



14 November 2024

The Forward Planning Unit,
Planning Department,
1 Dublin Street,
Monaghan Town,
H18 X982

To whom it concerns,

Re: Draft Monaghan County Development Plan 2025 – 2031

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995.

We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage. We welcome the opportunity to comment on the Draft County Monaghan Development Plan 2025-2031. Our comments deal with both built/ cultural heritage and natural heritage, as the matters appear in the plan. Ireland's national heritage is defined in the Heritage Act, 1995 as including: 'monuments, archaeological objects, heritage objects, architectural heritage, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens, and parks and inland waterways'.

National and Local Policy Context

It is important to state from the outset that the **National Planning Framework – Project Ireland 2040**, identifies "*Enhanced Amenities and Heritage*" as one of our national strategic outcomes. Within this, the NPF correctly notes that built, cultural and natural heritage has intrinsic value in defining the character of urban and rural areas, adding to their attractiveness and sense of place. National policy objectives 16, 17 and 52 in the NPF give further support to this ambition and there is a need to reflect this in county developments.

Development Plans – Guidelines for Local Planning Authorities were prepared for county and city councils in June 2022. Within these guidelines, there are detailed requirements for local forward planning objectives. Features of special architectural, historical, or natural value are our heritage assets, and mandatory objectives under the themes of 'heritage and landscape' have been identified throughout these guidelines. There is an obligation on local authorities to ensure the inclusion of such objectives in their statutory plans.

The 4th edition of Ireland's **National Biodiversity Action Plan (NBAP) 2023 – 2030** was published in January 2024. The NBAP states that "local authorities play a key role in

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biodiversity conservation through the planning system". There are several targets identified under Outcome 2A (*The protection of existing designated areas and protected species is strengthened and conservation and restoration within the existing protected area network are enhanced, regarding designated areas and protected species*) that are relevant for local authorities in their plan making functions. However, of key importance is Outcome 3C (*Planning and development will facilitate and secure biodiversity's contributions to People*). Action Numbers 3C2 and 3C3 are especially important, whereby the objectives of the NBAP are to be aligned and integrated within the statutory land use plans. In addition, actions 1B9, 1C5 should also be key considerations for all plans.

Heritage Ireland 2030 was published in February 2022 and details several action points relevant for local authorities and these should be included in forward plans. Most importantly are Action 22 - *Introduce policies on supports for urban biodiversity and tree planting*; Action 26 - *Support nature-based solutions for land-use management*; and Action 37 - *Integrate heritage considerations into urban and rural regeneration to ensure that built and natural heritage objectives underpin the planning and development process and inform the 'Town Centres First' policy approach*.

The **Guidelines for Planning Authorities on Architectural Heritage Protection** were developed in 2004 and give expression to the provisions of the Planning and Development Act 2000, with regards to built heritage. Chapter 2 and 3 give detailed guidance on the role of statutory county level plans with regards to the Record of Protected Structures and Architectural Conservation Areas. The Office of the Planning Regulator has also provided guidance on **Archaeology in the Planning Process** through **Planning Leaflet 13**.

The **Northern and Western Regional Spatial & Economic Strategy 2020-2032** is the current regional plan for the county of Monaghan. Whilst the RSES primarily deals with spatial planning matters at the regional level, Chapter 5 does provide policy on the environment, including natural heritage and built heritage. We would bring particular attention to RPOs 5.3 to 5.17 of this RSES.

General Comment

The Heritage Council notes that there is no specific chapter on placemaking and design in this draft county development plan. Accordingly, either a new chapter is needed, or clear objectives and policies for quality design should be drafted within an existing chapter. Whilst elements of good design and placemaking may have been included in the heritage, transport and climate change policies, there are no clear guiding policies, either at a strategic level or in individual chapters for the following:

- The importance of heritage led regeneration in towns and villages,
- The need for quality public realm and landscaping proposals, which work off inherent strengths such as existing heritage and landscape features.

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- The need for less traffic/car dominated streetscapes and greater pedestrianisation of towns and villages in the county.

