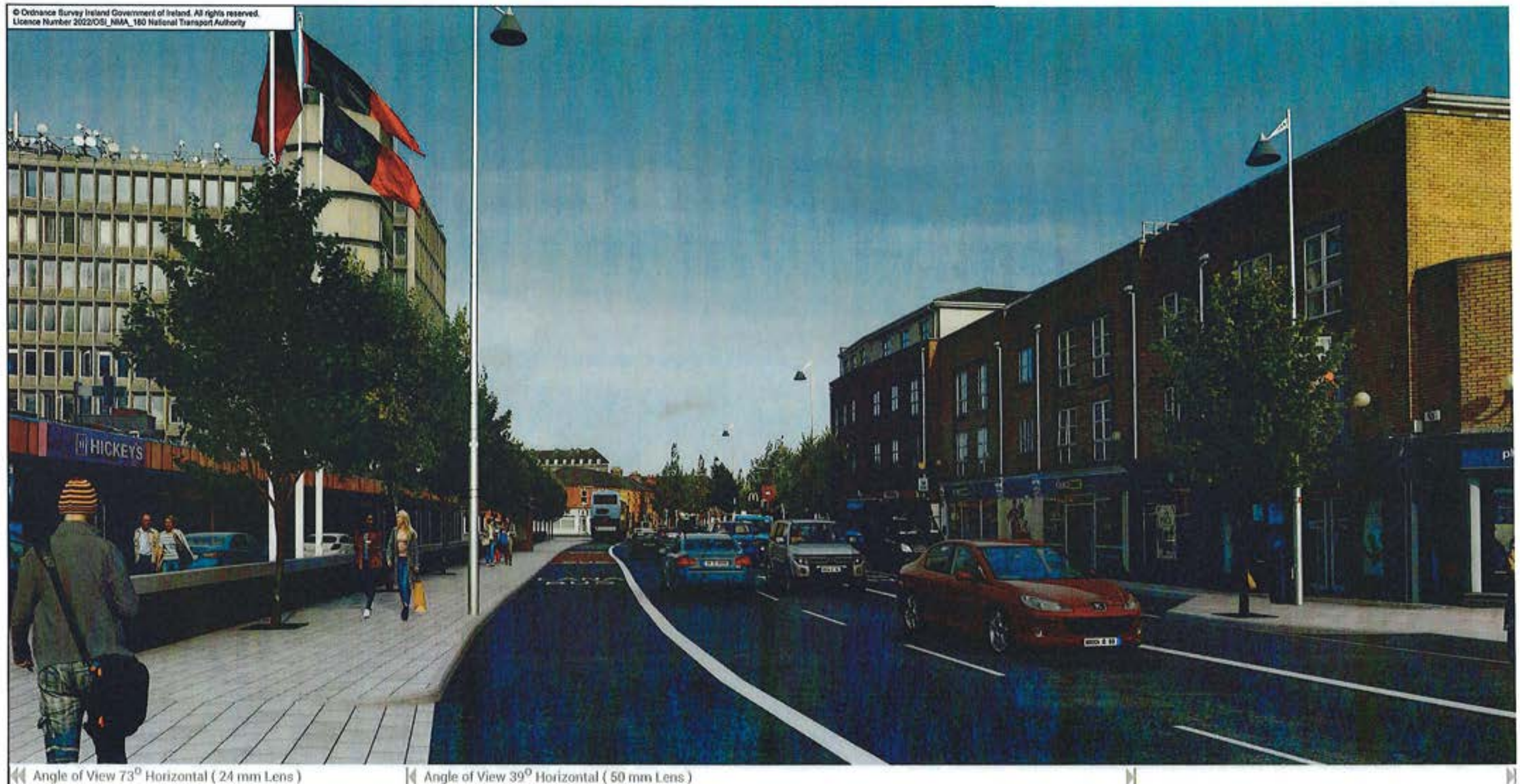
The resulting photomontage, having gone through this extensive procedure, is an accurate and verifiable representation of the proposed development as viewed from the viewpoint positions. The existing views, indicating the current view available from each of the viewpoint locations are

suffixed with the letter 'a' (e.g. Figure 14.4a) within EIAR Volume III Technical Drawings & Figures. The predicted view, indicating the proposed development in the context of the existing view is suffixed with the letter 'b' (e.g. Figure 14.4b) within EIAR Volume III Technical Drawings & Figures). Where the proposed development is not visible in the predicted view, a red line profile of the proposed development has been provided which indicates its position within the view.

I will demonstrate in the pages that follow an example of the recent infrastructure planning application Townscape and Visual Impact assessment and how the photomontages look like and how this application is not in line with its own Methodology and not compliant with GLVIA 3. As a result the findings and assumptions made in this chapter of the EIAR must be discarded and by extension the entire EIAR.



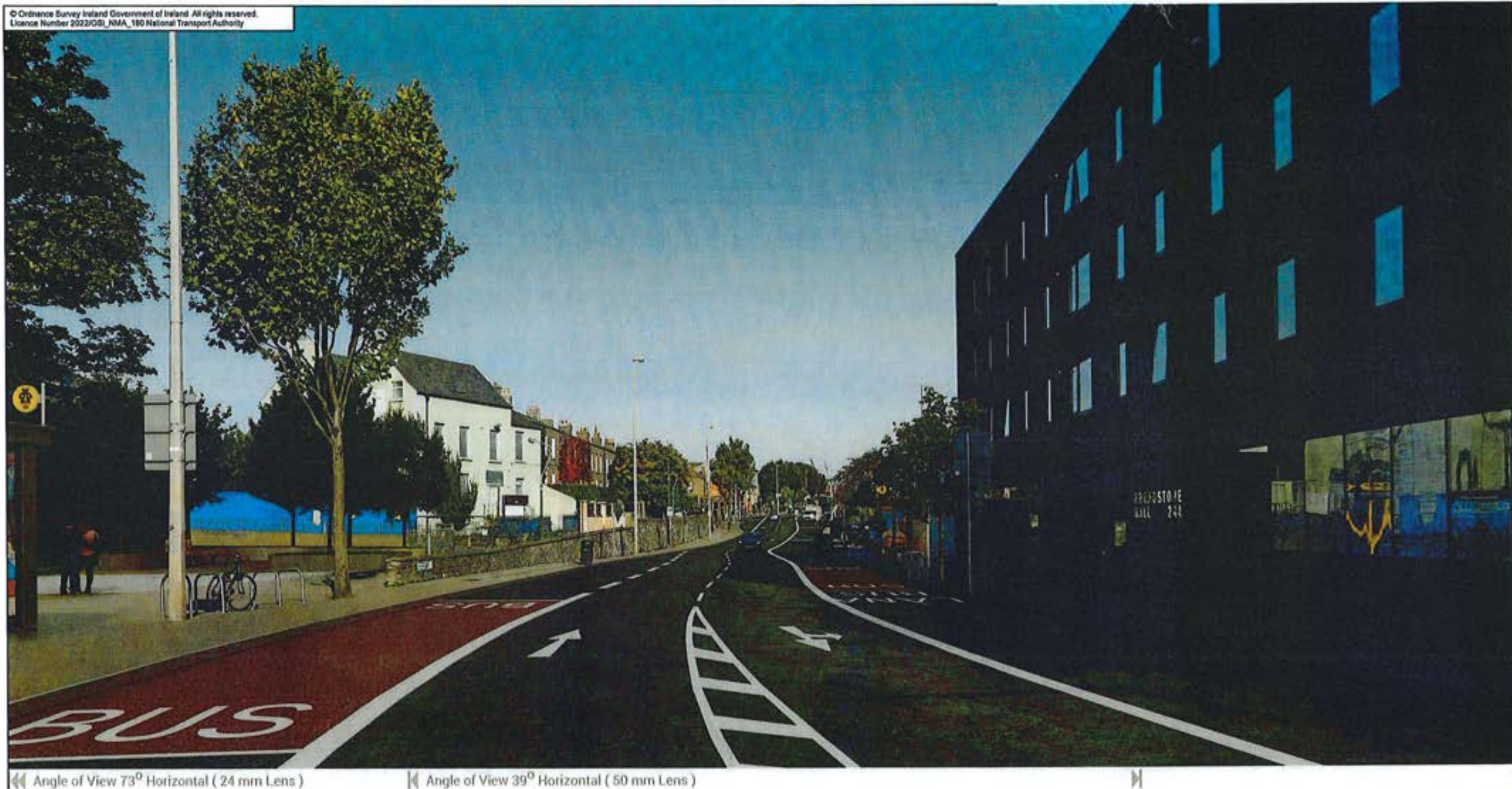
An example of a before and after photomontage as part of the Townscape and Visual Impact Assessment which was recently lodged with ABP. Produced in line with GLVIA3 and best practice.



An example of a before and after photomontage as part of the Townscape and Visual Impact Assessment which was recently lodged with ABP. Produced in line with GLVIA3 and best practice.



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An example of a before and after photomontage as part of the Townscape and Visual Impact Assessment which was recently lodged with ABP. Produced in line with GLVIA3 and best practice.



Existing view

Figure 14.4a

Job Ref:	N/2162
Drawn by:	EM
Checked by:	SM
Date:	February 2022

Notes:

Viewpoint 01
Dublin Street looking east
Existing View

Project:

Monaghan Town Centre

Client:



Comhairle Contae Mhuineacháin
Monaghan County Council





Proposed view

Faded buildings indicate artists impression of future development for info. only

Figure 14.4b

Job Ref:	N02362
Issued by:	EM
Checked by:	SM

Title:	Viewpoint 01 Dublin Street looking east
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Project:	Monaghan Town Centre
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Client:	 Comhairle Contae Mhuineacháin Monaghan County Council
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View Point not the same. Out of scale sketch elements. Not photo realistic. Not an accurate and verifiable representation of the proposed development. Therefore the findings in the EIAR can not be verified.



Existing view

Figure 14.5a

Job Ref:	N/2162
Issued by:	EM
Checked by:	SM
Dated:	February 2022

Title:

Viewpoint 02
Dublin Street looking west
Existing View

Project:

Monaghan Town Centre

Client:



Comhairle Contae Mhuineacháin
Monaghan County Council



View Point not the same. Out of scale sketch elements. Not photo realistic. Not an accurate and verifiable representation of the proposed development. Therefore the findings in the EIAR can not be verified.



Faded buildings indicate artists impression of future development for info only

Proposed view

Figure 14.5b

Job Ref:	N2162
Issued by:	EM
Checked by:	SM
Date:	February 2022

Title: Viewpoint 02
Dublin Street looking west
Proposed View



Project: Monaghan Town Centre

Client:  Comhairle Contae Mhuineacháin
Monaghan County Council

 RPS



Existing view

<p>Figure 14.7a</p>	<p>Job Ref: N/2167 Revised By: EMB Checked By: SWI Date: February 2022</p>	<p>Title: Viewpoint 04 Toward Courthouse Car Park Existing View</p>	<p>Project: Monaghan Town Centre</p>	<p>Client:  Comhairle Contae Mhuineacháin Monaghan County Council</p>	<p></p>
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View Point not the same. Not matching the design drawings. Not an accurate and verifiable representation of the proposed development. Therefore the findings in the EIAR can not be verified.



