

From: Alison Harvey <aharvey@heritagecouncil.ie>
Sent: Wednesday 19 October 2022 10:10
To: Appeals2 <appeals@pleanala.ie>; Bord <bord@pleanala.ie>
Cc: Alison Harvey <aharvey@heritagecouncil.ie>; Ian Doyle <idoyle@heritagecouncil.ie>
Subject: Planning Reference No. N12162 - Monaghan Urban Regen Proposals

Hello,

The Heritage Council's submission in relation to the above proposed development in Monaghan Town Centre is attached. I would be grateful if you would place this document on the public file.

Best

Ali

Alison (Ali) Harvey BSc (Hons) MSc PGDip PM

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The Heritage Council
Áras na hOidhreachta
Church Lane
Kilkenny R95 X264
IRELAND

An Chomhairle Oidhreachta
The Heritage Council



Charity Reg no: 20036867

T: 00353 56 7770777

M: 087 419 3458

E: aharvey@heritagecouncil.ie

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1.0 HERITAGE COUNCIL SUBMISSION - INTRODUCTION

The Heritage Council supports the planned regeneration of Monaghan Town Centre in principle. However, there are several concerns in relation to the proposed development, as submitted to An Bord Pleanála in August 2022. These are set out below under the following headings:

- 1. Outline appraisal of the built heritage of Dublin Street, Monaghan, and vicinity;**
- 2. Heritage Council funding for Monaghan Town, e.g. No. 24 Dublin Street (Sherry's) & Monaghan Town CTCHC - ongoing;**
- 3. Town Centre First (TCF) & the Collaborative Town Centre Health Check (CTCHC) Programme;**
- 4. Dublin Street Regeneration Plan by Sheridan Woods for Monaghan County Council, 2017;**
- 5. Need to Consider Climate Change Action Plan, 2021 (updated May 2022);**
- 6. Need to Consider - Places for People: National Policy on Architecture, published by Department of Housing, May 2022;**
- 7. Need for Architectural Conservation Officers (ACO) and Built Architects in Local Authorities;**
- 8. Need for a Design Palette and a Public Urban Design Panel;**
- 9. Liveability and Residential Amenity: Heritage Council's Historic Towns Initiative investment in Dublin Street, Monaghan;**
- 10. Protected Structures & Concept of Curtilage re. No. 24 Dublin Street; and**
- 11. Proposed demolition of a former protected structure and birthplace of Charles Gavan Duffy; and**
- 12. Need for Sustainable Development in Ireland.**

1.1 Outline appraisal of the built heritage of Dublin Street, Monaghan, and vicinity

Dublin Street is relatively narrow, threaded around the foot of the drumlin hill which is crowned by the site of an original fortification of Monaghan, according to the Urban Archaeological Survey. In addition, the burgage plots (subdivisions of land into long parcels associated with street frontage buildings) provide yards, storage, workshops and other outbuildings, and gardens. The street is characterised by a variety of building ages and types, two, three and four-storeys high. There is a wide variety of façade treatments, but most use a common language of vertical rectangular windows to upper floors, and street-level frontages as open as possible to commercial interaction with the pavement area. This diversity is a positive contribution to the historic streetscape and character of the Dublin Street Architectural Conservation Area (ACA).

The multiplicity of laneways to both sides gave access to rear gardens and outbuildings (including former smaller houses), which serviced the needs of the town for workshops, storage and the processing of agricultural produce from the rural hinterland. This porous urban structure allowed for functional variation, including a variety of house sizes within a heterogeneous urban fabric with clear and legible form. The lanes, outbuildings and gardens are still of functional value to the urban space, permitting residential amenity (or 'liveability'), wildlife reservoirs, space for micro-enterprises, etc. Many of the carriageway arches and gaps between buildings to the south-west side of Dublin Street give access to the car parking and a modern, large-scale, shopping centre. The historically determined urban pattern of burgage plots and lanes has served the functional life of Monaghan well for centuries and is an important historical characteristic that provides quality of life, sustainability and a sense of place - heritage 'time-depth'.

