

Chief Executives

Report Number: 1

Draft Consultation Phase

Ballina Local Area Plan

2024 -2030



Comhairle Contae Mhaigh Eo
Mayo County Council



Contents

Contents	1
Section 1 Introduction	2
1.1 Requirement for Chief Executive’s Report	2
1.2 Public Consultation	2
1.3 Submissions and Observations Received	3
1.4 Content of Chief Executive’s Report	3
1.5 Next Steps	3
Section 2 List of Persons/Bodies who Made submissions	4
Section 3 Office of the Planning Regulator & Prescribed Bodies	7
3.1 Office of the Planning Regulator	7
3.2 Northern and Western Regional Assembly	18
3.3 Office of Public Works	21
3.4 Uisce Éireann (Irish Water)	24
3.5 Environmental Protection Agency	26
3.6 Department of the Environment, Climate and Communications & Geological Survey Ireland	27
3.7 National Transport Authority	29
3.8 Transport Infrastructure Ireland	31
3.9 Department of Education	41
3.10 An Taisce	42
3.11 Electricity Supply Board (ESB)	43
3.12 The Heritage Council	44
3.13 Inland Fisheries Ireland	46
Section 4 Submissions relating to zoning. (See Appendix 1 of CE Report for Submission Maps)..	48
Section 5 Remaining Submissions	79
Appendix 1 Land Use Zoning & Location of Zoning Requests	91
Appendix 2 – Settlement Capacity Assessment & Maps	94

Section 1 Introduction

1.1 Requirement for Chief Executive's Report

In accordance with Section 20 of the Planning and Development Act 2000 (as amended), the Chief Executive (CE) of Mayo County Council (MCC) is required to prepare a report on the submissions and observations received during the public consultation period in respect of the draft Plan. This report should list the persons who made submissions and observations, summarise the issues, give the opinion of the CE in relation to the issues raised and make recommendations in relation to the draft Plan. The recommendations should consider the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

1.2 Public Consultation

The Draft Ballina Local Area Plan 2024-2030 was placed on public display from Tuesday 19th December 2023 to Thursday 8th Feb 2024. The draft Plan and accompanying documents were displayed on the County Council's dedicated online public consultation portal at: <https://consult.mayo.ie/en/consultation/draft-ballina-local-area-plan-2024-2030>

The Draft Ballina Local Area Plan 2024-2030 comprises a written statement with maps and is accompanied by:

- An Environmental Report on the likely significant effects on the environment on implementing the Plan - pursuant to the Planning and Development (Strategic Environmental Assessment [SEA]) Regulations 2004-2011.
- An Appropriate Assessment (AA) Screening Report - pursuant to the EU Habitats Directive (92/43/EEC).
- A Strategic Flood Risk Assessment (SFRA) Report - pursuant to Section 28 of the Planning and Development Act 2000 (as amended).

A public notice was published in The Mayo News, The Western People and The Connaught Telegraph on Tuesday 19th December notifying members of the public that a Draft Local Area Plan would be placed on public display from the 19th of December 2023 to 8th of Feb 2024.

Submissions/Observations were invited over the public consultation period. Copies of the draft Plan, associated documents and public notice were issued to prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended).

A public consultation drop-in session was organised for the 31st of January 2024 at the Ballina Civic Offices, Arran Place, Ballina. The purpose of the meeting/drop-in session was to inform the public and interested parties of the plan making process and to discuss/identify issues arising for consideration in the preparation of the draft Plan.

Social Media channels (Facebook and Twitter) were used as mechanisms in promoting awareness of the draft Plan public consultation period. A dedicated webpage and a specific Public Consultation Portal were employed to keep members of the public up to date with the process of the preparation of the LAP. The majority of submissions received in relation to the draft Plan were via the consultation portal. All valid submissions received were published for public viewing on the Mayo Consultation Portal for the draft Plan. Regular notifications relating to the Plan review were issued through the Council's Facebook and Twitter feeds.

1.3 Submissions and Observations Received

In total 44 submission/observations were received during the public consultation period.

The Elected Members of MCC are advised that the submissions are available for public viewing at <https://consult.mayo.ie/en/consultation/draft-ballina-local-area-plan-2024-2030>

1.4 Content of Chief Executive's Report

There are five sections in this report.

- **Section 1** (this section) gives a brief introduction and outlines the public consultation process on the draft Plan.
- **Section 2** List of persons or bodies who made submissions/observations and includes the CE's responses and recommendations.
- **Section 3** addresses the submissions made by the Office of the Planning Regulator, the Northern and Western Regional Assembly, Westport Municipal District Councillors and Prescribed Bodies and includes the CE's responses and recommendations.
- **Section 4** addresses submissions relating to zoning and includes the CE's responses and recommendations.
- **Section 5** addresses the remaining submissions and includes the CE's responses and recommendations.

All submission numbers in the CE Report include an electronic link to the original submission received.

Recommended proposed new text as an amendment to the draft Plan is coloured in green in the CE Recommendations, whilst recommended text to be removed from the draft Plan is indicated by a strikethrough coloured in red in the CE Recommendations.

1.5 Next Steps

Within six weeks of receiving the CE Report, the Elected Members of MCC must consider this report and the draft Plan. Following consideration, the Members may, as they consider appropriate, by resolution, make, amend or revoke the local area plan.

If the Members decide to materially alter the draft Plan, a further period of public consultation will be necessary and the planning authority must screen the proposed material alterations to determine if a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) or both are required for any of the Material Alterations. This screening, and if necessary, the SEA or AA, must be carried out before proceeding to the further public consultation period.

The public display period of any Material Alterations is for a minimum of four weeks. Submissions or observations with respect to the proposed Material Alterations only will be considered before the local area plan is made. The Elected Members must consider proposed Material Alterations to the local area plan, any environmental reports and the CE Report on any observations/submissions received and decide whether to make the local area plan with or without the Material Alterations.

Section 20(3)(r) of the Planning and Development Act 2000 (as amended) states that the Members of the MCC are restricted to:

- Considering the proper planning and sustainable development of the area,
- The statutory obligations of any local authority in the area; and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

In addition, the Members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the *'Code of Conduct for Councillors'* (July 2019) prepared under the Local Government Act 2001 (as amended), carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

Section 2 List of Persons/Bodies who Made submissions.

During the public consultation period of a total of 44 valid submissions/observations were received. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions is listed in Table 2.1.

Table 2.1: Persons/Organisations who made valid Submissions/Observations

List of Persons, Bodies or Organisations who made Submissions or Observations		
Submission Number:	Name	Chapters/Topic
MYO-C92-1	Ruairí O'Malley	Rezone lands to Residential.
MYO-C92-2	Environmental Protection Agency	SEA content.
MYO-C92-3	Northern & Western Regional Assembly	Enterprise & Employment Zoning, Residential Densities, Serviced Sites, Masterplans, C&D Landfill/ Reuse facilities.
MYO-C92-4	Office of Public Works	Flooding, Flood Relief Scheme
MYO-C92-5	Robert Morrow	Rezone lands to Agriculture.
MYO-C92-6	Transport Infrastructure Ireland	Issues regarding protection of national road network, Chapter 7.
MYO-C92-7	Simon Beale + Associates on behalf of Eoin Durcan	Rezone lands from Enterprise & Employment to Residential
MYO-C92-8	Simon Beale + Associates on behalf of David McGowan	Alter indicative route on opportunity site.
MYO-C92-9	Moytechnics Building Services on behalf of Ray & Margaret Collins	Rezone lands from Agriculture to New Residential
MYO-C92-10	Design Energy Homes Ltd on behalf of Donal Quinn	Rezone lands from Enterprise & Employment to Residential
MYO-C92-11	An Taisce	Green Schools Travel Programme – Ballina LTP
MYO-C92-12	Orlagh Hickey	Local Transport Plan
MYO-C92-13	Martin Creaven on behalf of Glebe Residents Association	Rezone lands, Transport, Map to illustrate Specific Local Objectives
MYO-C92-14	John Brogan	Rezone lands from Recreation &

		Amenities to Residential
MYO-C92-15	Electricity Supply Board (ESB)	ESB Network
MYO-C92-16	Maureen McDermott	Local Transport Plan
MYO-C92-17	Brock McClure Planning and Development Consultants on behalf of Bourke Builders	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Quantum of Residential Zoned Land
MYO-C92-18	Barry Gavin	Rezone lands from Enterprise & Employment to Residential
MYO-C92-19	Patrick Sweeney	Rezone lands from Agriculture to Residential
MYO-C92-20	Bridge, Western Care	Quay Regeneration
MYO-C92-21	The Heritage Council	Policy, SEA, Development Strategy, Climate Action, Regeneration, Opportunity Sites, Transport & Movement, Built Env., Natural Env, and Infrastructure & Environmental Services.
MYO-C92-22	Department of Environment, Climate and Communications	Climate, District Heating, Waste, Telecommunications, Geology
MYO-C92-23	The Planning Partnership on behalf of Newpark Developments (Ballina) Ltd	Rezone lands to New Residential, Extend plan boundary, Housing Demand figures, Quantum of Zoned lands, Unfinished Housing Estates
MYO-C92-24	The Planning Partnership on behalf of Cathal Deacy	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Residential Zoned Land Quantum, Neighbourhood Strategy for the Quay Area
MYO-C92-25	Michelle Syron	Rezone lands from Agriculture to Residential
MYO-C92-26	James Melvin	Local Transport Plan
MYO-C92-27	Department of Education	Reserving land for the expansion of Schools
MYO-C92-28	Sean Rooney	Local Transport Plan
MYO-C92-29	Teresa Browne	Local Transport Plan
MYO-C92-30	Taron Wright	Local Transport Plan
MYO-C92-31	The Planning Partnership on behalf of Vincent Ruane Builders Ltd.	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Residential Zoned Land Quantum, Neighbourhood Strategy for The Quay Area
MYO-C92-32	The Planning Partnership on behalf of Vincent Ruane Builders Ltd.	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Residential Zoned Land quantum, Killala Neighbourhood Area Concept

MYO-C92-33	Ballina Chamber of Commerce	Housing Target, Density, Placemaking/Regen/Masterplans, Eurovelo, Tourism, Housing Provision, Commercial Vacancy, Rail & Freight, Waste Infrastructure, Legislation Changes, Development Mix, Monitoring & Implementation
MYO-C92-34	National Transport Authority	Transport, sustainable travel, zoning, national road policy
MYO-C92-35	Uisce Éireann	Sustainable Drainage; Road & Public Realm projects; Water Services; Zoning; Wastewater Infrastructure; and Water Supply Infrastructure
MYO-C92-36	Paul and Amanda Cawley	Rezone lands from Agriculture to Residential
MYO-C92-37	Breege Goldrick	Rezone lands from Agriculture to Residential
MYO-C92-38	Avril Greham on behalf of MOVEIT	Local Transport Plan
MYO-C92-39	Mark Duffy	Compact development/housing, sustainable transport, infrastructure, Opportunity Sites, Regeneration of Convent of Mercy for Community Uses.
MYO-C92-40	The Planning Partnership on behalf of The Congregation of the Sisters of Mercy.	Rezone lands from Education to New Residential
MYO-C92-41	Inland Fisheries Ireland	Protection of Water Quality, EU Water Framework Directive, Infrastructure, Nature Based Solutions, Schedule Works, Policy.
MYO-C92-42	Shaun Heffernan on behalf of James Heffernan	Provide for residential development in Enterprise & Employment Land Use Zoning objective.
MYO-C92-43	Office of the Planning Regulator	Consistency with the Regional Spatial and Economic Strategy, Consistency with development Plan and Core Strategy, Tiered approach to zoning and infrastructural services, Town centre and regeneration, Transport and accessibility/mobility, Climate Action, Flood Risk Management, Environment, heritage and amenity, Economy and Employment, Implementing and Monitoring, General and procedural matters
MYO-C92-44	Cllr John O'Hara	Support Residential Rezoning at Friarscourt Laghtadawannagh, Killala Road; and Crokets Town/ Quay Lane.

Section 3 Office of the Planning Regulator & Prescribed Bodies

3.1 Office of the Planning Regulator

Submission No.	MYO-C92-43
Submission by:	Office of the Planning Regulator (OPR)
Issues Raised/Relevant Chapter(s):	See below.
Summary of Submission:	
<p>The submission sets out the role of the OPR and includes 6 no. Recommendations and 5 no. Observations under 11 no. Key Themes relating to the draft Plan, as follows:</p> <p>Key Theme 1: Consistency with the Regional Spatial and Economic Strategy Key Theme 2: Consistency with development Plan and Core Strategy (Recommendation 1) Key Theme 3: Tiered approach to zoning and infrastructural services (Recommendation 2) Key Theme 4: Town centre and regeneration (<i>Recommendation 3, Observation 1</i>) Key Theme 5: Transport and accessibility/mobility (Recommendation 4) Key Theme 6: Climate Action (Observation 2) Key Theme 7: Flood Risk Management (Recommendation 5) Key Theme 8: Environment, heritage and amenity (Observation 3) Key Theme 9: Economy and Employment (<i>Recommendation 6</i>) Key Theme 10: Implementing and Monitoring (<i>Observation 4</i>) Key Theme 11: General and procedural matters (Observation 5)</p> <p>The submission states their recommendations as listed above relate to clear breaches of relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Section 28 Ministerial guidelines. The Planning Authority is required to implement or address recommendation(s).</p> <p>Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of the Plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action these observations.</p>	
Key Theme 1: Consistency with regional spatial and economic strategy	
<p>The office considers the draft LAP to be generally consistent with the Regional Policy objectives of the RSES and also with the housing targets and policies and objectives of the County Development Plan.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: Noted</p> <p>Recommendation: No change to plan</p>	

Key Theme 2: Consistency with development plan and core strategy – Recommendation 1

OPR Recommendation 1

- (i) The office considers the housing targets and policies and objectives of the draft LAP to be generally consistent with Development and its core strategy. The submission does note however that there are inconsistencies between the narrative in Section 2.8 of the plan regarding the number of units proposed until 2028 and that indicated in table 2.1. The office therefore recommends that the plan shall:

“provide a clear core strategy table Table 2.1 which sets out the population growth targets as well as the housing target. The figures in Table 2.1 should be consistent with the supporting text, preceding Table 2.1, included in the draft LAP”.

- (ii) The Office is also concerned regarding the density assumptions employed in calculating the quantum of lands zoned for new residential, which is calculate at between 17.2 uph and 18.5 uph., which are considered low relative to those recommended in the recently published Sustainable Residential and Compact Settlement Guidelines. The Office considers that a consistent approach using the densities recommended in the new guidelines should be included in Table 2.1, and while this exercise may result in a lower requirement for land zoned, the office is of the opinion that the lands zoned new residential in the plan are located in accordance with the principles of compact and sequential growth within the existing built-up area. The Office therefore recommends that:

“as part of the revised core strategy table (Table 2.1), as well as the chapter relating to the core strategy, the planning authority should provide details of density assumptions used in relation to determine the quantum of residential land that is required to meet the housing targets. The planning authority should review these density assumptions to ensure consistency with the recently published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)”

- (iii) While the Office notes that the Development Strategy in section 2.6 of the plan states that new residential development will take place in the existing built-up footprint of the town, on fully services sites and at appropriate densities, it also notes that the LAP does not include any density standards. The PA is therefore required to:

“provide an objective in the draft LAP which sets out the appropriate density for development and/or that development will be considered as per the newly published Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)”

Chief Executive’s Response and Recommendation:

Response:

- (i) The Chief Executive notes the inconsistencies between the narrative in Section 2.8 and Table 2.1 and this will be adjusted accordingly to comply with the housing targets for Ballina as per the Core Strategy in the CDP. The figure of 511 units was calculated as 15.7% of the County Housing allocation as determined by the Department in 2020. Consequential correction of Table 2.2 is dealt with under NWRA submission.
- (ii) The density assumptions employed in determining the quantum of residential land required to meet the housing targets for Ballina over the lifetime of the plan are the

same as those employed in determining the Core Strategy in the County Development Plan. It is considered that densities used, while somewhat low in comparison to those recommended in the recently published Sustainable Residential and Compact Settlement Guidelines, give a more accurate reflection of the existing local context, while facilitating the type and mix of development needed to attract residential development and population back into the town that might otherwise pursue their housing needs outside of Ballina or other settlement in the county.

The 2022 census results for Ballina indicate that the population of the town essentially stalled during the intervening period from 2016 unlike other settlements in the less provincial areas of the state. This lack of residential development is reflected in the fact that despite employing relatively low densities to calculate the land area required to accommodate future housing needs, all the new residential zoned sites identified were so zoned in the previous Ballina Town and Environs Plan 2009-2015. These lands are located within the built-up footprint and settlement boundary of the town (as acknowledged in the OPR submission) and are fully serviced Tier 1 sites. Furthermore, notwithstanding any future potential impact of the RZLT in time, local experience would dictate that a broad selection of appropriately located and serviced zoned sites is preferable to overcome any local site-specific circumstances that might hinder the timely release of zoned and serviced land for residential development.

The flexible approach to the development of residential zoned land, as proposed in the draft plan is also a reflection of the requirement in a provincial Key town such as Ballina, not be shackled by having to comply with residential zoning densities, that if strictly and uniformly applied, might result in an excessive density of development that may be out of character with adjoining established patterns and that would not offer a full range of housing preferences and residence typologies within the boundary of the settlement.

This demand is reflected in Observation 3 of NWRA's submission in which the Assembly suggests that consideration be given to the provision of serviced sites as a mechanism to increase housing supply. However, it is considered the provision of serviced sites for detached dwellings on council owned lands would impact on the PA's ability to meet targets for the provision of social/affordable housing under Housing for All.

Therefore, it is contended that a more appropriate mechanism to ensure a mix and density of development that meets the demands of the market and facilitates a variety of dwelling types, including types that relieve development pressure beyond the town boundaries, is as proposed in the draft plan, to adopt a flexible approach to density, while having regard to the standards outlined in the recently published *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*.

(iii) Comments noted. A new objective will be inserted.

Recommendation:

Amend Table 2.1 and 2.2 in Chapter 2, Section 2.8 as below:

Town	Population 2016	Population 2021	Population Growth Rate %	Housing Targets	Housing Growth Rate %	Quantum of lands zoned for New Residential Development (Hectares)
Ballina	10,171	11,160	24.4%	551 511	15.7%	29.73

Table 2.1 Projected Population Increase and Housing requirements to 2028

- (i) No change to draft plan
- (ii) Insert new objective DSO 11 as below:
DSO 11: Ensure that all new residential developments are assessed having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) or any subsequent guidelines.

Key Theme 3: Tiered approach to zoning and infrastructural services – Recommendation 2

OPR Recommendation 2:

- i. The Office considers the LAP to be consistent with the CDP and the Core Strategy and that all residential zoned lands are within the existing built-up footprint of the settlement and consolidate the existing pattern of development. The submission also welcomes the inclusion of an SCA (Service Capacity Assessment) for New Residential and Strategic Residential Reserve lands in the Appendix but notes that the SCA's give no indication as to the TIER 1/Tier 2 status of the lands, as regards available services. The PA is therefore required to:

“Provide further detail in relation to the Settlement Capacity Assessment in relation to the infrastructure that may be required for the development of zoned lands during the lifetime of the plan and identify if lands are designated Tier 1 or Tier 2. Following the inclusion of this additional detail, the planning authority should review lands zoned New Residential to ensure that lands that are not serviced or serviceable within the lifetime of the LAP are not zoned for development.”

Chief Executive's Response and Recommendation:

Response:

Comments noted. All the lands zoned New Residential are Tier 1 lands and the Service Capacity Assessment will be updated accordingly to indicate this.

Recommendation:

Update SCA Table 4 in Appendix 1

Key Theme 4: Town centre and regeneration - Recommendation 3 & Observation 1

OPR Recommendation 3 & Observation 1:

The OPR welcomes the inclusion of a dedicated chapter on town centre regeneration and the identification of 11 Opportunity Sites. The office considers that the designation of Opportunity Sites is vital in order to ensure the prioritisation of town centre regeneration and to harness potential funding opportunities but feels that in order to promote quality design and healthy placemaking, there is a need for a clearer urban design brief for the key flagship sites. The Office also recommends that the PA demonstrates the effectiveness of its approach by the inclusion of measurable targets for the resolution of vacancy and proposals for monitoring same.

i. **Recommendation 3**

The PA is therefore required to: *Include measurable targets for the reduction of vacancy for the plan period and a strategy for the monitoring of same.*

ii. **Observation 1**

The PA is advised to: *Review and revise the development framework for the key Opportunity Sites to provide clearer parameters for their future development including guidance regarding layout, massing, materials, permeability etc.*

Chief Executive's Response and Recommendation:

Response Recommendation 3:

MCC will actively seek to reduce vacancy in Ballina within the lifetime of the plan through progression of URDFs projects, reduced rates in the Development Contribution Scheme for Opportunity Sites and Vacant/Derelict Sites, RZLT sites and the Town Centre First Approach. A Town Centre Health Check for Ballina carried out in 2016 and updated in July 2020 showed a retail vacancy of 19% and a complete vacancy of 20% in the town centre. Furthermore, the Geodirectory established an overall commercial vacancy rate for Ballina of 23.5% (Geodirectory Q4 – 2022). MCC will monitor the effectiveness of the aforementioned instruments in reducing vacancy. The GOAD classification to Ballina Town Centre Health Check and the latest Geodirectory will provide the basis for the monitoring of the success of the aforementioned measures to reduce vacancy. A strategy, including measurable targets for the reduction of vacancy will be inserted in the final plan.

Recommendation:

Insert measurable targets for the reduction of vacancy in the Town Centre in the final plan.

Response Observation 1:

Develop frameworks for the key Opportunity sites identified in the final plan.

Recommendation:

Insert development frameworks for the key Opportunity Sites in the final plan.

Key Theme 5: Transport and accessibility –Recommendation 4

OPR Recommendation 4:

The OPR welcomes the preparation of the draft LTP for Ballina, and that the draft LAP has been informed by the emerging proposals therein, which will allow for increased use of sustainable modes of transport. The office also welcomes the provision of modal shift ambitions to 2029 as

part of table 7.3 of the plan. The submission does feel however that there is need for better integration between both documents, with the provision of clear policies/objectives to ensure compliance with the active travel interventions as proposed in the LTP, particularly those that will deliver improvements to the walking and cycling network.

The office also supports the recommendation in the submission from the TII for the inclusion of a specific objective supporting to progress the N26 Ballina by-pass Phase 1, and recommends that, in the absence of an appropriate evidence base, that the route of the proposed eastern By-Pass be removed from the land use zoning map. The PA is therefore recommended to:

- i. *review Chapter 7 Movement and Transport, to provide clearer policies and objectives regarding the delivery and phasing of the key infrastructural requirements of the draft LTP, particularly those interventions and measures required to enhance pedestrian and cycling in the town. All mapping should be clearly legible. In particular, a clear map should be provided of the key active travel schemes to be delivered over the life of the LAP; and*
- ii. *in the absence of a robust evidence base to support the proposed eastern bypass, the planning authority is required to review the justification for this route and if necessary, omit reference to same in table 7.1 of the LAP and amend the land use zoning map accordingly.*

The planning authority should consult with the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) regarding this recommendation.

Chief Executive's Response and Recommendation:

Response:

- i. Comments noted. An improved more legible map showing proposed active travel interventions will be provided will be provided in the final plan and additional text will be added at the end of chapter 2 in section 7.5.4 of the plan to outline the timelines envisaged for the measures proposed. Also amend objective MT0 9 to indicate time frame of all active travel projects listed.
- ii. During the years 2005 and 2006 Mayo County Council, in conjunction with TII (then called the National Roads Authority) conducted a Route Selection Process that ultimately resulted in the selection of a Preferred Route bypassing the town of Ballina from the N59 Crossmolina Road to the N59 Sligo Road. The route that was selected was deemed, on balance, to be the preferred route. There were various constraints located within the study area such as the built environment, environmental, hydrogeological and archaeological constraints and the River Moy SAC. These constraints informed the selection of route options. The various constraints and options identified had to be considered in the context of the need to reduce congestion in the town centre while offering an alternative for strategic traffic to bypass the town. During this period three public consultation events took place. They included a Constraints Study Public Consultation, a Route Selection Public Consultation and a Preferred Route Public Consultation. The Preferred Route was adopted by Mayo County Council in 2007 and incorporated into the town plan at the time and future local area plans. If the preferred route is omitted from the LAP there is very little scope within the original study area to select an alternative, given the pattern of the existing built environment and other constraints. The proposed eastern by-pass of the town is also a long-term objective and is so designated in the LTP and its removal is a matter for the elected representatives of the local authority.

Recommendation:

- i. (a) Insert more legible map showing key active travel measures of the LTP in the final plan.
(b) Insert addition text at end of paragraph 2 of Section 7.5.4:
...design and construction techniques. **The measures have been categorised based on the**

delivery time framework as follows:

- Short-term: 2-3 years
- Medium-term: 3-5 years
- Long-term: 5+ years

(c) Amend objective MTO 9 as follows:

MTO 9 Support and facilitate the implementation of the proposed* (short-term unless otherwise stated) LTP measures.....

Proposed Active Travel Bridge (Medium-Term).....

ii. No change to plan.