Proposed view

Figure 14.7b

Job Ref:	N12162
Issued by:	EM
Checked by:	SM

Title:

Viewpoint 04
Toward Courthouse Car Park
Proposed View

Project:

Monaghan Town Centre

Client:



Comhairle Contae Mhuineacháin
Monaghan County Council





Existing view

Figure 14.8a

Job Ref:	N02162
Issued by:	EM
Checked by:	SM
Date:	February 2022

Title:

Viewpoint 05
Castle Road
Existing View

Project:

Monaghan Town Centre

Client:



Comhairle Contae Mhulneacháin
Monaghan County Council





Proposed view

Figure 14.8b

Job Ref:	N12162
Issued by:	EM
Checked by:	SM

Title:

Viewpoint 05
Castle Road
Proposed View

Project:

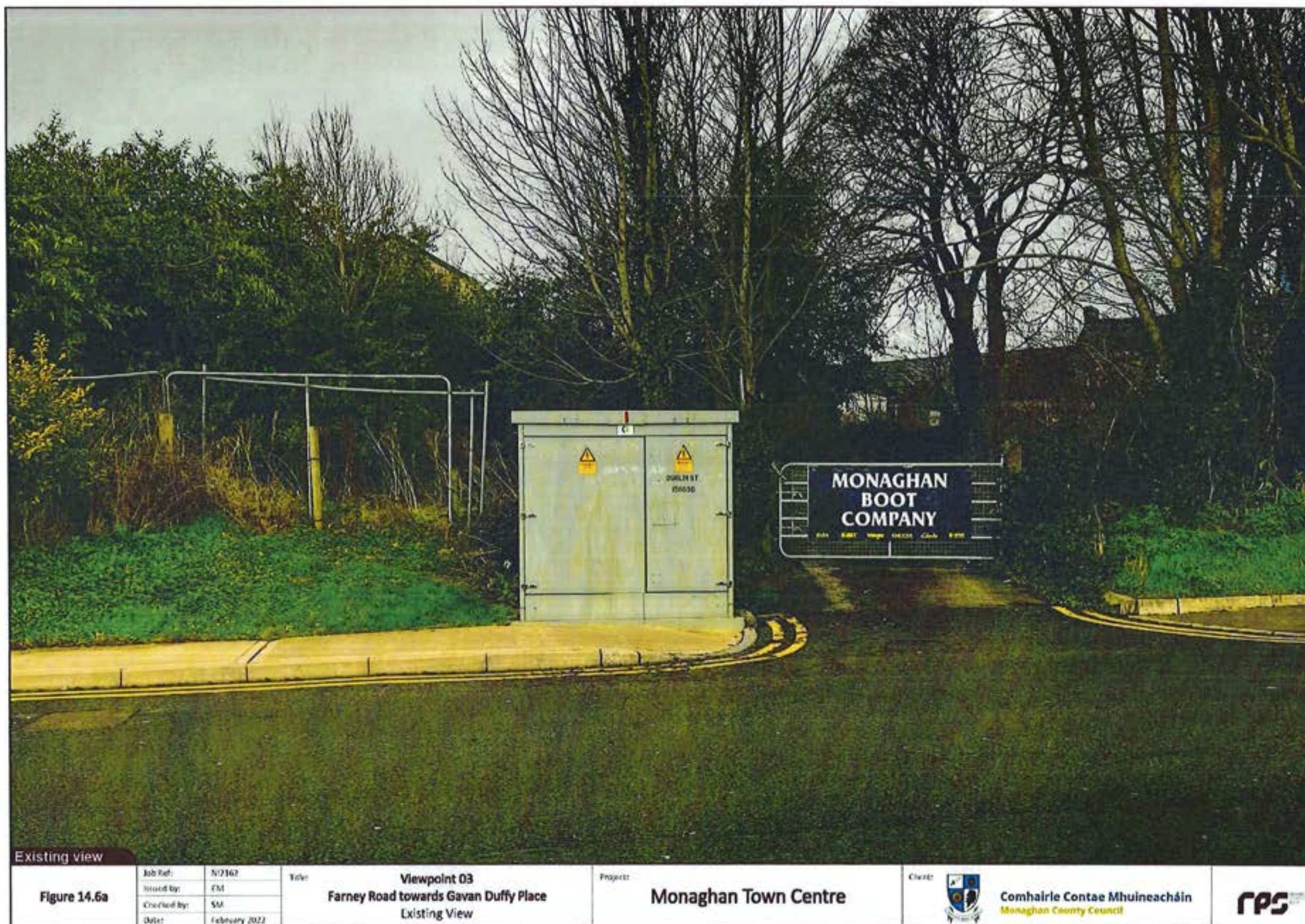
Monaghan Town Centre

Client:



Comhairle Contae Mhuineacháin
Monaghan County Council

rps





Proposed view

Figure 14.6b

Job Ref: N82162
 Issued by: EM
 Checked by: SM
 Date: February 2022

Title:

Viewpoint 03
Farney Road towards Gavan Duffy Place
Proposed View

Project:

Monaghan Town Centre

Client:



Comhairle Contae Mhuineacháin
Monaghan County Council

rps



No viewpoint at the most sensitive location, where the magnitude of change will be the greatest. The demolition of buildings without any idea of what the view will look like.

The entire chapter 14 of the EIAR must be discarded.

Appendix

Love Monaghan Save Dublin Street Report

Issued to RPS May 2021

South Dublin Street & Backlands
Response to the Plans 2021

Love Monaghan Save Dublin Street

Note: This Document should be made available to An Bord Pleanála
Issued 20 May 2021

Executive Summary

Monaghan County Council plan to demolish 4 No buildings on Dublin Street, including the home of Charles Gavan Duffy, in order to create a vehicle road into the back lands or car park area of the town. We believe there is no need for this proposal and it will in fact have a serious detrimental effect on Dublin Street and the wider town.

We respect and acknowledge the hard work and difficulty Monaghan Co.Co. have in trying to develop the car park area of the town which is currently unsightly. However, what started out as a worthy project and development has turned into something, which will not deliver what it should do that is the regeneration of Dublin Street.

The proposals under consideration and commented on within this document are in our opinion outdated and not the optimum solution for our town.

“Everyone has the right to live in a great place. More importantly, everyone has the right to contribute to making the place where they already live great.”

Fred Kent

Report Recommendations

- Retain the 4 No. buildings on Dublin Street, restore and regenerate them within the historic street context.
- The proposed road 'Gavan Duffy Place' should not be built. It is not needed and it has not been demonstrated that there was or ever will be a need for it.
- Consider the livability of the town in terms of people who might live in existing apartments/houses or proposed apartments in Dublin Street and surrounding areas. They require a high quality open space. The need for car parking does not override the needs of people to live, work and play in an safe, healthy and attractive location.
- Pedestrians and people spend money not cars and traffic. Regenerate Dublin Street to enhance the most of its wonderful character. Make the existing historic streets in the town comfortable & 'buzzing' with people & not stifled by cars and hostility.
- Change the project direction now before its too late. Save Dublin Street and don't reinforce its faults. Its backlands can be redeveloped without damaging the historic scape of Dublin Street if its done correctly.

Introduction

This report was compiled by members of the public in response to the South Dublin Street & Backlands Regeneration Scheme by Monaghan County Council and RPS in April 2021. The authors are chartered professionals within the built environment. They have no vested interest within the scheme nor do they or any of their family have any business interest within Monaghan Town which could lead to bias. The authors are however proud to consider Monaghan their home and want, what is best for our town. The authors consider the approach and application to be contrary to the Development Plan, contrary to National Planning Guidelines and not in keeping with best international practice for Market Towns of the size and character of Monaghan. Our issues will be explained in the following pages. We hope our comments are considered adequately by the Design Team, however we also intend to make representation to An Bord Pleanála with regards to this project. A summary about the professional background of the authors is at the back of this document.

“If you plan cities (towns) for cars and traffic, you get cars and traffic. If you plan for people and places, you get people and places. Fred Kent

The RPS Report Introduction

The introduction states: *“The South Dublin Street & Backlands project is the initial phase of the Dublin Street Regeneration Plan (2017). It aspires to create new highquality infrastructure and public realm, to act as a stimulus for attracting future town centre development, forming part of a new Dublin Street Quarter in Monaghan town centre.”* It is the opinion of the authors that creating development land in the backlands of Dublin Street adjacent the shopping centre is not a ‘stimulus’ for regenerating the existing town center streets (Dawson Street, Glaslough Street, Park Street, Mill Street, Market Street, High Street etc.) But is actually a discouragement to investment in those streets as the retail opportunity and offering of the town continue to be moved away from the historic core.

The introduction states: *“The aim is to enhance and improve the layout and structure of the town centre, creating new connections, new streets and spaces, and new high quality public realm including footpaths, street furniture, wayfinding, and landscaping..”* It is the opinion of the authors that what ever about the written aims the reality is the project as presented aspires to demolish historic buildings to make way for a road into a car park. A road without active frontage, a road which severs the pedestrian circulation on Dublin Street, a road which will increase vehicle movement throughout the town especially through the Diamond and Old Cross Square, a road is not a ‘space’ and a road with a footpath cannot be classified as high quality public realm nor can a few bins and benches, a few street trees including those in planters be considered as place making. There is no such thing as ‘landscaping’ - its a road to bring more vehicle into the town and no amount of fluffy text can hide that.

The RPS Report Project Background

The report states, that the vision is based on a Design Concept which states *‘Dublin Street together with its backlands offers a unique opportunity to create a new and viable town centre quarter, with the potential to accommodate additional shopping, office, cultural, residential and new employment zone. It offers the opportunity to address the weaknesses of the area and to maximise its strengths; to enhance pedestrian and vehicular movement, to enhance the existing built heritage; to integrate with the historic streetscape in a manner that is both contemporary and forward looking while complimenting the built heritage; to create an integrated and commercially robust, viable proposal, and a vibrant and sustainable new urban quarter in Monaghan’*

The authors contest aspects of this vision as manifested in the RPS proposals, that are outlined below.

1. *“to enhance the existing built heritage”* The proposals seek to remove 4No buildings on the historic Dublin Street in order to build a road. **This is not enhancement.**
2. *“it offers the opportunity to address the weaknesses of the area and to maximise its strengths”* The weakness of Dublin Street is not the need to increase vehicle movement which is an established inhibitor to the livability of a town. The weakness of the car park area cannot become a development which further removes retail activity in the traditional streets of the town therefore leading to dereliction and decay for those streets. A retail impact assessment for the rest of the town should be carried out and presented as part of the planning application.
3. *“Dublin Street together with its backlands offers a unique opportunity to create a new and viable town centre quarter, with the potential to accommodate additional shopping, office, cultural, residential and new employment zone”* Monaghan is a small market town, the term ‘quarter’ is used when describing zones within large metropolitan areas. This is not a ‘quarter’, its the creation of a road and a development of a retail plot within an exciting car park

therefore we request that the development proposals stops trying to embellish it with unnecessary terminology. The potential additional shopping opportunity should be considered within the context of likely impact on existing shopping streets. Please explain what cultural opportunities are considered within this plan. We hope that no residential development is considered here due to the lack of public open space, green infrastructure and that any residential opportunity would, in reality, be overlooking a car park and a supermarket service yard. This will not provide the location for a suitable high quality residential offerings.

4. "to enhance pedestrian and vehicular movement" There is no need to increase vehicle movement through the town and along Dublin Street. Current policies seek to remove or reduce vehicle movement within towns and these proposals seek to increase it. Please provide a traffic impact assessment on this, acknowledging the vehicle movement opportunity along the Broad Road into the car park which is only 450m (1 minute of driving) from the proposed vehicle entrance on Dublin Street. The aim seeks to enhance pedestrian movement, however the creation of a road from Dublin Street into the car park actually creates a more hostile pedestrian movement along Dublin Street with the unbroken movement from Old Cross Square to the Diamond now severed with a new road crossing Dublin Street.

5. "to enhance the existing built heritage; to integrate with the historic streetscape in a manner that is both contemporary and forward looking while complimenting the built heritage" Dublin Street is an Architectural Conservation Area. It is deeply contradictory to claim to 'integrate with the historic street scape' when the proposal seeks to demolish 4No. buildings within that conservation area. What makes this street scape of historic significance is its entire visual envelope. **The removal of buildings to create a road is not integration, is not contemporary with current urban design and planning and does not compliment the built heritage.** It is worth noting, that nowhere within the published documents is a Streetscape Character and Visual Impact Assessment to GLVIA 3, with verifiable photo realistic photo-montages.

"A good city (town) is like a good party. People don't want to leave early." Jan Gehl

The Planning Context.

Regional Spatial & Economic Strategy (RSES)

Within the Regional Spatial & Economic Strategy (RSES) Co. Monaghan belongs to the Northern and Western Regional Assembly and within that walking and cycling is covered as follows

Walking & cycling:

The walking and cycling offer within the region shall be improved to encourage more people to walk and cycle, through:

- (a) Preparation and implementation of Local Transport Plans for... Key Towns (Monaghan), which shall encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport.*
- (b) Safe walking and cycle infrastructure shall be provided in urban and rural areas, the design shall be informed by published design manuals, included the Design Manual for Urban Roads and Streets (DMURS) and the NTA Cycle Manual.*
- (d) The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life.*

The plans, as presented with the creation of a new road between Dublin Street and the car park, will create more vehicle use, create a more hostile environment on Dublin Street and not lead to a model shift as planned.

Priority already exists on the South Side of Dublin Street for walking and shopping. The proposals seek to sever this priority to give equal priority to vehicles, this in turn will affect the safety for pedestrians and with the removal of buildings on Dublin Street the vibrancy of that street.

The RSES goes on to state;

New development areas should be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken where practicable in existing neighborhoods, to give a competitive advantage to these modes. Prioritisation should be given to schools and areas of high employment density

Promote the provision of high-quality, accessible and suitably proportioned areas of public open spaces and promote linkage with social, cultural and heritage sites and

buildings. In this process prioritise access for walking and cycling.

A large number of connections exist between Dublin Street and its back lands, these already prioritise walking. Although the condition of these can definably be improved and could be achieved without the need to destroy the historic street scape of Dublin Street.

Monaghan Land Use & Transportation Study (LUTS)

A key objective of this plan is to relieve traffic congestion and divert through traffic, particularly commercial traffic and heavy goods vehicles, from residential areas and the town centre by providing alternative routes around the town. This should make the town centre a more pleasant and safer place to walk and cycle.

The proposals create more opportunity for vehicle movements through the center of Monaghan therefore a clear contradiction of this objective.

