



Forward Planning Section,
Galway County Council,
Áras an Chontae
Prospect Hill,
Galway
H91 H6KX

19 February 2025

Dear Sir/Madam

Re: Draft Gort Local Area 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 Gort LAP. Our comments will deal with both built heritage and natural heritage.

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 LAPs.

Development Plans – Guidelines for Local Planning Authorities was 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.

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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 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 a number of action points relevant for local authorities and these should be included in local area 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 Galway. 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.

The **Galway County Development Plan 2022-2028** has a comprehensive Chapter on Natural Heritage, Biodiversity and Green Infrastructure has comprehensive policies on designated sites, and biodiversity outside of designated sites included policies for ecological networks. While Chapter 12 Architectural, Archaeological and Cultural Heritage, has policy provision for protected structures, architectural conservations, as well as archaeological sites and vernacular heritage.

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Specific comments on the Draft LAP

Overarching Comment

The town of Gort has a remarkable heritage resource, both built and natural. We strongly welcome the publication of the draft LAP for the town and its immediate environs. The Heritage Council believe strongly in the potential of our towns and villages, many of which are historic market towns, which were, and can continue to be, the focus of activity for rural Ireland. Gort is one such town. The Heritage Council have supported projects in Gort; most recently the Gort Town Hall Project under the Heritage Stewardship Fund. We therefore encourage Galway County Council to ensure that through its planning function, the full potential of the town is maximised, so that Gort has a sustainable development trajectory.

There is no objection to the layout of the LAP, whereby one section deals with the thematic spatial planning context (Section 2), with the subsequent section (Section 4) detailing the policy requirements altogether. However, there is a need to make the document more accessible through the following:

- Insert an overarching aim for each of the thematic policy areas in Section 2.0 *Gort Spatial Planning Context*. Whilst there are strategic aims in the introduction sections to the Draft LAP, a clear and specific objective in terms of housing, natural heritage etc is needed.
- There is a need to group all the policies from GSST 1 to GSST 74 into their relevant thematic policy areas. The current listing is not conducive to easy navigation for development management purposes.
- Insert a key diagram of the town in the 'Profile of Gort'– with the key planning/ environmental features illustrated.

Section 2 – Gort Spatial Planning in Context

Section 2.5 Built and Nature Heritage

There is a good introduction and description of the architectural heritage profile of the town in this section. The town has a rich and attractive streetscape which has been rightly recognised as an Architectural Conservation Area.

However, there is no contextual/baseline information on natural heritage, nor the benefits that biodiversity has both intrinsically and for people. There is a need to note the proximate designated sites (Coole-Garryland Complex SAC, SPA and pNHA), and biodiversity features in the town itself, most notably the Cannahowna / Gort River, and its riparian zone and flood plain. The area towards Kinincha is particularly important. Such flood plains, alluvial/riparian woodland and associated ecological sites are some of the most important habitats in the town and its environs. This should be illustrated in the maps for the town. We also strongly recommend that the county's biodiversity and

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heritage officers be consulted to ensure that the key natural features are reflected in the LAP in this regard.

In addition, some greater context could be provided on the importance of archaeological and cultural heritage baselines. There are several monuments listed on the SMR in the town, as well as several zones of archaeological potential. These should be summarised in this section.

Section 3 – Opportunity Sites

The inclusion of opportunity sites is very important and is the specificity that is needed in local area plans. Four opportunity sites have been identified for the draft LAP. There is a need to identify the environmental constraints that are in and around each opportunity area. Site design/uses will be informed by site constraints, including environmental constraints. We also recommend that all the heritage assets be identified in each opportunity site. Ecological constraints (e.g. habitats, existing hedgerows/ tree stands and potential bat roosts) should also be detailed. This should then inform the development considerations for the site.