In terms of the latter, the Heritage Council believe that the Irish town and village is under considerable threat. Vacancy and dereliction are evident in many settlements, which seems incongruous with the positive economic climate. One of the main issues is that towns and villages are often planned as a “*place to pass through rather than place to be*”, leading to an over engineered rather than a designed built environment. This leads to an unpleasant living environment, with car noise and “traffic outside the front window”, discouraging not just living in town but also a more vibrant on street terrace culture for the hospitality sector. This is a threat to town vibrancy, with dispersed housing patterns also not helping. The Heritage Council believe the Irish town and village is an important part of our national heritage and to see it fall further into decline would be a lamentable reflection of planning policy.

This issue should be noted upfront in a design and/or a placemaking strategic policy with adequate policy provided throughout the plan. An option is to include such policies in Chapter 9 – Strategic Objectives for Settlements – where there appears to be several themes covered, ranging from retailing and economic development to natural heritage and residential development. A placemaking and quality design section could be integrated into this chapter. The Heritage Council believes that currently the lack of a quality placemaking and design narrative is a major shortcoming in the draft Monaghan County Development Plan 2025-2031.

Please note that amendments to policies are suggested in this submission. Suggested additions are in **bold text**, with deletions via ~~striketrough~~.

CHAPTER 2 – Core Strategy

The core strategy strategic objective is overly skewed towards enabling development only. If the core strategy does need to reflect the National Planning Framework and the relevant Regional Spatial and Economic Strategy, then a more balanced objective is needed, one that reflects planning in the common good i.e. an orderly scheme of development in the light of known constraints and accepted opportunities. Accordingly, the following amendment (or something similar) to CSSO 1 is suggested:

*“To ensure that new development within the County will provide for sustainable and balanced development that enables economic growth, delivery of accessible and high-quality infrastructure and services, **in a manner that protects our rich heritage and environment**, and guides population growth in accordance with the settlement strategy”.*

The Heritage Council supports the policies and settlement strategy in this plan for consolidation and compact growth. At the level of first principles negative impacts on natural and cultural heritage are the result of poor and inefficient land use planning. Achieving more consolidated growth will reduce greenhouse gas emissions from the built environment, but it will also ensure that land take is restrained and does not pose undue threats to cultural and natural heritage.

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The Heritage Council has strongly supported policies that bring back the vibrancy and vitality of county towns, smaller settlements and villages. We therefore support policies for clustering activity for all the tiers of settlements in Monaghan, which is in line with national policy.

We also recognise the challenging issue of managing isolated rural housing. In this regard we note the emphasis that this plan has, through Policy SHO7, for “dispersed communities” as opposed to dispersed dwellings. It is very important that the idea of nodes, i.e. a crossroads with a church, a community hall, or another amenity is seen as a centre point for clustering rural dwellings. Scoping the potential for additional dwellings in these locations is an important recognition and reflects our position on planning policy in terms of providing modern day clachans/hamlets in such locations. While this may not be necessarily the most compact of rural settlement types, it does mitigate somewhat the negative effects of scattered rural dwellings.

However, the policy, as drafted, seems to exclude non detached dwellings or is overly prejudiced towards them. Whilst it may manifest that such dwellings around such nodes will be predominantly single dwellings, the policy should not presume against a small row of terraced dwellings/semidetached dwellings centred on such nodes either. This is still the most desirable compact form of development, and the policy may unintentionally prejudice such proposals. Therefore, the following amendment to the Dispersed Rural Communities Objective SHO7 is recommended:

*“To support the viability of dispersed rural communities as locations for sustainable housing and to seek to encourage the growth of Tier 6 settlements generally in the form of single dwellings **or small scale multi-house developments**”.*

Within the context of this issue, we also support Objective RSO1, which is extremely important. However, there is a need to review Objective RSP2 in this regard. This objective is rather negative and seems to set exceptional requirements for what is essentially development within settlements. It may also work against Policies RS01 and CSP 3. If such settlements are to provide a more sustainable alternative to one off housing, policy should be supportive of such locations. The requirement to provide an assessment of the development site relative to the location, visual impact and other normal planning considerations *“including the ability to consolidate the settlement, enhance the existing character and strengthen a sense of identity and distinctiveness for the settlement”*, seems excessive and we question if this would be required for more unsustainable locations. This policy needs to be amended. There is little justification for it, and as drafted, appears to put additional barriers to development in settlements above and beyond what is required in general development management proposals.

Figure 2.4 ‘determining density’ is an important diagram for informing efficient use of land. However, in step 1, accessibility must include access to amenities and services (i.e. the trip generating uses). Access to schools and employment in particular, and secondarily retail and leisure facilities are just as important as access to public transport. Both accessibility to amenities/services and public transport should be identified in this step.