Town design issues

The layout of Co. Monaghan's towns and villages dates back hundreds of years, to a time when traffic was horse-drawn (and therefore carriages were narrower) and the traffic passing through was lighter in number and slower in speed. Our streets have struggled to cope with the demands of facilitating large volumes of fast-moving vehicles, and in many cases, they became unpleasant and sometimes unsafe places to be. In recent times, there has been a renewed appreciation of the negative impact of this on everything from air quality to the retail experience, and Town Teams are trying to reclaim town centres for local, slow-moving traffic, with an emphasis on creating a quality urban environment where people feel comfortable to spend time. Public Realm Plans support the work, showing towns the potential for opening up back lands behind streets and enhancing the permeability of the town centres by creating pedestrian links to connect streets

The underlined above highlights the contradiction with the proposals for Gavan Duffy Place. This is not about the creation of pedestrian links but the creation of vehicle links.

The pre-vehicular traffic era design width of many of the streets in our county's towns and villages make it difficult to find sufficient width to provide foot and cycle paths in addition to space for parking and the roadway itself. Choices may have to be made between facilitating vehicular traffic or facilitating walking and cycling. Some routes may lend themselves to replacing two-way traffic with one-way systems to make room for cycle lanes and wider pavements

The underlined above highlights the contradiction with the proposals for Gavan Duffy Place. This is not about facilitating vehicle traffic but actually encouraging it

and placing its importance above walking and cycling.

Whilst national policy is encouraging local authorities towards reclaiming town centre streets for pedestrians and cyclists, the Council must be mindful of lack of alternative routes in some cases, and also of local traders' concerns over loss of business due to a decrease in traffic and parking spaces near their premises. As always, we will pursue a policy of introducing change through consultation.

There is already an alternative route into and out of the car park in the backlands of Dublin Street only 450m away (or One Minute Drive) on the Broad Road. Nowhere in this study does it suggest that additional road capacity should be created within town centres. These proposals do nothing to create additional footfall on Dublin Street and therefore nothing to offset the loss of business in the historic streets.

Town Walking & Cycling Plans

In Monaghan, it was recognised that the greenway provided a convenient 'spine' which brings people from the edges of the town into the centre, and that on-road cycling infrastructure should be focused on linking to and from it, with the speed limit in the very centre of town being reduced to 30kph to allow the creation of a 'shared space' where the safety of cyclists is enhanced due to the slow movement of vehicular traffic. The recommendations from this Plan are incorporated into the MLUTS.

The additional vehicle movement around Dublin Street and Old Cross Square which connects to the Greenway does the opposite to enhancing the safety of cyclist and will prohibit the required model shift from private vehicles.

"It is difficult to design a space that will not attract people. What is remarkable is how often this has been accomplished."

William H. Whyte



**Dublin Street
May 2021**

**“Hostile East Side
Footpath (HGV)”**

**“Lacks Pedestrian
Comfort / Narrow
Footpaths (HGV)”**

**“Vehicle Movement
Dominated”**

**“Rich Market
Town Character
of Buildings”**

**“No Placemaking
but lots of potential”**

UN and EU declared Climate and Biodiversity Emergency

The Biodiversity Action Plan

The Climate Action and Low Carbon Development Bill

Monaghan County Council Climate Change Adaptation Strategy 2019-2024

Draft Monaghan walking & Cycling Strategy 2021

MONAGHAN COUNTY DEVELOPMENT PLAN 2019 - 2025

It appears the proposed plan for Dublin Street Backlands contravenes two actions of the National Biodiversity Action Plan:

1. Public and Private Sector relevant policies will use best practice in SEA, AA and other assessment tools to ensure proper consideration of biodiversity in policies and plans. These have not yet taken place to inform the design constraints.

2. All Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures, appropriate offsetting and/or investment in Blue-Green infrastructure. The current layouts result in significant loss of Green Infrastructure in an area adjacent a watercourse (River Shambles).

In addition The Climate Action and Low Carbon Development (Amendment) Bill 2021 was passed on 23 March 2021. It set Ireland on the path to net-zero emissions no later than 2050, and to a 51% reduction in emissions by the end of this decade. The Bill states a "national climate objective" which is "to provide for the approval of plans by the Government in relation to climate change for the purpose of pursuing the transition to a climate resilient, biodiversity rich and climate neutral economy by no later than the end of the year 2050". It includes a definition of biodiversity based on that of the Convention on Biological Diversity. In fulfilling their functions to achieve this objective, each Minister and the Government shall "have regard to the need to **promote sustainable development and restore, and protect, biodiversity**". A net loss of trees and green infrastructure and capping of soil on this scale does not support the national climate objective.

A key highlight of the Bill, according to the Government, is "**Public Bodies will be obliged to take account of Climate Action Plans in the performance of their functions**". It appears Monaghan County Council are developing proposals at odds with Monaghan County Council Climate Change Adaptation Strategy 2019-2024 in particular around G2: Infrastructure and the Built Environment, G4: Drainage and Flood Management and G5: Natural Resources and Cultural Infrastructure. The proposals should be considered within the letter and spirit of this strategy.

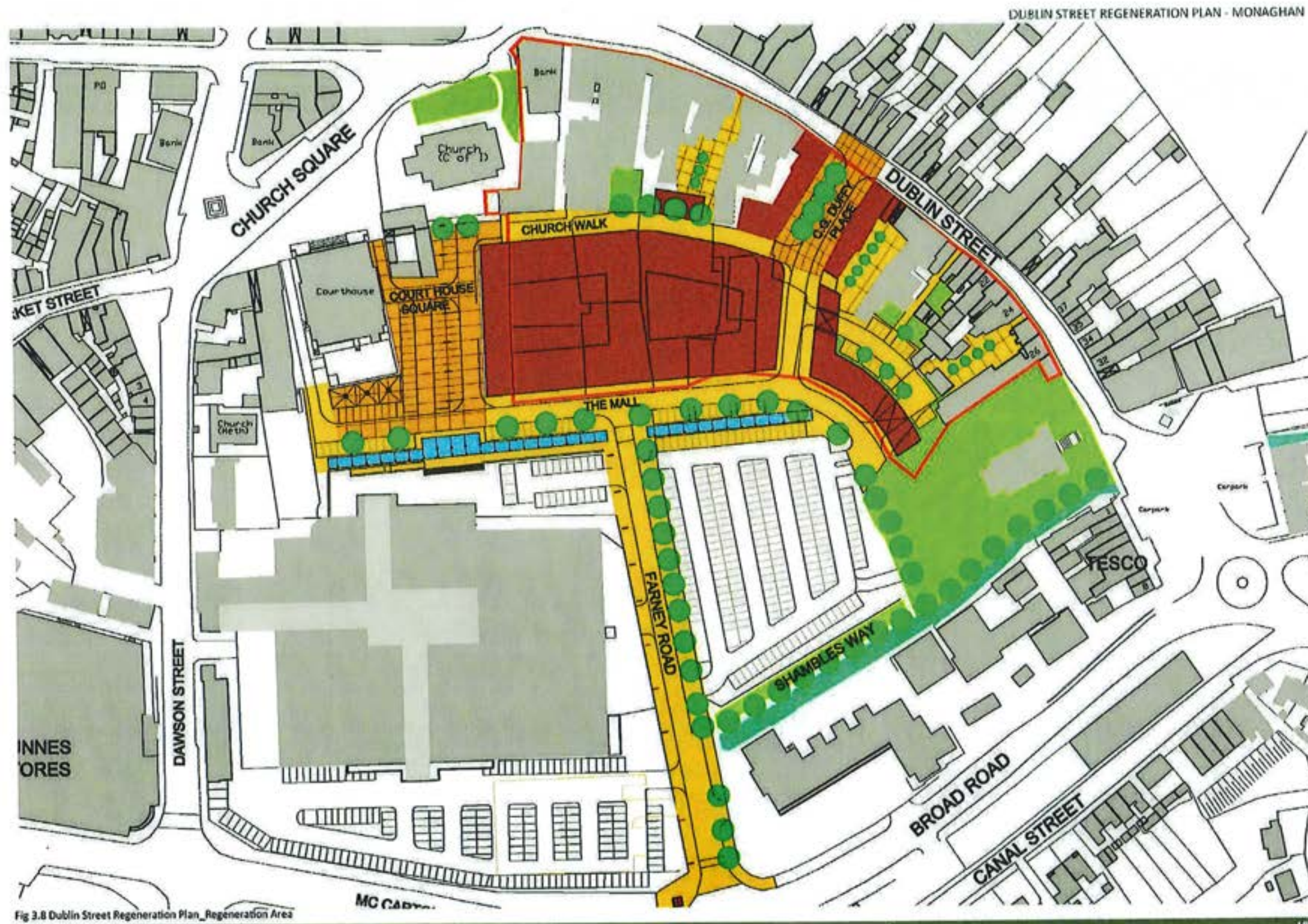
Transport Policies within the Monaghan Development Plan including TP2 "To support the creation of an integrated and sustainable transport system to promote a choice of transport modes including public transport, cycling and walking facilities. TP3 to capitalise on the County's existing transport infrastructure by implementing appropriate traffic management measures to reduce congestion and minimise travel times. These proposals encourage more traffic into the Diamond, and onto Dublin Street and Old Cross Square. This actually increases congestion within these areas.

In terms of Monaghan Town Centre Objectives MP04 *"Encourage new developments which refurbish existing buildings and back lands in order to eliminate dereliction and reinforce the town centre"* These proposals directly contradict this with the demolition of 4No. building to create a new road.

Within the Development Plan it states *"The opening of the Monaghan Town (N2) by-pass has removed most north-south bound through traffic from the town centre, particularly Glaslough Street, the Diamond, Church Square and Dawson Street. While east-west (N54) traffic continues to pass through the town, the reduced traffic flows have improved the town centre environment and pedestrian safety and has created a positive impact on commercial activity."*

A key objective of this plan is to relieve traffic congestion and divert through traffic, particularly commercial traffic and heavy goods vehicles, from residential areas and the town centre by providing alternative routes around the town." However the proposals to create a new road into the car park off Dublin Street now creates more traffic and reduces pedestrian safety and will have a negative impact on retail activity and livability of Dublin Street.

"If you make more roads, you will have more traffic." Jan Gehl



For Reference This is the Sheridan Woods Architects Dublin Street "Regeneration" Plan - Adopted 2nd Oct 2017

SOUTH DUBLIN STREET & BACKLANDS REGENERATION SCHEME, MONAGHAN TOWN CENTRE



Comhairle Contae Mhuineacháin
Monaghan County Council



DRAFT DESIGN PROPOSALS: GENERAL ARRANGEMENT

These draft design proposals aspire to achieve the short term objectives for the South Dublin Street and Backlands area, which focus on providing a new urban structure, spaces, connections, infrastructure, and a high quality public realm.

This includes:

- Creation of Gavan Duffy Place *
- Design of Church Walk, The Mall, Courthouse Square, and Farney Road *
- New high quality public realm and amenity facilities, including hard and soft landscape
- Supporting services, including utilities, EV Charging, drainage, street lighting etc.



(*) These are indicative street names at present, and are subject to change and agreement at a later date.

For Reference This is the RPS Draft Design GA Plan - Public Consultation 2021

Courthouse Square

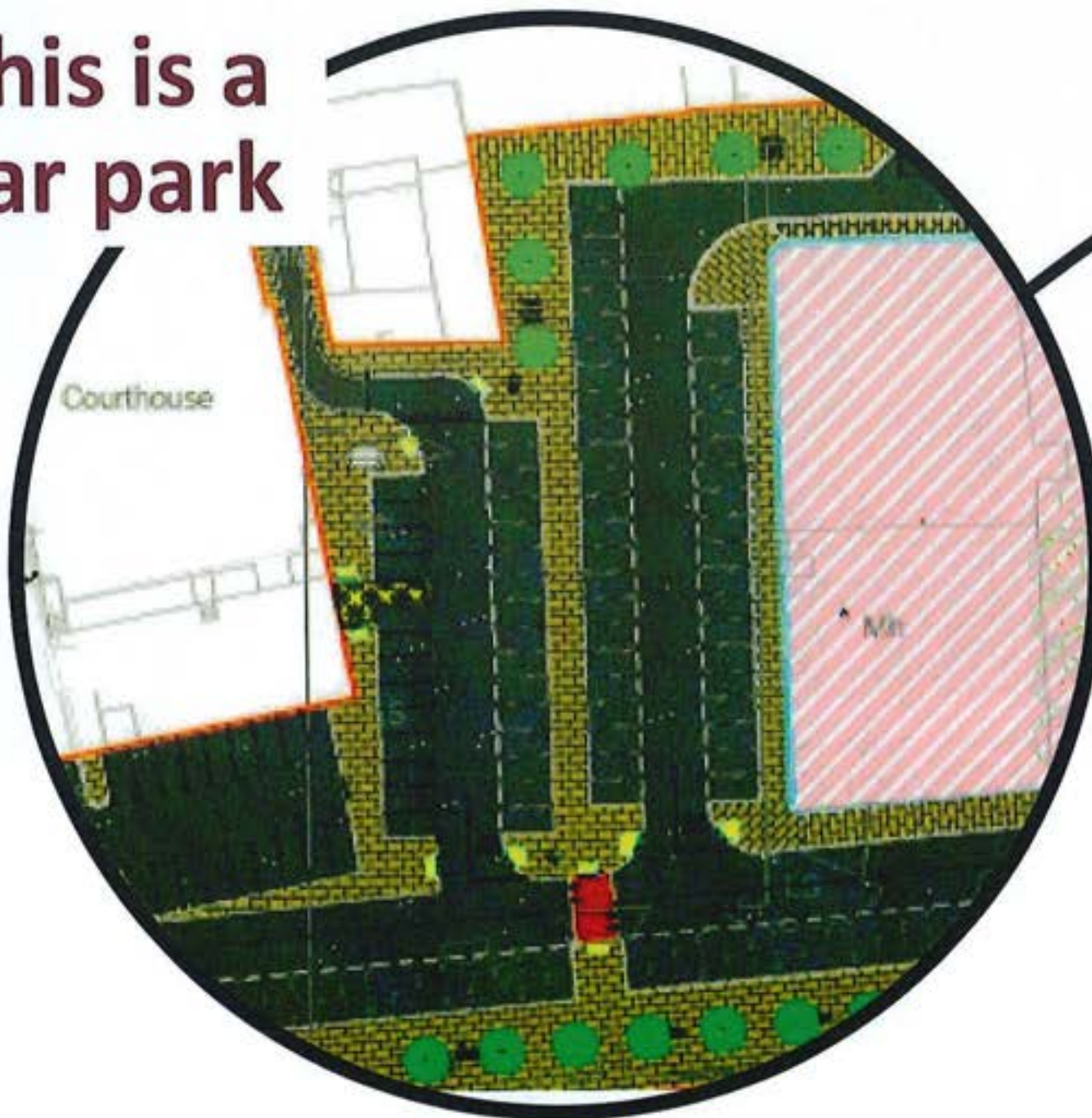
Did it ever exist? & If so where is it now?