Key Theme 6: Climate action – Observation 2

OPR Observation 2

The Office welcomes the inclusion of a dedicated chapter on climate action, however the following is suggested for inclusion in the chapter regarding Sustainable Urban Drainage Systems (SuDS) and proposed Opportunity sites:

- i. Having regard to the integration of climate action into the planning system, the planning authority is requested to include robust guidance and a framework in relation to the use of nature-based solutions and SuDS, including green infrastructure techniques and objectives, in the eleven Opportunity Sites identified in section 4.6.1 of the draft LAP.

Chief Executive's Response and Recommendation:

Response:

The SFRA will expand on where NBS/SuDS may be appropriate in the general context of Opportunity Sites or large undeveloped or large undeveloped zoned lands.

Recommendation:

No change to plan.

Key Theme 7: Flood risk management – Recommendation 5

OPR Recommendation 5:

The Office welcomes the preparation of an SFRA to inform the draft LAP but requests that the PA should overlay the extent of Flood Zones A & B on the land use zoning map for greater transparency and to clearly demonstrate whether any zoned land, that can accommodate vulnerable uses, encroaches into the defined Flood Risk Assessment areas.

The Submission also notes that the SFRA has not considered a small area of National Indicative Fluvial Mapping (NIFM) within the plan boundary and seeks a review of the Justification Tests regarding Test A.2.1 to ensure consistency with flood risk guidelines.

The Office also seeks clarity as regards climate change scenario in the draft plan, along with the inclusion of a register of flood risk infrastructure. The following items are specifically requested.

- i. *review and amend the Strategic Flood Risk Assessment of the draft LAP to:*
 - a)** *ensure that it is fully consistent with the Plan Making Justification Test as set out in the Guidelines. The review shall clarify whether the Justification Test also covers the area of Existing Residential' which overlaps with Flood Zone A and B to the north of the 'Existing Residential' area shown in the A.2.1 of the SFRA;*
 - b)** *include the most up to date flooding extents available, including NIFM extents within*

- the Plan area which has not been considered in establishing the flood zones; and*
- c)** *review the climate change scenarios outlined as part of the SFRA;*
 - ii. *amend the draft LAP, including zoning objectives as necessary, having regard to the revisions to the SFRA required under part (a), including zoning lands within Flood Zone A for water compatible uses, only, and zoning lands within Flood Zone B for less vulnerable uses, only, unless the subject zoning and/or infrastructure have each first passed the Plan Making Justification Test, including taking full account of future climate change scenarios as identified in the OPW Flood Mapping (floodinfo.ie);*
 - iii. *overlay the extent of Flood Zones A and B (separately) on the land use zoning maps in the draft LAP to clearly inform zoning decisions and provide for greater transparency; and*
 - iv. *include a register of flood risk infrastructure with the LAP.*

The planning authority should consult with the OPW regarding this recommendation.

Chief Executive’s Response and Recommendation

Response:

- i. (a) The reasoning behind the non-application of the Justification Test to Existing Residential is described in the Conclusion of Section 8.5 of the SFRA. The JT cannot be applied or passed outside of the core of the settlement. As such the SFRA is fully consistent with the Guidelines
- (b) The small area of NIFM data will be included in the Flood Zone mapping.
- (c) The SFRA can have the 1%/0.5% AEP climate change maps included. Land Use Zoning can also be added at all climate change maps.
- ii. Part 8 has been justified and does not require any further amendments.
- iii. Comments noted. A land use zoning map with flood layers overlain will be included in the Appendix of the final plan.
- iv. Comments noted. No such infrastructure extant pending the completion of the Ballina Flood Relied Scheme.

Recommendation:

- i. (a-c) No change to plan
- ii. No change to plan
- iii. Include land use zoning map with flood layers overlain in the Appendix of the final plan.
- v. No change to plan.

Key Theme 8: Environment heritage and amenity – Observation 3

OPR Observation 3:

The planning authority is requested to amend the built heritage map to ensure all protected structures and the ACA Zone Ballina are clearly identified on the map, in order to ensure their continued conservation and preservation.

Chief Executive’s Response and Recommendation:

Response:

Comments Noted. An updated map will be inserted into the final plan.

Recommendation:

Insert updated map into final plan.

Key Theme 9: Economy and employment – Recommendation 6

OPR Recommendation 6:

The office is concerned regarding the lack of a detailed evidence base to underpin the quantity of land zoned enterprise and employment in the draft plan and while the inclusion of an SCA for Enterprise and Employment lands forms part of the draft plan, no analysis has been carried out as regards the infrastructural requirement or otherwise of these lands. Furthermore, the 23.15ha site zoned Strategic Enterprise and Employment on the N26 to the north-west of the town are not included in the SCA.

The Office is particularly concerned regarding the zoning of site NEE8 on the N26 to the south of the town as they feel ore located in a relatively peripheral area, being accessed off a national route near the junction of a proposed by-pass.

Similar concerns are expressed regarding a site zoned Strategic Enterprise and Employment on the N26 to the north-east of the town which, due to its peripheral location, is considered not to constitute a sequential approach to zoning. Furthermore, it is considered that the location of the site on a national route, at a point where the maximum speed limit applies, would have the potential to undermine the carrying capacity of this strategic road infrastructure and be contrary to National Road Guidelines and Objective SO 12 of the CDP.

The PA is therefore required to:

- i. *provide further detail in relation to the Settlement Capacity Assessment with regard to the infrastructure that may be required for the development of enterprise and employment zoned lands, including the provision of an assessment for the Enterprise and Employment – Strategic lands, during the lifetime of the plan. Identify if lands are designated Tier 1 or Tier 2. Following the inclusion of this additional detail, the planning authority should review lands zoned Enterprise and Employment and consider if the zoning of any lands should be altered; and*
- ii. *having undertaken this assessment the planning authority should review and specifically consider omitting the following Enterprise and Employment land use zonings due to its peripheral and inadequately serviced location; the need to prioritise lands that are sequentially preferable; to ensure that lands will be served by public transport and active travel networks necessary to facilitate sustainable travel over the lifetime of the LAP and to protect the capacity and strategic nature of the national road network.*
 - a)** *the Enterprise and Employment land use zoning located to the south of the town noted as site NEE 8 as part of the Settlement Capacity Assessment; and*
 - b)** *the Strategic Enterprise and Employment land use zoning located to the north-east of the town noted as site SEE as part of the Settlement Capacity Assessment.*

Chief Executive's Response and Recommendation:

Response:

- i. The SCA Matrix will be updated to indicate the Tier1/2 status of all undeveloped Enterprise and Employment and Strategic Enterprise and Employment lands, along with reference as to active travel measures proposed, where considered relevant. The CE would highlight Proposal 3 of the draft Ballina LTP which proposes medium-term active travel measures along the N59 and Creggs Road to serve the Strategic Enterprise and Employment zoned lands to the north to the north-east of the town.
 - (a) The CE takes on board the concerns expressed in the submission regarding the

quantum of lands zoned Enterprise and Employment in the draft plan and more specifically the concerns expressed regarding the 27.13 hectare site identified as NEE 8 in the SCA matrix. In particular, the CE takes cognisance of the absence of a clear entrance to the site within the 60kph speed limit and the impact any future intensification of use on this site might have on any future of the N26 with the proposed N26 western bypass of the town. It is therefore recommended that the site be rezoned to Agriculture.

- (b) The 23.25-hectare site zoned Strategic Enterprise and Employment on the N26 to the north-east of the town is considered fundamental to Ballina functioning and expanding as befits its Key Town status in the RSES. As highlighted in section 5.5 - Economic Strategy of the plan, when extrapolated using the NPF population/jobs growth ratio of 0.66, there is a requirement to provide 1,306 extra jobs in Ballina over the lifetime of the plan.
- ii. This site was zoned Industrial Commercial in the previous Ballina Town and Environs Development 2010-2015 and forms part of a number of IDA owned site within the county which will be utilised to attract investment. Recent consultations between the PA, IDA and TII regarding this site have confirmed that plans for a high-quality industrial park at this location will be submitted by the IDA in the near future. As part of their role on the working group for the Ballina LTP the TII accepted the proposal to zone this site as **Strategic Enterprise and Employment** in the draft LAP and the office is directed to the response to the TII submission to the draft plan in submission MYO-C92-34 below.

The long-term commitment to the development of this on the part of both the Mayo Co Council and the IDA is also highlight by the fact that significant works were undertaken in 2005 to facilitate the installation of a right turn filter lane into the site. The work was undertaken by Mayo Co. Council and funded by the NTA at a cost of at a cost of 750,000 euro.

These lands are not EE they are SEE that will be applied for and filled only by IDA, is a separate and distinct zoning.

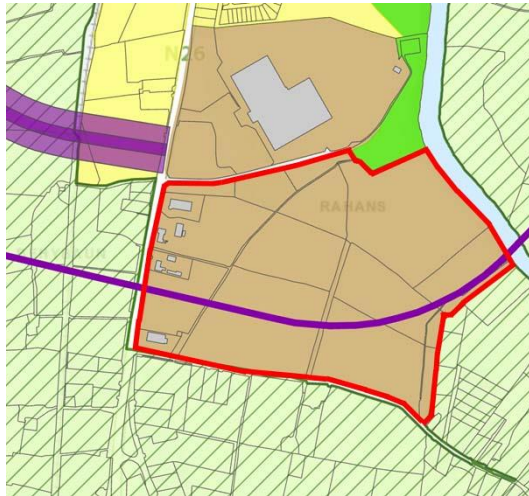
Furthermore, on foot of the proposed reappraisal of the Enterprise and Employment zone site NEE 8 on foot of OPR Recommendation 6 (ii)(a) above there would be a total of 36.94 hectares of undeveloped E&E zoned lands available in the town, most of which either forms extensions to, or is adjacent to conventional enterprise and retail parks that are much smaller in area than the IDA owned lands. However, it is worth repeating that these lands are designated as a very distinct zoning.

As regards future active travel measures to the site, these are proposed under Proposal 3 of the draft Ballina LTP, where it states: *"The element of Proposal 3 relating to Active Travel connectivity to the IDA site, will be progressed to facilitate active travel trips to and from the IDA site with consideration of the development of the site should it be considered necessary by the Planning Authority at the time."*

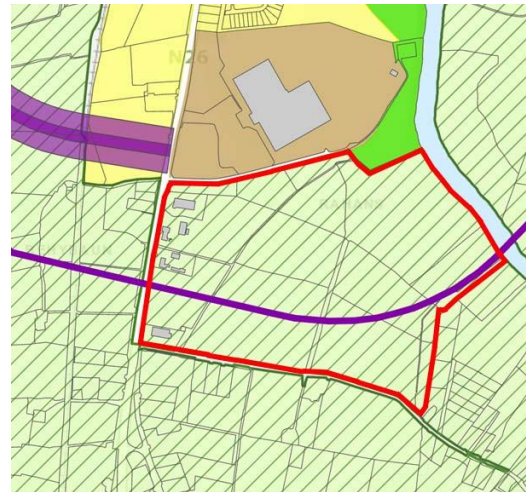
For the reasons outlined above it is proposed to retain the Strategic Enterprise and Employment zoning on this site.

Recommendation

- i. Amend SCA matrix to show Tier1/Tier 2 status of all undeveloped lands zoned Enterprise and employment and include new table for Strategic Enterprise and Employment lands.
- ii. (a) Rezone site NEE8, as indicated on SCA for Enterprise and Employment to 'Agriculture' and amend as outlined below and update SCA map 1 and table 1 in Appendix accordingly:



Site NEE 8 Draft Plan zoning



Site NEE8 Proposed rezoning.

(b) No change to Plan.

Key Theme 11 - Observation 4

OPR Observation 4:

The PA is advised to:

- i. *include a clear implementation and infrastructural delivery schedule in the draft LAP to ensure that the implementation of the policy objectives of the local area plan will take place and to ensure that development progress is consistent with the core strategy of the plan.*

Chief Executive’s Response and Recommendation:

Response:

Comments noted.

Recommendation:

A clear implementation and infrastructural schedule to ensure that the implementation of the policy objectives will be included in the final plan.

Key Theme 11: General and procedural matters – Observation 5

OPR Observation 5:

- i. *The Office notes a number of incorrect references in the document and advises the PA to: review the references to tables and images throughout the document to ensure that the text is referring to the appropriate table, image, etc. Where necessary, the planning authority should also include additional tables, images, etc. to ensure that the draft LAP is as legible as possible so as to assist the general public in reviewing the document.*

Chief Executive’s Response and Recommendation

Response:

Document will be reviewed as requested.

Recommendation:

Document will be reviewed and corrected.

3.2 Northern and Western Regional Assembly

Submission Number:	MYO-C92-3
Submission by:	Northern & Western Regional Assembly
Issues Raised/Relevant Chapter(s):	Enterprise & Employment Zoning, Residential Densities, Serviced Sites, Masterplans, C&D Landfill/ Reuse facilities.
Summary of Submission:	
<p>The NWRA (Northern and Western Regional Assembly) in their submission consider the draft Plan to be of a high standard, and are satisfied that, as was also the case with the County Development Plan 2022-2028, there is a broad level of consistency between the draft LAP and the NWRA’s Regional Spatial and Economic Strategy. However, the following issues are raised:</p> <ul style="list-style-type: none"> • The NWRA considers that the proposal in the draft Plan to consider residential densities on a site-by-site basis is appropriate but suggests that consideration should be given as to the range of densities in different parts of the town. The submission also notes that the area of land zoned new residential exceeds that required under the Core Strategy in the CDP and queries as to whether this would lead to low densities. • The NWRA note that there are few references to serviced sites in the draft Plan and that this might be considered inconsistent with RPO 3.7. (CSP 5 CDP). • The Assembly welcomes the identification of opportunity sites in the town but suggests that the LA assume responsibility for the preparation of a rolling program of masterplans as opposed to leaving it to developers to do so. They suggest rolling out urban design frameworks/masterplans for opportunity sites with 12-18 months timeline of adoption of the plan. • The Assembly notes that in the section on waste infrastructure, there is no reference to the existence, identification, and zoning of such areas for C&D landfill/reuse facilities. <p>The submission makes 3 recommendations which are outlined below:</p> <ol style="list-style-type: none"> 1. The Core Strategy of the Draft Plan to include reference to the Growth Ambition for Ballina as a Key Town in the RSES and provide commentary on the current and future growth trajectory in terms of its consistency or otherwise with Sec. 3.4 of the Regional Strategy, which envisages an uplift across all designated Key Towns of 30% to 2040. This to include a clear core strategy table, which sets out the area and quantum of housing to be delivered on lands zoned ‘town centre’, ‘existing residential’ and ‘new residential’, with appropriate indicative densities that demonstrate anticipated yield. 2. That the Draft Plan includes a synopsis of the Critically Enabling Infrastructure necessary to enable Ballina to fulfil its role as a Key Town, and such projects should be classified in terms of potential delivery timelines (e.g. Short / Medium / Long term). 3. That the Core Strategy of the Draft Plan is revised to incorporate clear timelines across a range of objectives, projects and policy commitments. (See Table 7.10 as an example, where timelines would be beneficial). <p>The submission also makes 6 observations as outlined below:</p> <ol style="list-style-type: none"> 1. That Chapter 5 of the Draft Plan is revised to include a clear rationale for the extent of Zoning of the lands adjacent to Hollister, which straddle both sides of the proposed Outer 	

Relief Road and lie beyond the built-up footprint East of the line of the proposed Ballina By-Pass Route.

2. That the Draft Plan is revised to ensure objectives relating to Greenways (including ED08) is consistent with that of Sec. 5.8 of the RSES, where the Policy wording should incorporate reference to the Euro-Velo Route 1.
3. Consideration should be given to the provision of serviced sites as a mechanism to deliver increased housing supply.
4. Consideration be given to the Local Authority developing Masterplans as applicable across the Plan, so that they are Local Authority driven, rather than developer led frameworks.
5. Consider including policy provisions that provide for the management of construction and demolition waste.
6. The Draft Local Transport Plan should be adopted in advance of or in tandem with the Local Area Plan and should align with the objectives of the Local Area Plan.

Chief Executive’s Response and Recommendation:

Response: in relation to Recommendations 1-3

- 1 The density assumptions employed in determining the quantum of residential land required to meet the housing targets for Ballina over the lifetime of the plan are the same as those employed in determining the Core Strategy in the County Development Plan. The number of residential units proposed over the lifetime of the plan (511) equates to 15.7% of the units allocated to the entire county by the department of Housing, Local Government and Heritage in 2021. It is within the remit of the Department to allocate the housing numbers, not within the remit of the Local Authority.
- 2 Comments noted. Such a synopsis shall be included in the final plan.
- 3 All objectives, projects and policy commitments have a timeline of within the plan period unless otherwise stated. The active travel measures proposed are all given envisaged timelines in the draft LTP, which will be included as an appendix to the final plan.

Recommendation: in relation to 1-3

1. Amend Table 2.2 as follows:

Ballina Allocation of Residential Units/Lands Requirements			
Land Zoning Category	Housing Targets (551)	Area	Overall housing target
Town Centre/Opportunity Sites	35	2.33ha	511
Residential Infill Lands	70	4.66ha	
New Residential Lands	446	29.73ha	

Table 2.2: Housing Units and land Requirements for Ballina to 2028.

2. A synopsis of enabling infrastructure with corresponding envisaged timelines will be included in the final plan.
3. No change to Plan.

Response: in relation to Observation 1-6

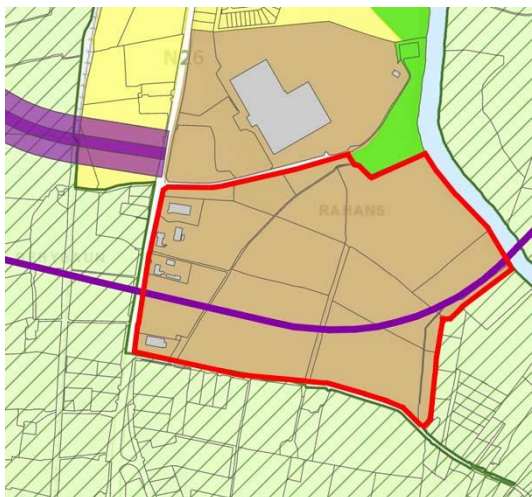
1. Comments noted. The CE takes on board the concerns expressed in the submission regarding the quantum of lands zoned Enterprise and Employment in the draft plan and more specifically the concerns expressed regarding the 27.13-hectare site identified as NEE 8 in

the SCA matrix. (See response to OPR Recommendation 6(ii)(a) above.)

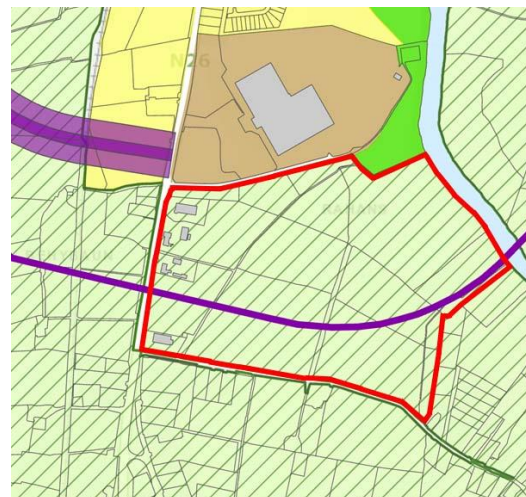
2. Comments noted. EDO 8 will be amended accordingly.
3. Comments noted. The provision of serviced sites on PA owned lands would result in an inefficient use of Council resources given ongoing requirements in terms of social/affordable housing provision under Housing for All. It is considered therefore that a more appropriate mechanism for the provision of stand-alone detached dwelling units in the town is to ensure that there is where, appropriate in terms of existing residential character and scale of development, that there is an appropriate mix of unit types. This can be achieved by the implementation of the fluid and site-specific approach to development densities proposed in Section 2.8.4 of the draft plan, while simultaneously having regard to the densities outlined in the recently published Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) or any subsequent guidelines.
4. The CE takes on board the observation, but it is simply not feasible for the LA to commit to the preparation of detailed masterplans for private sites over which it has no remit. Broad conceptual assessments would be more appropriate.
5. Comments noted. It is considered that the management of waste in the entire county is covered under INP 7 and INO 10 of the CDP.
6. The dLTP was drafted in conjunction with the dLAP and will be included in the appendix of the final plan NTA do not allow use.

Recommendation: in relation to Observations 1-6

1. Rezone site NEE8, as indicated on SCA for Enterprise and Employment to 'Agriculture' and amend SCA Map 1 and Table 1 in the Appendix accordingly:



Draft Plan Zoning – Enterprise and Employment



Proposed Zoning-Agriculture

2. Amend EDO 8 as follows:
'Support and facilitate the development of an integrated network of greenways and heritage trails, including The Monasteries of the Moy from Belleek to Killala, incorporating Eurovelo 1 Atlantic Coastal Route'.
3. Insert new objective DSO 11 as below:
DSO 11: Ensure that all new residential developments are assessed having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning

Authorities (2024) or any subsequent guidelines.

4. No change to Draft Plan.
5. No change to Draft Plan.
6. No change to Draft Plan.

3.3 Office of Public Works

Submission Number:	MYO-C92-4
Submission by:	OPW (Oifig na nOibreacha Poiblí)
Issues Raised/Relevant Chapter(s):	
Summary of Submission:	
<p>The OPW welcomes the preparation of an SFRA and the inclusion in the draft plan of policies IESP 2 and IESP 5 and objectives IESO 1 and IESO 3.</p> <p>The submission makes particular comments/recommendations regarding the following matters:</p> <ol style="list-style-type: none">1. Flood Zone Map - While Figure 8-1 in the SFRA shows Flood Zone A and B overlaid on Land Use Zonings, this is a low-resolution insert. It would be beneficial if a dedicated Flood Zone map at a legible scale with Flood Zones overlaid on Land Use Zonings were included.2. Groundwater Mapping - It would appear that in Figure 4- Maximum Historic Groundwater Flooding of the SFRA that the layers have been labelled incorrectly in the legend. Mayo County Council might review if it the purple shade should be the Groundwater & Surface Water Flooding from 2015/2016 and the pink shade should be the maximum historic groundwater flooding.3. National Indicative Fluvial Mapping - The SFRA states that: "There are no NIFM watercourses within the settlement boundary of Ballina, however there is one small area of NIFM extents within the Plan area which have not been considered in establishing the Flood Zones. The area is zoned Agriculture, which would be considered a less vulnerable type development in the Guidelines and would not be appropriate in Flood Zone A. When avoidance and substitution for a periphery urban area at flood risk is not possible and all criteria of the Justification Test cannot be satisfied then a policy objective should be attached to the zoning. This policy objective should limit existing development to minor development, as outlined in Section 5.28 of the Guidelines as amended by Circular PL 2/2014, and new development be limited to water compatible development in Flood Zone A and less vulnerable and water compatible in Flood Zone B.4. National Coastal Flood Hazard Mapping - There is no discussion or reference to the National Coastal Flood Hazard Mapping (NCFHM) in the SFRA. The NCFHM maps are based on more up-to-date estimates of extreme coastal levels than those used for the CFRAM coastal maps (that were based on the ICPSS data). As such the NCFHM maps may be considered in preference to the CFRAM with regards to the definition of the Flood Zones. There are only minor differences between the National CFRAM coastal dataset and the NCFHM dataset, and the flood relief scheme mapping may supersede both of these datasets.5. Flood Relief Scheme - Where there is evidentially robust additional sources of	

information, such as site specific flood risk assessments or where local, more recent surveys have been undertaken, this information can and should also be included in the making of spatial planning decisions. The OPW requests that Mayo County Council has full regard to the on-going design, planning and implementation of a flood relief scheme in Ballina, to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures, and that a specific objective in this regard is included in the Draft Local Area Plan.

6. **Existing Defences** - The National CFRAM programme identified defended areas with a 10% Annual Exceedance Probability (AEP) Standard of Protection. There is no discussion included in the SFRA in relation to these defences. Mayo County Council might also consider including a register of key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.
7. **Justification Tests (A21 Existing Residential)** - Mayo County Council might clarify if the Justification Test also covers the area of Existing Residential which overlaps with Flood Zone A and B to the north of the Existing Residential area shown in the image.
8. **Consideration of Climate Change Impacts** - The SFRA has included images of the 0.1%AEP present day extents with the 0.1% AEP climate change for both the National CFRAM fluvial and coastal respectively. While it is stated in the text that the fluvial climate change is the High-End Future Scenario it is assumed that the coastal climate change image is also the High-End Future Scenario. While the OPW welcomes this mapping climate change, mapping is also available for the fluvial and coastal indicative datasets, the mapping should also consider the effects of climate change on the 1% AEP extents as this is effectively Flood Zone A. Mayo County Council should consider climate change mapping produced as part of the Flood Relief Scheme. Future scenario mapping should also be overlaid with the land use mapping to help identify sites and developments that could potentially be affected by climate change.
9. **Arterial Drainage Schemes and Drainage Districts** - There is no discussion or reference in the SFRA to the OPW Arterial Drainage Schemes within the Plan area. The OPW requests that Mayo Council has regard in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.
10. **Nature Based Solutions and SuDS** - The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. There are 11 opportunity sites, 11 New Residential and 8 New Enterprise and Employment zonings identified in the Draft Plan where integrated and area-based provision of SuDS and green infrastructure may be appropriate in this context.
11. **Restrictions on the Construction Replacement and Alterations of Bridges and Culverts** - The OPW welcomes that the SFRA has noted that Section 50 consent is required for the three proposed travel bridges and for the watercourse crossings associated with the proposed western bypass. Mayo County Council may clarify that these consents are required from the Commissioners under Section 50 of the Arterial Drainage Act 1945 and is

in relation to the restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse.

