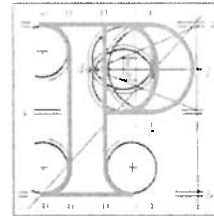


Our Case Number: ABP-318758-23



An  
Bord  
Pleanála

~Minister for Housing, Local Government and Heritage  
Development Applications Unit  
Government Offices  
Newtown Road  
Wexford  
Co. Wexford  
Y35 AP90

**Date:** 15 February 2024

**Re:** Proposed public realm improvement works known as the 'Westgate 2040 Project'  
in Drogheda, County Louth

Dear Sir / Madam,

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

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

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

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

Yours faithfully,

Aisling Reilly  
Executive Officer  
Direct Line: 01-8737131

JA03

Tel	Tel	(01) 858 8100
Glaó Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	<a href="http://www.pleanala.ie">www.pleanala.ie</a>
Ríomhphost	Email	<a href="mailto:bord@pleanala.ie">bord@pleanala.ie</a>

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

**Aisling Reilly**

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**From:** LAPS  
**Sent:** Friday 9 February 2024 09:11  
**To:** Aisling Reilly  
**Subject:** FW: Your Ref: ABP-318758-23 Our Ref: S177AE Westgate Vision Area  
**Attachments:** ABP-318758-23.pdf

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**From:** Housing Manager DAU <Manager.DAU@npws.gov.ie>  
**Sent:** Friday, February 9, 2024 8:58 AM  
**To:** LAPS <laps@pleanala.ie>  
**Subject:** Your Ref: ABP-318758-23 Our Ref: S177AE Westgate Vision Area

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

A Chara,

Attached please find the archaeological and architectural heritage observations/recommendations of the Department in relation to the aforementioned Section177AE Planning Application.

Can you please confirm receipt of same?

Kind Regards,  
Sinéad

—  
**Sinéad O' Brien**  
Executive Officer

—  
**Aonad na nIarratas ar Fhorbairt**  
*Development Applications Unit*  
**Oifigí an Rialtais**  
*Government Offices*  
**Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman Y35 AP90**  
Newtown Road, Wexford, County Wexford Y35 AP90  
—



Your Ref: ABP-318758-23

Our Ref: **S177AE Westgate Vision Area**

*(Please quote in all related correspondence)*

9 February 2024

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

Via email to [laps@pleanala.ie](mailto:laps@pleanala.ie)

Re: Notification under Section 175 and 177AE of the Planning and Development Act 2001  
(as amended)

**Re: Section 177AE application by Louth County Council for Public Realm  
Regeneration Works at Westgate Vision Area, Drogheda, County Louth**

A Chara

I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations co-ordinated by the  
Development Applications Unit under the stated headings.

### **Archaeology**

It is noted that the proposed development is located within the Historic Town of Drogheda, (LH024-041), Class: Historic town. It is also noted that it contains the following Recorded Monuments LH024-041063- : House – medieval, LH024-041079- : Quay, LH024-041014 Town defences and Old Abbey (St. Mary d'Urso) (LH024-041011), with both LH024-041014 Town defences and Old Abbey (St. Mary d'Urso)(LH024-041011), being National Monuments all of which are subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments (Amendment) Act 1994.

The proposed development area is proximal to a wreck (Wreck Inventory of Ireland ref W18567) that is protected by Section 3 of the National Monuments (Amendment) Act 1987. The large metal vessel, probably a barge from the former Boyne Navigation, is lying on the riverbed near the quay wall, immediately east of the Peace Bridge. Another protected wreck, a logboat (Wreck Inventory of Ireland ref W18585), is recorded as having been found upstream of the bridge, adjacent to the west bank of the river.



Whilst the planning submission indicates no direct adverse effects arising from the project on both wrecks, measures should be put in place to ensure their protection, should works be undertaken in close proximity to the vessels. The project also provides an opportunity to highlight Drogheda's significant underwater cultural heritage and the Department recommends that an interpretation strategy forms part of the final project design.

The Department notes that given the scale, extent and location of the proposed development it could impact on subsurface archaeological remains and the standing remains of Recorded Monuments LH024-041014 Town defences and Old Abbey (St. Mary d'Urso) (LH024-041011).