Note: A car park is never a high quality public realm intervention. It is in fact the colonisation of public open space for private property (vehicle).

Courthouse Square (Car Park).

This is not a town square of
high quality public realm but
simply a town car park

**This is a
car park**



SOUTH DUBLIN STREET & BACKLANDS REGENERATION SCHEME, MONAGHAN TOWN CENTRE



DRAFT DESIGN PROPOSALS: GENERAL ARRANGEMENT

These draft design proposals aim to achieve the short term objectives for the South Dublin Street and Backlands area, which focus on providing a new urban structure, spaces, connections, infrastructure, and a high quality public realm.

This includes:

- Creation of Green Bully Place *
- Design of Church Walk, The Mall, Courthouse Square, and Backland Road *
- High quality public realm and amenity facilities, including hard and soft landscaping
- Supporting services, including utilities, EV charging, drainage, street lighting etc.



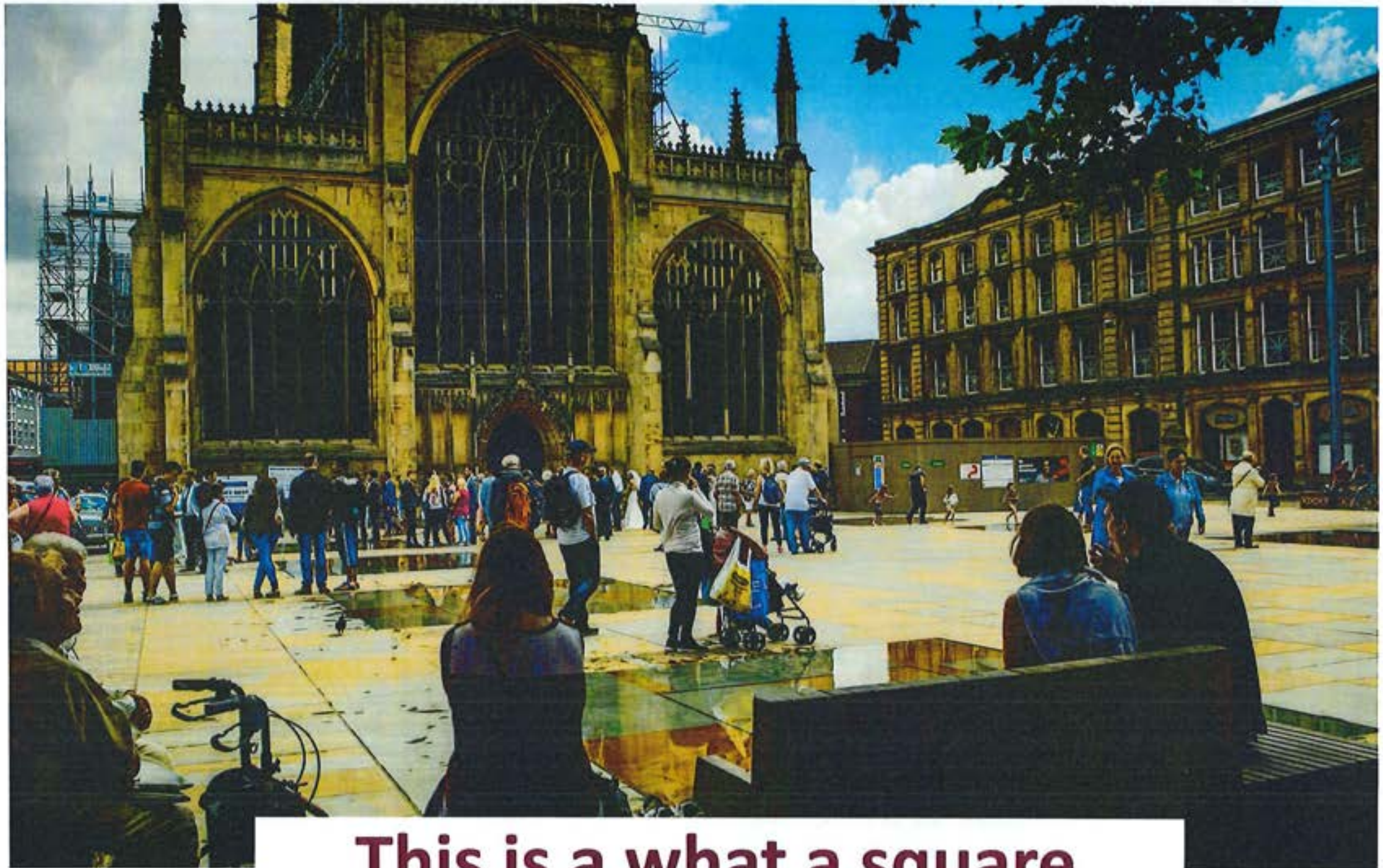
(*) These are indicative street names at present, and are subject to change and agreement at a later date.



The Sheridan Woods Artist impression hides the reality that this is not a square but a car park.
The RPS plans confirm the reality.

Courthouse Square.

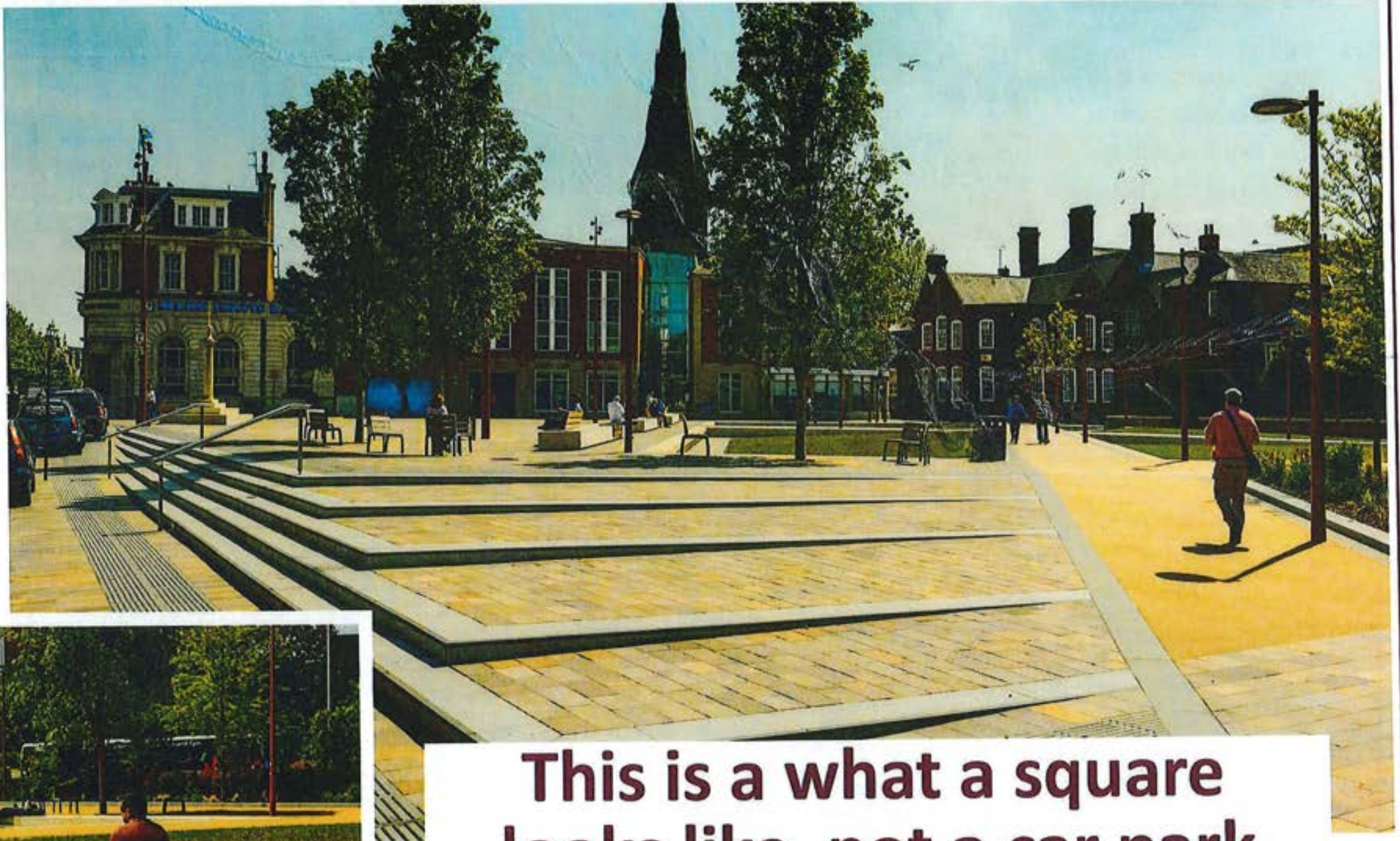
These are examples of town squares & should not be confused with the proposed car park incorrectly identified as a square.



This is a what a square looks like, not a car park

Courthouse Square.

These are examples of town squares & should not be confused with the proposed car park incorrectly identified as a square.



This is a what a square looks like, not a car park



Courthouse Square.

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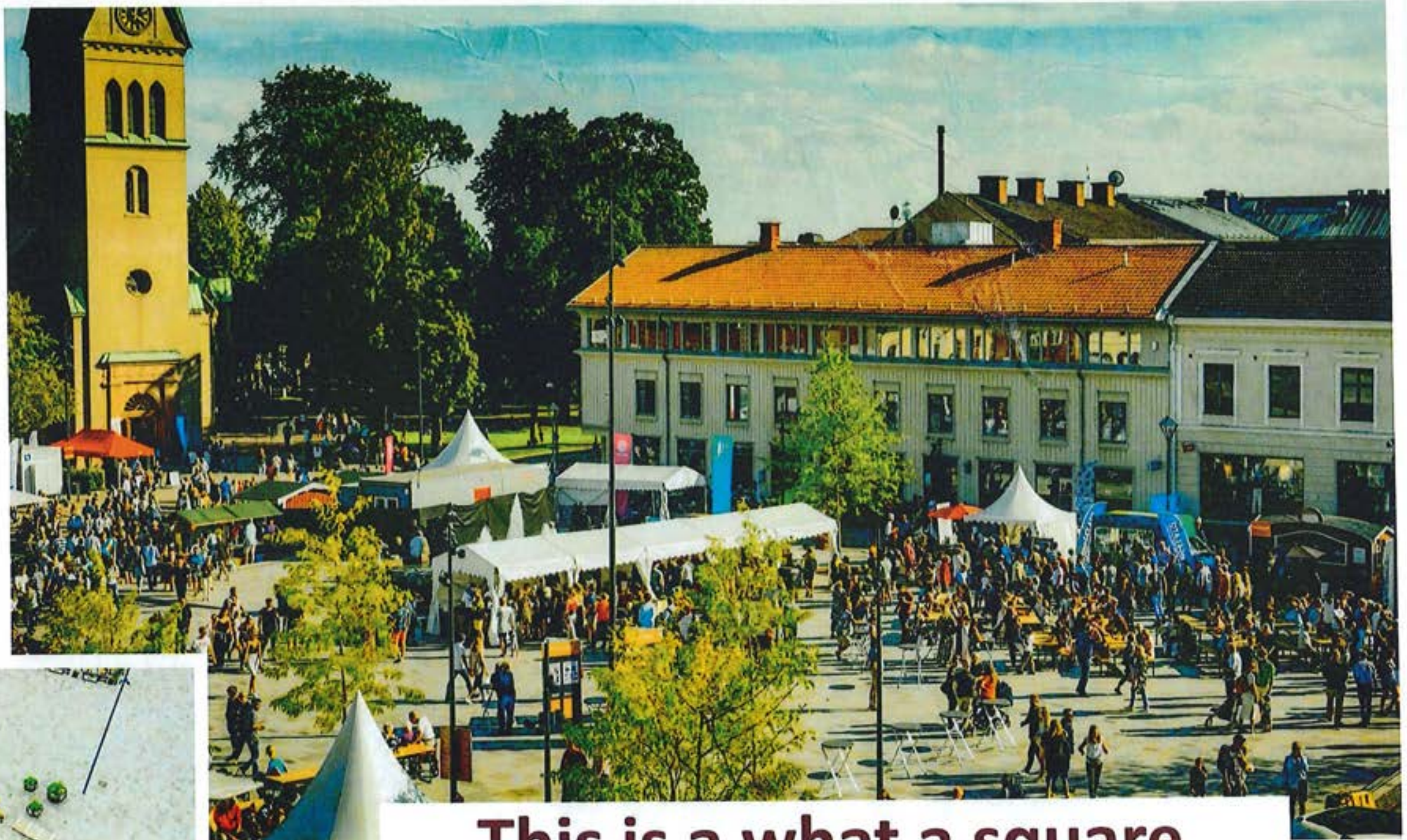


This is a what a square looks like, not a car park



Courthouse Square.