It is recommended that the development proposal be significantly altered to conform to this pattern, and not to break it by the opening-up of a large hole in the street elevation by the demolition of Istanbul, the birthplace of Charles Gavan Duffy and the Best4U shop and adjoining shop and house.

Photographs of these traditional buildings are provided at *Appendix 1*. Adequate permeability already exists between Dublin Street and the large open commercial area and car parking to the rear.

*Monaghan County Development Plan 2019–2025*¹ designates the Dublin Street ACA (p. 132), specifying the house numbers that are contained in it (Nos 15,31-50, 58,59, 63,64). The policy relating to this area (ACP 2) states:

“To resist development that would adversely affect the character and appearance of the Architectural Conservation Area. New development or alterations to existing building(s) in an ACA shall reflect the historic architecture in terms of scale, design and materials used.” (p. 132)

Even though the buildings included in this ACA appear arbitrarily limited and not to contain all the buildings of note and of similar character in the vicinity, it should be noted that every ACA has a unique setting. No. 50 Dublin Street, is, according to the Eircode map (<https://finder.eircode.ie/#/map>), opposite No. 14 Dublin Street, and clearly intervisible with Nos. 8 to 11 Dublin Street, which it is proposed to demolish. This proposal will thus affect the historic setting, and therefore the character of the Dublin Street ACA, designated in the *Monaghan County Development Plan 2019 - 2025*.

The proposal includes the demolition of four historic buildings that front onto Dublin Street. This is regrettable from the point of view of their historical worth and contribution to the setting of the Dublin Street ACA. They contribute to the very definition of what an ACA is meant ‘to preserve the character of a place, area, group of structures or townscape, taking account of building lines and heights’ (S. 81(1), Planning and Development Acts 2000-2019).

It has been said that the rear elevations of buildings can be as interesting a part of their architectural history as formal frontages:

*“The selection, such as we get in the pages of Bannister Fletcher, of those buildings which are generally approved and admired, as solely constituting the history of architecture is misleading to say the least. The backs of Georgian houses in Bath and Dublin are just as much a part of history as the sedate facades, and to the architect who thinks historically they are of great interest.” (Bruce Allsop, *The Study of Architectural History*, Studio Vista, London, 1970, p.83).*

The glimpses of the rear(s) of the Dublin Street buildings confirms their visual contribution to the unselfconscious streetscape of the town and their historical value.

1.2 Heritage Council funding for Monaghan Town, e.g. No. 24 Dublin Street (Sherry’s) & Monaghan Town CTCHC - ongoing

As An Bord Pleanála is aware, the Heritage Council has been advocating for a heritage-led approach to town centre regeneration for several years through its statutory policy advice role and its programmes and projects. This includes funding to Monaghan County Council’s Heritage Unit in 2022 of €247,952 for the re-establishment of residential use and external enhancement to 8 no. buildings and internal refurbishment to 2 no. buildings on Dublin Street.

¹ <https://monaghan.ie/planning/wp-content/uploads/sites/4/2019/04/Monaghan-County-Development-Plan-2019-2025.pdf>

One of these historic buildings/protected structures – No. 24 Dublin Street known locally as ‘Sherry’s’ will be refurbished with funding from the Heritage Council and Department of Housing’s Historic Towns Initiative (HTI) and includes outbuildings within the curtilage of the protected structure. The protection and enhancement of historic buildings and structures within the curtilage of a protected structure is an established best practice conservation principle.

These same outbuildings are due for demolition under this development proposal, which is to be funded by the URDF. We return to the issue of protected structures and curtilage in Section 1.9 below.