In line with national policy, see Section 3.6 of the Frameworks and Principles for the Protection of the Archaeological Heritage 1999, the Department recommends that **consultation with the Department of Housing, Local Government and Heritage is required prior to any grant of planning.**

A more detailed Archaeological Impact Assessment, as outlined below, should be prepared to assess any impact on archaeological remains within the proposed development site.

This consultation and further assessment should be undertaken prior to any grant of planning. This will enable the Planning Authority and the Department to prepare an appropriate archaeological recommendation before a planning decision is taken.

With regard to the above proposed development the Department has reviewed the Archaeological Assessment Report that was submitted with the application.

The archaeological assessment was carried out by Faith Bailey and Jacqui Anderson IAC Archaeology, and included the results of a desk based archaeological impact assessment. The assessment recommends that further archaeological investigation is warranted. The Department notes the recommendations in the report and seeks further consultation prior to any grant of planning. The Department notes the following described within the report:

**Old Abbey (St. Mary d'Urso) (LH024-041011):**

- At the Old Abbey (St. Mary d'Urso) (LH024-041011), it is proposed to conserve and repair the upstanding walls associated with the Abbey and erect a new roof, covering the area to the east of the medieval tower. The new roof will not be attached to the medieval masonry, comprising a free-standing Corten steel canopy. Prior to the application of mitigation, it is possible that the proposed repair works and construction of the canopy may have a direct, very significant negative impact on the medieval fabric of the Abbey.
- New paving will also be required throughout this area and as such, ground disturbances associated with the development may have a direct, negative and



very significant impact on any buried archaeological remains along the path of Old Abbey Lane.

- Prior to the commencement of works, a detailed measured photogrammetry survey will be carried out of the upstanding medieval fabric associated with the Abbey. This will provide an accurate and measured record of all the existing built remains on site. All repair and conservation work to the Old Abbey (St. Mary d'Urso) (LH024-041011) will require a detailed methodology to be produced in advance of the development proceeding. This will be produced by a Grade 1 Conservation Architect. The method statement and works detailed within, will require approval under Ministerial Consent as the structure is a National Monument. The method statement will also clearly state how the free-standing roof canopy will not affect the existing built fabric and include measures to protect the upstanding remains from inadvertent impacts during construction.
- In addition, all ground disturbances relating to the resurfacing of Old Abbey Lane will be subject to archaeological monitoring. This will be carried out under Ministerial Consent, by a licence eligible archaeologist.

#### **Town Wall LH024-041014 Town defences:**

- It is also proposed to conserve and repair the c. 70m section of medieval town wall to the east of the Bridge of Peace and construct an adjacent footpath and wooden walkway to the west of the wall, along with a water feature channel and a rainwater retention pond. The car park to the east of the wall will retain its current function. The town wall (both upstanding and buried remains) is a National Monument. Prior to the application of mitigation it is possible that the proposed repair works and construction of the footpath, water feature channel and retention pond may have a direct, very significant negative impact on the medieval fabric of the wall and any adjacent buried archaeological remains.
- Prior to the commencement of works a detailed measured photogrammetry survey will be carried out of the upstanding town walls. This will provide an accurate and measured record of all the existing built remains. All repair and conservation work to the wall will require a detailed methodology to be produced in advance of the development proceeding. This will be produced by a Grade 1 Conservation Architect. The method statement and works detailed within, will require approval under Ministerial Consent as the structure is a National Monument. This may also require removal of vegetation by a suitably qualified contractor.
- In addition, all ground disturbances (expected to be minimal) relating to the laying of the new footpath to the west of the wall and the insertion of a water feature channel and rainwater retention pond will be subject to archaeological monitoring. This will be carried out under Ministerial Consent, by a licence eligible archaeologist.