12. **Errata** - There is a cross reference in Section 8.5 Quignamanger of the SFRA which requires updating.

Chief Executive's Response and Recommendation:

Response:

1. Figure 8.1 in the SFRA will replicate in a map Appendix and a land use zoning map with flood layers overlain shall be included in the appendix of the LAP.
2. The figure will be reviewed and updated in the SFRA as necessary.
3. The Flood Zones will be updated with these small area of NIFM data. The peripheral nature of the Agriculture zoning will mean that the JT cannot be applied or passed and a simple caveat of no highly vulnerable land use in Flood Zone A/B and no less vulnerable land use in Flood Zone A will be applied, exceptions as noted under Section 5.28. Objective IESO 3 will also be amended accordingly.
4. The NCFHM is a direct projection of a tidal level at point NW1 which is located circa 13km to the north west of Iniscrone. The CFRAM model represents the tidal cycle in more detail up the Moy estuary but is based on older data at point NW1, the differences are minor (and only affect the lower part of the settlement) but being consistent with comments in Westport it has been decided to also replace the CFRAM data with NCFHM for the tidal extents.
5. Objective IESO 3 will be amended accordingly. This will be added to the SFRA text.
6. The reasoning behind the non-application of the Justification Test is described in the Conclusion of Section 8.5.
7. The JT cannot be applied or passed outside of the core of the settlement.
8. The SFRA can have the 1%/0.5% AEP climate change maps included. Land Use Zoning can also be added at all climate change maps. Flood Relief Scheme data will not be available until the Stage 1 of Flood Relief Scheme is completed.
9. Section 5.3 of the SFRA specifically discusses the River Moy Drainage District. This can be amended with an additional figure and information, if available.
10. The SFRA will expand on where NBS/SuDS may be appropriate in the general context of Opportunity Sites or large undeveloped zoned lands.
11. Comments noted.
12. Comments noted. This will be updated in the SFRA

Recommendation:

1. Include new land use zoning map with flood layers overlay in the appendix of the final plan.
2. No change to Draft Plan.
3. Include new part g to IESO 3 to read as follows:
g) Only minor additions to existing developments and new water compatible developments are permissible within Flood Zone A and less vulnerable water compatible development are permissible in Flood Zone B in accordance with the provisions of the Flood Risk Management Guidelines (DoEHLG/OPW 2009) and Circular PL2/2014 (or any updated/superseding document). SFRA will be reviewed and updated accordingly.
4. No change to Draft Plan

5. Amend IESO 3 by including additional section f):
“The LAP supports the on-going design, planning and implementation of the Ballina Flood Relief Scheme”
4. No change to Draft Plan.
5. No change to Draft Plan.
6. No change to Draft Plan.
7. No change to Draft Plan.
8. No change to Draft Plan.
9. No change to Draft Plan.
10. No change to Draft Plan.

3.4 Uisce Éireann (Irish Water)

Submission Number:	MYO-C92-35
Submission by:	Irish Water (Uisce Éireann)
Issues Raised/Relevant Chapter(s):	Sustainable Drainage; Road and Public Realm projects; Availability of Water Services; Zoning; Wastewater Infrastructure; and Water Supply Infrastructure
Summary of Submission:	
<p>Uisce Éireann welcomes the inclusion of objectives and initiatives relating to Sustainable Urban Drainage Systems (SuDS).</p> <p>As regards proposed public realm and active travel measures, Uisce Éireann recommends engagement is necessary to ensure public water services are protected and maintained during any necessary works.</p> <p>In relation to zonings, Uisce Éireann make reference to sites and provides commentary on potential works such as network extensions, third party agreements etc.</p> <p>As regards specific recommended for alterations, additions to the plan; Uisce Éireann request the following:</p> <ol style="list-style-type: none"> 1. Amend DSP 6 as follows: <i>“Ensure that all new development within the Ballina LAP area accord with the policies, objectives and development standards set out in the Mayo County Development 2022-2028, in respect of water and wastewater infrastructure wastewater systems.”</i> 2. Amend population equivalent text in Table 10.2 from 10,171 to 14,731 3. Amend IESP2 by added the following: <ol style="list-style-type: none"> a. <i>“Maintain, improve and enhance the environmental and ecological quality of surface waters and groundwater, including reducing the discharges of pollutants or contaminants to waters in accordance with the River Basin Management Plan for Ireland 2022-2027 (DHPLG) and associated Programme of Measures.</i> b. <i>Require all planning applications to include surface water design calculations to establish the suitability of drainage between the site and the outfall point; where appropriate and feasible.</i> 	

- c. *Encourage Require the use of SuDS in public and private developments and within the public realm to minimise and limit the extent of hard surfacing and paving, in order to reduce the potential impact of existing and predicted flooding risks*
- d. *To require all new development to provide a separate foul and surface water drainage system*
- e. *To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water.”*

4. Amend IESO2 as follows: *“Work with Uisce Éireann to ~~separate~~ prohibit the discharge of additional surface water to combined (foul and surface water) sewers within the plan area, in order to maximise the capacity of existing collection systems, where possible.”*
5. Amend IESO1 as follows: *“Encourage Require the use of SuDS within public and private developments and within the public realm to minimise and limit the extent of hard surfacing and paving, in order to reduce the potential impact of existing and predicted flooding risks.”*
6. Add new Policy to LAP to read as follows: *“Prior to granting planning permission the Council will ensure that adequate water services will be available to service development and that existing water services are not negatively impacted. The Council should require developers to provide evidence of consultation with Uisce Éireann prior to applying for planning permission.”*
7. UE seek confirmation that ‘Utility Structures’ as referenced in the Land Use Zoning Matrix as ‘Open for Consideration’ includes new infrastructure that may be required by UE.
8. UE suggests the inclusion of a requirement for developers to undertake pre-planning consultation with UE.
9. UE encourages the preparation of masterplans/frameworks for regeneration/opportunity sites and that consideration should be given as to how the sites will be serviced and how development might impact on UE infrastructure.

Chief Executive’s Response and Recommendation:

Response:

1. Comments Noted. Amendment considered acceptable.
2. Comments Noted. Amendment considered acceptable.
3. Amendment in respect of IESP2(c) only is considered acceptable, as it consistent with Objective INO17 of the MCDP. It is considered that points (d) and (e) as proposed can be adequately managed through the provisions of MCDP 2022-2028 and the Development Management process.
4. IESO2 is consistent with Surface Water Policies and Objectives contained in the MCDP 2022-2028 and considered in line with same. Proposals as sought by UE can be managed through the Development Management process as appropriate.
5. Amendment in respect of IESO1 is considered acceptable, consistent with the Objectives of the MCDP.
6. Consideration as to how developments will be serviced or might impact on UE infrastructure form part of all preliminary plan and pre-planning application procedures. It is considered that the issues highlighted in the objective as proposed is adequately

addressed in the draft Plan and the County Development Plan 2022-2028.

7. New 'Utility Structures' as referenced as 'Open for Consideration' includes new infrastructure required by UE, subject to proper planning and sustainable development.
8. It is considered that the issue highlighted is adequately addressed in the dLAP and the Mayo County Development Plan 2022-2028 and the Development Management process.
9. Comments noted, but it is simply not feasible for the LA to commit to the preparation of detailed masterplans for private sites over which it has no remit. Broad conceptual assessments would be more appropriate. Due regard will be had to the service capacity and UE's infrastructure and projects.

Recommendation:

1. Amend DSP 6 as follows: *"Ensure that all new development within the Ballina LAP area accord with the policies, objectives and development standards set out in the Mayo County Development 2022-2028, in respect of water and wastewater infrastructure ~~wastewater systems.~~"*
2. Amend Table 10.2 to reflect the population equivalent in text from ~~10,171~~ to 14,731
3. Amend IESP2 (c) to replace the word *Encourage* to 'Require'. No change to remainder of IESP 2.
4. No change to Draft LAP
5. Amend IESO1, to replace the word *Encourage* to 'Require'
6. - 9. No change to Draft LAP.

3.5 Environmental Protection Agency

Submission Number:	MYO-C92-2
Submission by:	Environmental Protection Agency
Issues Raised/Relevant Chapter(s):	See below.
Summary of Submission:	
<p>SEA (Strategic Environmental Assessment) Guidance document should be considered when preparing the LAP. The LAP should also be consistent with the policies and objectives of the National Planning Framework (NPF) and the Northern and Western Regional Spatial and Economic Strategy (RSES).</p> <p>The EPA recommend the following is included in the Environmental Report in line with SEA Regulations:</p> <ul style="list-style-type: none"> • Assessment of Alternatives • Assessment of Environmental Effects • Mitigation Measures • Monitoring (with effective and suitable remedial action where appropriate) <p>Any future amendments to the plan should be screened using the same method as applied in the 'environmental assessment' of the plan.</p> <p>The SEA Statement – 'information on the decision' should be issued upon adoption and should summarise:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been 	

<p>considered during the preparation of the Plan;</p> <ul style="list-style-type: none"> • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>A copy of the SEA statement with the above information should be sent to any environmental authority consulted during the SEA process. The following should be consulted as per SEA Regulations:</p> <ul style="list-style-type: none"> • EPA • Minister for Housing, Local Government and Heritage • Minister for Environment, Climate and Communications • Minister for Agriculture, Food and the Marine • Any adjoining relevant adjoining planning authority
Chief Executive’s Response and Recommendation:
<p>Response: Comments noted.</p> <p>Recommendation: No change to the Draft Plan.</p>

3.6 Department of the Environment, Climate and Communications & Geological Survey Ireland

Submission Number:	MYO-C92-22
Submission by:	Department of the Environment; Climate and Communications / Geological Survey Ireland
Issues Raised/Relevant Chapter(s):	Climate, District Heating, Waste, Telecommunications, Geology
Summary of Submission:	
<ol style="list-style-type: none"> 1. It is pointed out that The Climate Action Plan 2023 (CAP23) is currently being updated as Climate Action Plan 2024 (CAP24). It is recommended that the Local Area Plan be updated to be consistent with CAP23 and subsequent CAP24, following its finalisation, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended). Amend the reference to the Climate Action Plan 2023 in Section 1.2 Climate Action to be amended to refence CAP24. 2. The Department makes a recommendation to include specific reference to the National Adaption Framework (NAF) 2018 and any subsequent variations in the finalised LAP, by incorporating policy which is consistent with the updated NAF and policies in the MCDP 2022-2028. 3. In relation to district heating, the Department recommends that the Local Authority consider the outcomes of the National Heat Study when examining the potential roll-out of district heating. 4. In relation to the built environment and heating, the Department highlight policy which promoted the use of zero carbon technologies (CAP1(c) Section 3.5) and recommends 	

that consideration be given to implementing further policy to support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP23 and subsequent CAP24.

5. In relation to Waste and the Circular Economy, the reference to the Circular Economy Bill 2021 in Section 3.4.6 is noted, and it is requested that it be updated to the 'Circular Economy Act 2022'.
6. In relation to Construction Waste Management, it is recommended that the LAP has regard to the guidance 'Best Practice guidelines for the preparation of resources & waste management plans for construction & demolition projects' and give this effect through the objectives of the plan.
7. In relation to telecommunications, the Department encourages the inclusion of specific reference to the following:
 - Harnessing Digital – the Digital Ireland Framework' particularly Dimension 2 of the framework which places importance on supporting 5G rollout across populated areas of Irelands by 2030.
 - NSO 6 of the National Development Plan 2021-2023 which states that high quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State.
 - In addition to the above, it would be welcomed if direct reference is made in the dLAP supporting 5G rollout.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted. It is considered appropriate to update reference to the Climate Action Plan 2024, as recommended.
2. Comments noted. The Mayo County Development Plan 2022-2028 has incorporated the provisions of the National Adaption Framework 2018 into its policies and objectives, which in turn underpins all Local Area Plans in the County.
3. Comment Noted. It is considered that LA actions regarding district heating from renewable energy sources are outlined in Section 11.7.11 and Objective REO 19 of the Mayo County Development Plan 2022-2028. There is also a commitment to carry out a feasibility assessment for district heating under Objective REO 21 of the MCDP.
4. It is considered that the promotion of the electrification of heating systems is more a matter for the relevant government agency and perhaps the building Regulations.
5. Noted. It is considered appropriate to amend text to bring into line with the current position of legislation as recommended.
6. It is considered that LA actions regarding Waste Management are provided for in Section(s) Section 7.4.2 contained in the MCDP. The management of waste within the entire county is covered under policy INP 7 and objective INO 10 of the Mayo County Development Plan 2022-2028.
7. Comments noted. Section 4.4.2, 4.4.7 and 7.4.4.4 of the MCDP refers to Telecommunications. In considering proposals for telecommunications infrastructure, it is stated that the Council will have regard to the Department of the Environment, Heritage and Local Government's "Telecommunications Antennae and Support Structures, Guidelines for Planning Authorities" 1996 and Circular Letter PL07/12 'Telecommunication Antennae and Support Structures' and any amendments thereof.

The provision of Telecommunications Infrastructure is covered under policies INP 18, INP 19, EDP 15, EDP 16 and EDP 17 and objective(s) EDO 51, INO 32, INO 33, INO 35 and INO 36 of MCDP. It is considered that the Local Authority actions regarding telecommunications is adequately provided for in the various sections of the MCDP.

Recommendation:

1. Amend Section 1.2, to reflect the following changes:
Paragraph 2 as follows: ‘....The Climate Action Plan (CAP) ~~2023~~ 2024 sets out the measures to be taken to reach our targets in each sector of the economy.....’
paragraph 4 as follows:’The compact growth agenda outlined in the NPF is reinforced through Ireland’s CAP ~~2023~~ 2024, which promotes extensive retrofitting of existing premises and housing stock and the prioritisation of brownfield and compact development. The actions committed to in CAP ~~2023~~ 2024 strongly align and support the regeneration and revitalisation of Ireland’s towns, including through reducing demand for travel by car, sustaining economic and social activity at street level and increasing access to shops, employment, and amenities by sustainable transport modes.’
Amend Section 2.9, paragraph 1 as follows:’The Plan also places a priority and focus on enhancing and protecting the biodiversity, natural heritage and environment of the town and its environs. The LAP has been guided by the UN Sustainable Development Goals and climate action provisions of the NPF and RSES, and Ireland’s CAP ~~2023~~ 2024’.
2. No change to Draft LAP
3. No change to Draft LAP
4. No change to Draft LAP
5. Amend Section 3.4.6 as follows:’The government’s commitment to these principles is underlined by the publication of the ~~Circular Economy Bill 2021~~ Circular Economy Act 2022, which will provide a national policy framework for Ireland’s transition to a circular economy’.
6. No change to Draft LAP
7. No change to Draft LAP.

3.7 National Transport Authority

Submission No.	MYO-C92-34
Submission by:	National Transport Authority (NTA)
Issues Raised/Relevant Chapter(s):	Issues: Transport, sustainable travel, zoning, national road policy Chapter(s): Chapter 7 (Movement & Transport), and Chapter 11 (Land Use Zoning Objectives of the draft Ballina LAP; and the draft Ballina Local Transport Plan.
Summary of Submission:	
The submission from the NTA commences by welcoming the fact that the draft LAP and draft LTP were produced in parallel.	

The NTA then set out list of policy and guidance documents and the relevant provision of the CDP upon which their submission was based.

1. **Integration of Land Use and Transportation:** The NTA consider that the parallel drafting of the Ballina LAP and LTP provides an opportunity to ensure that future development locations in the town are well serviced by sustainable modes of transport going forward. The Authority consider therefore that it is imperative that prior to the development of both residential and non-residential lands on the periphery of the town be closely linked to the delivery of associated active travel infrastructure. The submission states that this linkage is particularly relevant to the site zoned Strategic Enterprise and Employment on the eastern edge of the town and asks that Table 11.1 be altered to state that the delivery of these lands will be tied to the delivery of associated sustainable transport infrastructure. The NTA area also concerned with the text in Section 5.5.2.1 which references the potential of these lands to “accommodate both people and product intensive economic activity”. The Agency recommends therefore that appropriately worded objectives are included in the draft plan requiring that development of trip intensive developments on peripheral sites would only occur where the sequential approach is applied and where lands are adequately served by sustainable transport.
2. **Car Parking:** The NTA consider it an imperative that the LTP policy objectives reflect the commentary in the LAP regarding the development of a parking strategy and the potential to reduce on-street parking on foot of the low occupancy levels identified in some car parks.

Response and Recommendation of Chief Executive

Response:

1. All sites zoned New Residential and Enterprise and Employment, irrespective of sequential location, are fully serviced as regards footpaths and lighting. However, while all of these will be serviced by enhanced active travel measures in the short-medium time in accordance with the measures outlined in the LTP, it is not considered appropriate, owing to their Tier 1 status, to restrict development on these sites until they are adequately serviced by the relevant sustainable transport measures proposed in the LTP.
2. As regards the installation of active travel measures to serve the Strategic enterprise and Employment zoned lands on the N26; Proposal 3 of the LTP states: *“The element of Proposal 3 relating to Active Travel connectivity to the IDA site, will be progressed to facilitate active travel trips to and from the IDA site with consideration of the development of the site should it be considered necessary by the Planning Authority at the time.”*

Comments noted. Text in section 7.9 of Draft Plan will be altered.

Recommendation

1. No change to Draft Plan
2. Alter text of Section 7.9 as follows:

While it is necessary to have parking provision within the town, the devotion of large portions of the town centre to surface parking requires a new perspective, in line with the overarching objectives of this Plan, and the LTP in particular - regeneration within the town centre, compact.....

3.8 Transport Infrastructure Ireland

Submission Number:	MYO-C92-6
Submission by:	Transport Infrastructure Ireland
Issues Raised/Relevant Chapter(s):	Chapter 7: Movement and Transport Development Strategy and National Roads, Enhanced Regional Accessibility, Local Area Plan / Local Transport Plan Integration, Specified Local Transport Measures, Maintaining the Strategic Capacity and Safety of National Road Network
Summary of Submission:	
<p>1. EN, National and Regional and Regional Policies The TII commence their analysis of the Draft LAP by first referencing regulations and policies that relate to the Draft LAP such as:</p> <ul style="list-style-type: none"> • Ten-T Regulations, • National Planning Framework (NPF) • National Investment Framework for Transport in Ireland (NIFTI) • National Sustainable Mobility Policy • Spatial Planning and National Road Guidelines for Planning Authorities • Regional Spatial and Economic Strategy <p>1. Development Strategy and National Goals: The TII quote RPO 6.5 which gives effect to NSO 2 in maintaining the strategic safety and capacity of the national road networks. The submission subsequently states that it would welcome the inclusion in Sections 2.10 of the Draft LAP of objectives which integrate this protection of the national road network into the Draft LAP.</p> <p>2. Enhanced Regional Accessibility (i) The submission references the collaboration that has taken place between the PA and themselves in relation to the progressing of the N26 Ballina Bypass Phase 1 and its notes that while the line of the road is indicated on Map 1 Land Use Zoning, there is no specific policy/objective that relate directly to the project. TII request that such a policy/objective be included. (ii) The submission also requests that MTP 3 of the plan be amended to include reference to the need for all new developments comply with DMURS, but also, where national roads are impacted, with the requirements of TII publications.</p> <p>3 Local Area Plan/Local Transport Plan Integration and Specific Objectives The TII supports the concurrent preparation of the LAP and LTP.</p> <p>4 Official Policy, Design standards and TII Publications The TII especially welcomes measures in the LTP such as Measure R2 which seeks to retain the capacity of the national road network to cater for through traffic trips using the N526 and N59 along with the inclusion of confirmation that projects with potential to impact on national roads will be developed in accordance with the requirements of TII publication DN-GEO-03030. The TII recommends that the LAP includes objectives that mirror this commitment, such as altering policy MTP 3 as previously proposed under item 2 of this submission.</p> <p>5 LAP and LTP Integration/ Enterprise and Employment Lands The Authority refers to the NPF National Strategic Outcomes concerning compact growth and sustainable outcomes, with particular reference to the Enterprise and Employment</p>	

zoned lands located on the N26 to the south of the town. The TII notes that a 100 kph speed limit applies along the site frontage and expresses concern that direct access or intensification of direct access onto a national route in this scenario may conflict with the provisions of official policy. In light of this TII recommends that this zoning be reviewed.

6 Strategic Enterprise Employment Lands/Specific Local Transport Plan Measures

The TII acknowledge that liaison has already taken place with the local authority in relation to this IDA owned site on the N26, with regard to what they refer to as, progressing the subject site as a location where Developments of National and Strategic Importance can be considered in accordance with Section 2.6 of the DoECLG , having regard to the 100kph speed limit that pertains on the N59 at this location. The TII is aware that the Case for Exceptional Circumstances” in accordance with Section 2.6 of the DoELG Planning and National Roads Guidelines has yet to be completed and finalised by the Council. The TII is also aware that the Council in accordance with TII Publications DN-GEO-03030 (Design Phase Procured for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes) are pursuing the completion of a Design Report requirement with the IDA to fulfil the requirements of Section 2.6 of the DoELG Planning and National Roads Guidelines, in particular the outstanding analysis of the proposed access from the N59.

The TII state that they are available to liaise on this matter and recommend the use of a table attached to their submission which represents the 10 items that Section 2.6 of the DoELG Guidelines require to be addressed in the development of any case for Exceptional circumstances.

The submission requests that it be acknowledged in section 5.5.2.1 of the draft plan that the lands are zoned Strategic Enterprise and Employment and that the zoning designation is subject to Section 2.6 of the DoELG Planning and National Roads Guidelines. The submission also requests that the zoning matrix be altered to remove what are considered inappropriate uses for the proposed Strategic Enterprise and employment zoning such as “Restaurant Café and Offices”.

The TII also references proposed measures in the LTP to connect residential areas between Creggs Road and Quay Lane as part of the SRTS which will allow for the provision of safer active travel measures to the site in question. The TII request that this proposal should be clearly aligned with the development of the Strategic Enterprise lands in the LAP and a requirement to support the development of the IDA lands. This requirement is considered especially pertinent by the TII in light of what they consider are significant issues regarding the achievement of the long-term LTP objective to link the IDA lands and Creggs Cross to the N59/Quignalecka/Behy Road junction along the high-speed N59.

The TII Specifically recommends the following:

- (i) The Council is requested to review the Enterprise and Employment Lands to the south of Ballina adjoining the N26, national road, where TIIs records indicate a 100kph speed limit applies to ensure proposals comply with the requirements of Section 2.5 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities.
- (ii) TII recommends that the designation and objectives concerning the Strategic Enterprise and Employment designated lands on the N59, Sligo Road, are reviewed to address the requirements of Section 2.6 of the DoECLG Guidelines and finalise provisions related to ‘Exceptional Circumstances’ for ‘Developments of National and Regional Strategic Importance’ prior to the adoption of the Local Area Plan. To assist, please see the Table included in Appendix 1 which represents the ten items that Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities require to be addressed in the development of any case for ‘Exceptional Circumstances’. Associated text updates to the Draft Local Area Plan and Local Transport Plan should also be considered.

The co-ordination of the development of the Strategic Enterprise and Employment Lands on the N59, Sligo Road, with the required Active Travel measures identified along Creggs Road should be explicitly provided for in the Local Area Plan as well as the Local Transport Plan in the interests of clarification and to give effect to the plan led and evidence based requirements of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

- (iii) TII considers that the issues identified in the foregoing require review to ensure that the national road network continues to perform its strategic function in accordance with official Government policy and that policies and objectives included in the Local Area Plan adhere to the provisions of Government policy.

7 **Maintaining the Strategic Capacity and Safety of the National Road Network**

The TII recommends that the LA considers and references, and incorporates into the LAP the following elements of the DoECLG Guidelines when exercising its development management functions:

- i. TII Publications DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'
- ii. The TII Traffic and Transport Assessments (TTA) Guidelines 2014
- iii. **Section 3.8 of the DoELGs Guidelines** regarding to control the proliferation of non-road traffic signage on and adjacent to National Roads.
- iv. **Safeguarding National Road Drainage Regime:** the TII recommend the inclusion of a new objective in the LAP outlining that; *The capacity and efficiency of the national road network drainage regimes in Mayo will be safeguarded for road and drainage purposes.*
- v. **Renewable Energy Grid Connections:** The TII would welcome the consideration of an objective in the LAP requiring the consideration of alternative locations for grid connections as opposed to been placed along the strategic national road network.
- vi. **Noise:** S.I. Number: 140 of 2006 Environmental Noise Regulations
- vii. **Green Ways:** TII recommends consultation with internal project and design staff.