1.3 Town Centre First (TCF) & the Collaborative Town Centre Health Check (CTCHC) Programme

The Heritage Council is a champion for a Town Centre First (TCF) Policy in the country, which emerged through its detailed planning policy submissions^{2,3} - the heart of this now established national policy is to value, promote and enhance the cultural uniqueness and identity of our historic towns and town centres throughout the country. The focus for the Heritage Council in this regard is to ensure that historic towns/town centres have a quality design-led approach to regeneration, which embraces all components of heritage at its core, particularly in relation to in-fill developments and the regeneration of important backland sites. As part of this strategic and evidence-based approach to regeneration, a detailed CTCHC landuse survey and consumer survey⁴ were undertaken in Monaghan Town in 2016, as part of the pilot CTCHC Programme, in partnership with Monaghan County Council.

This CTCHC research informed the regeneration plan for Dublin Street and the Heritage Council supported the formulation of the award-winning, design-focused Regeneration Plan by Sheridan Woods for Monaghan County Council in 2017. It should be noted that the 2017 regeneration plan was formally adopted by Monaghan County Council on the 2nd October 2017. As such, the applicant’s planning statement appears to submit that only Protected Structures are worthy of retention and further argues that there is no impact from the proposal on the coherent historic streetscape of Dublin Street.

1.4 Dublin Street Regeneration Plan by Sheridan Woods for Monaghan County Council, 2017

This design-led and people-focused regeneration plan, which was created by a multi-disciplinary team, including urban design and heritage/conservation experts, was funded by Monaghan County Council in partnership with the former Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs. Section 5 of the plan sets out numerous design objectives, which are relevant to the historic town centre and the proposed development, as follows:

- 1. *Promote the creation of a traditional street/public spaces as the primary circulation routes, with active ground floor uses, fronting onto Gavan Duffy Place, The Mall and Courthouse Square, and as appropriate facing Church Walk;***
- 2. *Ensure that the public realm is characterised by high quality materials such as paving, street furniture, lighting and planting. Opportunities for public art should be created particularly in public squares; Courthouse Square and Gavan Duffy Place;***

² <https://www.heritagecouncil.ie/content/files/Submission-to-Louth-County-Development-Plan-2021-2027.pdf>

³ <https://www.heritagecouncil.ie/content/files/Workshop-for-Owners-and-Leaseholders-of-Vacant-Property-in-Dundalk-Feedback-for-agreement.pdf>

⁴ https://www.heritagecouncil.ie/content/files/Monaghan_Town_Centre_Consumer_Surveys.pdf

3. *Provide positive interaction between spaces and the built form, e.g. building frontages, windows and entrances should face onto and overlook the street and public spaces...;*
4. *Promote a design-led approach to the redevelopment of infill and new development sites;*
5. *Ensure that development delivers quality, attractive urban environments and a high level of amenity for commercial and residential developments;*
6. *Ensure that development provides for the sustainable conservation of the architectural, social and historic heritage of the area, and promotes the adaptation and reuse of protected structures;*
7. *Provide a detailed design statement for all new buildings proposed, i.e. for sites in excess of 500 sqm;*
8. *Provide for the use of high quality materials which are durable and require a low level of maintenance, use of local or indigenous materials.*

The Heritage Council submits that the proposal does not adhere to the detailed design objectives as set out in the 2017 Plan. It is further submitted that the Environmental Impact Assessment Report, (hereafter referred to as the EIAR), lacks detail on how the overall design rationale was informed and guided by the adopted regeneration plan for Dublin Street South and its detailed design objectives.

For example, the treatment of the proposed Gavan Duffy Street and new vehicular junction do not adhere to the overall design principles set out in the 2017 Plan, i.e. the proposal does not have any active frontage on Gavan Duffy Place. In addition, there is no detailed design statement to accompany or as part of the EIAR, which means that the proposed materials have no local context or continuum of Monaghan's unique materiality. Principally, this proposal claims to create a 'vibrant public space' and a 'much enhanced public realm' but fails to address the principal ways that this will be delivered, through defining uses, morphology, elevational treatment. The only elevations that are provided within the planning submission is one for a wooden fence beside the 'Northern Standard elevation' and the ESB substation.