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Whilst we recognise that this is sourced from the Compact Settlements Guidelines 2024, we suggest that Monaghan County Council bear this in mind when defining density levels.

Chapter 6 – Heritage, Conservation and Landscape

The Heritage Council has particular interest in this chapter. There are several important provisions that forward plans, both county development plans and local area plans, should make policy for. The highest designation in an Irish context is the natura 2000 network, namely Special Protection Areas, and Special Areas of Conservation. Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) sit beneath the European sites, while nature reserves may also be present in some local authority areas.

In addition, there are many locally important biodiversity sites, that provide important habitats for ecological assets commensurate with county/regional importance.

Monaghan is an example of a county where only a small fraction of the land area is designated for nature conservation. With the exception Slieve Beagh SPA/NHA and the Kilroosky Lough Cluster SAC, there are no designated nature conservation sites, with vast swathes of the county having no statutory protection. This would include wetland sites also. Accordingly, the Heritage Council not only supports Objective HCLO 3, but believe it is particularly necessary in a Monaghan county development plan.

The County does have several proposed Natural Heritage Areas (pNHAs), which identify further nature conservation sites. The county development plan is the only avenue through which such sites get protection. However, even with these sites included, the county still has a dearth of nature conservation sites. It is important to note at this stage that the Heritage Council aspires for the identification of locally important biodiversity sites, that will sit under NHAs in a hierarchy. However not all features will be worthy of this identification. Therefore, policies on green infrastructure networks/ecological corridors, which are present in this plan, are welcome in terms of their importance for ecological features that are critical for wider landscape level connectivity.

With this in mind, we strongly commend the identification of the proposed Natural Heritage Areas in Table 6.3. Their listing in such a format, and the summaries provided are needed in county development plans. In addition, the identification of County Sites of Biodiversity Importance is very welcome and aligns with the Heritage Council's aspiration for a universally applied locally important biodiversity sites identification process. Accordingly, we support objectives HCLP 5 and Policy HCLO 14. We would recommend that each objective/policy regarding NHAs/pNHAs and/or county biodiversity sites include a requirement for an ecological assessment.

With regards to the preamble to the objectives, specifically concerning Sliabh Beagh, it would be prudent to include [The Hen Harrier Threat Response Plan](#), and summarise this in the relevant sections. Given that Monaghan has one of the six SPAs for the Hen Harrier it is important to amplify its importance.

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The following points are also made:

- HCLO 13 needs to be revisited. The objective makes little sense to the reader, and it is not clear what “lower level of decision making” is.
- HCLO 17 – why does this objective confine the ambition for hedgerow and native planting to local authority owned development. This needs to be expanded to all developments, irrespective of the applicant.
- A policy is needed for the retention of natural features generally through site design iterations. The following is suggested:

“All developments, should seek to retain natural features e.g. hedgerows, stands of trees, minor watercourses, as part of the design of schemes. Unnecessary removal of any natural features will be resisted”

In relation to paragraph 6.11.1 *Areas of Primary Amenity Value*, “cultural heritage features” should be included in the last paragraph in this section and Policy PAP 1 amended as such:

*“To restrict development in Areas of Primary Amenity Value to sites where it can be demonstrated to the satisfaction of the Planning Authority that the proposed development would not threaten the scenic, **cultural and natural heritage**, or environmental quality of the area*

While for secondary amenity areas, the following amendment is recommended for Policy SAP 2:

*“To limit development in Areas of Secondary Amenity Value and to only permit compatible amenity developments where they do not unduly impact on visual amenity **or the natural and cultural heritage of the area**”.*

The Heritage Council welcome the inclusion of policies for County Geology Sites. Monaghan benefits from several unique geological sites. The Heritage Council believes that the work that the Irish Geological Heritage Programme undertook was of exceptional importance, and we welcome the inclusion of county geological sites in the Monaghan CDP 2025-2031. However, GEP 2 needs to be redrafted as follows:

*“Where a proposed development is likely to impact on the setting or integrity of County Geological Sites listed in Table 6.7, **an assessment of its impacts will be required and** of the Monaghan County Development Plan 2025–2031 the Geological Survey of Ireland shall be consulted. **Any proposal that has significant negative impacts will not be supported**”*

It is not necessary to mention the plan in the policy, and the protection of important geological sites should not be relying on an external organisation having the resource to respond to each application that may impact on a feature. The burden of proof should be put on the applicant in the first instance, while indeed the GSI should be consulted also.