Chief Executive's Response and Recommendation:

Response:

- 1 Comments noted. It is considered that National Routes are sufficiently protected under MTP 23 and MTP 24 of the CDP.
- 2
 - i) Comments noted. New objective will be included.
 - ii) Comments noted. Policy MTP 3 will be amended accordingly.
- 3 Comments noted. No change to draft plan.
- 4 Comments noted. Policy MTP 3 will be amended accordingly.
- 5 Comments noted. The subject site will be rezoned to Agriculture. (See recommendation in response to OPR Recommendation 6(ii)(a) above.
- 6
 - (i) The lands in question will be rezoned to Agriculture, as proposed in point 5 above.
 - (ii) This site was zoned Industrial Commercial in the previous Ballina Town and Environs Development 2010-2015 and forms part of a number of IDA owned strategic sites within the county which will be utilised to attract investment. Objective MTO 22 of the Mayo County Development Plan 2022-2028 identifies the site as one that will be subject to consultation with the TII regarding "Exceptional Circumstances" criteria, as outlined in Section 2.6 of the DoELG Guidelines. These consultations between the PA, IDA and TII regarding this site commenced in July 2023 and as part of their role on the working group for the Ballina LTP the TII indicated their acceptance of the principle to zone this

site as **Strategic Enterprise and Employment** in the draft LAP. The IDA have also confirmed that plans for a high-quality enterprise/technology park at this location will be submitted in the near future.

The long-term commitment to the development of this on the part of both the Mayo Co Council and the IDA is also highlight by the fact that significant works were undertaken in 2005 to facilitate the installation of a right turn filter lane into the site. The work was undertaken by Mayo Co. Council and funded by the NTA at a cost of €750,000.

Furthermore, on foot of the proposed reappraisal of the Enterprise and Employment zone site NEE 8 on foot of OPR Recommendation 6 (ii)(a) above, there would be a total of 36.94 hectares of undeveloped E&E zoned lands available in the town, most of which either forms extensions to, or is adjacent to conventional enterprise and retail parks that are much smaller in area than the IDA owned lands. However, it is worth repeating that these lands are designated as a very distinct zoning.

As regards future active travel measures to the site, these are proposed under Proposal 3 of the draft Ballina LTP, where it states: *“The element of Proposal 3 relating to Active Travel connectivity to the IDA site, will be progressed to facilitate active travel trips to and from the IDA site with consideration of the development of the site should it be considered necessary by the Planning Authority at the time.”*

As a further indication of the commitment on the part of the PA to with the requirements of S2.6 of the Guidelines, the 10 items included in the table attached as an appendix to the TII report are addressed as follows:

- **The relevance and appropriateness of proposed development in supporting the aims and objectives of the National Spatial Strategy and Regional Planning Guidelines;**

Response: Developments of national or regional strategic importance are those which contribute significantly to meeting any of the objectives of the National Planning Framework or contribute significantly to meeting any regional spatial and economic strategy for an area, or have a significant effect on the area of more than one planning authority. It is considered that the development of a business park to accommodate foreign direct investment (FDI) meets the above criteria. The IDA is committed to the pursuit of more balanced, compact regional development which can deliver complementary efficiency and equity gains, with the overall impact of helping to advance national development. In line with national and regional economic policy, FDI has been, and will continue to be, hugely important to the Irish economy. IDA Ireland’s strategy, [‘Driving Recovery and Sustainable Growth’ 2021-2024](#) sets out the key targets that the Agency is working towards in order to sustain and grow investment by overseas companies in the next number of years. While Ireland continues to benefit from FDI, there is a clear focus on ensuring its advantages are spread more evenly across the country. IDA Ireland and the Government have placed a particular emphasis on growing investment in the regions, with regional development at the centre of the IDA’s strategy. This entails new regional investment targets in addition to developing clusters of investment within regions to sustain and attract more overseas companies from particular industries.

The IDA site is located on lands zoned Industrial in the current Ballina Town and Environs Development Plan 2009-2015, which provides for industry and employment (See Map 1 below). The plan also refers to IDA Ireland which has a number of key strategic sites in County Mayo, including the subject site in Ballina. These strategic sites will be utilised to attract investment into these areas and the plan indicates an expectation the that the development of a high-quality industrial park will be put in place on the IDA owned lands in the near future. The NWRA RSES and MCDP 2022-2028 identifies Ballina as a key town to be prioritised for local and regional enterprise as the main economic driver for a large area of north Mayo and West Sligo.

“Key Towns are those regionally strategic employment centres of significant scale that can act as regional drivers complimenting and supporting higher-order urban areas within the settlement hierarchy with potential to accommodate a significant level of growth in population and employment through appropriate investment in infrastructure, support services and placemaking initiatives” – NWRA RSES

According to the National Planning Framework (NPF) and RSES, as part of Ballina’s key town status it’s projected population increases should be accompanied by job creation at a ratio of 0.66:1 (NPO 1c). This translates to the creation of 784 jobs in Ballina over the lifetime of the new Ballina Local Area Plan which is currently being prepared. Zoning provision must be included to ensure that enough serviced enterprise and employment lands are available for development over the lifetime of the plan to assist Ballina capitalise on its Key Town status and build on the links with the nearest Regional growth centre of Sligo as defined in the NPF. The IDA site which is the subject of this report has a provisional zoning of Enterprise and Employment in the draft LAP. This has been guided by current zoning provision, planning history on the lands in question, Objective MTO 22 of the MCDP, existing on site services and road improvements made on this section of the N59 to accommodate the development of an industrial park at this location. The zoning provision has also been guided by the Draft Ballina Local Transport Plan which includes proposals for active travel measures and public transport modes linking the town centre and its environs (See Proposal 3 below). We would therefore respectfully suggest that the proposed zoning of these lands aligns directly with the objectives of the NPF, RSES and MCDP and furthermore impact on a regional scale beyond Mayo into adjoining counties. Clearly, development of a national and strategic importance.

- **The requirements of other planning guidelines issued under section 28 of the Act including the Retail Planning Guidelines (2005), which include a general presumption against large retail centres being located adjacent or close to existing, new or planned national roads, including motorways;**
Response: No retail is permitted under the zoning matrix for the lands in question.
- **The nature of proposed development and the volume of traffic to be generated by it;**
Response: The IDA Ballina Local Improvement Scheme TII Design Report for the Strategic Enterprise and Employment lands has been submitted to Transport Infrastructure Ireland as part of the Exceptional Circumstances case procedure.
- **Any implications for the safety, capacity and efficient operation of national roads;**
Response: The IDA Ballina Local Improvement Scheme TII Design Report for the Strategic Enterprise and Employment lands has been submitted to Transport Infrastructure Ireland as part of the Exceptional Circumstances case procedure.
- **Any plans for future upgrades of national roads and other transport infrastructure/services;**
Response: The IDA Ballina Local Improvement Enterprise and Employment lands has been submitted to Transport Infrastructure Ireland as part of the Exceptional Circumstances case procedure.
- **The suitability of the location compared to alternative locations;**
Response: There are no other lands proposed for Strategic Enterprise and Employment zoning other than the IDA site and adjacent lands (Site 2 below, Map 2) as these lands are of a significant scale to cater for strategic developments of a bespoke nature such as an IDA business park. Development of the scale envisaged for the IDA site could not be accommodated on other proposed Enterprise and Employment lands due to size constraints shown on Table 1 below.

New_E&E_No	Area Hectares
1	7.42
3	10.27
4	27.12
5	2.28
6	2.13
7	5.94
8	7.74
9	1.16
New Strategic E&E No	Area Hectares
1	23.15

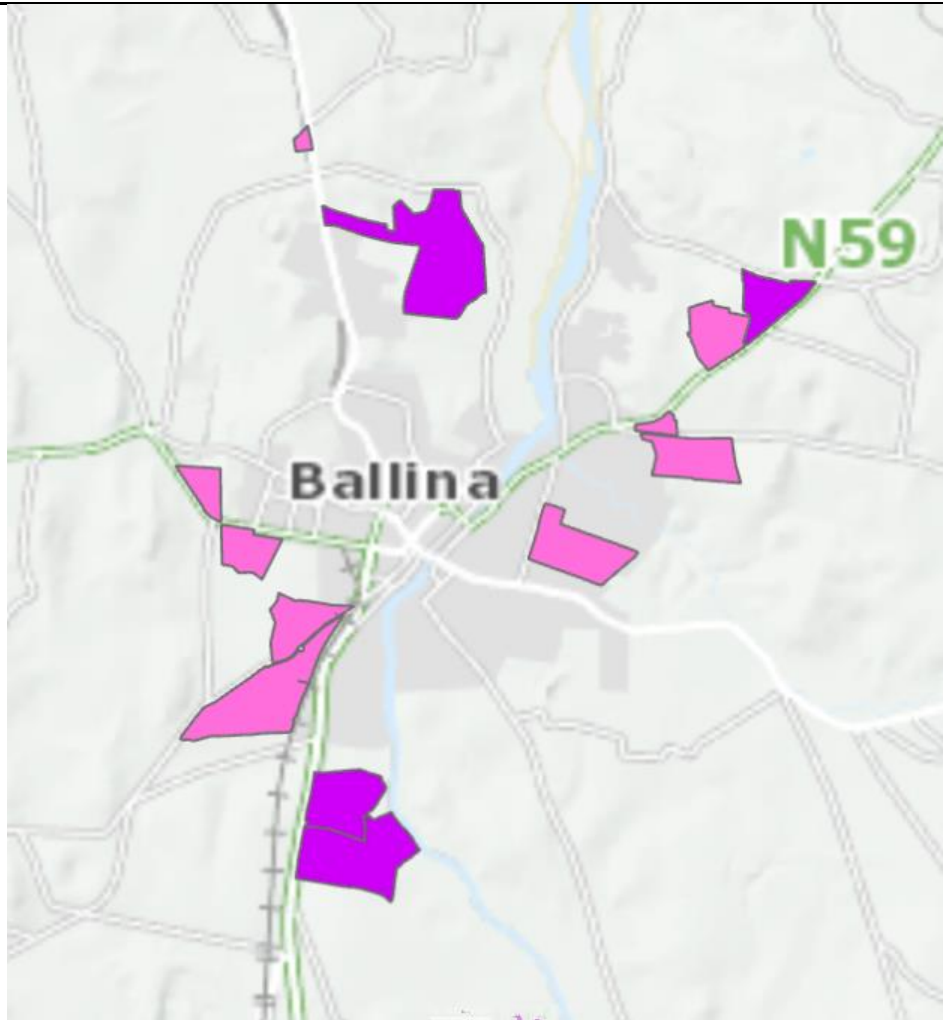
Table 1: Areas of land in Ha identified for new/Strategic E&E zoning provision in the Draft Ballina LAP.

Note: The CE Report proposes the re zoning to Agriculture of Site 4.

Ballina Town and Environs Development Plan 2009-2015 and works enabled by the National Roads Authority:

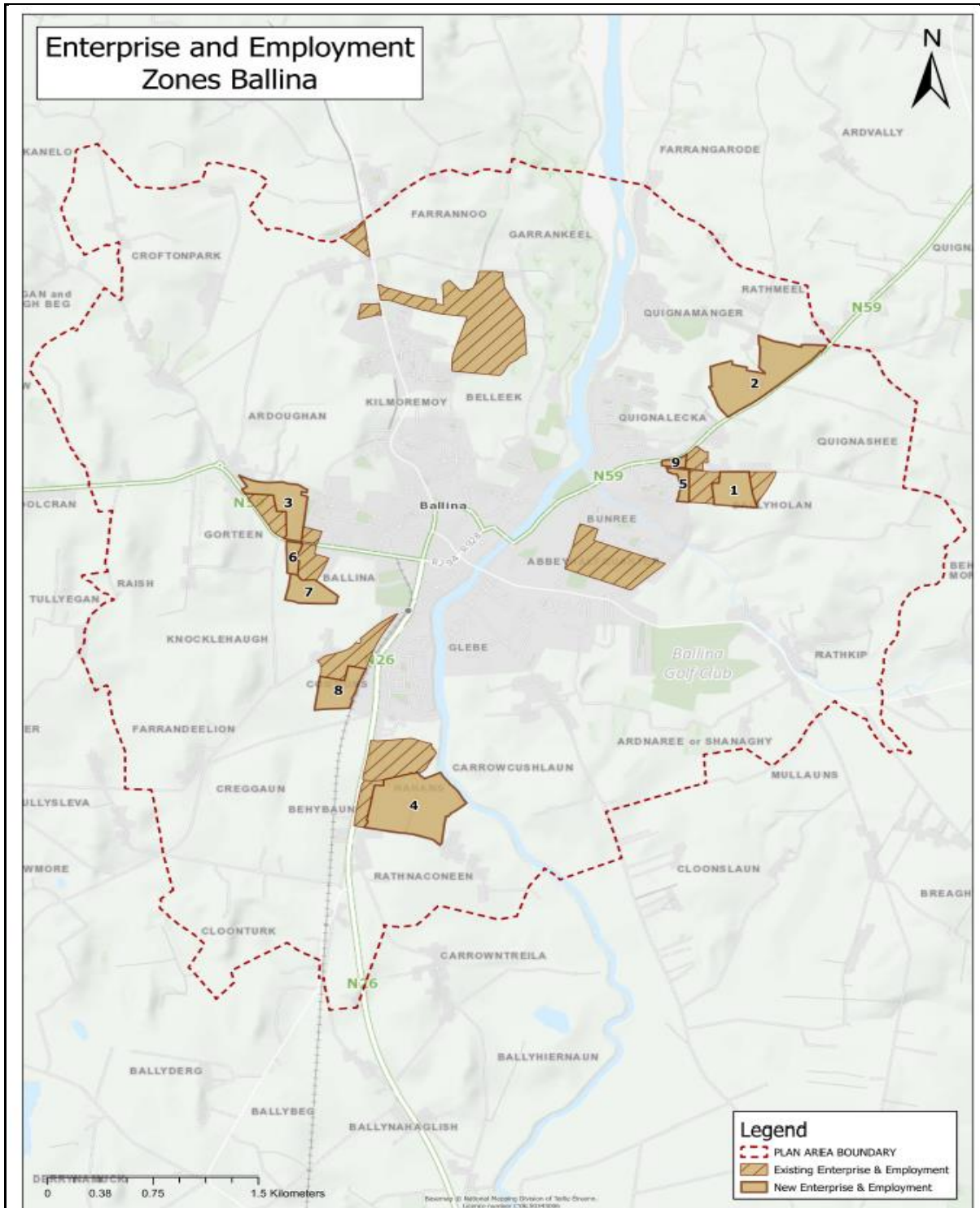
The lands at Quignamanger lands were zoned IC Industry and Commercial in the most previous Town & Environs Plan for Ballina. This followed the purchase of the lands by the IDA, in conjunction with Mayo County Council, and the roads works/improvements/widening carried out on the lands in question by Mayo County Council, funded by the NRA. to accommodate the proposed zoning. ***The works at the IDA site on the N59 were undertaken by Mayo County Council and funded by the NRA. The approximate cost was €750,000. The work comprised the widening and re alignment of the N59 from the southern boundary of the IDA site to the Creggs Road junction. The widening was to facilitate the installation of a right turn filter lane to the IDA site.***

Map 1 below shows the lands zoned for Industry and Commercial in the previous Town & Environs Plan. It is clear that nearly all the lands being proposed for Enterprise and Employment in the draft Ballina Town and Environs Local area Plan were already zoned Industry/Commercial. Including the proposed Strategic Enterprise and Employment lands at Quignamanger.



Map 1: Current Industrial (pink) and Industrial Commercial (purple) zoned lands in the Ballina Town and Environs Development Plan

Map 2 (below) is an up-to-date assessment of the available/undeveloped lands for Enterprise and Employment in the Draft LAP boundary. In relation to the issue of *the suitability of the location compared to alternative locations* it clearly demonstrates that the proposed Strategic Enterprise and Employment lands at Quignamanger are the only lands of a suitable size/area available to accommodate the IDA proposal. Particularly as site 4 is now proposed for to be varied to Agricultural zoning as recommended by the TII and the OPR.



Map 2. Up-to-date assessment of available/undeveloped lands for Enterprise and Employment in the Draft LAP boundary

- The pattern of existing development in the area;**
 Road improvements have been carried out to accommodate the proposed zoning/development as detailed in item 6 above. The lands have been specifically catered for in the Ballina Local Transport Plan and integrated into the existing active travel facilities/measures in the immediate area.
- Satisfactory details of the proposed demand management measures;**
 The proposal is simply for zoning and at this stage the exact uses have not been established. In

this regard the IDA Ballina Local Improvement Scheme TII Design Report for the Strategic Enterprise and Employment lands has been submitted to Transport Infrastructure Ireland as part of the Exceptional Circumstances case procedure.

- **Acceptable funding and delivery proposals for any road improvements required;**
Previous spend of €750,000 had been documented in item 6 above. Further funding and delivery proposals will be identified on receipt of TII assessment of road improvements required.
- **The precedent that could be created for cumulative development in the area and the potential implications for the national road network.**

The lands proposed to be zoned are subject to the Exceptional Circumstances requirements of the TII and so cannot be simply replicated and do not provide precedence for further development.

The CE proposes to continue on going consultation with TII as regards satisfying the Exceptional Circumstances criteria, as required under 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012) for the Strategic Enterprise and Employment Zoned lands in question.

To further strengthen this commitment in the LAP, and in response to items outlined under heading '**The TII Specifically recommends the following**' in it is also proposed to:

- a) amend the title and narrative of Section 5.5.2.1 of the plan to confirm the Strategic Enterprise and Employment zoning of the lands.
 - b) to amend objective EDO 1 and
 - c) Amend Table 12.2 Land Use Zoning Matrix.
 - iii. The text relating to this issue in the draft LTP is proposed to be updated to:
"This element of Proposal 3 relating to ACTIVE Travel connectivity to the IDA site, will be progressed to facilitate active travel trips to and from the IDA site with consideration of the development of the site"
The TII in its remit with regard to the LTP will have overview of said wording and the final LTP will be an appendix to this LAP.
 - iv. The issues will be reviewed to ensure that the national road network continues to perform its strategic function in accordance with official Government policy and that policies and objectives included in the LAP adhere to the provisions of Government policy.
- 7 (i) This document is referenced in objective MTO 9 of the Mayo Co. Development Plan 2002-2028.
- (ii) This document is referenced in objective MTO 23 of the Mayo Co. Development Plan 2002-2008.
- (iii) These guidelines will be consulted as required under normal Development Management/Planning enforcement procedures.
- (iv) Drainage Regimes along national routes in the county are protected under MTO 27 of the Mayo Co. Development Plan 2002-2008.
- (v) Comments noted
- (vi) Comments noted.
- (vii) Consultation with internal project and design staff is an integral element of projects within the LA, including greenways.

Recommendation

- 1 No change to Draft Plan.
- 2 (i) Insert new Objective MTO 8 under Road Objectives as follows and re number

subsequent objectives accordingly:

To progress the N26 Ballina Bypass Phase 1 and to safeguard the proposed route from development proposals that would impact the delivery of the proposed scheme.

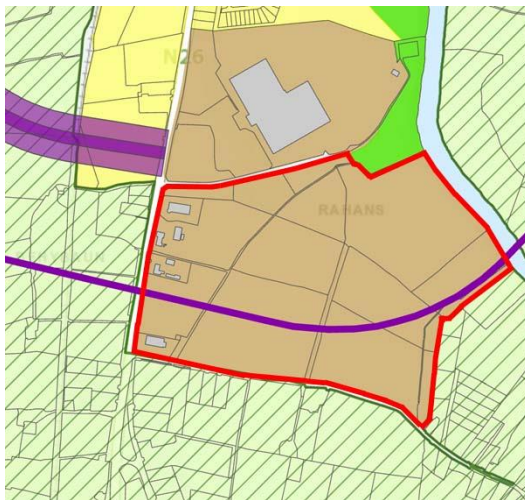
(ii) Amend policy MTP 3 as follows:

Ensure that new developments are designed to comply with Design Manual for Urban Roads and Streets (2019) including making provision for pedestrian and cycle infrastructure and enhancing connectivity and accessibility to the town. Where national roads are impacted, designs shall comply with complementary TII publications requirements.

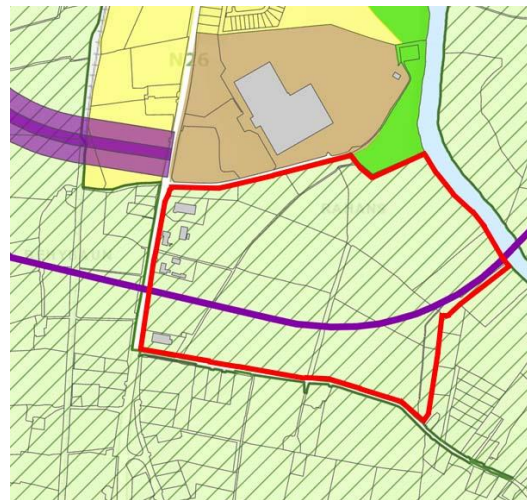
3 No change to Draft Plan.

4 Amend Policy MTP 3 as outlined in 2(ii) above.

5 Rezone site NEE 8, as indicated on SCA for 'Enterprise and Employment' to 'Agriculture' and amend SCA Map 1 and Table 1 in the Appendix accordingly (See OPR Recommendation 6(ii)(a)).



Draft Plan Zoning – Enterprise and Employment



Proposed Zoning-Agriculture

6 (i) Rezone site NEE8, as indicated on SCA for Enterprise and Employment to Agriculture and amend SCA Map 1 and Table 1 in the Appendix accordingly (See recommendation 5 above).

(iii) (a) Amend title and narrative in Section 5.5.2.1 of LAP as follows:

5.5.2.1 Strategic Enterprise and Employment Lands of National or Regional Strategic Importance..... lands have the potential to accommodate both people and product intensive economic activity – knowledge orientated services and associated high tech manufacturing, subsequent to having been deemed by the TII to have satisfied the Exceptional Circumstances criteria, as required under 2.6 of the DoECLG Spatial Planning and National Roads Guidelines for Planning Authorities (2012). Once developed.....

(b) Amend Table 12.1 Land Use Zoning Matrix as follows:

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Edge of Town Centre	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise and Employment	Strategic Enterprise and Employment	Community Services	Recreation and Amenity	Agriculture	Open Space	Infrastructure and Utilities	Quay Development/Marine Related Tourism	Tourism and Related
Nursing Home/Retirement Village/Residential Care	P	P	P	P	P	X	X	X	O	X	X	X	X	X	X
Office	P	P	X	X	X	X	O	+	X	X	X	X	X	X	X
Open Space (Public)	P	P	P	P	P	P	P	X	P	P	P	P	X	P	P
Land Use Zoning Matrix Table 11.2	Town Centre Inner	Edge of Town Centre	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise and Employment	Strategic Enterprise and Employment	Community Services	Recreation and Amenity	Agriculture	Open Space	Infrastructure and Utilities	Quay Development/Marine Related Tourism	Tourism and Related
Professional Services	P	P	X	X	X	X	X	X	X	X	X	X	X	X	X
Residential – Multiple (two or more units)	P	P	P	P	P	X	X	X	X	X	X	X	X	X	X
Residential – Single	P	P	P	P	P	X	X	X	X	X	O ³	X	X	X	X
Restaurant/ Café	P	P	X	X	X	X	O	+	O	X	X	X	X	P	P
Detail/Neighbourhood								X							

(iii) No change to Draft Plan.

(iv) No change to Draft Plan

7 (i-vii) No change to Draft Plan.

3.9 Department of Education

Submission Number:	MYO-C92-27
Submission by:	Department of Education
Issues Raised/Relevant Chapter(s):	Reserving land for the expansion of Schools
Summary of Submission:	
<p>The Department acknowledges the projected population growth for Ballina outlined in the draft CDP 2022-2028, with an anticipated increase to 12,348 by 2028. With 11 schools already in the area (6 primary, 3 post-primary, 2 special), the Department prefers expanding existing facilities to accommodate the expected increase in demand for school places. It suggests protecting land buffers around primary schools for potential expansion. Although there's expected growth in post-primary school demand, expansion of existing facilities is deemed sufficient.</p>	

The Department supports initiatives to engage with educational authorities in identifying and delivering school sites and improving educational facilities in Ballina. It also endorses measures for sustainable travel links between schools and residential areas. The Department highlights the need for flexibility in assessing current and future capacity, considering external factors like the Ukrainian crisis. Additionally, it anticipates a growing need for Special Education Needs provision and commits to consulting with the Council on future accommodation requirements.

Ultimately, the Department emphasises the importance of ongoing collaboration with the Council to ensure adequate zoning of land for educational purposes.

Chief Executive’s Response and Recommendation:

Response:

Comments noted. The draft Plan includes an ‘Education’ land use zoning provision for existing school sites in Ballina. This zoning provision essentially provides a buffer for future expansion by safeguarding existing schools and their associated lands. Furthermore, the provision of educational facilities is also ‘Open to Consideration’ in other land use zoning categories of the plan, as set out in land use zoning matrix (Table 11.2), such as town centre, residential and enterprise & employment lands.

Recommendation:

No change to draft Plan.