The achievement of this key design objective from the 2017 plan of creating an active ground floor is completely lacking in the proposed development. The failure to submit elevations for all sides of the new space is indicative of the failure to address this positive interaction with a historic street. Urban design methodology requires envisaging a suitable morphology to generate the vitality aspired to in any proposal. This is entirely lacking in the planning application documents submitted. Surfacing materials cannot be used to substitute for the importance of three-dimensional development in a historic core. The application lacks any information on the qualification of the professional team in this regard. The historical urban design context described within the planning statement is limited to a single paragraph.

Given the importance of this historic street in terms of urban form and fabric, it is submitted that the scheme is a modern car-focused proposal rather than people-focused/human-scale as proposed by the 2017 Plan, i.e. the proposed scheme does little to add to a walkable historic town centre. For example, there is no attempt to provide detail of elevational treatment, other than the gable length treatment of 'Charles Gavan Duffy Place', the 'Northern Standard' which provides for a 'high quality wooden fence' and the front and side elevational treatment of the ESB sub-station.

The creation of a vibrant public/urban space is dependent on the delivery of uses which support this animation.

No attempt is made to identify such appropriate uses, or to envisage the 'seamless integration between the historic and the new'.... Indeed, the planning statement fails to comment positively on the existing heritage of the streetscape that it professes to 'enhance'.

The submitted drawings e.g. proposed elevations require a radical rethink, in order to create and enhance an intervention at a 'human-scale' that contributes to the overall vitality and vibrancy of Monaghan's historic core. As noted above, it is somewhat ironic that the Heritage Council is refurbishing in one location in the historic core whilst this application includes the proposed demolition of a former protected structure on the same street – it should be highlighted that demolition is contrary to current EU thinking in relation to the EU Green Deal and the New European Bauhaus (NEB). The lack of any urban design input is notable and lamentable and has led to the submission of a deficient and unsatisfactory description of the historic / built fabric context of Monaghan Town.

Further, in the interests of transparency, the Heritage Council would also submit that historic building(s) should not be taken off the list of protected structures without input from a LA ACO. In the interests of transparency, it would be prudent to provide details of the date of this decision.

It is also unclear from the documents submitted if a registered Conservation Architect is part of the overall project team for the proposed development.

1.5 Need to Consider Climate Action Plan: Securing Our Future, 2021 (updated May 2022)

The submitted EIAR makes no reference to the Climate Action Plan 2021. According to Chapter 5 of the Climate Action Plan 2021:

"Since the publication of the Climate Action Plan 2019, there has been a significant strengthening of the governance structure to support ambitious climate action, underpinned by the enactment of the Climate Action and Low Carbon Development (Amendment) Act 2021. We now have a legally binding target to be climate neutral no later than 2050, and to reduce emissions by 51% by 2030".

The Climate Action Plan continues, *"The Climate Action Delivery Board will ensure that each department and public body is held to account for the delivery of actions set out in the Climate Action Plan. The Board will also review key strategic projects and areas of work.."*

Chapter 9 of the Climate Action Plan highlights that: *"Local authorities, in particular, have a pivotal role to play in the decarbonisation transition, including through spatial planning, the provision of public housing and transport infrastructure, and the maintenance of biodiversity"*.

Chapter 13 of the Climate Action Plan highlights that the (now published – see below) National Policy on Architecture has, as one of its objectives, the design of places for climate neutrality, climate resilience, circularity and sustainability. The policy will prioritise and support the integration of sustainable practices in architecture with respect to new construction, and the reuse, refurbishment and conservation of existing structures, as flexibility and adaptability are essential to environmental sustainability.

The submitted scheme is contrary to the Climate Action Plan 2021. It is also unclear the level of the Climate Action Regional Office's input into the EIAR and in turn in relation to delivering the *Monaghan County Council Climate Change Adaptation Strategy 2019-2024*.