These are examples of town squares & should not be confused with the proposed car park incorrectly identified as a square.



This is a what a square looks like, not a car park



Courthouse Square.

These are examples of town squares & should not be confused with the proposed car park incorrectly identified as a square.



This is a what a square looks like, not a car park

Gavan Duffy Road (Second Car Park Access Road)

Note: A road entrance to a car park is never a place.

Gavan Duffy Place

This is not a place but simply an access road.

"This is a Road"



SOUTH DUBLIN STREET & BACKLANDS REGENERATION SCHEME, MONAGHAN TOWN CENTRE



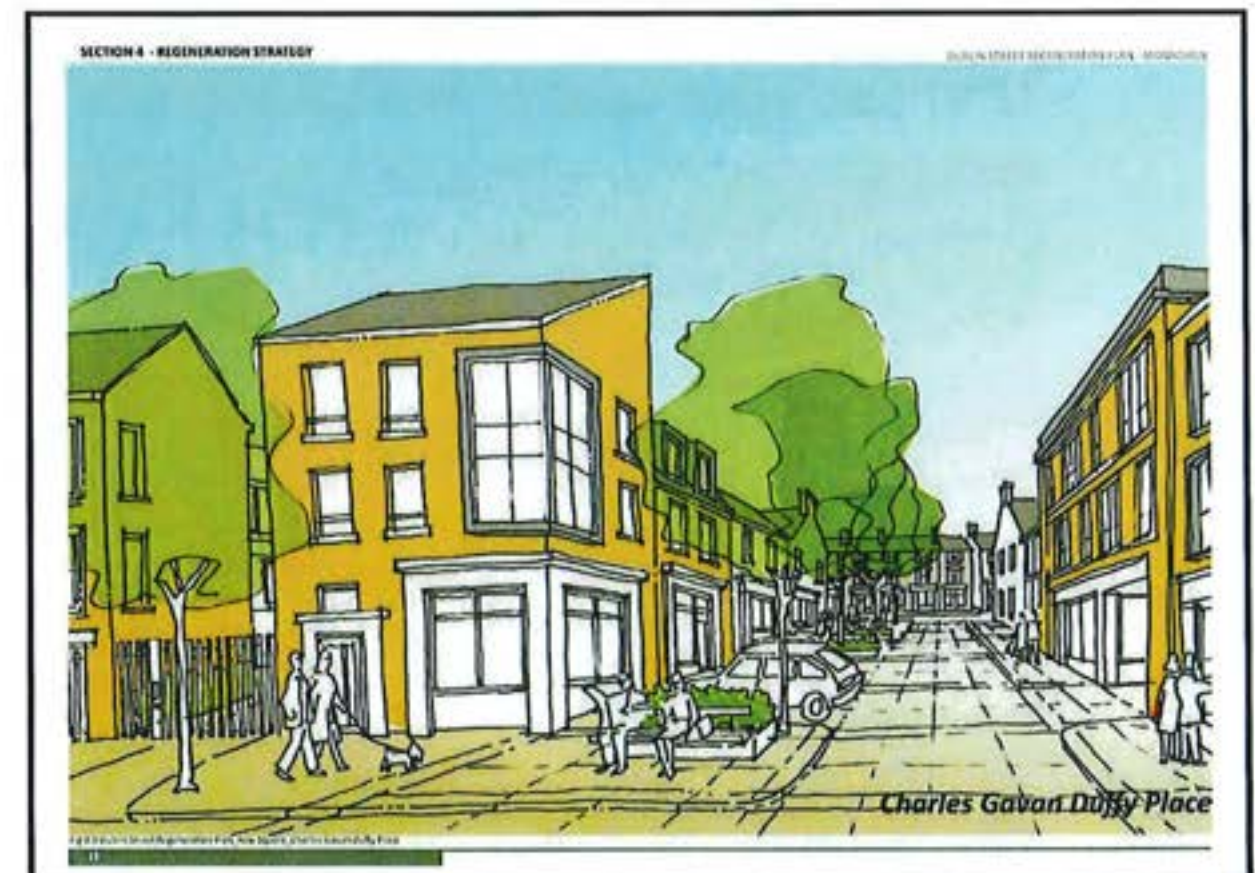
DRAFT DESIGN PROPOSALS: GENERAL ARRANGEMENT

These draft design proposals aim to achieve the short term objectives for the South Dublin Street and Backlands area, which focus on providing a new urban structure, spaces, connections, infrastructure, and a high quality public realm.

This includes:

- Creation of Gavan Duffy Place *
- Design of Church Walk, The Mall, Courthouse Square, and Family Road *
- New high quality realm and public facilities including hard and soft landscaping
- Supporting services, including utilities, EV charging, drainage, street lighting etc.

(*) These are indicative street names at present, and are subject to change and agreement at a later date.



The Sheridan Woods Artist impression hides the reality that this is not place but actually a road. A road without any animation from the building edge and Car Parking!

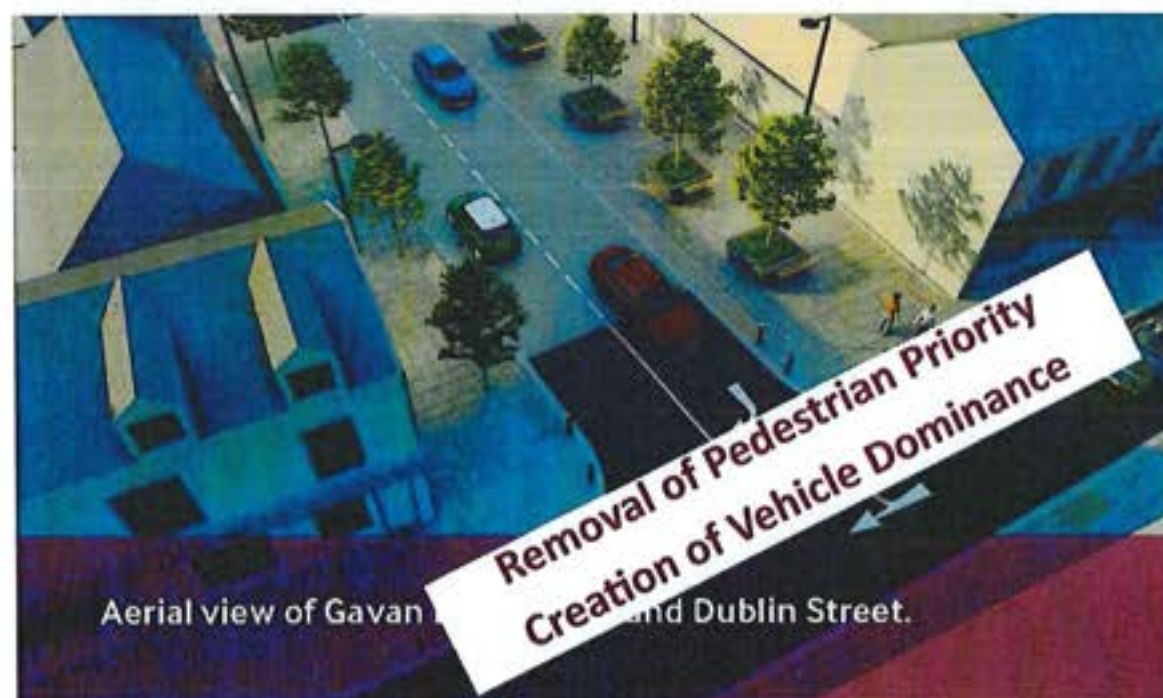
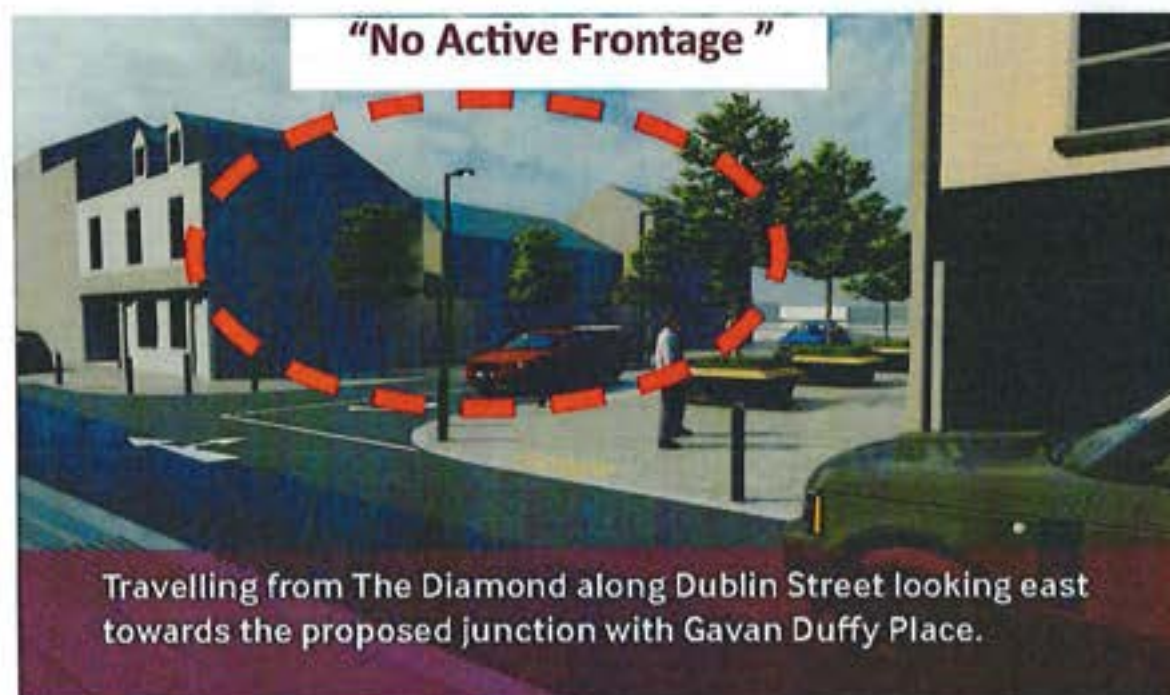
SOUTH DUBLIN STREET & BACKLANDS REGENERATION SCHEME, MONAGHAN TOWN CENTRE



Comhairle Contae Mhuineacháin
Monaghan County Council



GAVAN DUFFY PLACE – PROPOSALS FOR NEW STREET & JUNCTION



Gavan Duffy Place

This is not a place and does not involve place making. It is a road which is created by demolishing 4 buildings within an Architectural Heritage Zone.

The road is not needed for pedestrian circulation and indeed the Sheridan Woods report states: *"There are good pedestrian links from Dublin Street to the backlands. These create a permeable pedestrian network."* Page 10 of Sheridan Woods DUBLIN STREET REGENERATION PLAN MONAGHAN. Although acknowledging that there condition currently is very poor and has a lack of natural surveillance. The proposed road is the antithesis of good urban planning and design to solve the condition and supervision issues of these lane ways.