3.10 An Taisce

Submission Number:	MYO-C92-11
Submission by:	An Taisce
Issues Raised/Relevant Chapter(s):	Green-Schools Travel Programme, Ballina LTP
Summary of Submission:	
<p>This submission is concerned mainly with the provisions contained in the draft LTP for Ballina, highlighting that there are 6 participating green-schools travel programme in the Ballina plan area. It is pointed out that Green-Schools Travel is a behaviour change programme, funded by the NTA, aims to promote active modes such as walking, cycling, public bus transport and park & stride for schools.</p> <p>A suite of observations are provided in their submission relating to :</p> <ul style="list-style-type: none"> → Proposal 2 – McDermott St/Killala Rd area, with many findings of their own audits/studies provided, including student recommendations. It is highlighted the lack of pedestrian connectivity between Scoil Íosa and St. Patrick’s Church as a barrier to walking, as well as traffic and dangerous parking. Provisions set out in Proposal2 is therefore welcomed. → Proposal 3: Creggs Rd/Quay Rd area, the findings of a walkability audit carried out is included in ths submission. Findings include concerns regarding speed limits, parking and pedestrian safety. Provisions set out in Proposal 3 are welcomed. Traffic calming measures as well as a crossing by Keane XL is suggested. Other matters highlighted in the submission relate to surfacing, markings, signage, public transport timetables. A suggested 	

<p>permeability link through Heffernan Park from Creggs Rd was recommended by students.</p> <p>→ It is also stated that Moyne College is not adequately represented in the maps provided and suggests a marker for each school location along the route be included in the map accompanying the Executive Summary.</p>
<p>Chief Executive’s Response and Recommendation:</p>
<p>Response:</p> <p>The comments and observations provided are noted, however these matters refer to the draft Local Transport Plan for Ballina, which deals with the details in relation to travel and transport proposals for the Ballina town area. The dLTP informs the Local Area Plan for Ballina. The findings and outcome of the Local Transport Plan will inform and serve alongside the Ballina Town and Environs Local Area Plan.</p> <p>Recommendation:</p> <p>No change to Draft Plan</p>

3.11 Electricity Supply Board (ESB)

Submission Number:	MYO-C92-15
Submission by:	Electricity Supply Board (ESB)
Issues Raised/Relevant Chapter(s):	ESB Network
Summary of Submission:	
<p>ESB acknowledges the Draft Plan's aim to establish a development strategy for Ballina in line with a long-term vision for sustainable development. As the entity responsible for constructing and maintaining electricity networks in Ballina and County Mayo, ESB emphasises the importance of its depot at Teeling St. for efficient operations and meeting response times for fault repairs. It supports the Edge of Town Centre Zoning Objective for its lands at Teeling St. and advocates for its continued use as a depot servicing electricity transmission infrastructure.</p> <p>ESB also backs Policy Objectives protecting energy infrastructure integrity and facilitating future expansion to meet demand while aligning with the Council's vision for compact growth. Additionally, ESB's eCars division operates electric vehicle charging networks and supports the expansion of charging points in Ballina to meet government targets for EV adoption. ESB's overall strategy focuses on creating a low-carbon future and it seeks collaboration with local authorities, including Mayo Co. Co, to future-proof electricity infrastructure through early engagement in key public infrastructure projects. ESB is committed to sustainability and supports the Draft Plan's ambition for Ballina's development. They invite further discussion or clarification on the points raised.</p>	
Chief Executive’s Response and Recommendation:	
<p>Response:</p> <p>Comments noted.</p> <p>Recommendation:</p> <p>No change to Draft Plan.</p>	

3.12 The Heritage Council

Submission Number:	MYO-C92-21
Submission by:	The Heritage Council
Issues Raised/Relevant Chapter(s):	Policy, SEA, Development Strategy, Climate Action, Regeneration, Opportunity Sites, Transport & Movement, Built Env., Natural Env, and Infrastructure & Environmental Services.
Summary of Submission:	
<p>The Heritage Council, made a detailed comments on a number of chapters, which have been summarised below:</p> <ol style="list-style-type: none"> General Note: Recommends focusing on detailed expression of County Development Plan (CDP) policies for specific settlements in Local Area Plans (LAPs) rather than repeating general policies. Strategic Environmental Assessment (SEA): Welcomes detailed SEA. It states that there is a need to ensure that all objectives are addressed in the comments section that accompanies each table and uses the example of Policy DSP4 on “ensuring” that sufficient land is available for economic development growth, which will undoubtedly lead to negative impacts on land and soils, biodiversity, and climate and is 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. Therefore, ensuring accuracy in assessing impacts is recommended, particularly regarding economic development growth and road policies. Development Strategy: Supports policies promoting compact growth and town centre regeneration to preserve historic environments and address changing settlement patterns. It is stated that some of the development management standards in the county development plan are not conducive to compact growth, options for departures from these standards in town centres could be further considered in this LAP. Climate Action: Concern in relation to the Climate Adaptation Strategy which does not use the opportunity within the section on nature-based solutions to discuss flood alleviation measures over the long term. Suggest the need for a more river basin/catchment (Moy and Killala Bay Catchment) approach to address flood risk. Advocates for a river basin approach to flood risk management and nature-based solutions to address climate change impacts. Town Centre Regeneration: Highlights successful heritage-led regeneration projects and emphasizes the importance of addressing vacancy and neglect in built heritage. Opportunity Sites: Provides specific recommendations for Opportunity Sites emphasising heritage-led regeneration and avoiding negative impacts on heritage assets: <ul style="list-style-type: none"> <i>Opportunity Site 1 - Market Square</i> – notes that Ballina Military Barracks (regionally important heritage) does not feature in detail for this site and points out that there is the opportunity for the building to be the anchor for heritage led regeneration. <i>Opportunity Site 2 – BMW Tesco Area</i> where an opportunity is missed to see how ‘The Gem’ Pearse Street protected buildings could contribute to the cultural aspirations for this opportunity site; and <i>Opportunity Site 5</i> - suggest that any of the public realm works should avoid any visual 	

impacts on the setting of the heritage assets along the route and to use public realm works to enhance the perception of the area and setting of historic the environment.

7. **Transport and Movement:** Calls for tangible objectives to reduce car reliance. Refers to the need for cycle parking standards. Suggests departures from car parking standards to enable compact growth.
8. **Built Environment:** Recommends heritage-led regeneration as an overarching policy and protection of existing features in the architectural heritage objectives. Could anchor heritage sites be identified in the architectural heritage objectives?
9. **Natural Environment:** Supports policies against felling trees in new development proposals as contained in Policy NEP 4 and suggests including hedgerows in tree preservation efforts.
10. **Infrastructure and Environmental Services:** Advocates for a catchment-level approach to flood defence strategies and emphasizes collaboration with neighbouring councils.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted.
2. Comments noted. The SEA for Ballina LAP will review and address policy.
3. Comments acknowledged and welcomed. It is considered that the policies and objectives of the dLAP, together with the DM standards contained in the MCDP and the recently published Section 28 Guidelines entitled *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)*, will adequately provide the necessary guidance and standards in relation to compact growth.
4. Comments noted. The SFRA will expand on where NBS/SuDS may be appropriate to address climate change impacts.
5. Comments acknowledged and welcomed.
6. The PA welcome the feedback in relation to Opportunity Sites. As per the recommendations contained in MYO-C92-43 the, a series of development frameworks will be prepared and included for the key Opportunity sites identified in the final plan. The suggestions of the Heritage Council will be considered in the preparation of these Frameworks.
7. Comments noted. The dLTP for Ballina has provided a parking strategy in tandem with Active Travel Strategy for the town that facilitates a range of transport modes, together with the provisions in the LAP and MCDP and Section 28 Guidelines that support compact development, it is considered that departure from car parking standards is not warranted.
8. Comments noted. Architectural heritage buildings and sites are provided for within the policy and objectives of the dLAP and MCDP. An anchor heritage site or project as suggested that would warrant the inclusion of a specific objective would be a matter for the Ballina MD to recommend.
9. Comments noted. It is considered that the inclusion for the preservation of hedgerows into Policy NEP 5 would be appropriate.
10. Comments noted.

Recommendation:

1. No change to Draft Plan

2. Comments noted. The SEA for Ballina LAP will review and address policy assessment as considered appropriate.
3. As per response to submission MYO-C92-43, a new objective DSO 11 is recommended, which addressed adherence to compact growth see below:
 - (i) **DSO 11: Ensure that all new residential developments are assessed having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) or any subsequent guidelines.**
4. Review and amend the SFRA to ensure NBS/Suds may be appropriate in addressing the impacts of climate change.
5. No change to Draft Plan
6. & 8. As per in MYO-C92-43, Insert development frameworks for the key Opportunity Sites in the final plan.
7. No change to Draft Plan
9. Amend Policy NEP 5 as follows: ‘There shall be a presumption against the **unnecessary removal of mature hedgerows** or the felling, topping, lopping or wilful destruction of mature trees as part of development proposals. Where a development proposal involves the felling, topping, lopping or threatens the destruction of a mature tree or trees, a tree survey will need to be included in the submission, carried out by a qualified Tree Specialist to justify the exceptional circumstances for their interference. The applicant must demonstrate the justification and rationale for removal of mature trees in terms of effect on ecology and landscape and demonstrate how replacement planting will compensate for loss of trees and woodland features. An assessment of potential tree roost features by a qualified and experienced ecologist may also be requested as part of such proposals’.
10. No change to Draft Plan.

3.13 Inland Fisheries Ireland

Submission Number:	MYO-C92-41
Submission by:	Inland Fisheries Ireland
Issues Raised/Relevant Chapter(s):	Protection of Water Quality, EU Water Framework Directive, Infrastructure, Nature Based Solutions, Works, Policy for prevention of invasive species.
Summary of Submission:	
<p>Inland Fisheries Ireland (IFI) submitted comments on the Draft Ballina Local Area Plan (LAP) 2024-2030, emphasising the importance of protecting water quality and aquatic habitats. IFI, responsible for managing Ireland's inland fisheries, highlighted the significance of safeguarding the River Moy, a vital salmon fishery, and its estuary, which supports sea trout populations. They stressed compliance with the EU Water Framework Directive to maintain ecological status. IFI advocated for infrastructure considerations, including adequate sewage treatment capacity, and opposed package treatment plants due to maintenance concerns. Support nature-based solutions and urged the protection of riparian habitats to enhance biodiversity. IFI recommends scheduling works in water bodies to minimise disruption to fisheries and</p>	

emphasised consultation on developments impacting aquatic ecosystems. They proposed policies to prevent the spread of invasive species and highlighted the importance of well-designed river crossing structures to facilitate fish migration. Additionally, IFI encouraged water conservation measures such as rainwater harvesting to address summer water shortages and mitigate ecological impacts.

Chief Executive's Response and Recommendation:


Response:

Comments noted. The IFI will be consulted if a proposed development is in close proximity to the Moy. The Mayo County Development 2022-2028 and the Draft LAP have adequate policies and objectives protecting riparian zones/habitats and the control of invasive species.

Recommendation:

No change to Draft Plan.

Section 4 Submissions relating to zoning. (See Appendix 1 of CE Report for Submission Maps.)

Submission Number:	MYO-C92-1
Submission by:	Ruairí O'Malley
Issues Raised/Relevant Chapter(s):	Rezone lands to Residential
Summary of Submission:	
<p>Location: Castle Road, adjacent to Belleek Gate Lodge.</p> <p>The submission seeks zoning of lands from 'Recreation & Amenities' to 'Residential' zoning. It is stated that it is a residential area, the site previously had a dwelling on it and previously had the benefit of planning permission. Map included. Lands marked in red.</p>  <p style="text-align: center;">Site location outlined in red.</p>	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP.</p> <p><i>Town Centre First Policy</i> prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area. It is considered that the required quantum of land zoned for 'New Residential' and 'Strategic Residential Reserve' uses has been fully met in the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 and national <i>Town Centre First Policy</i>. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land, and therefore would constitute over-zoning and would be contrary to national <i>Town Centre First Policy</i>.</p> <p>In addition to the above, it should be noted that the subject land directly adjoins a designated protected structure, see Ref: Ballina Town 04 / Entrance Arch - an elaborate, mid-19th century, ashlar limestone, neo-medieval entrance arch with tower and machicolations, which is the former entrance arch to Belleek Castle. BEO 2 of the dLAP includes a stated objective to 'Preserve the protected structures and their settings in Ballina on the Record of Protected</p>	

Structures...’ Furthermore, Objective BEO 9 of MCDP is ‘To ensure the protection and sympathetic enhancement of buildings and structures included and proposed for inclusion in the Record of Protected Structures (RPS) that are of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest, together with the integrity of their character and setting.’

It is considered that the rezoning of the subject land to ‘Residential’ as proposed would be at odds with the provisions of Objective(s) BEO 9 and BEO 10 set out in the MCDP 2022-2028 relating to the protection of integrity of the protected structure, its character and of its setting.

Furthermore, the CE would not encourage the further erosion of ‘Recreation and Amenity’ zoned lands or the precedent this would establish.

Recommendation:

No change to Draft Plan.

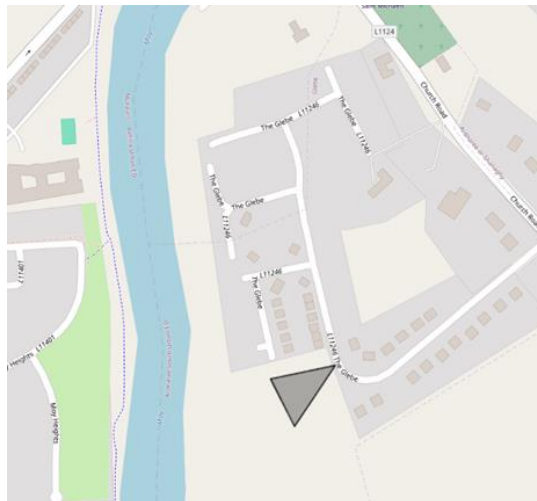
Submission Number:	MYO-C92-5
Submission by:	Robert McMorrow
Issues Raised/Relevant Chapter(s):	Rezoning lands from Residential to Agriculture

Summary of Submission:

Location: Glebe Road, Ballina

This submission requests rezoning of lands from ‘Residential’ zoning to ‘Agriculture’ zoning dLAP 2024-2030. It is stated that the land is active farmland (for over 45 years) and intends to continue farming this land. The subject land is on the town edge, bordered by farmland to the east.

Map included. Land marked grey.



Site location in dark grey

Chief Executive’s Response and Recommendation:

Response:

The subject land is zoned ‘Phase 2 Residential’ in the Ballina Town & Environs Development Plan 2009-2015. It is zoned ‘Existing Residential’ in the dLAP for Ballina 2024-2030.

The subject land is located within the established Glebe residential area, with direct access to roads, footpath and services. The subject land is zoned ‘Existing Residential’ based on its location in an established neighbourhood and is considered Tier 1 land. *Town Centre First Policy*

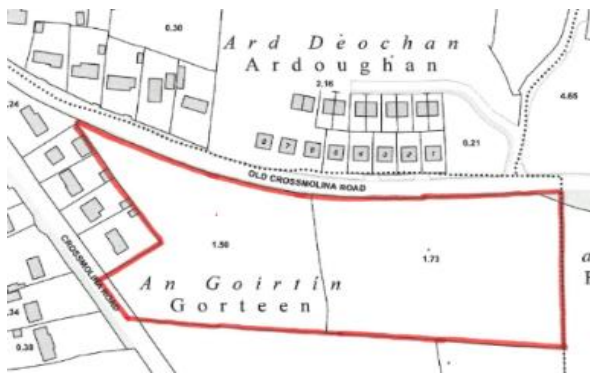
prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area.

Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate density, optimising existing social and physical infrastructure. All land use zonings within the dLAP for Ballina have been considered in the Settlement Capacity Assessment accompanying the Plan, in terms of their potential for future development based on serviceability. This land constitutes Tier 1 land.

Having regard to the above, it is considered that the subject land is 'infill' in nature, and that dLAP has appropriately identified and zoned the necessary quantum of land to meet the required housing targets set out in the Core Strategy contained in the MCDP 2022-2028 in line with national Town Centre First Policy and as such is consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft Plan.

Submission Number:	MYO-C92-7
Submission by:	Simon Beale + Associates on behalf of Eoin Durcan
Issues Raised/Relevant Chapter(s):	Rezone lands from Enterprise & Employment to Residential
Summary of Submission:	
<p>Location: between Crossmolina Rd and Old Crossmolina Rd.</p> <p>This submission seeks reversion back to a 'Residential' zoning. It was always intended to develop this land for residential purposes but could not be developed to date owing to the Phased 2 Residential zoning of the Ballina T&E Development Plan 2009-2015 (as extended). The landowner does not agree with the 'Enterprise and Employment' zoning as indicated in the draft LAP, noting that land surrounding is zoned 'Existing Residential' in the dLAP 2024-2030.</p> <p>Map included. Land marked red.</p>	
	
Site location outlined in red.	
Chief Executive's Response and Recommendation:	
Response:	
The subject land is zoned 'Phase 2 Residential' in the Ballina Town & Environs Development Plan	

2009-2015. It is zoned 'Enterprise and Employment' in the dLAP for Ballina 2024-2030.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area.

Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure. Residential land in Ballina is zoned in line with Regional Policy RPO 3.1 and 3.2 of the RSES which prioritises compact, sequential growth and regeneration in our towns and villages; and more specifically Objective SSO3 and SSO6 of the MCDP 2022-2028 which requires sustainable, compact, sequential growth and urban regeneration of the town centre.

It is considered that the required quantum of land zoned for 'New Residential' uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land, and therefore would constitute over-zoning.

The CE acknowledges the previous zoning provision 'Residential Phase 2' on these lands and the rationale presented in this submission seeking a 'New Residential' zoning on same.

Furthermore, having regard to the proposal to rezone to 'Agriculture' site NEE8 on the N26 in response to OPR Recommendation 6(ii)(a) and NWRA Recommendation 1 above, it is important that a sufficient quantum of land be provide for Enterprise and Employment zoned land within the Ballina LAP area. It is considered that the subject land is well placed and serviced to meet such needs.

Recommendation:

No change to Draft Plan.

Submission Number:	MYO-C92-9
Submission by:	Moytechnics Building Services on behalf of Ray & Margaret Collins
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential
Summary of Submission:	
<p>Location: Off the Killala Road. The Hawthorns residential estate adjoins immediately south.</p> <p>This submission requests changing the 'Agriculture' zoning as per the dLAP to 'New Residential'. There is existing residential development to the east and south, commercial development to the north, a new school near completion and major employers in the immediate area. It is stated that there is existing infrastructure is available, including footpaths and cycle lanes connecting to the town centre. The land was previously zoned Residential Phase 1 in the Ballina T&E Development Plan 2009-2015. The land is accessed via an established road serving the</p>	

Hawthorns residential estate (south). The access to The Hawthorns is via road junction along the R314 within the 50kmph speed limit. Map included. Land hatched in red.



Site location hatched in red (above)

Chief Executive's Response and Recommendation:

Response:

This land is located west of the Killala Road, on the northern fringes of dLAP area. The zoning provisions of the Ballina Town & Environs Development Plan 2009-2015 includes a portion of subject lands as 'Agriculture' and a portion 'R2 Existing Residential'. The land is currently zoned 'Agriculture' in its entirety in the dLAP.

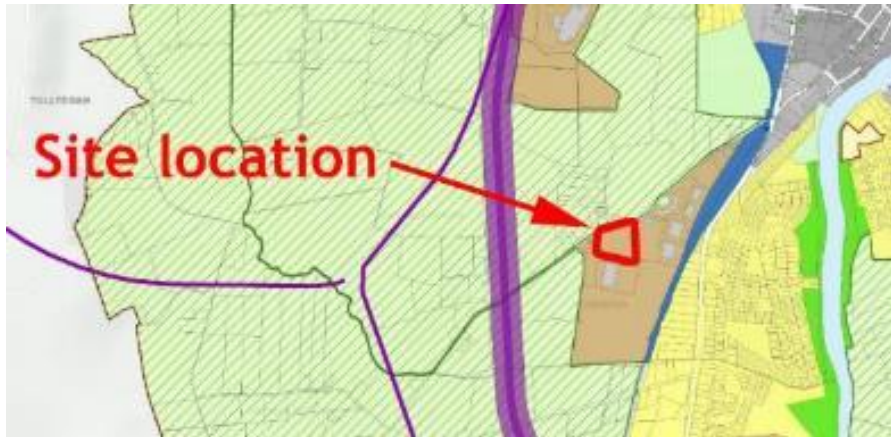
Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure. Residential land in Ballina is zoned in line with Regional policy RPO 3.1 and 3.2 of the RSES which prioritises compact, sequential growth and regeneration in our towns and villages; and more specifically Objective SSO3 of the MCDP which requires sustainable, compact, sequential growth and urban regeneration in Ballina.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area.

It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning. Furthermore, The zoning of additional lands for residential development at this peripheral location would be premature by reason of its non-sequential location and as such represents a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft Plan

Submission Number:	MYO-C92-10
Submission by:	Design Energy Homes Ltd on behalf of Donal Quinn
Issues Raised/Relevant Chapter(s):	Rezone lands from Enterprise & Employment to Residential
Summary of Submission:	
<p>Location: The Commons, (L-5113-0) Ballina</p> <p>This submission is seeking that the proposed Enterprise & Employment zoning as per the dLAP be changed to a Residential zoning. It is stated that its location is close to existing residential development and convenient to the town and would be suited to small/medium density residential development.</p> <p>Map included. Land outlined red.</p>	
	
Site location outlined in red	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The subject site/land is located in an area zoned 'IC-Industrial/Commercial' in the Ballina & Environs Development Plan 2009-2015 (as extended). It is zoned 'Enterprise and Employment' in the dLAP, a similar zoning category. The land directly abuts the Moyvalley Business Park (to west of site) and a Warehouse development to the south. The rail line is located further east.</p> <p>Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, and in existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure.</p> <p>The presence of the Business Park, the Railway station & Rail line acts as a physical buffer between the subject site/land and the built-up town core area. The 'Enterprise and Employment' zoning of these lands is consistent with its historical zoning and is considered appropriate in order to accommodate the future expansion at this strategic location adjoining the rail and road network.</p> <p>The location of the subject site/land is non-sequential to any established residential area, with limited physical and social infrastructure. This area does not have any active travel proposals to connect the area to the town core (as per the Ballina LTP). It is considered that the introduction of residential development at this location, characterised by its business and commercial uses, would not adhere to the tenets of compact growth, placemaking or proper planning. It is considered that the introduction of residential development at this location would represent a</p>	

piecemeal approach to development and would be contrary to the overall strategy for growth for Ballina that must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft LAP.

Submission Number:	MYO-C92-13
Submission by:	Martin Creaven on behalf of Glebe Residents Association
Issues Raised/Relevant Chapter(s):	Rezone lands, Transport & Mobility, Map to illustrate Specific Local Objectives

Summary of Submission:

Location: Church Road, eastern side of River Moy

1. Concern is expressed regarding the absence of a Specific Local Objectives map in the draft LAP, particularly in relation to local transport plan and major proposals.
 2. Requests inclusion of a Specific Local Objective to provide a safe footpath along Church Rd (north frontage to St Michael’s Church).
 3. Would like greater emphasis on creating a pedestrian and cyclist friendly town in the LAP.
 4. Concern expressed regarding lands zoned ‘Residential’ adjoining the Glebe Estate, querying if the lands could/would ever be developed within the timeframe of the Plan. Eg. land (Morrow’s land) zoned ‘Existing Residential’ despite a submission to MCC to rezone land ‘Agricultural’.
 5. Concern is expressed that their pre-draft submission was not reflected in the draft LAP regarding maintenance of the aesthetic along the riverside frontage.
 6. It considers lands zoned ‘New Residential’ along the end of Ridgepool Rd and the northern boundary of the Glebe estate has limited potential for housing owing to flood risk, archaeology, and other dLAP objective provisions relating to transport infrastructure (roads, footpaths, cycleways), access for fishing, preservation of riparian habitat, etc.
- Map included. Land and locations highlighted with notes.



Site locations shown

Chief Executive's Response and Recommendation:**Response:**

1. Comments noted. It is considered appropriate to include a map to show travel measures provided for in the LTP.
2. Comments noted. The Draft Local Transport Plan for Ballina (dLTP) does not overtly indicate the upgrade of the footpath at this specific location. However, proposals are included in the dLTP to upgrade existing permeability links between St Michael's Church from Church Rd to Salmon Weir Lower Bridge (Proposal 1). In addition, the dLTP (Auxiliary Proposal) includes provision for Shared Streets at this location, including the area that runs along Church Road and Plunkett Rd. The purpose of Shared Streets is to improve public realm through streetscape/landscape design and to create a sense of community and contribute to the urban regeneration of the town area. This generally includes provision of shared space between cyclists, motor vehicles with a continuous segregated footpath on either side of the street to DUMRS standard. Footpaths are generally 1.8m wide and Speed limits ranging from 20-50kmph. The Auxiliary Proposal contained in the dLTP can be progressed in parallel with Proposal(s) 1, 2 and 3. Therefore, the upgrading of the existing footpath can be addressed in this context as appropriate.
3. Comments noted.
4. Comments noted. The progression of development on privately owned land is a matter for the landowner.
5. Concerns noted. All pre-draft submissions were considered in the preparation of the dLAP. Maintenance of the aesthetic along the riverside frontage can be managed through the Development Management Process.
6. Comments noted. All zoned lands in the dLAP for Ballina have been subject to Strategic Flood Risk Assessment (SFRA) and Strategic Environmental Assessment (SEA) which has considered all environmental and flooding parameters and is zoned accordingly. Notwithstanding the concerns raised, the dLAP for Ballina has been screened and prepared in accordance with the outcomes and recommendations of the SFRA and SEA. All site-specific development shall be fully considered in accordance with Development Management Standards set out in the Mayo County Development Plan 2022-2028.