1.6 Need to Consider - Places for People: National Policy on Architecture, published by the Department of Housing, May 2022

The submitted EIAR makes no reference to the important document *Places for People: National Policy on Architecture*⁵, which was published by the Department of Housing, Local Government and Heritage in May 2022. This new policy speaks very much to the New European Bauhaus (NEB), which is a key EU initiative. This important policy contains four objectives, namely:

The aim of Objective 1 is to prioritise and support sustainable practices with respect to reuse, refurbishment and conservation of buildings as well as well-considered interventions and infill, and new buildings and places, where necessary. Carbon neutrality and built longevity, flexibility and adaptability are essential to environmental sustainability;

The aim of Objective 2 is to deliver quality architecture and places, planned and designed with wider engagement and accessible to all, in rural area and villages, towns, cities and suburbia as an essential element of social sustainability;

The aim of Objective 3 is to encourage leadership within the public sector and to show the importance of leadership at all governance levels and across the community of architects, architectural technologists and architectural conservation professionals in practice, education, engagement and policy/advisory/regulatory roles to support the delivery of high-quality built environment;

The aim of Objective 4 is to promote the architecture as a continuum, inextricably linked to society's past, present and future as both an art form and a science. This objective recognises the contribution that architecture makes to the form, character and health of places, communities and livelihoods.

The Heritage Council submits that the EIAR does not include this important policy document and as a result fails to embrace the recent 'cultural shift' towards quality design-led, people-focused urban areas. This can only be demonstrated through envisaging uses and morphology (building widths, heights, etc), i.e. building form. The EIAR fails to address built heritage, which the consultants note is a 'critical environmental consideration'. In addition, the EIAR fails to demonstrate how it delivers a 'much enhanced public realm' despite its claims to do so.

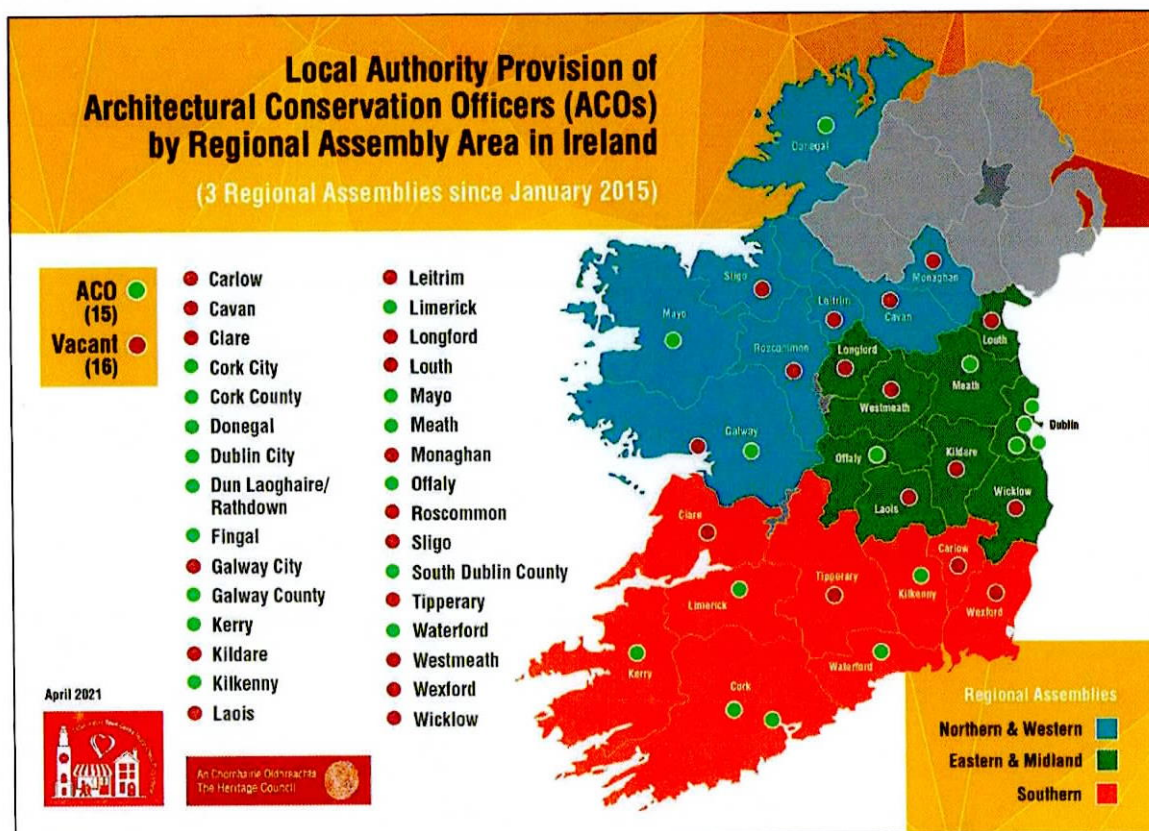
As noted above, the project team has failed to involve the appropriate disciplines, namely urban design and conservation. The EIAR fails to include a requirement for a Heritage Impact Assessment (HIA) prior to the demolition of a strategic stretch of built heritage streetscape (vernacular heritage, which needs to be understood and accepted as part of our urban historic/heritage environment).