The removal of Gavan Duffy House No10 Dublin Street as a protected structure as indicated in the Architectural Heritage Impact Assessment report by Consarc Conservation issued 30th June 2020 fails to substantiate any comments with regards to the impact on both the Dublin Street Conservation Area and the Diamond Conservation Area. No Landscape (Streetscape) Visual and Character Impact Assessment to GLVIA3 standards with the associated verifiable photorealism photo-montages have been carried out. In fact no impact assessment was carried out at all. The Consarc report states *"The property as outlined above has limited architectural significance and whilst it forms part of the streetscape of Dublin street, so too the new proposal will create a new and enhanced streetscape."* **The new street scape will not be enhanced with the removal of buildings within the fabric of the street to expose gable walls.** The report goes on to say *"The social significance of the building will still be recognised in the creation of the new Gavan Duffy place and the social / historical significance will be more evident and legible to the public than it is currently"* **A mural on the wall does not improve the historical significance of the site or the person Charles Gavan Duffy.** The report also states *"The proposal relates to a wider public realm and opportunity for Monaghan to drive regeneration into the town centre."* **These proposals do the opposite to drive development further away from the town centre towards the car park and a potential 'characterless' shopping centre that could be standing anywhere in the world. This is not in the spirit of Town Centers First as outlined in the Program for Government.**

The Sheridan Woods report states about Dublin Street that *"The building line is well defined, and with a gentle rising topography, and slightly curving building line creates an attractive and intimate closing effect."* **This building line will be destroyed as part of proposals to remove 4No. buildings in order to build a new road and will increase the already vehicle dominated and hostile environment on Dublin Street.**

The RPS proposals state *"A raised table (natural stone) will be provided at the junction,*

to slow traffic speed and create a shared surface for pedestrians and vehicles. Uncontrolled pedestrian crossings are proposed." This is somewhat recognising that a new conflict point between vehicles and pedestrians has been created and pedestrian comfort has been further eroded within the town centre. It also now brings vehicles into conflict with pedestrians on the safest side of the street especially for vulnerable users (children, disabled and those with mobility issues)

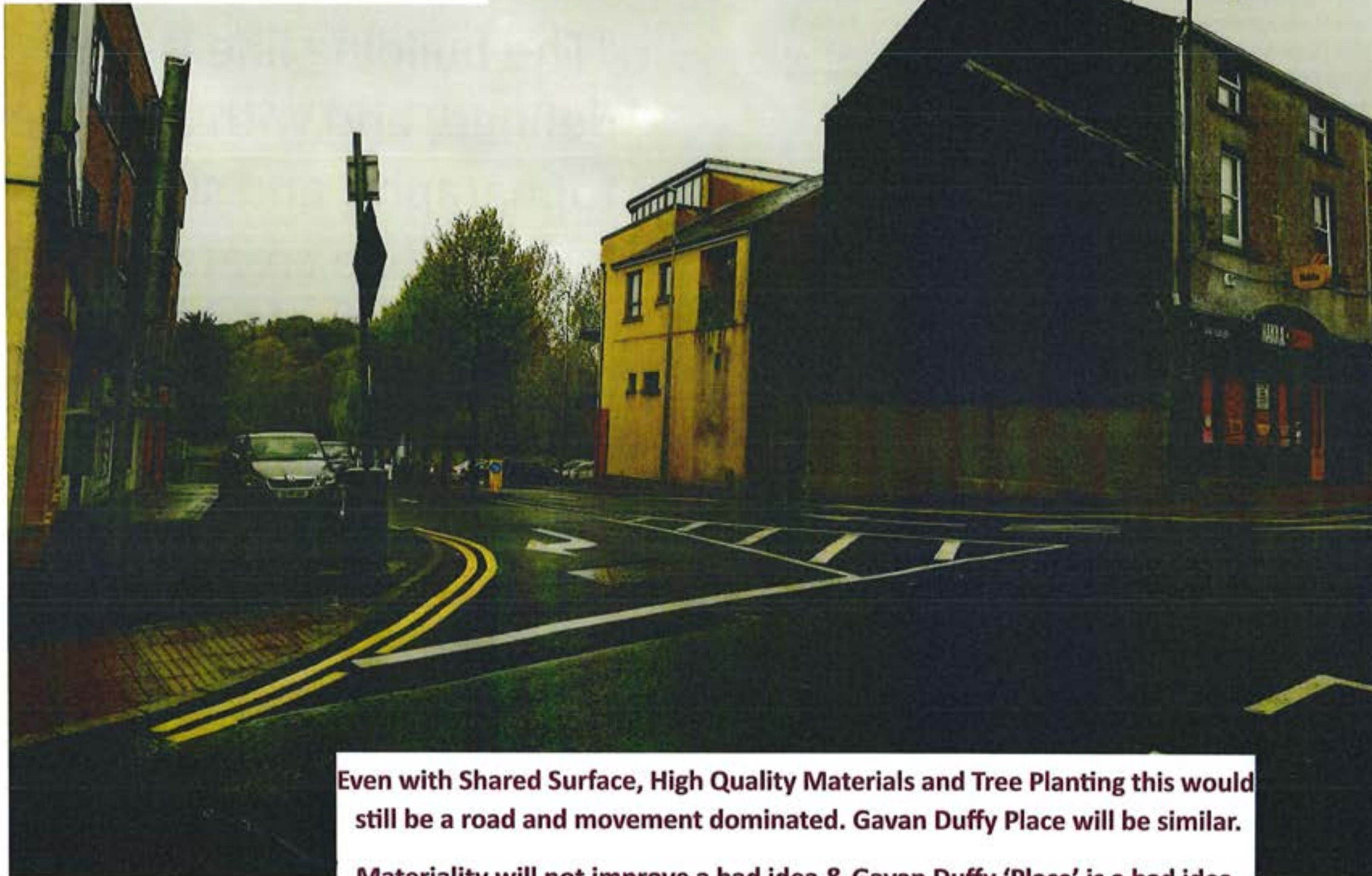
"The building line is well defined, and with a gentle rising topography, and slightly curving building line creates an attractive and intimate closing effect."
Sheridan Woods Report on Dublin Street.

It should be noted that street trees within planters do not constituent public realm enchantments, in fact trees in planters contribute negatively to climate change and do not provide carbon sequestration due to their short design life. These are not permanent structures and could be removed to allow the space to be used for other things such as car parking at any time in the future.

The proposed level surface should be reviewed with mobility groups especially NCBI who often oppose such measures.

The view from Dublin Street towards the proposed developments within the Backlands should form part of a Landscape and Visual Impact Assessment. This needs to be carried out to inform the sweeping statements of 'improvements' within various reports. As no development is currently proposed within the development plots, various reports stating that the removal of the 4No. buildings will be an improvement can therefore not be confirmed. In fact these development may or may not take place and may not have the aspired quality which a masterplan may indicate. It is therefore premature to remove these 4No. buildings. In addition the developments may not need or wish to have this access road and therefore destroying the fabric of Dublin Street without any development need.

The example on Glaslough Street Monaghan where a break in the street scape results in blank gable walls, a small number of trees, and a vehicle dominated approach to St Peters Lake.



Even with Shared Surface, High Quality Materials and Tree Planting this would still be a road and movement dominated. Gavan Duffy Place will be similar.

Materiality will not improve a bad idea & Gavan Duffy 'Place' is a bad idea.

The concept that Gavan Duffy Place will become a location for Events and Market, begs the question "Why?" when it is an inferior location to the exciting front of the courthouse. How many of such locations does a town of the size of Monaghan need. Also, if it is to be used for this function, then why is a road needed?

The Need for a Road Access to Backlands from Dublin Street.

The especially curious 'need' to create a new vehicle entrance and exit onto Dublin Street from the backlands seems to ignore that it is only a distance of 450m from the main entrance into the same car park off the Broad Road. According to Google this is only a 1 minute drive. Therefore to save 1 minute drive time, the destruction of the historic street scape is proposed.



The existing vehicle entrance to the car park off the Broad Road is only 450m from the proposed entrance on Dublin Street. This means vehicle movements will increase on Dublin Street at the expense of the pedestrian.



This is how you regenerate a street



This is how you destroy a street



Which type of council will Monaghan be? A preserver of our build heritage or a destroyer?

**“Every time we build
anything we affect
the quality of life
of people.”** Jan Gehl

Dublin Street

Why not Regenerate it ? (as opposed to destroying it)

Note: Calling a development plan a regeneration plan does not automatically make it a regeneration plan

“Dublin Street is a narrow street with limited car parking, there is no opportunity to comfortably walk and pause on the street.

This environment creates a poor public realm and has also contributed to the deterioration and decline of Dublin Street as a shopping destination, a place to do business and a place to live.”

Sheridan Woods Report on Dublin Street.

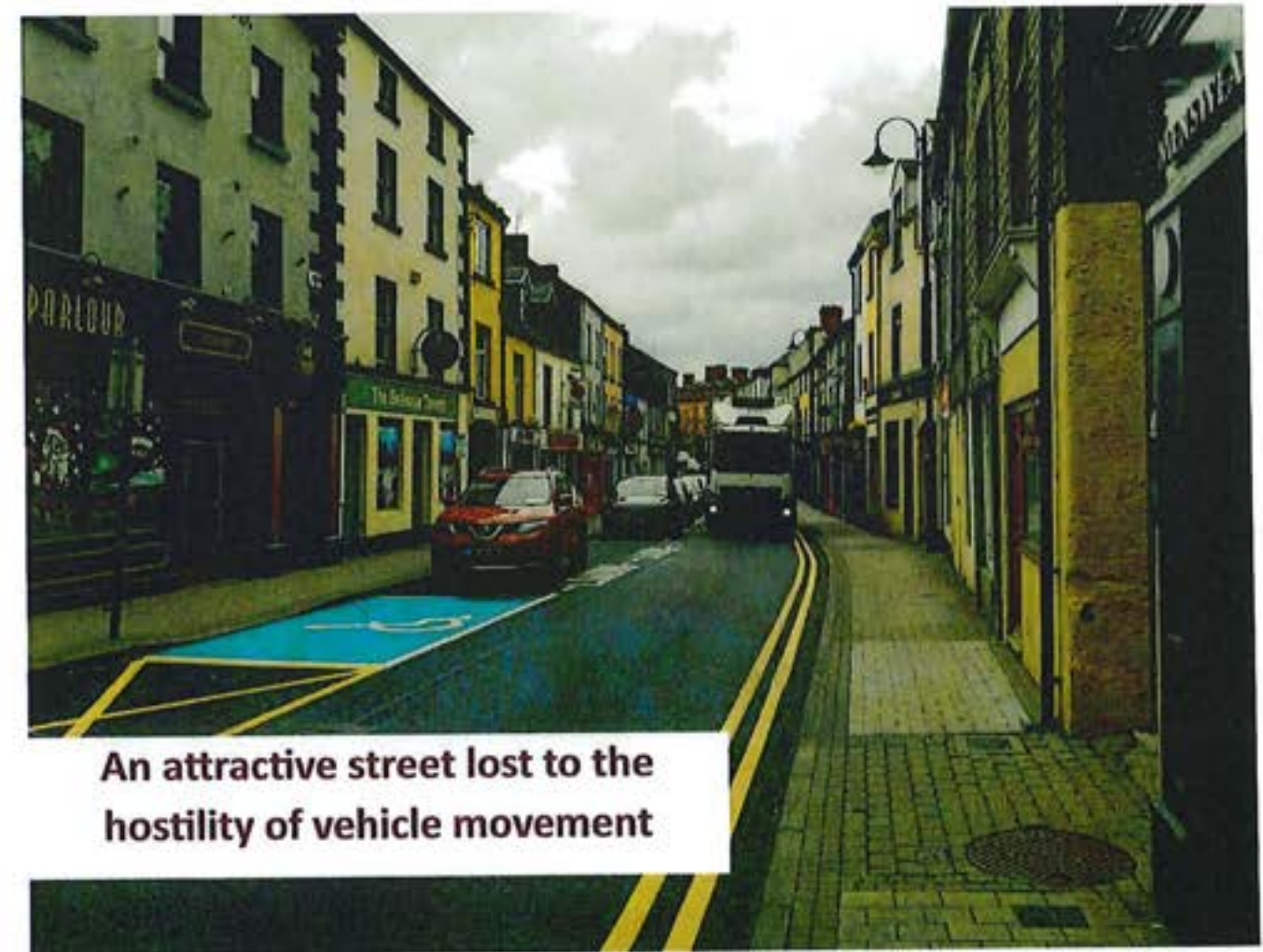
The Sheridan Woods report correctly identifies the crucial fault with Dublin Street yet in their proposals and again with the RPS proposals fail to deal with the issue that is causing the decline of Dublin Street. The street is hostile for pedestrians. It is not a place to stop, rest or enjoy. It is not a place you wish to spend any time in. The safest side of the street is north facing and covered in shade while the south side has vehicles passing very close to a narrow footpath. This is not a location which leads itself to visit.

“The building line is well defined, and with a gentle rising

topography, and slightly curving building line creates an attractive and intimate closing effect.”

Sheridan Woods Report on Dublin Street.

All is not lost as the street scape itself has a wonderful character and potential. It is however currently lost beneath the hostility of the vehicle movement and narrow footpaths.



An attractive street lost to the hostility of vehicle movement

Shoppers are Walkers

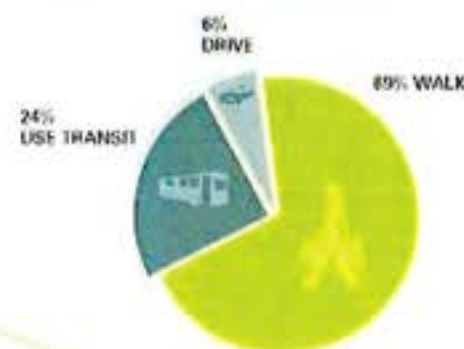


All too frequently we forget that cars don't shop, people do. When shopping destinations work for the pedestrians and connect well to public transportation, people linger longer and spend more.



Throughout New York shoppers see walkers.