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In terms of Policy GEP 5, emphasis on the Rockcorry-Cootehill ribbed Moraine and the Scotshouse-Redhills as unique landscapes, is important. This reflects the site summary for these assets and the Heritage Council recommend that they are reflected in the relevant landscape character assessments. In this context we note that this important area, which has been described as having the “*largest individual ribbed moraines found anywhere in the world*”, is not reflected in the primary or secondary amenity areas. This is a significant oversight and we recommend that the local authority familiarise itself with the [site synopsis](#), and ensure that these geologically unique landscapes are accounted for in landscape policies.

The Heritage Council wish to ensure that ecological networks are distinct amidst the general green infrastructure network. Several features of green infrastructure, particularly green spaces, active travel and recreation routes may have only limited ecological potential and depend highly on design and maintenance regimes. Within green infrastructure, there are two key ecological threads:

1. Sites – SPAs/SACs/NR/NHAs/pNHAs/County Biodiversity Sites or Locally Important Biodiversity Sites
2. General natural features/connections – ecological corridors/networks i.e. hedgerows/smaller stands of trees/watercourses, scrubland, smaller wetland sites.

Combined this is the ecological network of a county area. In general terms it appears that the green infrastructure policies in this plan are primarily drafted with ecology in mind, and accordingly we commend the local authority for this. The section has not been diluted by having multifunctional green infrastructure features i.e. parks etc, and this is important.

Designated sites, subject to our earlier recommendations, are adequately covered in the plan. We have also recommended a new policy for general natural features which accounts for the second point above. In general terms we believe that Objective GIO 5 seeks to achieve this, while the subsequent policies on wetlands and woodlands, particularly TWP1, does go some way to addressing our previous point. This policy has rightly identified hedgerow loss in rural areas as an issue in the preamble to the policy.

Whilst agricultural activity may be outside of the planning remit, it was correct to identify one off housing as a threat to hedgerows. Often there is needless removal of mature trees and hedgerows, of considerable character and ecological value, as part of site works to ‘tidy’ the site before construction commences. While opportunity sites within the town or any phased greenfield release should also have stringent design standards for retention of natural features. Therefore, this policy is particularly important, and we support it.

A concern of the Heritage Council is that often county development plans state an ambition to achieve something as part of an objective, when in fact, it should be the objective. With specific regard to Policy TWP2, the Tree Preservation Orders should be designated as part of the plan, rather than having an aspiration to designate.

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6.17 Architectural Heritage and Architectural Conservation Areas (ACAs)

The Heritage Council continue to believe that the statutory protection of structures through the Record of Protected Structures (RPS), and/or collection of structures and features through ACAs, remains the most important heritage protection function in Irish planning. Two strands of policy initiatives need to be pursued in this regard:

- The continued re-use of such assets, which is essential for their maintenance, vitality and long-term protection.
- The protection of their key features of interest, including their setting and context.

Accordingly, we believe that Objective BHO1 hits the right balance in this regard. In addition, the Heritage Council consider entire settlements as being part of our heritage, and therefore non designated vernacular structures, particularly linear townscapes and smaller villages should also be supported by planning policies. Objective BHO5 rightly notes this, and we support this policy.

However, the Heritage Council is concerned that more minor planning considerations such as development management standards with respect to parking, amenity distances etc, may be compromising more important strategic planning objectives. Smaller rural towns to larger county/regional towns are suffering from vacancy and dereliction. Compact growth policies at national level are seeking to address this issue. Yet, continued car dominance in such settlements and dispersed housing patterns are undermining settlement viability.

At the very least, policies in county development plans should not apply rigid standards to the re-use of designated and non-designated heritage properties. It is with this in mind that we strongly support Policy BHP5 in this section. We would only suggest that the first line is amended to include “non designated heritage assets”. These would include vernacular buildings in villages and towns, and properties listed on the NIAH, and in particular properties which may not be protected by ACAs. In terms of ACAs, we note that there are 20 designated ACAs and generally support the policies and objectives as drafted.