Recommendation:

1. Insert more legible map showing key active travel measures of the LTP in the final plan.
- 2.- 6. No change to Draft Plan

Submission Number:	MYO-C92-14
Submission by:	John Brogan
Issues Raised/Relevant Chapter(s):	Rezone lands from Recreation & Amenities to Residential
Summary of Submission:	
<p>Location: Belleek along L-1120-8, west of Belleek Castle / n/east of Coca Cola</p> <p>This submission requests that lands, currently zoned 'Recreation & Amenities' in the dLAP, be zoned 'Residential'.</p> <p>It states that the land does not form part of the castle ground or woodlands, along a road with existing dwellings to the west. It is stated that the site is serviced.</p> <p>Map included. Land marked in red.</p>	



Site location outlined in red

Chief Executive's Response and Recommendation:

Response:

The site is located on the northern fringes of the Plan area, west of Belleek Castle. There is some one-off housing in the general area, though no established built-up residential area at this location, with no footpaths, public lighting, surface water sewer at this location.

In accordance with the NPF, all plans are required to have a tiered approach to land use zoning. Tier 1 land (priority residential land) is defined as that which is 'able to connect to existing development services and within the existing built-up footprint of a settlement or be contiguous to existing developed lands or spatially sequential within the plan area'. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. This land does not meet the Tier 1 land criteria at present.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP and in line with national Town Centre First Policy.

Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning. Therefore, zoning additional lands for residential development at this peripheral location would represent a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft Plan

Submission Number:	MYO-C92-17
Submission by:	Brock McClure Planning and Development Consultants on behalf of Bourke Builders
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Quantum of Residential Zoned Land

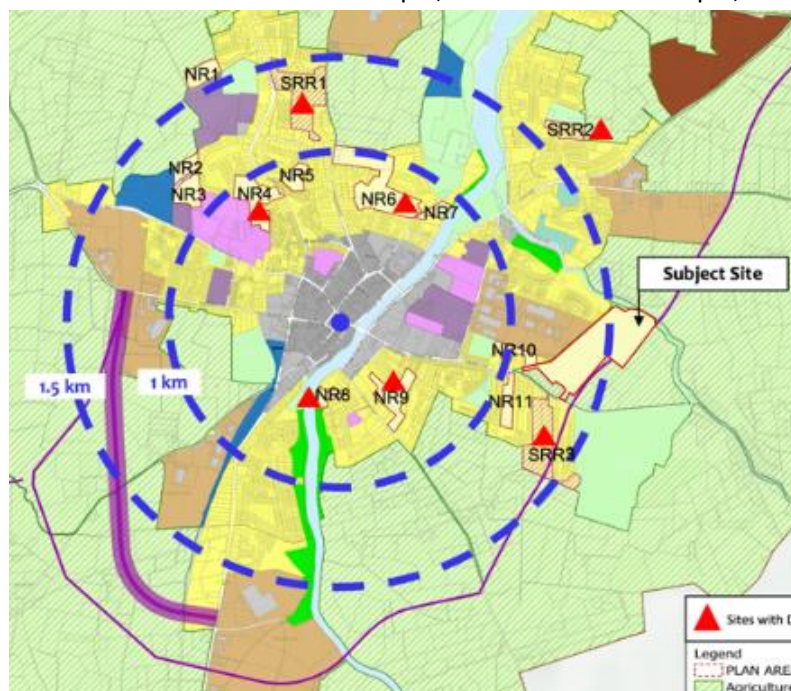
Summary of Submission:

Location: lands (16.6ha) at Abbeyhalfquarter, on the eastern fringes of the built-up area of Ballina.

This submission requests the following:

1. A review of the housing yield allocation for Ballina, based on accurate, evidence based for a 6-year period.
2. Zoning of sufficient lands to deliver on housing projection forecasts for Ballina (LUZ7 New Residential and LUZ8 Strategic Residential Reserve residential zoned lands) and only zone lands that are accessible, serviced and readily available for development within the lifetime of the LAP (2024-2030).
3. Rezone the lands owned by Bourke Builders Ballina, (at Abbeyhalfquarter) from 'Agriculture' to 'New Residential' and urge Mayo County Council not to overlook this prime development site. The lands are centrally located, within the town boundary, accessible off the R294 Bunniconlon Rd, serviced in terms of water and electricity connections, and located along the proposed Ring Road outlined in the Town Plan.
4. A detailed analysis of zoned lands within the dLAP area is included in the submission. It is argued that zoned lands for residential development be able to demonstrate a readiness for development in order to address the current and future housing needs Ballina & Environs, with cognisance of site-specific development constraints in calculating housing yields. The Council is urged to prioritise 'ready to go' and serviced sites for housing development over historically zoned residential lands. It is stated that the subject lands at Abbeyhalfquarter are appropriate for residential use, being is immediately available for development, pending the required rezoning from 'Agricultural' to 'Residential'.

Map(s) included. Land outlined in red on map 1, hatched in red in map 2, see below



Map 1 (site location)



Map 2 (site location/satellite)

Chief Executive's Response and Recommendation:

Response:

This land is located on the eastern fringes of the built-up area of Ballina, off the R294. The land is zoned 'Agriculture' in the Ballina Town & Environs Development Plan 2009-2015.

The dLAP for Ballina proposes 'Agriculture' zoning for this land.

1. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate new residential development throughout the County over the plan period. The housing targets for Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended).

2.& 3.

Noting point 1 above, a housing target of 511 is allocated for Ballina as per the Core Strategy, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. Compact Growth is a central element of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure. Residential land in Ballina is zoned in line with Regional policy RPO 3.1 and 3.2 of the RSES which prioritises compact, sequential growth and regeneration in our towns and villages; and more specifically Objective SSO3 and SSO6 of the MCDP 2022-2028 which requires sustainable, compact, sequential growth and urban regeneration in Ballina.

4. The zoning of lands in Ballina dLAP is based on the Settlement Capacity Assessment carried out as part of the plan preparation. All 'New Residential' zoned land and 'Strategic Residential Reserve' zoned lands meet Tier 1 criteria. The zoning outcome set out in dLAP is consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning.

Recommendation:

1. No change to Draft Plan.
- 2.- 3. No change to Draft Plan
4. No change to Draft Plan

Submission Number:[MYO-C92-18](#)**Submission by:**

Barry Gavin

Issues Raised/Relevant Chapter(s):

Rezoning lands from Enterprise & Employment to Residential

Summary of Submission:**Location:** lands (5.024 ha) at Knockleigh, The Commons, Ballina

1. The 'Enterprise and Employment' zoning is welcomed but requests a change of zoning to 'Residential' on the basis that commercial development is stagnant and such zoning is outdated.
2. This submission seeks a change in the proposed zoning from commercial zoning to 'Residential (Medium Density)' in order for the Council to meet its own objectives. It is stated that the land is well positioned with good access to the town and to public transport services; and is closer to the town centre than other Residential zoned lands contained in the dLAP.
3. Development potential of this land could be facilitated by the proposed new By-Pass for longer term development.
4. It is requested that this site/land form part of the (land use) strategy to meet the housing target figure (for Ballina) of a suggested figure of 773 houses.

Map included. Land hatched in dark red.



Site location hatched in dark red

Chief Executive's Response and Recommendation:

Response:

Comments noted. The subject site/land is located in an area zoned 'IC-Industrial/Commercial' in the Ballina & Environs Development Plan 2009-2015 (as extended). It is zoned 'Enterprise and Employment' in the dLAP, a similar zoning category.

1. The land adjoins the Moyvalley Business Park and a Warehouse development located north of subject lands. The Rail line is located to the east. The presence of the Business Park, the Railway station & Rail line acts as a physical buffer between the general area of the site and the built-up town core area. There is no existing permeable links connecting this area to the any established residential neighbourhood or to the town core area. The 'Enterprise and Employment' zoning of these lands is consistent with its historical zoning and is considered and appropriate zoning in order to accommodate the potential future development of this nature at this strategic location close to the rail and road networks.
2. Compact growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, and in existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure. The location of the subject site/land is non-sequential to any established residential neighbourhood, with limited physical and social infrastructure. This area does not have any active travel proposals to connect the area to the town core (as per the Ballina LTP). It is considered that the introduction of residential zoned land at this location, characterised by its established business and commercial uses, proximate to strategic rail and road networks at this location and would not adhere to the tenets of placemaking or proper planning.
3. Comments noted.
4. It is considered that the introduction of residential uses at this location would represent a piecemeal approach to development and would be contrary to the overall strategy for growth for Ballina that must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SS03 and Objective SSO6. Furthermore, the Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning.

Recommendation:

1. - 4. No change to Draft Plan.

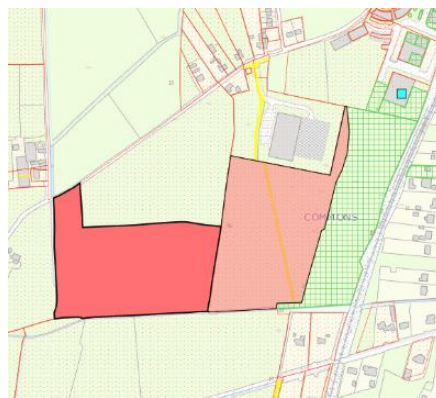
Submission Number:	MYO-C92-19
Submission by:	Patrick Sweeney
Issues Raised/Relevant Chapter(s):	Rezoning lands from Agriculture to Residential

Summary of Submission:

Location: lands (4.65 ha) at Knockleigh, The Commons, Ballina

1. This submission considers that the zoning of the previous Development Plan for Ballina is outdated. Going forward it needs to be changed from 'Agriculture' to 'Residential (Medium Density)' for the Council to meet its own objectives.
2. It is requested that zoning be changed to 'Residential' on the basis that the land abuts lands zoned for commercial development, close to Moyvalley Business Park, proximate to the Railway Station and Bus Eireann depot, and c.0.5 miles from the town centre. As such represents an opportunity to provide residential development.
3. Reference is made to the Core Strategy and a suggested target figure of 773 new houses in Ballina is recommended. It is requested that these lands be considered to form part of the strategy to meet the housing target figure for Ballina.

Map included. Land hatched in dark red.



Site location hatched in dark red

Chief Executive's Response and Recommendation:

Response:

This site/land is zoned 'IC-Industrial/Commercial' in the Ballina & Environs Development Plan 2009-2015 (as extended). It is zoned 'Agriculture' in the dLAP.

The subject site/land directly abuts that contained in submission MYO-C92-18.

1. In accordance with the National Planning Framework, all plans are required to have a tiered approach to land use zoning. Tier 1 land (priority residential land) is defined as that which is 'able to connect to existing development services and within the existing built-up footprint of a settlement or be contiguous to existing developed lands or spatially sequential within the plan area'. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. This site/land does not meet all the criteria for Tier 1 land at present.
2. The site/land is non-sequential to any established residential neighbourhood and has limited physical and social infrastructure at this location. This area does not have any active travel proposals to connect the area to the town core (as per the dLTP). Furthermore, the indicative corridor for the Ballina By-pass runs through the subject lands.
3. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the

population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve'. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy and Objective SSO3 and SSO6 of the MCDP 2022-2028 which requires sustainable, compact, sequential growth and urban regeneration in Ballina. Zoning of additional lands for residential uses at this peripheral location, with limited physical & social infrastructure, removed from any established residential neighbourhood would represent a piecemeal approach that individually and cumulatively would be contrary to the strategy for growth for Ballina which must be consistent with the objectives set out in the MCDP 2022-2028.

Recommendation:

1. - 3. No change to Draft Plan.

Submission Number:	MYO-C92-23
Submission by:	The Planning Partnership on behalf of Newpark Developments (Ballina) Ltd
Issues Raised/Relevant Chapter(s):	Rezoning lands to New Residential, Extend plan boundary, Housing Demand figures, Quantum of Zoned lands, Unfinished Housing Estates
Summary of Submission:	
<p>Location: lands(2.5ha) adjoining the Abbey Court estate, Killala Rd, Ballina.</p> <p>This submission relates to the infrastructurally serviced and unfinished element of the long-established Abbey Court housing development at Killala Rd.</p> <ol style="list-style-type: none"> 1. An extension of the dLAP boundary is sought to include the Abbey Court Area. 2. It is requested that the dLAP include identifiable extents of the town, including the Killala Road/Culleens 'cluster' area. In particular - the Abbey Court area, or at least to facilitate completion of the Abbey Court estate, on the basis that the Abbey Court area an established part of the town forming part of a cluster of development along the Killala Road. 3. Inclusion of the existing Abbey Court development (and contiguous housing) as 'Existing Residential' zoning objective. It is requested that the remaining unfinished area of Abbey Court within the New Residential zoning (or Existing Residential) to reflect its interrelationship with the established scheme on the wider site. 4. It is suggested that the subject lands be a priority for the Planning Authority to promote completion of unfinished housing developments (whether as 'Existing Residential' or 'New Residential'). It suggests inclusion & modification of relevant policies and objectives on a site-specific basis – for the resolution of unfinished housing estates, as follows: <u>A new objective is proposed (in green):</u> <i>'It is an objective of the Council to address the issue of unfinished housing estates in the</i> 	

town, including at Abbey Court at Culleens/Killala road by implementing the guidance manual *Managing and Resolving Unfinished Housing Developments (2011)* and positively considering proposals for additional housing thereon for their completion.'

It is also proposed to modify the following objectives (modifications underlined):

DSP 7 Support the effective and efficient use of land in Ballina, prioritising compact growth through the development of brownfield/infill land in the built-up footprint of the town and existing unfinished housing developments in preference to greenfield land.

DSO 2 Seek the sustainable intensification and consolidation of the existing built environment in accordance with the objectives for compact growth in higher-level spatial plans through appropriate infill, brownfield development, and completion of existing unfinished housing developments supported by the necessary physical and community infrastructure.

HSCO 1 Support, promote and facilitate the appropriate consolidation, densification and/or redevelopment of brownfield and infill sites for residential uses within the footprint of the existing built-up area, where appropriate, including living above the shop opportunities, and the completion of existing unfinished housing developments.

5. It requests that consideration should be given to master-planned, partially complete development, such as Abbey Court and suggests modification to Objective HSCO2.

In relation to Objective HSCO 2, the following revision is proposed (modifications underlined):

HSCO 2 Safeguard the amenity and integrity of completed residential estates and provide for smarter travel options, it is the objective of the Council to ensure that new access proposals to any adjoining lands through an existing completed residential estate is provided for pedestrian or bicycle movements/connectivity primarily, without prejudice to any established or masterplanned neighbourhood access strategy.

6. Concern is expressed regarding the housing target figure for Ballina. It is suggested the figure requires substantial increase to account for the ESRI, NPF Projected Housing Demand and/or increased to account for the longer period up to 2030 (rather than 2027 as percurrent MCDP). Thus, a greater number of housing units and volume of land than that indicated in the LAP is required. A total of 1,370 housing units to 2030 is suggested to provide for additional demand, including future proofed adjusted targets to align the LAP timeline to 2030, legacy under provision, and to provide for anticipated increase targets arising from 1st revision of the NPF. Suggests a quantum of 73hectares of 'Residential' zoned land would apply.

Map included, land outlined in red.



Site location outlined in red

Chief Executive's Response and Recommendation:

Response:

1. There is ample 'Residential' zoned Tier 1 land within the draft Plan boundary that is sequential to established residential neighbourhoods and close to the town centre. Ballina has a substantial amount of quality Tier 1 land within the settlement boundary. Owing to the quality and availability of such land, peripheral locations such as that contained in this submission are not regarded as priority residential development land. Past experience would indicate that the extent of residential zoned land and the pace of residential development within Ballina does not warrant an extension of the Plan boundary.
2. & 3 The dLAP does not provide for any sub-settlements within the Plan extent. Zoning and housing targets are based on the Core Strategy, policy and objectives set out in the MCDP 2022-2028, in line with Regional policy and National *Town Centre First Policy*, which prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area.
4. The completion of unfinished housing development is dealt with under Planning Control and appropriate planning policy. The rewording of DSP7, DSO2 and HSCO1 is not warranted.
5. The completion of unfinished housing development is dealt with under Planning Control and appropriate Development Management policy. The rewording of HSCO2 is not considered necessary.
6. The Core Strategy sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would

result in an excess of Residential zoned land and would constitute over-zoning. Zoning of additional lands for residential development at this peripheral location would be a premature, piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

1. - 6. No change to Draft Plan

Submission Number:	MYO-C92-24
Submission by:	The Planning Partnership on behalf of Cathal Deacy
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Residential Zoned Land quantum, Neighbourhood Strategy for the Quay Area
Summary of Submission:	
<p>Location: lands (c.9.5ha) at Quay Lane backlands area</p> <ol style="list-style-type: none"> 1. This submission requests that the subject land be zoned ‘New Residential’ not ‘Agriculture’ as proposed in the draft LAP, in order to accommodate future development of the Quay area. 2. It is considered that amount of land zoned ‘New Residential’ in the draft plan is not adequate for the housing demand and anticipated changes in housing unit targets. It is highlighted that the calculations set out in the dLAP are based on the timeframe contained in the Draft County Development Plan 2021-2027, and do not accommodate the housing needs of Ballina LAP up to 2030. A total of up to 1,370 units in the medium to long term is suggested to provide for additional demand, including future proofed adjusted targets to align the LAP timeline to 2030, legacy under provision, and to provide for anticipated increase targets arising from 1st revision of the NPF. A suggested quantum of 73hectares of ‘Residential’ zoned land is put forward to accommodate revised housing target figure. 3. It is suggested that zoning the subject lands for housing should not be assessed in quantitative/sequential terms only but on the role & function of the lands (Quay/Sligo Road backland) in terms of the long-standing neighbourhood strategy for the Quay area. 4. It is requested to reinstate the strategic objective for the Quay Area, underpinned by the Ballina & Environs Development Plan 2003-2009, the Quay Area Neighbourhood Action Area Plan 2004-2009 and the (current) Ballina & Environs Development Plan 2009-2015, in the absence of a replacement strategy. 5. Concern is expressed in relation to reduction in population by preventing natural progression of urban development in the Quay area, in that the provision of the draft LAP is limiting housing supply. 6. It is suggested that the LAP should identify lands for residential development to allow natural and appropriately paced development of the area. The IDA land (key strategic employment site as per CDP) is highlighted as ‘an ‘out of town’, disconnected, a semi-rural landbank without potential for sustainable travel or integration with the adjacent neighbourhood, not least given the national road designation along the site frontage’. In this regard and in the absence ability to develop the backland area between the Quay Rd and Sligo Rd, it is considered that the potential for enterprise/employment/ industrial objectives of the Planning Authority, i.e. the Strategic Employment Sites, is undermined. 7. The submission refers to the draft Local Transport Plan (dLTP) for Ballina, including its objectives for improved mobility in and around these lands. It considers that dLAP sterilises all 	

the backland area at this location which would likely diminish the delivery of transport and mobility infrastructure at this location. Together with the removal of road link objectives, this would reduce the potential for coordination between employment and residential land use, producing a development pattern of siloed employment and residential zones. In this regard, it is suggested that provision is made for master-planned areas. The following proposed revision to Objective HSCO2 is suggested (modifications underlined):

'HSCO 2 Safeguard the amenity and integrity of completed residential estates and provide for smarter travel options, it is the objective of the Council to ensure that new access proposals to any adjoining lands through an existing completed residential estate is provided for pedestrian or bicycle movements/connectivity primarily, without prejudice to any established or masterplanned neighbourhood access strategy.'

Map included. Land outlined in red.



Site location outlined in red

Chief Executive's Response and Recommendation:

Response:

The subject lands are zoned Phase 2 – Residential in the Ballina & Environs Development Plan 2009-2015 (as extended). It is zoned 'Agriculture' in the draft LAP.

1. & 2. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for 'New Residential' purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. The zoning of additional lands for residential development would be premature by reason of its non-sequential location, representing an approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.
3. The dLAP for Ballina does not provide for any sub-settlements within the Plan extent. Zoning and housing targets are based on the Core Strategy, policy and objectives set out in

the MCDP 2022-2028, in line with Regional policy and National Town Centre First Policy, which prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. The subject land does not meet all the criteria for Tier 1 land.

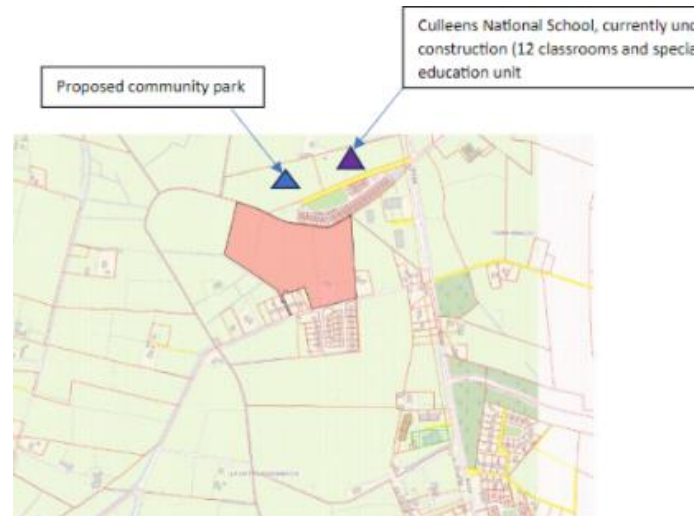
4. It is considered that the character and development of the Quay area can be achieved within the context of the provisions of the LAP and by the development management process. As such it is considered that the Quay area does not warrant a separate Action Plan to realise its potential.
5. Comments noted.
6. There is provision in the draft LTP for Ballina (contained in Proposal 3) for upgraded Cyclist and Pedestrian Facilities (including fully segregated cycle tracks) along Creggs Road, which provides sustainable transport links from the Quay area to the lands zoned 'Strategic Enterprise and Employment'. Proposal 3 in the dLTP also includes provisions for upgraded Creggs Rd/Quay Rd junction with cyclist & pedestrian facilities; and Shared Streets all along Quay Road. In addition, the dLTP (Auxiliary Proposal) provides permeability links (tie-ins) and Shared Streets along Quay Lane, which will provide linkages between established residential neighbourhoods in the area. Therefore, demonstrable sustainable travel opportunities are provided in the dLTP to link residential areas from the Ballina Quay area with the 'Strategic Enterprise and Employment' land (i.e. IDA lands). The proposed upgrades along Creggs Road facilitating this direct link. As per response outlined in 1 and 2 above, additional residential zoned land is not required to meet housing targets for Ballina allocated in the Core strategy.
7. See response outlined in point (3) in respect of provision of zoned land within the dLAP; and (6). Above in relation to sustainable travel provisions. In respect of request to modify policy HSCO2, the completion of unfinished housing development is dealt with under Planning Control and appropriate Development Management policy. The rewording of HSCO2 is not considered necessary.

Recommendation:

- 1-3. No change to Draft Plan.
4. No change to Draft Plan.
5. - 6. No Change to Draft Plan.
7. No change to Draft Plan.

Submission Number:	MYO-C92-25
Submission by:	Michelle Syron
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to Residential
Summary of Submission:	
<p>Location: lands (6.81ha) west of Killala Road.</p> <p>This submission seeks 'Residential' zoning for the subject land, currently zoned 'Agriculture' in the dLAP. It is stated the lands are services, with good access to roads, footpaths and lighting. Proposals set out in the draft LTP include provision of upgraded active travel path running north of the lands and east of the Killala Rd. It is in close proximity to education, recreational and employment centres.</p>	

Map included. Land hatched in red.



Site location hatched in red

Chief Executive's Response and Recommendation:

Response:

This land is located west of the Killala Road, on the northernmost fringes of dLAP area. The land is zoned 'Agriculture' in the Ballina Town & Environs Development Plan 2009-2015 and in the current dLAP.

Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate densities, optimising existing social and physical infrastructure. Residential land in Ballina is zoned in line with Regional policy RPO 3.1 and 3.2 of the RSES which prioritises compact, sequential growth and regeneration in our towns and villages; and more specifically Objective SSO3 of the MCDP 2022-2028 which requires sustainable, compact, sequential growth and urban regeneration in Ballina. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area.

It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning. Furthermore, the zoning of additional Residential land at this peripheral location would be premature representing a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft LAP.