How do shoppers get around?



“Shoppers are Walkers
We forget that cars don't shop, people do. When shopping destinations work for the pedestrian, people linger longer and spend more.” Yet the Dublin Street Proposals bring more vehicles into the Town Centre.



Clonakilty to pedestrianise main street on Saturdays to help businesses

The news comes as both **Bandon and Kinsale** announce similar measures.

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By Gavin O'Callaghan
12:28, 25 JUN 2020

NEWS



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Emergency services searching for missing

All of Portlaoise Main Street set for short trial ban on cars

by Lynda Kiernan 18 Jun 2020

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What other councils are doing to regenerate their main shopping streets

More bikes, more pedestrians, more street seating as Cork city gets a major makeover

It may have taken a global pandemic - but Cork city is finally going to get some imagination under new plan

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By **Joe O'Shea** Editor
09:19, 29 JUL 2020 | UPDATED 11:40, 29 JUL 2020

NEWS



Princes Street looking gorgeous (image: Clare Keogh)

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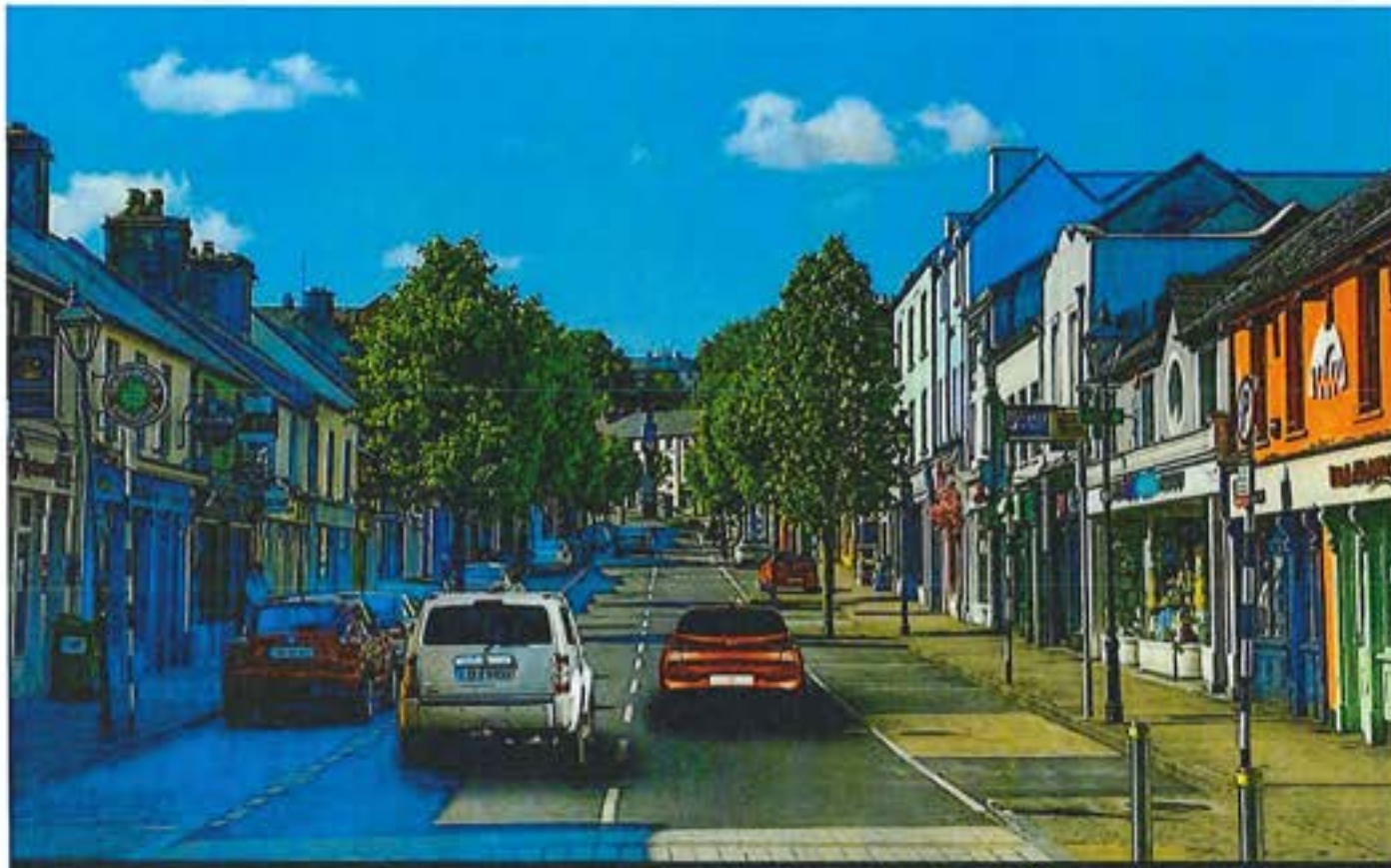
Emergency services searching for missing person in North Cork woodlands



This movement is happening all around the world and Covid has accelerated this process



Westport the 15 Minute Town Why not Monaghan?





**With Vision, Dublin Street
Could be a Destination Street**

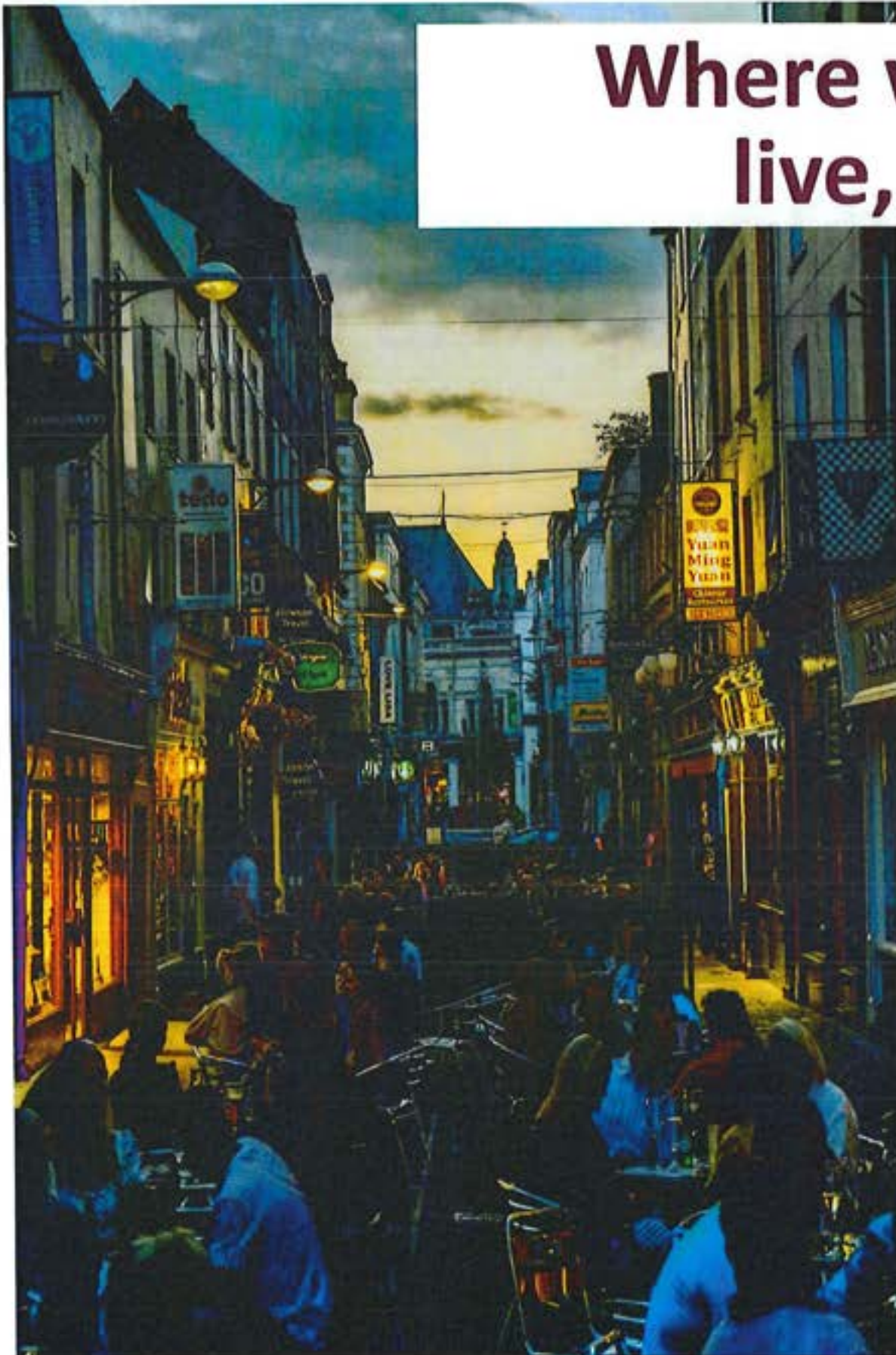


**With Vision, Dublin Street
Could be a Destination Street**



The current proposals bring more cars, vans and HGV's into Dublin Street and continue to kill it

Where would you rather live, work & visit?



Shambles Way

What happened to the Shambles Way?

This is a car park with some trees. A missed opportunity.



**SOUTH DUBLIN STREET & BACKLANDS
REGENERATION SCHEME, MONAGHAN TOWN CENTRE**



Council of the Monaghan Town Centre

RPS

DRAFT DESIGN PROPOSALS: GENERAL ARRANGEMENT

These draft design proposals aim to achieve the short term objectives for the South Dublin Street and Backlands area, which focus on providing a new urban structure, spaces, connections, infrastructure, and a high quality public realm.

This includes:

- Location of Gates Dully Place *
- Design of Church Walk, The Mall, Courthouse Square, and Fanny Road *
- New high quality public realm and amenity facilities, including hard and soft landscape
- Supporting services, including utilities, EV charging, drainage, street lighting etc.

(*) These are indicative short term proposals, and are subject to change and agreement at a later date.



Like other areas of the masterplan we have managed to turn our back on our prime opportunity areas in favor for the private car.

It provides an excellent opportunity to create a high quality public realm location for people living within the town including anyone who might live within the proposed developments.



What Shambles Way Could Be





What the River Shambles currently is.

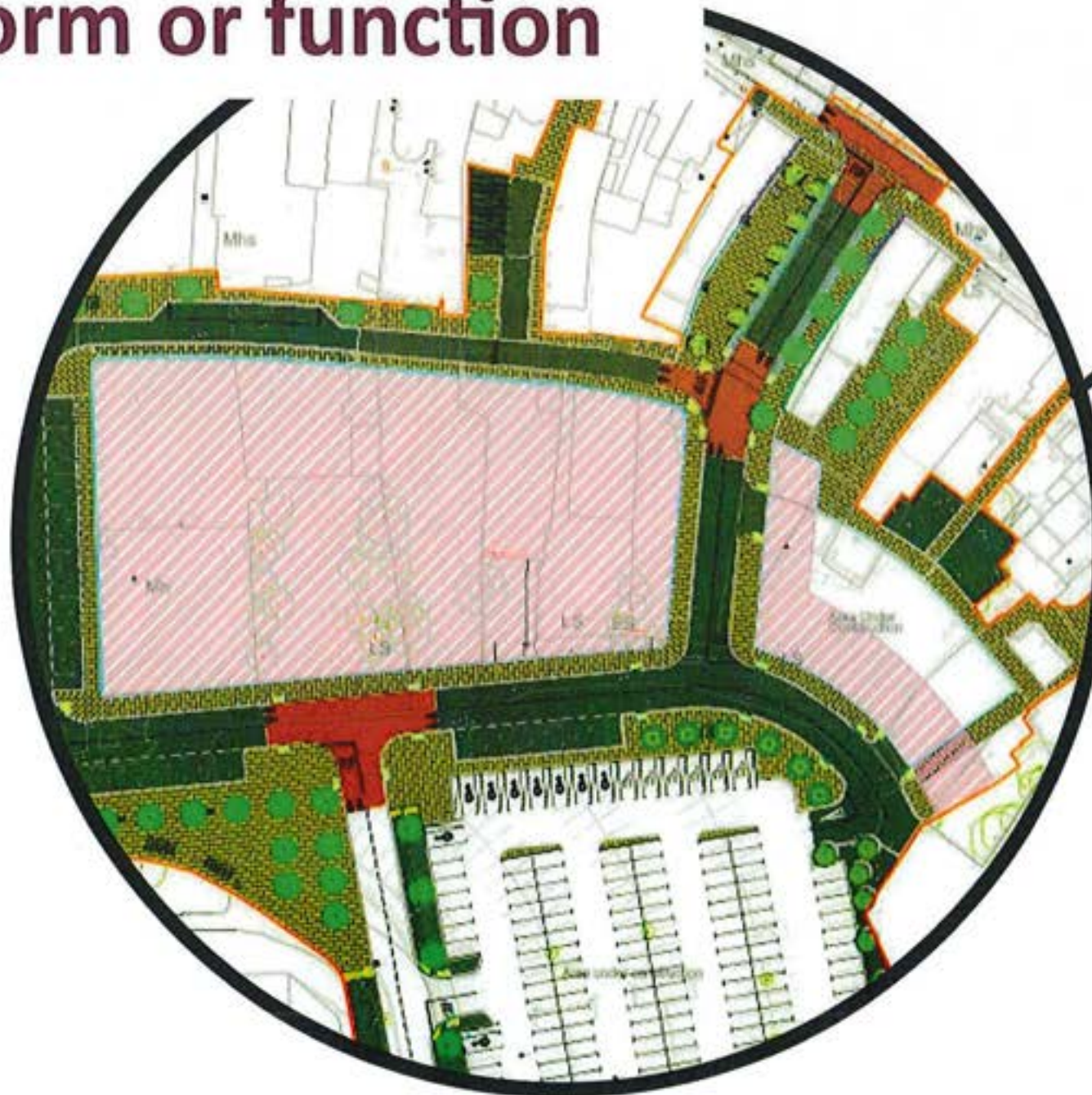


The plans ignore the opportunity to develop a high quality connection to the towns only moving water-body.