Section 6.17.2 Architectural Conservation Areas (ACAs) notes the presence of ACAs in Monaghan town, Carrickmacross, Clones, Castleblaney as well as the proposed ACA in Castleblaney. The objective ACO 1 seeks to ‘*To carry out a comprehensive review of the Architectural Conservation Areas within the County during the lifetime of this Plan, subject to available resources.*’ However, there appears to be an absence of detailed mapping of ACAs in the plan as presented, which is unusual and needs to be rectified for the sake of clarity. There may also be cases where adjacent ACAs could be merged but it is difficult to assess this in the absence of any concise mapping. A strategic map of the ACA locations should be provided, while each of the village and settlement plan maps should clearly show them. There appears to be a “landscape/Conservation” label in the legend to each settlement plan map. These should be amended to more accurately reflect the ACA designation.

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We support the objective of carrying out a review of the ACAs and we suggest that a key measure to deliver this is the employment of an Architectural Conservation Officer to address not just this, but also planning and development as it relates to Protected Structures; heritage-led regeneration; and the efficient management of grant aid to the Council and building owners.

Archaeological Heritage

Archaeological heritage in Ireland is rich and forms part of our cultural and physical landscape. This section in this chapter rightly notes some of the threats to archaeology and has provided objectives/policies to mitigate such threats. The section also provides a good example of the need to better distinguish objectives from policies. In effect, objectives are a targeted goal, whereby policies are needed to achieve such goals. As such, the number of policies should be greater than objectives, as essentially the former are needed to achieve the latter. Some policies need to be refined or added to achieve each objective. In this regard we have the following recommendations:

- A new policy should be drafted that prohibits development on archaeological sites. This policy should then establish exceptional circumstances for any negative impact on archaeological sites or features, and also the required archaeological assessment required.
- Amend PMP 1 as follows - *Development adjacent to an archaeological monument or site will only be acceptable where it is sited in a manner which **ensures that there are no significant** minimises the impacts on the monument and its setting. Development which is likely to have an adverse impact upon an archaeological monument or site or its setting shall be resisted*
- A new policy is required to follow immediately from Policy PMP2 that states the following: *“PMP X - In cases where preservation by record is required, information and interpretation of the historic archaeology in and around the site should be part of the design considerations for the site. This can be achieved by street naming, and landscape and public realm design”*
- A new policy that establishes public rights of way to archaeological sites, through the development plan, and ensures that development proposals do not prejudice or compromise access to such sites is also needed.

Chapter 7 Transport and Infrastructure

The Heritage Council support public transport and walking/cycling infrastructure as one of the main ways through which the planning system can contribute to reducing greenhouse gas emissions. In this regard the integration of patterns of developments and transport are key. The following amendments are suggested:

- “regarding TISO 1 – *“To promote and facilitate a sustainable, efficient, and integrated transport system and ease of movement throughout County Monaghan by enhancing the existing and delivering new transport*

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*infrastructure in terms of road transport, public transport, cycling and pedestrian facilities, and by promoting more compact urban forms close to existing **or planned** facilities to encourage more sustainable movement patterns and to reduce carbon emissions”*

- A new objective, as per the following is recommended: *TOX – “To ensure that patterns of development and transport are integrated in order ensure that new developments are conducive to public transport roll out and walking and cycling”.*

In addition, the Heritage Councils strongly support active travel, including strong commitments to the construction of cycle lanes, and adequate cycle parking in new developments for all uses.

Chapter 8 Environment, Water services and Climate Change

There is comprehensive information in this section on waterbodies, groundwater and water quality. However, the issues detailed in the section are not matched by the necessary number of policies. While there are nine Water Protection Objectives, there are only two policies to help achieve them. As an example, the policy on supporting SUDs, should be subsequently supported by a detailed requirement on SUD design in development proposals that includes reference to any relevant guidance.

Similarly, WPO7 details an objective on agriculture and intensive farming, yet lacks detailed policy to achieve the objective. As an example, water impacts of this sector are largely outside the remit of the planning system, yet applications for slatted sheds are increasing, which are needed for storage of slurry during the non-spreading season but will eventually need to be emptied. Accordingly, there should be a policy that account for the development management considerations associated with agricultural buildings such as slatted sheds, within the context of water quality.

Similarly, there are no detailed development management policies for renewable energy. Whilst there are general “support” objectives, there does need to be greater tangibility for developers and communities in relation to the design and installation of renewables infrastructure. The Heritage Council support renewables, as mitigating climate change is a matter of natural heritage importance. We would recommend that county development plans give greater clarity in policy drafting in terms of how renewables interact with built, cultural and natural heritage assets.

