



08 February 2024

**Planning Section,**  
Mayo County Council,  
Aras an Chontae,  
Castlebar,  
Mayo,  
F23 WF90

Dear Sir/Madam

**Re: Draft Ballina Local Area Plan (LAP) 2024-2030**

The Heritage Council is a prescribed body under S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia. We seek to provide submissions on forward planning, development control and strategic infrastructure developments as they relate to Ireland's heritage, both cultural and natural heritage.

It is important to state from the onset 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 particular, give further support to this ambition.

We welcome the opportunity to comment on the Ballina Draft Local Area Plan 2024-2030. Our comments will deal with both built/ cultural heritage and natural heritage, as the matters appear in the plan.

**General note**

Whilst not unique to this Local Area Plan, there is a tendency to repeat general county development plan policies and even national level policies. We would recommend that Mayo County Council endeavour to concentrate more on giving further detailed expression of CDP policy for specific settlements in LAPs. This should be the primary function of LAPs. For example, we strongly welcome the detail provided as part of the opportunity sites/ character area section.

**Strategic Environmental Assessment**

In terms of SEA, we welcome the detailed table in Annex 1 which provides a policy-by-policy assessment against each SEA objective. This is good practice although there is a need to ensure that all objectives are addressed in the comments section that accompanies each table.

It is recognised that land take for future employment and housing land is part of development planning. However, strategic environmental assessments do need to be

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accurate. For example, policy DSP4 on “ensuring” that sufficient land is available for economic development growth will undoubtedly lead to negative impacts on land and soils, biodiversity, and climate. It is highly unlikely that this can ever be mitigated against, in any meaningful way. And if it is, the SEA needs to give a description of it, in the assessment. This is also the case for some of the road policies. It goes without saying that mitigation will always be provided for large infrastructure/development projects, to ‘lessen’ their impact, however the net effect on the environment is still negative. This is unavoidable. The SEA needs to reflect this accurately in order to plan properly.

## **Chapter 2 – Development Strategy**

We strongly support policies DSP2, DSP3, and DSP7 with regards to compact growth and the reuse of existing building stock. This will invariably mean greater attention on reusing existing buildings in town centre locations which will bring benefits to the historic environment. This includes protected structures and the general townscape.

The NPF rightly identifies that changing settlement patterns and building vacancy in rural towns and villages has resulted in the demise of the historic vibrancy and vitality of towns and villages. Compact growth and town centre regeneration will aid efforts at creating more sustainable patterns of development which will bolster historic vibrancy, while also lending itself to less land take (reducing impacts on landscape heritage, soil carbon sequestration, and ecology), and less car use. However, it should be noted that some of the development management standards in the county development plan are not conducive to compact growth, therefore options for departures from these standards in town centres could be further considered in this LAP.

## **Chapter 3 – Climate Action**

It is also unfortunate that the climate adaptation strategy does not use the opportunity within the section on nature-based solutions to discuss flood alleviation measures. Whilst specific flood defences have been discussed in chapter 11, there is a need for a more river basin/catchment (Moy and Killala Bay Catchment) approach to address flood risk over the long term. This will become increasingly more important given higher and more intense precipitation events under extreme climate change scenarios. Hard infrastructure in a single town may not provide all the necessary adaptation needed.

## **Chapter 4 – Town Centre Regeneration**

Since 2019 the Heritage Council has awarded €776,539 to a range of town centre regeneration projects in Ballina through the Historic Towns Initiative. In 2019 and 2020 this funding focused on the Pearse Street Architectural Conservation Area (ACA), and this has demonstrated strong benefits for the quality of the built fabric. Since then, funding has concentrated on the Belleek Gate Lodge, and we look forward to a new use being identified for this structure. As these efforts have demonstrated clear benefits, further measures to address vacancy and neglect in the built heritage of Ballina are to be welcomed.

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We strongly support the identification of opportunity sites. This is the specificity that is needed from local areas plans. With regards to each opportunity site the following comments are as follows:

*Opportunity Site 1 - Market Square.* It is unfortunate that the Ballina Military Barracks, which is a regionally important heritage structure, does not feature in detail for this site. The quadrangular layout lends itself well the public realm/ cultural vision for the site. There is the opportunity for the building to be the anchor for heritage led regeneration in this location. The Heritage Council grant aided a conservation report for this building in 2015 which set out necessary works and potential future use, i.e. this is an important building for creating a sense of time depth.

*Opportunity Site 2 – BMW Tesco Area –* Similarly, an opportunity is missed here to see how ‘The Gem’ Pearse Street protected building could contribute to the cultural aspirations for this opportunity site.

*Opportunity Site 5 –* We suggest that any of the public realm works seek to not have any visual impacts on the setting of the heritage assets along the route. While the river wall itself is also a protected structure. Efforts should be made to use the public realm works to enhance the perception of the area and the setting of the historic environment.

## **Chapter 7 – Transport and Movement**

Policies to reduce car reliance in general are welcome however this needs to be supported by tangible objectives. In the transport chapter, there is no mention of cycle parking provision/standards. This is needed, as the CDP is weak in terms of cycle parking standards. This is imperative to provide alternatives to the car, therefore reducing GHG emissions, thus reducing climate change impacts on habitats and ecosystems.

Furthermore, for opportunity/ town centre sites a departure from CDP parking standards is needed to enable compact growth. There is an opportunity for the LAP to address this. There is a need to ensure that excessive parking expectations do not compromise reuse of buildings, or the development of well-located sites in the town.

## **Chapter 8 – Built Environment**

In the same vein as the comments on the opportunity sites, heritage led regeneration should be an overarching policy of the built environment policies. The linear Irish townscape is a key feature of the heritage of towns such as Ballina. The protection of existing features should be a key objective. Are there any anchor heritage sites that could be identified in the architectural heritage objectives?

## **Chapter 9 – Natural Environment**

The Heritage Council strongly supports and commends Policy NEP5 regarding the presumption against felling of trees in new development proposals. There is often needless removal of mature trees, of considerable character and ecological value, as part of site works to ‘tidy’ the site before construction commences. We would only suggest

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that hedgerows be included in the wording. From an ecological view these linear features are one of few ecological corridors in and around urban areas. In fact, the trees referred to are often found in hedgerows. The Heritage Council would also encourage active TPO work in the form of a fresh 'walk about town' simple assessment of trees of important ecological and character value with the view to identify further TPOs.

#### **Chapter 10 – Infrastructure and Environmental Services.**

It is noted that RPS have been commissioned to prepare a Flood Relief Strategy. We reiterate here that any flood defence strategies should be approached at the whole catchment (in this case the Moy and Killala Bay catchment) river basin level in the first instance. This is likely to include liaisons with neighbouring councils.

I trust these comments will be considered carefully as Mayo County Council progresses the Ballina Local Area Plan 2024-2030.

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