1.7 Need for Architectural Conservation Officers (ACOs) and Built Architects in Local Authorities

Given the growing importance of built and cultural heritage policy at a European and National level, the Heritage Council wishes to highlight that Monaghan County Council is currently without an Architectural Conservation Officer (ACO) and/or LA built architect to input and guide this important proposed town centre regeneration project, which is intended to be funded by public monies under the URDF. As such, the proposed scheme lacks a design focus and rigour that is centred on the unique built and cultural heritage of this important border county town. The consultants have failed to acknowledge the need for a multi-disciplinary design team that should address the key components of urban design and built fabric.

⁵ <https://www.gov.ie/en/publication/f9879-places-for-people-national-policy-on-architecture/>

The Heritage Council's concern for the lack of LA ACOs warranted the preparation of a map in 2020 and again in 2021 to raise public awareness of the importance of an ACO to guide publicly (and privately) funded built heritage programmes and projects - see below:



Please note that the LA ACO map will be updated in October 2022 as part of a time series to highlight gaps in relation to heritage management within the national planning system. The Heritage Council further submits that it is not best practice for public monies to be spent on the regeneration of historic town cores without the expertise and input of a LA ACO as part of the overall process.

1.8 Need for a Design Palette and a Public Urban Design Panel

In addition to the lack of a design statement as noted above, the proposed materials for the scheme are not linked to any agreed quality design palette for the historic town centre. Such a design palette for materials and detailed scheme to deliver a vibrant public space, would have involved significant input and direction from local and national heritage experts and from key stakeholders including civic and business leaders to ensure that the unique character, [historic] materiality and distinctiveness is being valued, understood and enhanced.

The scheme, which involves significant public monies and is of huge public interest to Monaghan's citizens and its diaspora, would also benefit from the establishment of a Public Urban Design Panel, as per other developed countries – see Vancouver's Urban Design Panel which was set up in the early 1970s⁶.

⁶ <https://vancouver.ca/your-government/urban-design-panel.aspx>

Given the lack of these key design components, the Heritage Council submits that the planning application is premature and requires more consultation and engagement and detail to ensure that any proposal brought forward is for a high-quality addition/infill to the historic built environment, i.e. receiving environment.