We note the climate action objectives which are welcome. Because climate action and sustainable development generally are threads that follow through a development plan, we recognise that many of the policies required to implement the objectives will be in other chapters. We recommend that this is emphasised in this section. In general terms, the Heritage Council believe the following are the keyways in which the planning system can aid climate action and recommend that these themes are adequately addressed in each section, if they have not been already.

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- Ensure efficient use of land to reduce the built environment footprint and encourage non-vehicular transport modes.
- Avoid sites that have high ecological potential, informed by habitat mapping.
- Reuse of the embedded carbon in existing stock including vacant buildings.
- Ensure that brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development.

We would also recommend to Monaghan County Council that any flood defence measures should be considered at the entire catchment level in the first instance. There is opportunity to manage flood risk via nature-based solutions, whereby lands liable to flooding should be avoided in terms of development, while at the same time natural habitats should be allowed to replenish in these flood plains. Flood plains should be the “low hanging fruit” for ecological restoration measures given their unsuitability for development. While it is recognised that in established urban areas, flood relief schemes may be needed; in the first instance, a whole river basin catchment approach to managing flooding should be pursued (as noted under actions 2D6 and 2D7 of the NBAP 2023-2030). In this regard we strongly support Objective FRMO 4 in this section.

Chapter 9 – Strategic Objectives for Settlements

In general terms the Heritage Council welcomes the policies in this section on regeneration and compact growth. Proactive land activation in brownfield locations is needed. In addition, we note the natural and built heritage policies in this section, and commend the commitment to identify further ACAs, as well as Objective NBHO 3 to protect natural features. We would recommend that further Tree Preservation Orders be undertaken in settlements, given the important role stands of trees have for the character and natural heritage of towns. Heritage led regeneration and conservation through use should also be emphasised in this section, as per our general comment earlier.

Chapter 10 – Monaghan Town Settlement Plan

The Heritage Council funded the Monaghan Historic Towns Initiative Report, due to be finished in late 2024. This initiative is to develop a heritage led regeneration plan for the town. Initial work has identified historic character areas, key issues and opportunities. Specific policies and actions will be identified, many of which provide good placemaking and design approaches, based on existing heritage which cannot be recreated and replicated.

It is therefore concerning that there appears to be little mention of this plan in this chapter. Whilst the intention is noted on page 238, there are no objectives, nor detailed information on the heritage led regeneration plan, which should influence the future development trajectory of the town. The consultation on this draft county development plan will end in November 2024. Therefore, there is adequate time to integrate fully the Monaghan Historic Towns Initiative Report into this chapter, which is necessary. This should not be conducted by a single policy seeking to implement, where appropriate, the heritage led

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regeneration plan but rather it should inform this entire chapter, as it touches on several different policy objectives. In addition, many of the policies in the Monaghan Historic Towns Initiative Report will provide some placemaking and quality design actions that can be used to address the lack of such policies in this draft of the plan.

Mapping and Zoning

The Heritage Council recommend that all nature conservation sites, including county biodiversity sites and pNHAs are fully illustrated and captured in the mapping that accompanies the plan. Similarly, ACAs, national monuments and the record of protected structures, landscape designations and county geological sites should also be made visible. This should be achieved via a GIS Layer with the information provided on the development management map viewer platform also. This is essential for both prescribed bodies and the public in general.

Strategic Environmental Assessment/Appropriate Assessment

There will be an SEA and AA required for the CDP. There is a need to ensure that all future policies drafted are individually assessed against the SEA objectives. The Heritage Council recommends that the SEA guidance prepared by the Office of the Planning Regulator (OPR) be consulted when preparing the SEA for the CDP. The relevant guidance on the *Appropriate Assessment of Plans and Projects* is also available from NPWS.

Conclusion

The Heritage Council strongly encourage Monaghan County Council to continue to acknowledge the primacy of the county's heritage resource. The built and natural heritage of the county should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development for Monaghan.

I trust these comments will be considered carefully as Monaghan County Council progresses the Monaghan County Development Plan 2025-2031.

Please do not hesitate to get in touch with any clarifications.

Yours sincerely,

Virginia Teehan
Chief Executive Officer

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