Submission Number:	MYO-C92-31
Submission by:	The Planning Partnership on behalf of Vincent Ruane Builders Ltd.
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential, Housing Demand Target Figures, Residential Zoned Land Quantum, Neighbourhood Strategy for the Quay Area
Summary of Submission:	
<p>Location: lands (5.1ha) at Crockets Town (backlands) / Quay Lane area, Ballina.</p> <ol style="list-style-type: none"> 1. This submission seeks 'Residential' zoning for the subject land, currently zoned 'Agriculture' in the draft LAP. As these lands were formerly zoned 'residential' over a number of plan cycles, it is stated that subject land is 'infill' and should be a high priority for future development, consolidating the urban form and 'sub-settlement' at the Quay area. It is requested that the land use zoning be changed to 'New Residential' in the dLAP. 2. Housing Targets/demand and adequate quantum of zoned land in the Ballina LAP area to facilitate revised figures. It is considered that amount of land zoned 'New Residential' in the draft plan is not adequate for the housing demand and anticipated changes in housing unit targets. It is highlighted that the calculations set out in the dLAP are based on the timeframe contained in the Draft County Development Plan 2021-2027, and do not accommodate the housing needs of Ballina LAP up to 2030. A total of up to 1,370 units in the medium to long term is suggested to provide for additional demand, including future proofed adjusted targets to align the LAP timeline to 2030, legacy under provision, and to provide for anticipated increase targets arising from 1st revision of the NPF. A suggested quantum of 73 hectares of 'Residential' zoned land is put forward to accommodate revised housing target figure. 3. It is contended that - the exclusion of these lands without a corresponding strategy for the Quay / Sligo Road neighbourhood would likely have unintended consequences for the wider LAP strategy (including in terms of transport / permeability, regeneration, employment and enterprise). The submission considers that the role and function of the lands and the Quay / Sligo Road backlands should be a core consideration in terms of benefit of implementing the long-standing neighbourhood strategy for the area. 4. In respect of Enterprise and Employment zoned Land, in particular the IDA lands along the N59/Creggs Rd, the submission considers that the employment site emerges as an 'out of town' and disconnected semirural landbank, without potential for sustainable travel or integration with the adjacent neighbourhood. The submission contends that the designation of the enterprise landbank was based on a holistic approach to the masterplanning of the Quay / Sligo Road area, involving a corresponding and complementary residential expansion, along with transport infrastructure, creating a new urban district. The omission of the subject land undermined the core tenets of the Enterprise and Employment Strategy. The removal of the backlands area (including subject site) from the residential landbank, and the removal of road link objectives, results in the loss of potential for coordination between employment and residential land use. 5. In addition to the above, the submission suggested that provision is made for master-planned areas. It is requested to revise Objective HSCO2 as follows (modifications underlined): <i>HSCO 2 Safeguard the amenity and integrity of completed residential estates and provide for smarter travel options, it is the objective of the Council to ensure that new access proposals to any adjoining lands through an existing completed residential estate is provided for pedestrian or bicycle movements/connectivity, <u>primarily, without prejudice to any established or masterplanned neighbourhood access strategy.</u></i> 	

Map included. Land outlined in red.



Site location outlined in red

Chief Executive's Response and Recommendation:

Response:

These lands are zoned 'Phase 2 Residential' in the Ballina Town and Environs Development Plan 2009-2015 (as extended). The lands are zoned 'Agriculture' in the dLAP. The entirety of land, as outlined in red on the map provided, are backlands to rear of established development along Quay Road/Quay Lane.

1. - 2. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 identified and zoned accordingly for 'New Residential' purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. The zoning of additional lands for residential development would be premature by reason of its non-sequential, backland location, representing an approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6. Furthermore, all land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. This land does not meet the Tier 1 land criteria at present.
3. The dLAP for Ballina does not provide for any sub-settlements within the Plan extent. Zoning and housing targets are based on the Core Strategy, policy and objectives set out in the MCDP 2022-2028, in line with Regional policy and National Town Centre First Policy. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. The subject land does not meet all the criteria for Tier 1 land at present. It is considered that the character and development of the Quay area can be achieved within the context of the provisions of the LAP and by the development management process. As such it is considered that the Quay area does not warrant a separate Action Plan to realise its potential.
4. It should be noted that the IDA land zoned Strategic Enterprise and Employment (SEE) is a

separate land-use zoning category, serving a definite specific Strategic purpose – to provide an IDA business Park of National or Regional significance. Therefore, IDA lands zoned for Strategic Enterprise and Employment should not be regarded as a general land bank for Enterprise and Employment. The dLTP for Ballina contains a number of proposals which provides upgraded two-way cyclist and pedestrian facilities and upgraded junctions all along Creggs Road (Proposal 3), which links the Quay area to the proposed Strategic Enterprise and Employment land. There is provision for a long-term indicative future link road from Quay Land to Creggs Rd (Proposal 5), as well as provision for Shared Streets and permeability link tie-ins at this location (Auxillary Proposal). It is considered that the IDA/SEE lands can be served by sustainable travel modes as outlined in the dLTP that connect established neighbourhood to these lands, as well as having adequate access to the national road network along the N59. As per response outlined in 1 and 2 above, additional residential zoned land is not required to meet housing targets for Ballina allocated in the Core strategy.

5. In respect of request to modify policy HSCO2, the completion of unfinished housing development is dealt with under Planning Control and appropriate Development Management policy set out in the Mayo County Development Plan 2022-2028. The rewording of HSCO2 is not considered necessary.

Recommendation:

1. - 5. No change to Draft Plan.

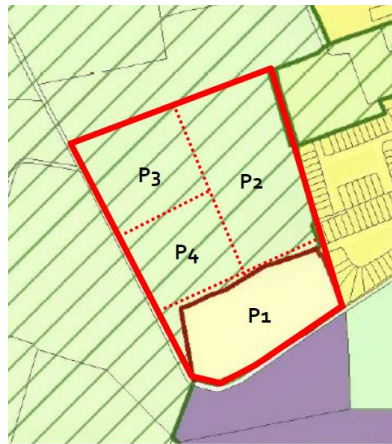
Submission Number:	MYO-C92-32
Submission by:	The Planning Partnership on behalf of Vincent Ruane Builders Ltd.
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential, Housing Demand Figures, Residential Zoned Land quantum, Killala Neighbourhood Area Concept
Summary of Submission:	
<p>Location: lands (8.2ha) at Friarscourt/Laghtadawannagh, Killala Rd, Ballina</p> <ol style="list-style-type: none"> 1. It is requested that this land be zoned in its entirety as ‘New Residential’ to reflect the intended development of Phase 1 (2.59ha) under pl.ref.21/793 and currently on appeal to ABP pl.16.315466. It is pointed out that the north-western portion of the lands are part of a larger masterplan for their landbank, most of which is zoned ‘Residential Phase 1’ (former plan). Only the southern portion of the landbank is zoned ‘New Residential’ in the dLAP. In this regard, they consider these lands an important location for Residential expansion, supported by its brownfield & serviced nature and the planning history. Having regard to the ‘brownfield’ nature of the site, reverting to ‘Agriculture’ zoning is not realistic given the enabling works undertaken to date and does not reflect the current or potential future land use given the aims of the dLAP to prioritises development of brownfield lands ahead of greenfield locations. 2. It is stated that the housing demand calculations contained in the draft LAP are based on the timeframe of the <u>Draft County Development Plan (2021-2027)</u> and does not provide correct figures for the housing needs of the Ballina for the duration of the Plan up to 2030, resulting in a shortfall. Therefore, there is capacity for allocating more ‘New Residential’ zoned land in Ballina to accommodate increased housing target figures. 3. The submission addresses the concept of the Killala Road Neighbourhood Area, previously included in the Ballina T&E Development Plan 2009-2015 which included the Killala Road Area as part of Neighbourhood Area V. and refers to the <i>Killala Road Neighbourhood Action Area Plan 2004-2009</i>. It is considered that the subject land would integrate with the 	

Neighbourhood Area V and contribute positively to the identity of the area.

4. The submission suggested that provision is made for master-planned areas. Similar, to [MYO-C92-23](#), [MYO-C92-24](#) and [MYO-C92-31](#) above, it is requested to revise Objective HSCO2 as follows (modifications underlined):

***HSCO 2** Safeguard the amenity and integrity of completed residential estates and provide for smarter travel options, it is the objective of the Council to ensure that new access proposals to any adjoining lands through an existing completed residential estate is provided for pedestrian or bicycle movements/connectivity primarily, without prejudice to any established or masterplanned neighbourhood access strategy.*

Map included. Lands outlined in red.



Landbank/site location outlined in red

Chief Executive's Response and Recommendation:

Response:


1. The subject land is immediately west of the established Residential areas of Friars Court and The Hawthorns. The area identified P1 on the map submitted is zoned 'New Residential' in the dLAP, is serviced, sequential to existing residential development of the town and could be regarded as Tier 1 land i.e. would be a natural extension of same. Notwithstanding the planning history on the lands, it is considered that an ample timeframe had been available over previous plan cycles to develop these lands. Despite permission obtained for the land zoned 'New Residential' within the indicated holding, it would appear that no development has commenced to date. In the current development climate and having regard to National, Regional and Local policy and objectives which prioritises compact, sequential growth it is considered that additional Residential zone land at this location would militate against such policy.
2. Residential land in Ballina is zoned in line with Regional policy RPO 3.1 and 3.2 of the RSES which prioritises compact, sequential growth and regeneration in our towns and villages; and more specifically Objective SSO3 of the MCDP 2022-2028 which requires sustainable, compact, sequential growth and urban regeneration in Ballina. The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for 'New Residential' purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP

area. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. Any additional lands for 'New Residential' or 'Strategic Residential Reserve' purposes would result in an excess of Residential zoned land and would constitute over-zoning. Furthermore, the zoning of additional Residential land at this peripheral location would be premature representing a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

3. Comments noted. The dLAP does not provide for any sub-settlements within the Plan extent. Zoning and housing targets are based on the Core Strategy, policy and objectives set out in the MCDP 2022-2028, in line with National *Town Centre First Policy*, which prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area.
4. The completion of unfinished housing development is dealt with under Planning Control and appropriate Development Management policy. The rewording of HSCO2 is not considered necessary.

Recommendation:

1. - 4. No change to Draft LAP.

Submission Number:	MYO-C92-36
Submission by:	Paul and Amanda Cawley
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to New Residential
Summary of Submission:	
<p>Location: townland of Garrankeel, south of the Belleek Rd (L1120).</p> <p>This submission states that outline planning permission had previously been obtained (in 2001) subject to a connection to the town sewer (be extended). Since then, zoning has changed. They now wish to be able to apply for planning permission given the availability of services in the Belleek area, in effect seeking the land to be zoned 'Residential', currently zoned 'Agriculture' in the dLAP.</p> <p>Map included. Land hatched in grey.</p>	
	
Site location outlined in black/hatched in grey	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The site is located on the northern fringes of the Plan area, along Belleek Road (L1120). There is some one-off housing in the general area. There is no established built-up residential area at this</p>	

location, with no footpaths, public lighting, surface water sewer at this location.

In accordance with the NPF, all plans are required to have a tiered approach to land use zoning. Tier 1 land (priority residential land) is defined as that which is 'able to connect to existing development services and within the existing built-up footprint of a settlement or be contiguous to existing developed lands or spatially sequential within the plan area'. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. This land does not meet the Tier 1 land criteria at present.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). The required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 and in line with national Town Centre First Policy. Furthermore, zoning of additional lands for residential development at this peripheral location would represent a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft Plan

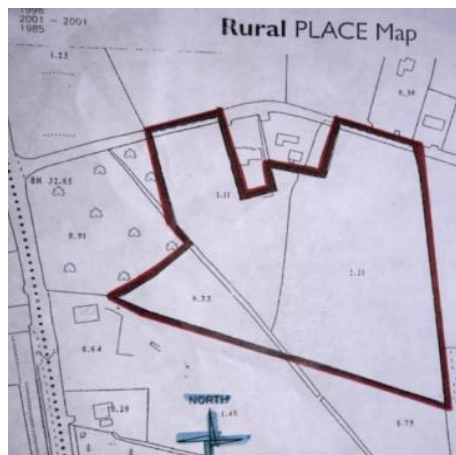
Submission Number:	MYO-C92-37
Submission by:	Breege Goldrick
Issues Raised/Relevant Chapter(s):	Rezone lands from Agriculture to Residential

Summary of Submission:

Location: lands (3.553ha) on the Belleek Rd (L1120), west of Belleek Park Caravan & Camping site.

This submission requests the zoning of the subject land for Residential uses, having regard to the type of development in the area and the demand for quality housing in the Ballina Area. The area is close to Culleens National School, Ballina beverages, McVann interiors and Belleek woods, considered an ideal location.

Map included. Land outlined in dark red.



Chief Executive's Response and Recommendation:**Response:**

The site is location along the Belleek Rd (L1120), with some one-off housing in the general area and a Caravan & Camping business along the road to the east of the site. There is no established built-up residential area at this location, with no footpaths, public lighting, surface water sewer at this location.

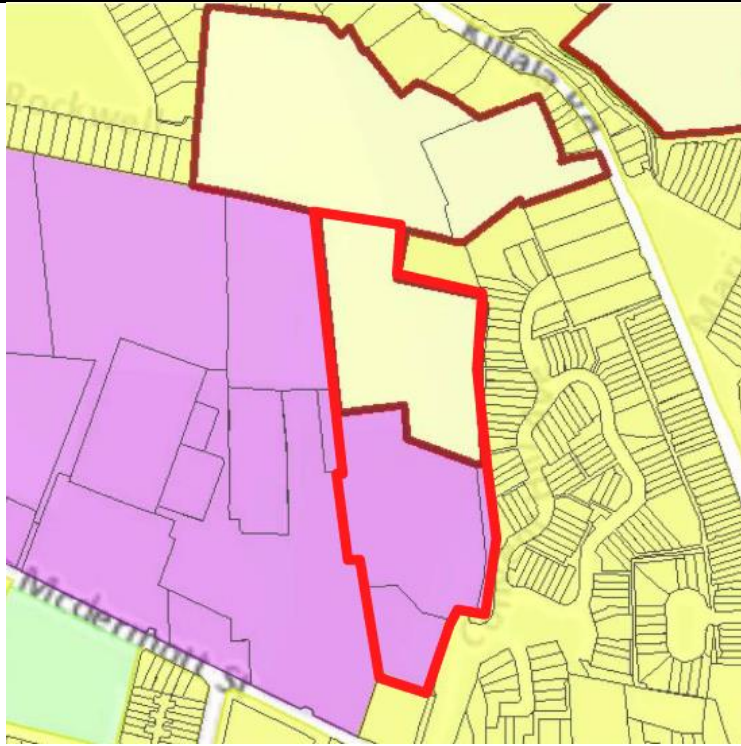
In accordance with the NPF, all plans are required to have a tiered approach to land use zoning. Tier 1 land (priority residential land) is defined as that which is 'able to connect to existing development services and within the existing built-up footprint of a settlement or be contiguous to existing developed lands or spatially sequential within the plan area'. All land use zonings within the dLAP for Ballina have been assessed in terms of their potential for future development based on serviceability as per the findings of the Settlement Capacity Assessment. This land does not meet the Tier 1 land criteria at present.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). The required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 and in line with national Town Centre First Policy. Furthermore, zoning of additional lands for residential development at this peripheral location would represent a piecemeal approach that individually and cumulatively would be contrary to the overall strategy for growth for Ballina which must be consistent with the objectives set out in the Mayo County Development Plan 2022-2028 to deliver compact sequential growth and the regeneration of the town centre under Objective SSO3 and Objective SSO6.

Recommendation:

No change to Draft LAP.

Submission Number:	MYO-C92-40
Submission by:	The Planning Partnership on behalf of The Congregation of the Sisters of Mercy.
Issues Raised/Relevant Chapter(s):	Rezone lands from Education to New Residential
Summary of Submission: Rezone land	
Location: Convent of Mercy lands located between McDermott St and Killala Rd (R314)	
This submission is seeking the rezoning of a portion of land from Education to New Residential. The overall land holding (as outlined in red) owned by the Sisters of Mercy. The zoning as per the dLAP splits the use type between Education and New Residential. It is contended that the current educational and active use is focused in the southern portion of the land, while the northern portion remains an inherent part of the overall unit and is not realistically severable in terms of sub-division of the land holding into two parcels or physical split, as per the zoning contained in the dLAP. Map included, land outlined in red	



Site location outlined in red

Chief Executive's Response and Recommendation:

Response:

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for 'New Residential' purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. It is considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy.

Road L-11194-0 (Convent Hill Avenue/Grove/Crescent) serves the established Convent Hill Residential area to the east. However, noting the physical constraints by virtue of the significant gradient differences between the land and the road level along Convent Hill Ave, it is considered access onto same is unachievable. Furthermore, the land is on convent lands which contains Protected Structures, Ref Ballina 10/Sisters of Mercy Convent and School. It is considered that rezoning of the Education land on the grounds of designated Protected Structures to 'New Residential' would be out of context with the protected historical buildings. Together with the limited potential for access on to L-11194, it is considered that 'New Residential' zoned land at this location would not adhere to proper planning.

Recommendation:

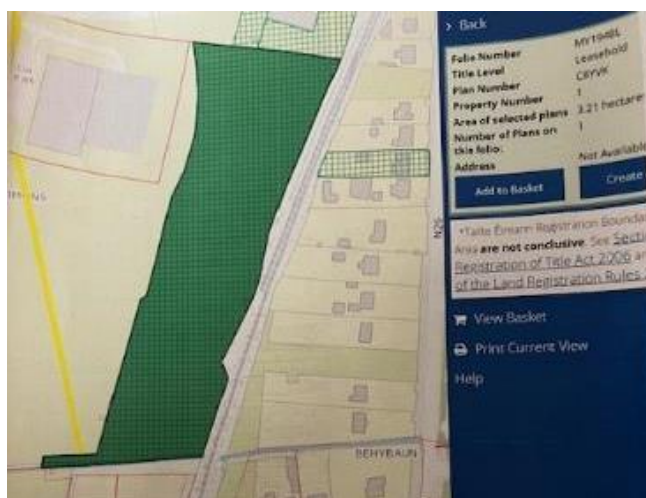
No change to Draft Plan.

Submission Number:	MYO-C92-42
Submission by:	Shaun Heffernan on behalf of James Heffernan
Issues Raised/Relevant Chapter(s):	Add residential to Enterprise & Employment Land Use Zoning objective.

Summary of Submission:

Location: lands (3.21ha) at The Commons, Ballina

The site is zoned 'IC Industry/Commercial' in the Ballina Town and Environs Development Plan 2009-2015 (as extended). The site is zoned 'Enterprise and Employment' in the dLAP. It is beside the Moyvalley Business Park (commercial, retail, office), other business and residential terrace at Cockle St. and proximate to the Railway and Bus stations. It is requested that residential development be given consideration in this zoning category, given the demand for housing and to provide for a sufficient quantum of zoned lands in Ballina town. Map included. Land hatched in green.



Site location hatched in Green

Chief Executive's Response and Recommendation:

Response:

The land adjoins the Moyvalley Business Park (north) and the Rail line (east) of subject lands. The presence of the Business Park, the Railway station & Rail line acts as a physical buffer between the general area of the site and the built-up town core area. There is no existing permeable links connecting this area to the any established residential neighbourhood or to the town core area. Furthermore, there is limited physical and social infrastructure at this location to support residential development.

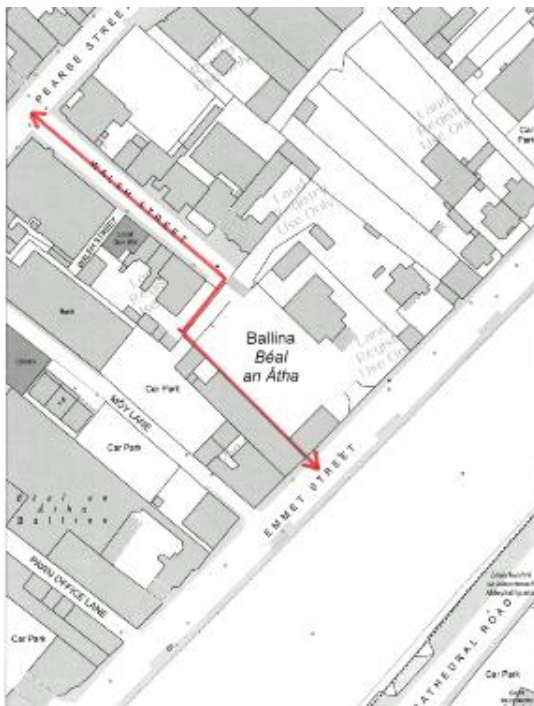
The proposed 'Enterprise and Employment' zoning as per the dLAP is consistent with historical zoning, which is considered appropriate to accommodate potential future enterprise and employment development at this strategic location close to the rail and road networks. It is considered inappropriate to introduce provision for residential uses at this location, as it would be an incompatible use in an area characterised by its established business & commercial uses, proximate to strategic rail and road networks, and as such would not adhere to the tenets of placemaking or proper planning.

Recommendation:

No change to Draft Plan

Submission Number:	MYO-C92-44
Submission by:	Cllr John O'Hara
Issues Raised/Relevant Chapter(s):	Support Residential Rezonings
Summary of Submission:	
<p>Location(s): lands located at (1) Friarscourt Laghtadawannagh, Killala Road, Ballina; and (2) and Croketstown Blocks / Quay Lane, Ballina</p> <p>(1) This submission is made in support of submission to the draft on lands located at Friarscourt Laghtadawannagh, Killala Road</p> <p>(2) This submission also supports submission to draft LAP in respect of lands at Crokets Town/ Quay Lane.</p> <p>Support of these lands is based on the fact that these lands are in Ballina, with housing all around. The submission is seeking a favourable consideration of these lands.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: Comments noted.</p> <p>Recommendation: No change to Draft Plan</p>	

Section 5 Remaining Submissions

Submission Number:	MYO-C92-8
Submission by:	Simon Beale + Associates on behalf of David McGowan
Issues Raised/Relevant Chapter(s):	Alter indicative route on opportunity site.
Summary of Submission:	
<p>The submission represents McGowans Funeral Home in Ballina and emphasises their longstanding presence and reputation for high standards in funeral services. The submission pertains to the Draft Ballina Local Area Plan 2024-2030, specifically addressing Opportunity Site 3 on Emmet Street. It highlights concerns regarding proposed permeability linkages through the funeral home site, emphasising the need to maintain privacy and dignity for grieving families.</p> <p>An alternative route between Walsh Street and Emmet Street, running along the boundary with the Mary Robinson Centre, is sought in order to preserve the operation of the funeral home while facilitating connectivity in the area. It is requested to amend the plan to reflect an alternative route and emphasises the significant impact on the funeral business if the proposed route directly through the property were to be implemented.</p>	
	
<p>Alternate route shown in red.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: The dLAP has included illustrative permeability routes. The realisation of any permeability routes is outside of the remit of the dLAP and is subject to engagement and consultation.</p>	
<p>Recommendation: No change to plan.</p>	

Submission Number:	MYO-C92-20
Submission by:	Bridge, Western Care
Issues Raised/Relevant Chapter(s):	Quay Regeneration
Summary of Submission:	
<p>The submission advocates for the revitalisation of the quay area in Ballina to enhance access to the river Moy for recreational activities like kayaking and water sports. It proposes a partnership between the local authority and community groups, similar to one in Dublin, to provide easier access to the river and organise water sports activities. Drawing on the success of a previous partnership in Dublin, which saw thousands of young people, including those with disabilities, benefit from water sports, the submission emphasizes the positive impact of such initiatives on mental well-being. The author, having been involved in a similar partnership, expresses willingness to discuss and collaborate on implementing such a program at the Quay, involving stakeholders and water sport enthusiasts.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: Comments noted.</p> <p>Recommendation: No change to Draft Plan.</p>	

Submission Number:	MYO-C92-39
Submission by:	Mark Duffy
Issues Raised/Relevant Chapter(s):	Compact development/housing, sustainable transport, infrastructure, Opportunity Sites, Regeneration of Convent of Mercy for Community Uses.
Summary of Submission:	
<ol style="list-style-type: none"> 1. The Ballina Local Area Plan must address the housing crisis by allowing lands within a 10-minute cycle route of the town centre to be flexible for housing zoning, especially with the rollout of sustainable transport infrastructure. 2. Several opportunity sites for development are identified, including the Ballina Mineral Water site, Emmet Street, Moy Quarter, Becketts House, Bunree Mill site, and The Quay Quarter. Each site presents potential for residential, hotel, commercial, and public amenity spaces, with emphasis on preserving green spaces and historic sites like the Augustinian Abbey and Palmyra Hill. 3. Additional suggestions include prioritising the regeneration of the Historic Convent of Mercy for community use, improving sporting and amenity infrastructure with facilities like an indoor dome, all-weather playing fields, a skatepark, and roofed street concepts to enhance the town centre shopping experience, considering the town's high precipitation levels. 	
Chief Executive's Response and Recommendation:	

Response:

3. *Town Centre First Policy* prioritises Tier 1 lands for the purposes of delivering residential development within the existing built-up footprint of a settlement or contiguous to existing developed lands or spatially sequential within the plan area. Compact Growth is one of the main elements of the Development Strategy for Ballina whereby new residential development must be accommodated within the existing built-up footprint of the town on brownfield/vacant/infill sites in the town centre, existing & new residential areas, at appropriate density, optimising existing social and physical infrastructure, in line with national Town Centre First Policy. All land use zonings within the dLAP for Ballina have been considered in the Settlement Capacity Assessment accompanying the Plan, in terms of their potential for future development based on serviceability and sequential development.