- Overall, ground disturbances associated with the proposed scheme will be relatively low impact, as the proposed public realm regeneration scheme will comprise the installation of new surfaces, footpaths and road markings. As part of the scheme, new trees and signage is proposed, which will require excavations that may affect buried archaeological remains below the modern road/tarmac surface. Impacts have the potential to be direct, negative and moderate, significant or very significant, dependant on the nature, extent and significance of any such remains that are present.
- All excavations within the public realm area (with the exception of re-surfacing) will be subject to archaeological monitoring under licence, as issued by the National Monuments Service of the Department. If archaeological remains are identified, further mitigation may be required, such as preservation in situ or by record. Any further mitigation will require agreement from the Department.
- The proposals also seek to mark/delineate the path of the buried town wall along the northern side of the River Boyne and Father Connolly Way. This will be done with a stretch of Corten steel plate enclosed within the pavement. This is a surface treatment and no direct negative impacts are predicted on the buried remains of the wall. Previous archaeological investigations have identified that the wall is buried at least 0.6m below the current ground level. The Shafts of Light Sculpture will be retained within the scheme at its current location and will not be impacted by construction activities associated with the proposed development.

Outlined below are the archaeological recommendations of the Department of Housing, Local Government and Heritage.

**Consultation and further Archaeological Investigations:**

1. Prior to any grant of planning permission the Department seeks consultation with Louth County Council regarding the proposed development in relation to Recorded Monuments LH024-041014 Town defences and Old Abbey (St. Mary d'Urso) (LH024-041011), both of which are National Monuments and subject to statutory protection in the Record of Monuments and Places, established under section 12 of the National Monuments (Amendment) Act 1994.
2. The applicant is required to engage the services of a suitably qualified archaeologist and Grade 1 Conservation Architect to carry out more detailed archaeological and architectural assessments of the development on all proposed works associated with Recorded Monuments LH024-041014 Town defences and Old Abbey (St. Mary d'Urso) (LH024-041011).
3. The Department requests detailed method statements in relation to all proposed works associated with Recorded Monuments LH024-041014 Town defences and Old Abbey



(St. Mary d'Urso) (LH024-041011) which will require approval under Ministerial Consent as these structures are National Monuments.

4. No sub-surface developmental work, including geotechnical test pits, should be undertaken until such further archaeological assessment has been completed and commented on by the Department.
5. Prior to any grant of planning the archaeologist shall carry out any relevant documentary research and inspect the development site. As part of the assessment a programme of test excavation shall be carried out at locations chosen by the archaeologist (licensed under the National Monuments Acts 1930-2004), having consulted the site drawings and the Department.
6. Having completed additional assessments works, the archaeologist shall submit a written report stating their recommendations to the Planning Authority and to the Department. Where archaeological material/features are shown to be present, preservation in situ, preservation by record (excavation) or monitoring may be required.
7. All ground works and structural conservation works associated with LH024-041014 Town defences and Old Abbey (St. Mary d'Urso) (LH024-041011) shall be monitored under Ministerial Consent by a suitably qualified archaeologist and Grade 1 Conservation Architect.
8. Should archaeological material be found during the course of works, the work on the site shall be stopped pending a decision as to how best to deal with the archaeology. The developer shall be prepared to be advised by the Department with regard to any necessary mitigating action (e.g. preservation in situ, or excavation) and should facilitate the archaeologist in recording any material found.
9. Whilst the planning submission indicates no direct adverse effects arising from the project on both wrecks, measures should be put in place to ensure their protection, should works be undertaken in close proximity to the vessels. The project also provides an opportunity to highlight Drogheda's significant underwater cultural heritage and the Department recommends that an interpretation strategy forms part of the final project design.

**Reason:**

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

**Architectural Heritage**

The Department welcomes the proposed heritage-led regeneration of the Westgate area of Drogheda, in the context of the 'Westgate 2040' Louth County Development Plan 2021-27





and acknowledges that the upgrading of the public realm will support future revitalisation of the area. The cultural significance of the area and the layering and interrelationship of archaeological and built heritage sites, that retain its distinctive medieval character are the basis of the proposals. Drogheda retains cultural significance as a historic urban landscape, defined by its early urban buildings, streetscape and surviving fortifications. The proposed application site is predominantly located within the zone of archaeological potential for the historic town of Drogheda (LH024-041), which is a Recorded Monument.