1.9 Liveability and Residential Amenity: Heritage Council's Historic Towns Initiative Investment in Dublin Street, Monaghan

The aim of the Heritage Council's Historic Towns Initiative (HTI) grant scheme is to revitalise Ireland's historic town centres, and to demonstrate, in particular, how heritage-led urban regeneration can unlock disused existing housing, an important contribution to the resolution of the housing crisis. For the long-term social sustainability of this approach, it is essential to protect and enhance the residential amenity of areas adjoining and in the vicinity of where it is intended for people to live. Historic urban burgage plot patterns embodied the qualities that contribute to residential amenity, making town-houses pleasant to live in through all the stages of life. To curtail burgage plots is to gainsay this quality of the historic inherited built environment, which in the case of this proposal, is, additionally, protected as an Architectural Conservation Area for such reasons.

Historic Towns Initiative grant funding has been awarded to Monaghan County Council for Dublin Street precisely to facilitate the re-inhabitation of this street through tackling the design challenges and regulatory barriers to getting these disused houses back into use. It is important for the achievement of the aims of this policy approach that the totality of development actions and policies is coherent and harmonious and converges on providing the necessary pleasant spaces that are to make urban living attractive.

1.10 Protected Structures & Concept of Curtilage re. No. 24 Dublin Street

The planning application proposes the demolition of outbuildings within the curtilage of No. 24 Dublin Street, which is a protected structure. It is submitted that these structures should not be demolished to ensure that the overall integrity of the historic building, which is currently being refurbished with Historic Towns Initiative (HTI) funding, is maintained.

The importance of the concept of curtilage is highlighted below (2010⁷),

"Since 1999, the planning legislation gives protection to buildings included in the 'Record of Protected Structures', and the wording of the legislation extended the protection to include its 'Curtilage', the area of ground that is directly connected with the functioning or inhabitation of the structure. The protective nature of this mechanism recognises that buildings create places, through the zones of influence that surround them and which are larger than their outer walls, and begins to address the practical necessities of protecting the values of those places along with the building. It is the first step outwards from buildings towards their landscapes and settings."

As noted above, the outbuildings to the rear of No. 24 Dublin Street are a constituent part of the overall 'structure' and its historic setting and should therefore not be demolished.

⁷ Heritage Outlook, Summer 2010

1.11 Proposed demolition of a former protected structure and birthplace of Charles Gavan Duffy

The application also includes the proposed demolition of a former protected structure of significant local, national and international cultural significance – this cultural value and significance is not included in the EIAR. This has been highlighted by other stakeholders during the EIA process, e.g. An Taisce. The significance of this building rests in its historical association and we question the decision to remove it from the RPS.

1.12 Need for Sustainable Development in Ireland

The development is being proposed at a time when land use policy is being critically re-appraised to ascertain if it is indeed delivering its stated statutory objective of achieving sustainable development. In particular, Ireland's car-dependent culture must be questioned given the need to meet climate change targets. In this context, and, in light of the other active initiatives in the vicinity to use this urban land sustainably and develop it by the adaptive re-use of existing assets, the provision of further car parking must be questioned. If this involves foreclosing on the sustainable use of existing assets (which have heritage value), it surely must be labelled bad value from a carbon accountancy point of view, and therefore assumed to be unsustainable development.

Further, in the interests of sustainable development, which is the fundamental objective of the *Climate Action and Low Carbon Development (Amendment) Act 2021*, the embodied carbon of existing buildings ought not be wasted through needless demolition, when existing enclosed space in the form of dwellings could instead be adaptively re-used as housing.

It is notable that the objective of creating a large-scale development site could be achieved by the re-development of the former Northern Star printing works and associated car parking. The interior of this building was not examined to exclude the possibility that it may have some industrial heritage value, but even if it did, on balance this represents a better balance between heritage retention and facilitating a modern building if one is needed, than erasing the former urban gardens and their historic [rubble] stone walls. These areas are necessary to provide residential and natural amenity in the heart of the historic town and are a crucial aspect of liveability.