What will be in the Development Plots
& Who would want to live here?

A development of roads with no idea of building form or function



SOUTH DUBLIN STREET & BACKLANDS REGENERATION SCHEME, MONAGHAN TOWN CENTRE



Council of the City of Dublin
Monaghan Town Centre



DRAFT DESIGN PROPOSALS: GENERAL ARRANGEMENT

These draft design proposals aim to achieve the short term objectives for the South Dublin Street and Backlands area which focus on providing a new urban structure, space, connections, infrastructure, and a high quality public realm.

This includes:

- Creation of a new 'Duty Place'*
- Design of Church Walk, The Mill, Courthouse Square, and Family Road*
- New high quality public realm and amenity facilities including hard and soft landscaping
- Support services including utilities, EV charging, drainage, street lighting etc.

* These are indicative street names at present, and are subject to change and agreement at a later date.



We hope, if the offer is retail, that it is not a soulless multi national chain sucking life away from the independent retailers within the town.

We hope, that if it is residential that people are not forced to live in a location mainly overlooking a car park with no public open space and with views to a supermarket service yard.

The proposals could result in 4 buildings demolished on Dublin Street to create a road which views onto something potentially as soulless as this?

Without knowing the functions of the buildings and the needs of those users, the removal of buildings on Dublin Street is unnecessary.

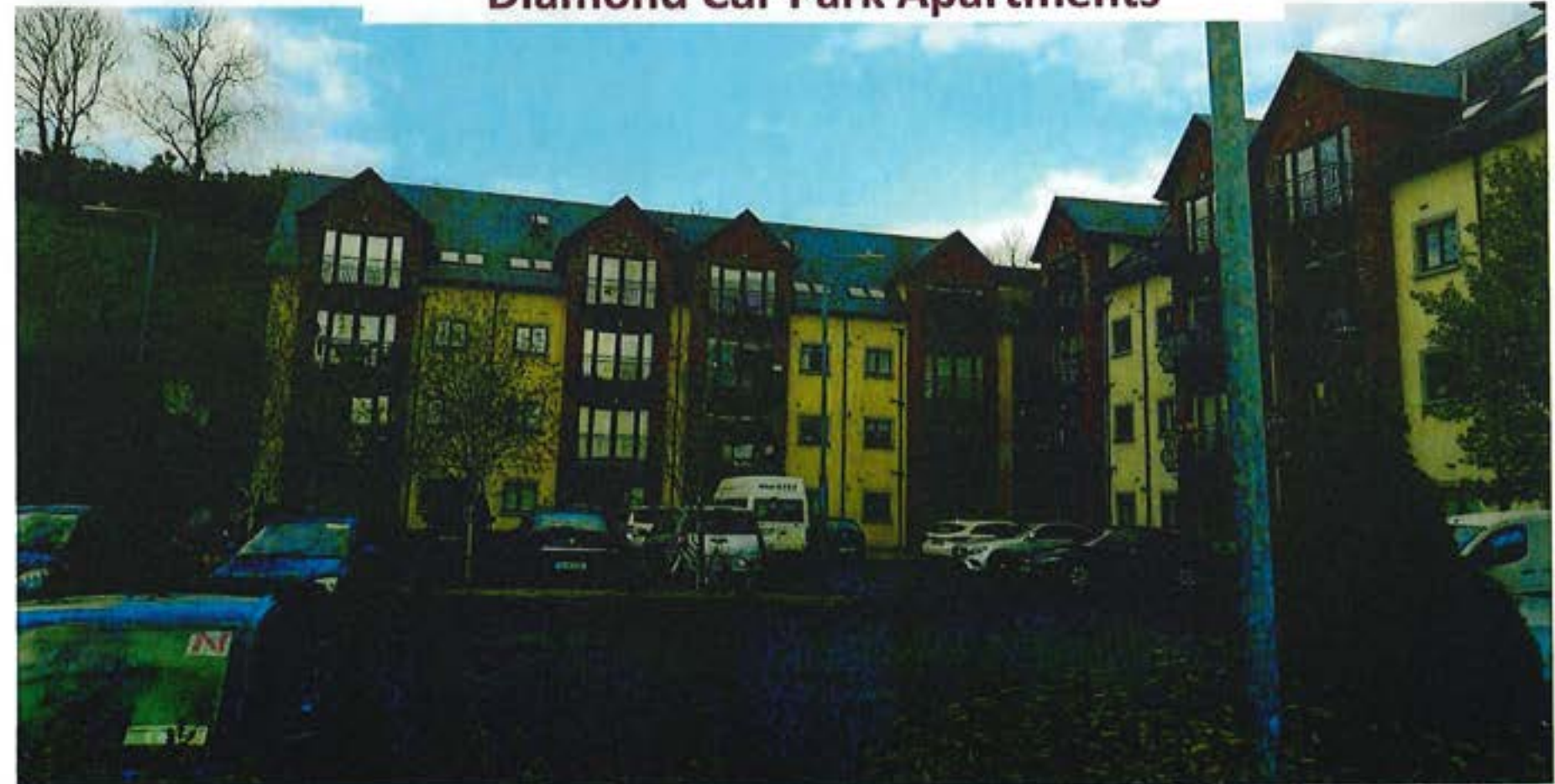


Are the proposals to develop a residential block without public open space, like has happened in Monaghan previously?

- Where children play in alleyways akin to post war inner city developments**



Diamond Car Park Apartments

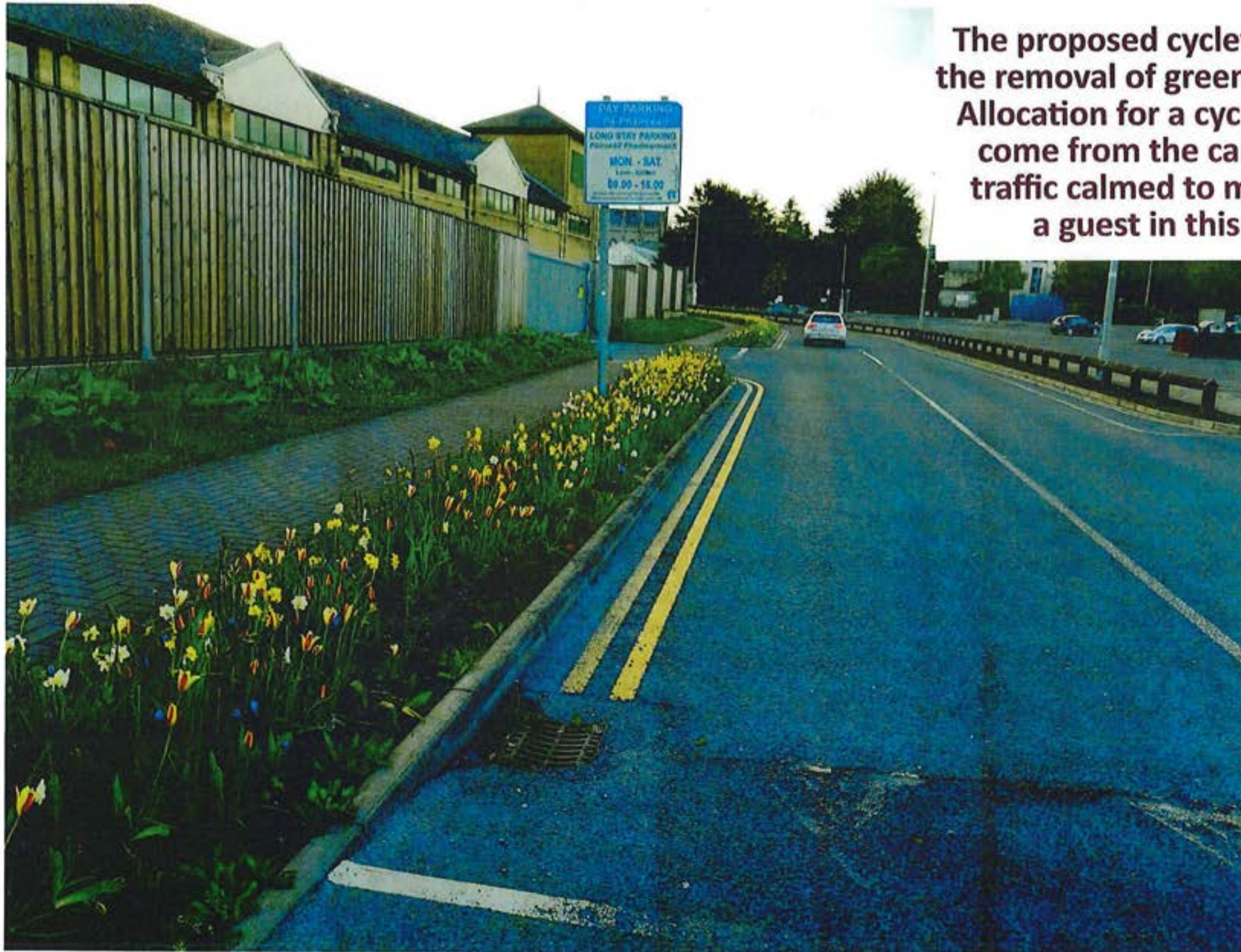


The proposed development concentrates on creating parking for private cars and roads without any thoughts on the livability of the area and the Town.

Credit Union Apartments - Gravel Car Park



The Wrapping Up - Additional Points of Note



The proposed cycleway results in the removal of green infrastructure. Allocation for a cycle way should come from the carriageway or traffic calmed to make vehicles a guest in this location.



Pedestrian circulation needs to be considered in the context of the entire movement in this location and not just from the car park to the shopping centre. Although not popular, the dedicated left turn should be removed and a raised pedestrian crossing added.

The development of the backlands keeps car parking and vehicle movement the dominate feature of someone approaching Monaghan by road.



No active kerbside frontage, only car park, blank facade, service yard. This does not create an inviting and desirable entrance to the town.





**Gavan Duffy's House N10
Dublin Street may in itself not
be architecturally significant
but within the context of
Dublin Street it is important
for the entire street scape.**

**Here is a photo of Nelson
Mandela's home, it is not
architectural significant. Would
anyone suggest the authorities
in South Africa knock it to build a
road and put some art on a wall as
a replacement to the actual house?**

Report Recommendations

- Retain the 4 No. buildings on Dublin Street, restore and regenerate them within the historic street context.
- The proposed road 'Gavan Duffy Place' should not be built. It is not needed and it has not been demonstrated that there was or ever will be a need for it.
- Consider the livability of the town in terms of people who might live in existing apartments/houses or proposed apartments in Dublin Street and surrounding areas. They require a high quality open space. The need for car parking does not override the needs of people to live, work and play in a safe, healthy and attractive location.
- Pedestrians and people spend money not cars and traffic. Regenerate Dublin Street to enhance the most of its wonderful character. Make the existing historic streets in the town comfortable & 'buzzing' with people & not stifled by cars and hostility.
- Change the project direction now before it's too late. Save Dublin Street and don't reinforce its faults. Its backlands can be redeveloped without damaging the historic scape of Dublin Street if it's done correctly.

About the Authors

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Eddie is a Chartered Landscape Architect with over 15 years experience in the design and delivery of award winning Landscape and Public Realm proposals. He studied Landscape Architecture in the UK which included a period of study of Urban Landscape Design in Finland. He has worked nationally and internationally within both the Private and Public Sector. Project experience includes Public Realm projects in Dubai, Public Realm Proposals within the Dublin Docklands, Village Regeneration proposals in Northern Ireland, City Centre Redevelopments in the UK, SHD's in Ireland, Regional Planning Proposals in Northern Ireland, Airports in India, Roads and Light Rail in the UK and Ireland and Coastal Resorts in Jordan. He has experience of presenting proposals to An Bord Pleanála.

Anne Kühnert Dipl.-Ing. CMLI

Anne is a non practicing Chartered Landscape Architect and former member of the Saxon Chamber of Architects. She holds a Masters with Distinction in Landscape and Open Space Planning from The Leibniz University Hanover, Germany. She has delivered high quality projects in Germany, UK, North Africa and the Middle East including Streets, Parks, Hotel Resorts, Schools & Airports.