There are three individual Recorded Monuments within the proposed development area, comprising the Old Abbey [Abbey of St Mary d'Urso (LH024-041011)], the path of the medieval town wall and the site of two gates (recorded as town defences LH024-041014), which are both National Monuments and a site of a quay (LH024-041079).

A number of protected structures of national, regional and local importance adjoin and/or are located in the wider area surrounding the application site, including Barlow House (13618010), West Gate House (13618009), a large concentration of C18<sup>th</sup> and C19<sup>th</sup> terrace houses, etc.

A northern section of the application site is located within the Fair Street Architectural Conservation Area.

An eastern section of the application site is located with the West Street and Surrounding Street's Architectural Conservation Area.

A central section of the application site is located within the Old Abbey Lane Architectural Conservation Area.

### **Review and Recommendations**

The Department was not party to any pre-planning applications but are available on request for the review of development proposals. Having reviewed the overall proposed works the Department would make the following observations on key areas of the proposals for the Local Authority's further consideration.

#### **Medieval Wall:**

A reading of the built and archaeological layering and cultural significance of the site together to inform the level and location of interventions is required i.e. the position of the town wall, the structures that once interfaced with the fortification and the historic places and routes immediate to it need to be properly identified and used to inform the proposals. The understanding of the integrity of the surviving medieval wall in the context of the historic town and its relationship to the river is necessary to inform the location and scale of the proposed intervention.

The proposed ramp appears to be of substantial scale and length in the context of the historic setting of the town wall. Whilst greater engagement with the wall is welcome, the proposal





appears not to have fully evaluated the surviving wall, its features and relationship to the river. Proposals for the town wall conservation and interpretation have not been included.

The length and close proximity of the contemporary ramp to sections of the medieval wall creates potentially insecure spaces, the overall dominance of the contemporary design set against the wall appears to diminish the presence or experience of the wall.

#### **Old Abbey Lane:**

The proposals for this site focus on the remains of the Old Abbey and are to enhance its overall presence and appreciation in the town. The proposed works include the roofing over of the historic volume or chancel of the historic Abbey, the conservation of the Old Abbey fabric and adjoining sections of historic masonry. Detailed design proposals (including demolitions) in the context of the surviving fabric are necessary and a description of works and specifications is necessary to inform the overall approach, planning and conservation outcome. The justification of the use of Corten steel to roof one of the most prominent roofscapes/heritage sites in the town is questionable. The dominance of the roof colour and material confuses the experience of the surviving structure. The Department references the glass roof at Kilfenora medieval Cathedral in County Clare as an alternative design approach. Landscape proposals within the Old Abbey should be carefully considered in the context of the site.

#### **Riverfront:**

The proposed riverfront structure is regarded as being of contemporary design and its position and overall landscaping improves access along the river, conceals car parking and enhances the existing river edge amenity. The use of Corten steel in the contemporary structure referencing the shipping prowess of the town is acceptable. The conflict arising from using this material and roof design for the Old Abbey roof and the Riverfront contemporary pavilion is noted.

#### **Adjoining Streets and Lanes:**

In terms of the proposed new areas of public realm, proposals based on detailed historic survey and the identification of the medieval walls, historic boundaries, thresholds, staircases and historic paving finishes and features are required. The avoidance of inappropriate building materials and large metric paving is recommended, to avoid adverse impact on the organic nature of the medieval character. The use of locally sourced materials that accommodate/reference historical and traditional paving finishes is welcome.

The Department recommends the input of a Grade 1 Conservation Architect to review and to amend the proposals by providing advice on cultural significance, the special heritage context of the proposed development, the scale and location of interventions and the presentation of historic fabric and spaces with specifications for repair and conservation.

For further relevant information please see the "Conservation Plan for the Town Walls and other defences of Drogheda" which is accessible at



<https://www.heritagecouncil.ie/content/files/Drogheda-Town-Walls-Conservation-Plan.pdf>

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

The Manager,  
Development Applications Unit (DAU),  
Government Offices,  
Newtown Road,  
Wexford,  
Y35 AP90

Is mise, le meas

A handwritten signature in black ink, which appears to read 'Cormac O' Flaherty'.

Cormac O' Flaherty  
Higher Executive Officer  
Development Applications Unit  
Administration