2.0 HERITAGE COUNCIL CONCLUSIONS

In conclusion, the Heritage Council submits that this proposed development lacks design rigour and rationale, and is contrary to numerous statutory planning policy objectives for the historic town centre and should be refused for the following reasons:

- The overall proposal is contrary to the detailed design principles set out in the 2017 Regeneration Plan for Dublin Street in relation to urban design, urban structure, public realm, urban form, and architectural design objectives;
- Notwithstanding its inclusion in the 2017 Regeneration Plan for Dublin Street, the Heritage Council does not recommend the demolition of numbers 8-11 Dublin Street for reasons of their embodied carbon, the association with Charles Gavan Duffy and their importance to the grain and historic fabric of the street;
- The overall proposal has not been informed by a detailed design statement, design palette or public urban design panel;

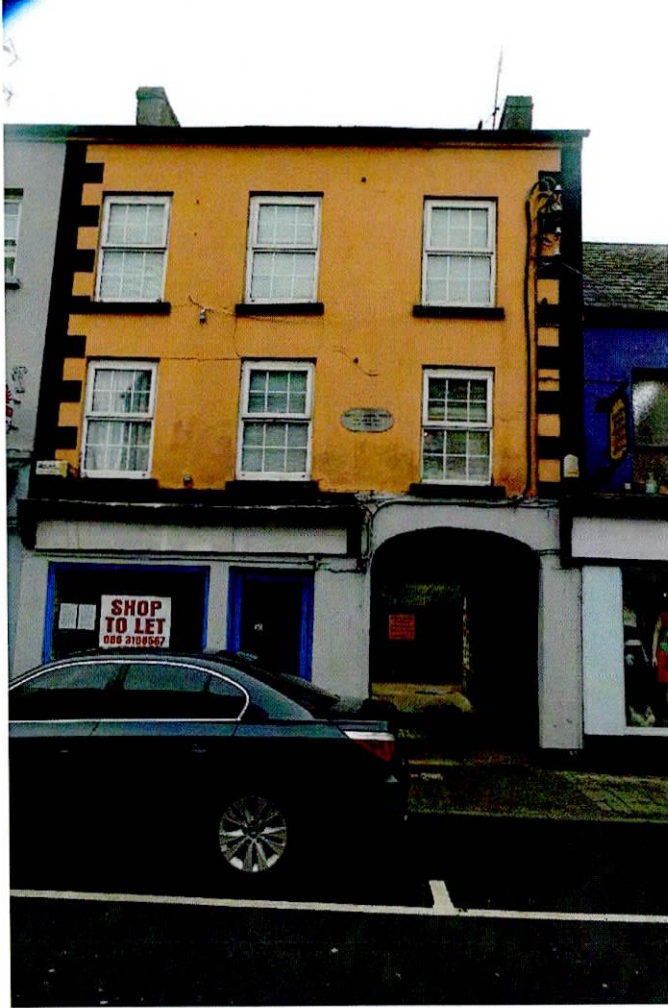
- The overall proposal is contrary to the new national policy on architecture (2022), which seeks to promote quality architecture and the delivery of sustainable, high-quality built environments; and
- The proposal is in conflict with a historic building conservation project that is currently underway in Dublin Street, which is being funded by joint Heritage Council – Department of Housing, Local Government and Heritage Historic Towns Initiative (HTI).

For further information on the Heritage Council's submission, please contact Alison Harvey MIPI AILI at aharvey@heritagecouncil.ie and/or M. 056 7770777.

Appendix 1: Photographs of buildings in Monaghan Town Centre to be demolished



Outbuilding (former bottling store) to the rear of No. 24 Dublin Street



No. 10 Dublin Street, a 3-bay, 3-storey former Protected Structure that contributes to the streetscape of Monaghan town, and to the setting of its Dublin Street ACA, and of historical importance as the birthplace of patriot and nationalist Gavin Duffy



Nos 8 & 9 ('Best 4 You') Dublin Street, proposed to be demolished



No. 11 Dublin Street ('Istanbul Kebab'), proposed to be demolished.