As an example, Opportunity Site 1 includes an area of woodland/scrub habitat, and a property listed on the NIAH. Opportunity 2 fronts the riparian zone of the river; has buildings that have likely bat roost potential; and the Barracks building is a protected structure. Opportunity site 3 has large treeline habitats. Opportunity site 4 also has archaeological constraints, and habitats. While some of the sites may be in ACAs and flood zones. It would also be useful if the legend from the zoning plan was included for each illustration of the opportunity sites. Currently it is not, and therefore it is very difficult to comprehend the map of each site.

Policy Objectives 4.0

On the specific policies, the following comments, and suggested amendments/new policies are provided here:

GSST 3 Environmental Assessment – Strategic Environmental Assessment is primarily based on plans and programmes, not applications. There is some clarification needed for this policy i.e. If an application requires an appropriate assessment etc, it must be provided with the application. The intention may be that the environmental assessments conducted for the LAP may aid applicants in terms of informing site selection/site design. The policy needs to be redrafted to be clearer in its intention.

GSST 4 Compact Growth, GSST 5 Opportunity sites, GSST 8 Sequential Development, GSST 26 Active Land Management in Gort – are commended and supported. Sites, particularly town centre sites, and sites free of environmental and flooding constraints, next to public transport infrastructure should be preferred. While

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compact growth and targeted land activation of the most sustainable sites for development will reduce greenhouse gas emissions from the built environment and ensure that land take is restrained and does not pose undue threats to cultural and natural heritage.

GSST 7 Residential Infill Development policy appears overly restrictive, and contradictory to other policies, such as town centre first policies. Infill development on small sites should be supported in line with compact growth policies. Furthermore, standards on privacy distances, parking should be flexible when considering such sites. Whilst good design is needed, particularly one that enhances the historic character of Gort, the policy could be more supportive, as per the following:

*Within the Settlement Boundary, small scale ~~limited~~ infill housing development will be **supported** ~~considered in appropriate sites~~, **subject to good design**. These infill sites shall have regard to the existing **historic** character of the street, ~~respecting the~~ existing building line, scale, proportions, layout, heights and materials of the surrounding **built environment** ~~developments~~. A proposed site must have a safe means of access and egress and comply with development management standards for new dwellings. **In some cases, flexibility on other development management standards will be considered to facilitate development on such sites.***

GSST 11 Gort Inse Guaire Town Centre First Plan; Policy GSST 44 Local Transport Plan – the current policy is not sufficient. The most pertinent elements of the Town Centre First Plan should be drafted and integrated into the draft LAP, commensurate with their importance.

GSST 12 Shop Front Design – We strongly commend and support this policy. The town of Gort has an attractive streetscape, with several traditional shopfronts present which is essential for the town's inherent positive historic character.

GSST 22 The River Walk policy is supported as it is an important amenity feature that involves people better with their local heritage. Whilst the concern with Otter is welcome, this should be expanded to all species and habitats, including other protected species, as per the following:

*“Protect and enhance walkways along the Cannahowna/Gort River including the Kinincha and Pound Road in a sustainable manner where possible. **Any proposals must have regard to the ecological potential of the area. Proposals that may have an impact on ecology should be accompanied by an Ecological Assessment which should include locally important habitats and protected species including** ~~Regard should be had to the protection of Otters and Otter and their breeding and resting sites and resting places along the river walk~~”*

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GSST 33 Public Spaces and Streets should be amended to also include biodiversity features, tree planting and soft landscaping more generally, as per the following:

*“Promote the development of high-quality public spaces consisting of streets, squares, parks and amenities connected by a network of pedestrian and cycling routes. Public spaces should have a high standard of design, **comprehensive soft landscaping**, and street furniture that will create a coherent character for the area. This would include appropriately designed and located park benches, bus shelters, bicycle storage facilities, refuse bins, signage, street sculpture, etc. but should avoid the over-proliferation of different elements and/or cluttering of public spaces, **as well as an overly harsh hard landscaped environment**”*

GSST 38 Design Statements – The Heritage Council welcome the qualifying statement at the end of this policy, regarding the flexibility of design and DM standards. We do have concerns that other planning considerations may be compromising more important strategic planning objectives, such as vacancy and dereliction in the historic environment. There is a need that quantitative development management standards are not applied bluntly to heritage buildings both designated and non-designated. This relates to parking standards, privacy distances and amenity standards etc. The challenges and costs associated with bringing heritage assets back into use may be considerable, and a more hospitable planning environment is needed. Therefore, we commend the recognition of the need for flexibility.

GSST 39 Architectural Heritage we recommend the following be inserted at the end of the policy:

*“**Development management standards will be applied flexibly for protected structures and non-designated built heritage assets, to encourage new uses to such buildings**”.*

Policies GSST 40 and GSST 41 are also supported. We would however recommend that some description is given of what is meant by “areas of special interest” in GSST 40, while a slight amendment is also recommended as per the following:

*“Protect, conserve and enhance the essential character of the Gort Architectural Conservation Area (ACA) through the **avoidance of demolition, as well as the appropriate management and control of the design, location and layout of new development, respecting surviving historic plots and street patterns, alterations or extensions to existing structures, and/or modifications to the character or setting of the Architectural Conservation Areas. The identification of areas of special interest within the plan boundary may be considered during the lifetime of the plan**”*

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GSST 53 Climate Change is strongly supported. The Heritage Council believe that at the level of first principles, together with the reuse of the embedded carbon in vacant buildings, that ensuring land use patterns and mobility are integrated, is the most important role the planning system has in reducing greenhouse gas emissions i.e. the cause of climate change. This is captured well in this policy. In addition, we also consider the following important, and therefore recommend that it be included under this policy:

- Ensure that any greenfield release makes efficient use of land, whilst providing the mix of homes necessary, and having densities and facilities, that are conducive to public transport roll out and cycling and walking.
- Prefer sites that have poor ecological potential.
- Existing brownfield sites and well-located sites within the urban boundary are preferred in a sequential approach to development including any sites next to the train station.
- Active reuse of existing building stock, which does constitute much of our vernacular and urban heritage building stock.

GSST 55 European Sites is an important policy. However, we question if it is necessary to detail the requirements of Article 6 of the Habitats Directive in the Policy itself, which makes it overly cumbersome for a forward planning policy.

GSST 56 Trees, Parkland/Woodland and Hedgerows, and GSST 57 Biodiversity & Ecological Networks policies are strongly supported. There is often needless removal of natural features as part of the construction phase of works, and it is welcome to see such policies in the draft plan. With respect to GSST56 there should be a policy that identifies trees worthy of Tree Preservation Orders (TPOs); while we would recommend that another bullet point be included, as per the following:

“Existing natural features such as trees, and hedgerows should be retained as part of the design proposals of the site, and should inform the layout of the development”

GSST 62 Protection of Waterbodies and Watercourses is an important aspiration, we recommend that Inland Fisheries Guidance be included in the plan i.e. *Planning for Watercourses in the Urban Environment*, in the LAP. However, it is probably necessary to removal reference to “coastal areas” in the context of Gort.

Schedule of Maps

Map 2 on built and archaeological heritage is a detailed and well-constructed map that is easy to navigate. We welcome its inclusion, and reference needs to be made to it in Section 2.5 of the LAP. Natural Heritage is not fully represented in any of the maps. In most cases, the areas of most importance are viewed through the prism of “constrained” land. Whilst indeed flood risk is an essential emphasis, it should be possible to also

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illustrate the ecological importance of such areas. 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 and their riparian zone should be the “low hanging fruit” for ecological restoration measures given their unsuitability for development. This land use is like to also overlap with the areas generally zoned under Open Space (OS). This could be alluded to elsewhere in the LAP and reflected in mapping.

Conclusion

The Heritage Council strongly encourage Galway County Council to continue to acknowledge the primacy of Gort’s heritage resource. The built and natural heritage of the town should be the focus for guiding any future strategy. We recommend that this important heritage and character continues to guide a sustainable future development trajectory for the town and its environs.

I trust these comments will be considered carefully as Galway County Council progresses the Gort Local Area Plan.

Yours sincerely,

Virginia Teehan
Chief Executive Officer

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