The Core Strategy of the Mayo County Development Plan 2022-2028 (MCDP) sets out the population and household targets as well as the zoning requirements to facilitate New Residential development throughout the County over the plan period. The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). A housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. It is therefore considered that the required quantum of land zoned for Residential uses has been appropriately met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy, and the objectives set out in the Mayo County Development Plan 2022-2028 under Objective SSO3 and Objective SSO6.

The Draft Local Transport Plan (dLTP) for Ballina has been prepared alongside the Draft Ballina Local Area Plan. The Land use zoning contained in the dLAP has been informed by the dLTP through engagement with consultants dLTP in considering the Proposals contained therein.

4. Comments noted.
5. Comments noted. It should be noted that the Sisters of Mercy have made a submission in respect of their Convent lands, see MYO-C92-40 above. It is considered that the comments and suggestion contained in the subject submission in respect of the Convent lands are, in principle, good suggestions and conducive to meaningful placemaking. However, such proposals from a third-party on lands outside of their direct control would warrant further engagement and a collaborative approach between the landowner, particularly given the varied range of suggestions proposed.

Having regard to the matters raised in submission MTO-C92-40 together with the suggestions proposed in the subject submission, it is considered premature to amend zoning or include specific objectives for these lands. It should be noted that the Land Use zoning objectives contained in the dLAP makes provision for 'Ancillary Uses' (LUZ16) and 'Established Use/Non-Conforming uses'(LUZ17), which provides for non-specific development to some degree.

Recommendation:

1. - 3. no change to Draft Plan.

Submission Number:	MYO-C92-33
Submission by:	Ballina Chamber of Commerce
Issues Raised/Relevant Chapter(s):	Housing targets, Density, Placemaking/Regeneration/Masterplans, Eurovelo, Tourism, Housing Provision, Commercial Vacancy, Rail & Freight, Waste Infrastructure, Legislation Changes, Development Mix, Monitoring & Implementation
Summary of Submission:	
<p>Sets out the legislative and policy requirements for inclusion in preparation of LAPs. Provides a summary of the Plan provisions, under various headings. Ballina Chamber has concerns and considerations relating to land zoning and residential density in the dLAP, as follows</p> <ol style="list-style-type: none"> 1. Density: call for clarity on the acceptable range of densities in different areas of the town, their concern is with potential low densities in peripheral areas. 2. Housing Development: In respect of housing figures over the lifetime of the Plan, seeks adjusted figures and strategies. It is highlighted that there is a need for clear justifications for land zoning decisions, the importance of defining acceptable residential densities, and the necessity of effective monitoring to align housing completions with the set targets. 3. Placemaking and urban regeneration: It is suggested that the Local Authority to take responsibility for preparing a rolling program of master plans within a specific timeframe after the adoption of the plan, i.e within 12-18 months. 4. Eurovelo: Seek to reference the EuroVelo Route 1 in EDO 8, particularly in relation to Moy Greenway from Belleek to Killala. (EuroVelo1 Atlantic Coastal Route, Mountain Biking Trail via Ballina connecting the Wild Nephin Ballycroy National Park to the National Mountain Bike Trail at Coolaney. 5. Tourism: Suggest MCC take a leadership role in spearheading development of the waterfront, through planning, coordination and potentially attracting private investment. <ul style="list-style-type: none"> - Encourages focus on the River for aesthetic and functional purposes, including opportunities for vacant spaces in Emmett St and Abbey St and other spaces along the River front. 6. Housing/Provision: Comments are made in respect of Government increasing the amount paid in grants to tackle vacancy and dereliction. Seeks introduction of regulation to tackle the maintenance of buildings in town centre, as well as the cleanliness of the street. 7. Housing Referb Schemes: Suggests tweaking of the Schemes (buy and renew schemes, repair and leasing) to provide broader range of housing options in the town centre & environs and timely provision of cost-rental homes in the town. 8. Commercial Vacancy: this issue needs to be addressed and suggests that it be examined to see what can be done to get buildings and spaces occupied and how to make these spaces nicer and more inviting in the interim. Advocates the use of over the shop living. 9. Waste Infrastructure: The absence of reference to waste infrastructure is noted, specifically Construction and Demolition (C&D) and landfill/reuse facilities. Suggests incorporating such references into the plan. 10. Rail & Freight: It is suggested to review Policy MTP 2 with a view to potentially including a specific objective related to Rail Travel improvement and expansion in line with provisions of RPO 6.11 in the Regional Spatial and Economic Strategy (RSES) regarding the Western Rail Corridor. 11. Call for legislative changes: There is a call for lobbying efforts to bring about changes in laws related to compulsory purchase and fines for disused or derelict sites, suggesting a desire for legislative measures to address the issue of neglected properties in the Ballina 	

Area. The Chamber expresses their willingness to engage with policymakers to bring about positive transformations in the Ballina Area and potentially at the national level.

12. **Retail:** The submission also refers to matters relating to dynamic retail environment (e-commerce), struggles with online platforms, and call for local authority support to the business community, highlights the importance of collaboration in overcoming the challenges/difficulties facing the retail landscape, in light of Town Centre First Regeneration.
13. **Development Mix:** supports a diverse range and mix of real estate types i.e. residential, commercial, retail, education, etc. The submission also comments on tenures and ownership, lends their support for mixed-use development to promote vibrant 24/7 environment, welcomes public realm enhancement, promotes education and retail interactions, promotes the involvement of community engagement in the planning process, supports the integration of cultural facilities into the town centre, promotes availability of affordability housing options within or near town centre, welcomes improve transportation connectivity, welcomes business support programs as well as encourages digital infrastructure in the context of changing retail context.
14. **Monitoring & Implementation:** In respect of Chapter 12 of the LAP, the following is suggested:
 - a dedicated committee within Ballina Chamber for overseeing implementation.
 - Regular meetings with representatives from MCC re: progress of LAP implementation.
 - Periodic progress reports from MCC detailing the achievements, challenges and upcoming phases.
 - Engage with the local community to gather feedback on LAP implementation.
 - Work with Mayo County Council to establish clear performance metrics and indicators outlined in the LAP.
 - Public information on achievements and challenges related to LAP implementation.
 - Advocate for the resources to support LAP implementation.
 - Collaboration with other local organizations, businesses, and stakeholders.
 - Monitor environmental and social impact of LAP implementation by ensuring the sustainability goals are being met.
 - Monitor LAP in regard to compliance with relevant legal and regulatory requirements

Chief Executive's Response and Recommendation:

Response:

1. - 2.

The Ballina Local Area Plan must be consistent with the provisions of the MCDP, as per Section 19(2) of the Planning and Development Act 2000 (as amended). As such, a housing target of 511 has been allocated to Ballina, with a quantum of 29.73ha of Tier 1 land identified and zoned accordingly for New Residential purposes in the dLAP. An additional 15.51ha of land is zoned 'Strategic Residential Reserve' within the Ballina dLAP area. Therefore, the required quantum of land zoned for Residential uses has been met by the current provisions of the dLAP, in accordance with the Core Strategy set out in MCDP 2022-2028 in line with national Town Centre First Policy. The density assumptions employed in determining the quantum of residential land required to meet the housing targets for Ballina over the lifetime of the plan are the same as those employed in determining the Core Strategy in the County Development Plan. The number of residential units proposed over the lifetime of the plan (511) equates to 15.7% of the units allocated to the entire county by the department of Housing, Local Government and Heritage in 2021.

In addition to the above, it should be noted that under MYO-C92-3 the inclusion of a new objective is recommended, as follows:

'DSO 11: Ensure that all new residential developments are assessed having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning

Authorities (2024) or any subsequent guidelines.’

3. The CE takes on board the observation, but it is simply not feasible for the LA to commit to the preparation of detailed masterplans for private sites over which it has no remit. Broad conceptual assessments would be more appropriate. Development Frameworks will be prepared for Opportunity Sites, as per recommendations contained in MYO-C92-43.
4. Comments noted. This request is considered acceptable and is consistent with that considered in submission MYO-C92-3.
5. Comments noted.
6. - 7 Comments noted. Schemes and grant aid regarding active land management or general maintenance is outside of the remit of the Local Area Plan process.
8. Comments noted. There are various instruments/mechanisms available in tackling vacancy, however this is outside of the remit of the Local Area Plan process.
9. It is considered that LA actions regarding Waste Management are provided for in Section(s) Section 7.4.2 contained in the MCDP. The management of waste within the entire county is covered under policy INP 7 and objective INO 10 of the Mayo County Development Plan 2022-2028.
10. It is considered that the LA actions regarding Rail Travel and Transportation within the County is covered in Chapter 6 and, Policies MTP 17, MTP 18, MTP 19 and under objectives EDO 34, MTO(s) 18 – 21
11. Comments noted. Legislation changes are outside of the remit of the LAP process.
12. Comments noted.
13. Comments noted.
14. Comments noted. The support and commitment from the Ballina Chamber of Commerce in realising the targets and objectives of the Ballina LAP is welcomed. In line with recommendation contained in other submissions received, a monitoring and implementation strategy, including measurable targets for the reduction of vacancy will be inserted in the final plan. Any other measures are beyond the scope and remit of a Local Area Plan.

Recommendation:

- 1.-2. No change to Draft Plan
3. No change to Draft Plan
4. As per recommendations contained in submission MYO-C92-3, Amend EDO 8 as follows:
Support and facilitate the development of an integrated network of greenways and heritage trails, including The Monasteries of the Moy from Belleek to Killala, **incorporating Eurovelo 1 Atlantic Coastal Route.**
5. No change to Draft Plan
6. - 7. No change to Draft Plan
8. - 13. No change to Draft Plan
14. Amend Chapter 12 of the LAP to include a monitoring and implementation strategy, including measurable targets for the reduction of vacancy to be inserted in the final plan.

Submissions on Draft Ballina Local Transport Plan

Submission Number:	MYO-C92-12
Submission by:	Orlagh Hickey
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Ballina Local Transport Plan, on public display concurrently which informs the Draft Ballina Local Area Plan 2024-2030 (LAP).</p> <p>The authors object to the proposed roadway(s) connecting Belleek Manor/Belleek Manor to Bohernasup/Lansyn/Lansing outlined in the Auxiliary Proposal Schedule of the Draft Ballina Local Transport Plan. The proposed road would pass through an area zoned for residential use and designated for a children's playground according to a planning application. Their fears are that the roadway would diminish communal green space, increase traffic flow, and pose a hazard to the young families living in the area.</p>	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>In respect to the points raised, it should be noted that the proposals made in the submission will be considered in the design stage of Local Transport Plan projects as they are developed. All individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.</p> <p>Recommendation:</p> <p>No change to Draft Plan</p>	

Submission Number:	MYO-C92-16
Submission by:	Maureen McDermott
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Ballina Local Transport Plan, on public display concurrently which informs the Draft Ballina Local Area Plan 2024-2030 (LAP).</p> <ol style="list-style-type: none"> 1. They support the concept of cycle paths but express genuine safety concerns, particularly regarding groups of primary school children cycling through the estate with numerous house entrances and potential hazards before reaching the main road. 2. They mention discussions with an engineer who indicated limitations on housing development due to insufficient road width, raising questions about the feasibility of new cycle paths. 3. The submission also highlights maintenance issues in The Moorings, including challenges with mature trees and cleanliness of paths. They question who will be responsible for maintaining the proposed cycle paths, given historical issues with upkeep. 4. There are doubts about the necessity of the proposed cycle paths and the adequacy of local 	

consultation. The writer suggests alternative solutions such as shuttle buses and safer cycle routes. They also emphasise the need for safety measures around local shops.

5. Finally, they criticise the difficulty of the observation process for the Local Area Plan (LAP), suggesting that it discourages participation from residents who may not be aware of the process or find it user-unfriendly.

Chief Executive’s Response and Recommendation:

Response:

1-5 Comments noted, in respect to the points raised, it should be noted all individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.

Recommendation:

No change to Draft Plan.

Submission Number:	MYO-C92-28
Submission by:	Sean Rooney
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Ballina Local Transport Plan, on public display concurrently which informs the Draft Ballina Local Area Plan 2024-2030 (LAP). The author, a resident of the Quay area in Ballina, supports the county council's local transport plan and suggests the following:</p> <ol style="list-style-type: none"> 1. They propose reconsidering the proposed greenway from Tom Ruane Park and instead suggest implementing it along Quay Road. They believe this would be beneficial as it would connect the Quay area with amenities such as the running track, soccer pitch in Belleek, and nearby woods, providing valuable assets for residents. 2. They argue that implementing the greenway on Quay Road would benefit not only residents of Quay Village but also those in surrounding areas such as The Moorings, Blackrock Court, Riverside Estate, Rathmee lawns, and the rugby club on Creggs Road. 3. The writer suggests that aligning the greenway with existing and proposed routes in Belleek could potentially lead to future connections to Enniscrone, Easkey, and other parts of Sligo, enhancing regional connectivity. 4. They believe that these developments would not only benefit local residents but also attract tourism to the area, contributing to the regeneration of the Quay area and its surroundings. They also suggest that it would be an asset to the Wild Atlantic Way, further enhancing its appeal. 	
Chief Executive’s Response and Recommendation:	
Response:	
<p>1.– 5. Comments noted, in respect to the points raised, it should be noted all individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical</p>	

assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.

Recommendation:

No change to Draft Plan

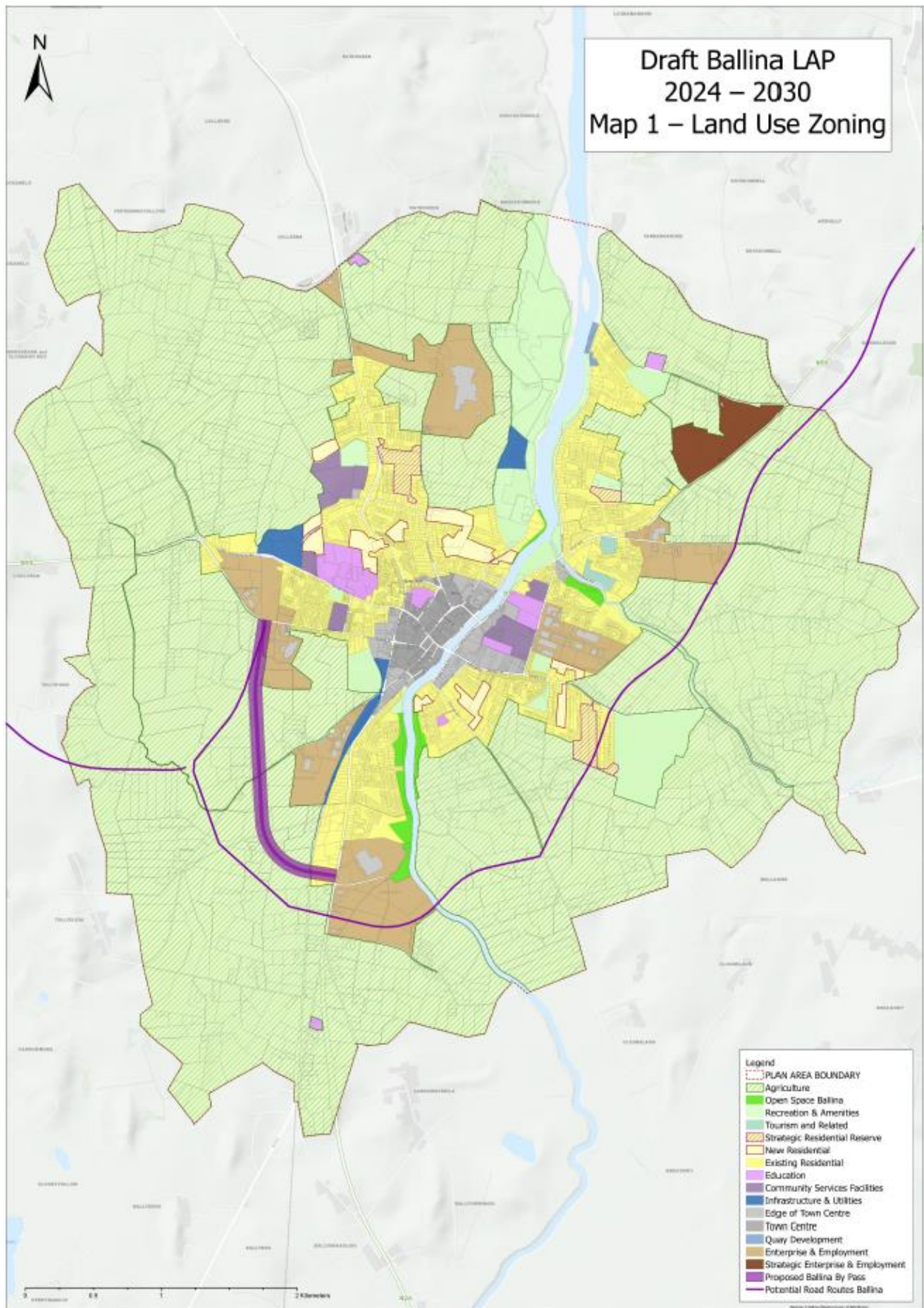
Submission Number:	MYO-C92-29
Submission by:	Teresa Browne
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Ballina Local Transport Plan, on public display concurrently which informs the Draft Ballina Local Area Plan 2024-2030 (LAP). The writer expresses objection to the proposed cycle path through their cul-de-sac estate, citing several concerns:</p> <ol style="list-style-type: none">1. The narrow roads and limited parking space in the primarily residential estate could worsen traffic congestion and hinder residents' access to their homes if a cycle path is introduced.2. They worry about the safety of pedestrians, particularly children, as increased cyclist traffic might compromise their well-being. The estate was designed with resident safety in mind, and a cycle path could upset this balance.3. The construction of a cycle path could negatively impact the aesthetic appeal of the neighborhood, which many residents take pride in maintaining. They fear it may detract from the overall ambiance of the area. <p>In conclusion, while the writer supports cycling initiatives, they believe their cul-de-sac estate is not suitable for a cycle path. They urge the council to reconsider and explore alternative routes that preserve the residential character of their neighborhood.</p>	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>1-3 Comments noted, in respect to the points raised, it should be noted all individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.</p> <p>Recommendation:</p> <p>No change to Draft Plan.</p>	

Submission Number:	MYO-C92-30
Submission by:	Taron Wright
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Ballina Local Transport Plan, on public display concurrently which informs the Draft Ballina Local Area Plan 2024-2030 (LAP).</p> <p>The author requests a reconsideration of the proposed greenway route in Ballina's transport plan, highlighting concerns and suggesting alternative options:</p> <ol style="list-style-type: none"> 1. The proposed route, including a bridge at Tom Ruane Park, lacks strategic rationale due to existing infrastructure nearby, rendering it redundant and inefficient in resource utilisation. 2. They propose relocating the bridge to Quay village, offering visibility and serving as a point of interest for residents and visitors, contrasting with the concealed nature of the proposed Tom Ruane Park bridge. 3. Moving the greenway to Quay village would enhance accessibility for a wider population, provide scenic views of the river, and highlight historical landmarks, enriching the cultural experience. 4. Redirecting the greenway towards Belleek forest via Quay village would align with environmental conservation efforts and offer a picturesque route celebrating the town's natural heritage, in contrast to the proposed route lacking scenic value. <p>The writer urges reconsideration of the proposed route, advocating for options prioritising community accessibility, environmental conservation, and cultural enrichment in urban planning decisions.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: 1 - 4 Comments noted, in respect to the points raised, it should be noted all individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.</p> <p>Recommendation: No change to Draft Plan.</p>	

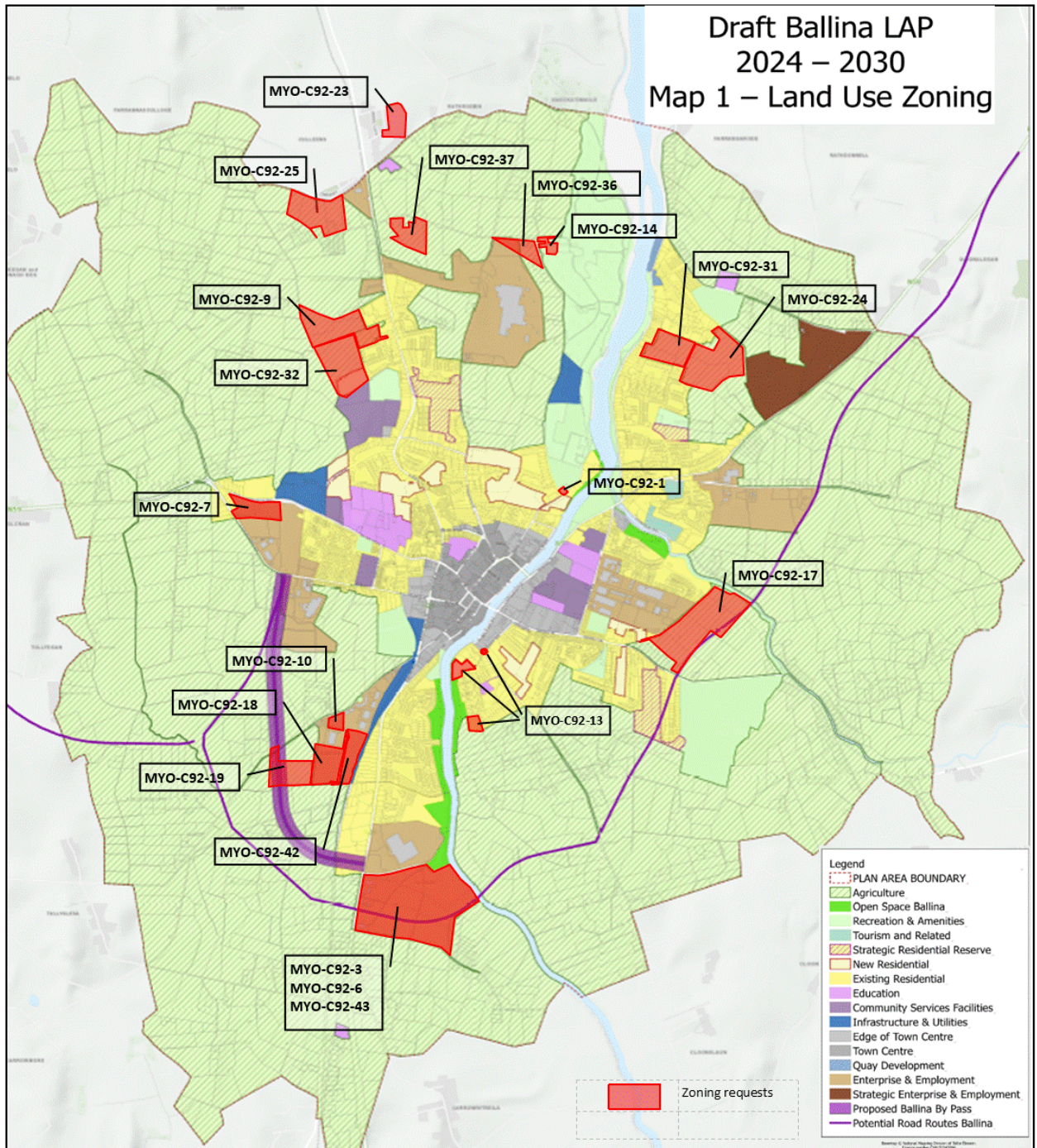
Submission Number:	MYO-C92-38
Submission by:	Avril Greham on behalf of MOVEIT
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>The submission makes detailed comments wholly with respect to the Draft Ballina LTP. The same submission has been made to the public consultation of the Draft Ballina Local Transport Plan.</p> <p>MOVEIT Ballina is a group of residents advocating for better public and active transport connections in Ballina and its surrounding areas.</p> <p>Key Observations and Recommendations:</p> <ol style="list-style-type: none"> 1. Accessibility Improvements: Prioritize pedestrian accessibility improvements, including footpaths, cycle paths, and crossings, especially in areas lacking such infrastructure. Engage individuals with disabilities in the planning process for valuable insights. 2. Priority of Rollout: Urgently progress sections of routes with high road safety impact, especially those connecting to existing routes. Consider measures that can be implemented quickly to reduce traffic and meet emissions reduction targets. 3. Pragmatic Approach: Focus resources on critical projects rather than non-essential improvements. Avoid mixing walking and cycling on shared paths, especially on main roads. 4. Rural Connections: Ensure the cycle network serves rural areas surrounding Ballina, not just the town itself. 5. Controlled Crossings and Signalisation: Avoid over-reliance on signalisation, especially at junctions where it may not be necessary. 6. Risk of Disconnected Routes: Ensure cross-town connections and connections to suburbs are included in the plan. 7. Specific Proposal Feedback: Provide detailed feedback on each proposal outlined in the plan, including suggestions for improvements, prioritisation, and potential issues. 8. Objectives Alignment: Align proposals with objectives such as improving public transport networks, pedestrian, and cycle networks. 9. Consider Water-Based Solutions: Explore the possibility of using water transportation as a short-term solution to improve access across the river. 10. Final Thoughts: Express optimism for the future of Ballina and commitment to continued engagement with the council to refine and implement the transport plan. <p>Overall, MOVEIT Ballina aims to ensure the final transport plan reflects the needs and aspirations of the local community while promoting sustainable and accessible transportation options.</p>	
Chief Executive's Response and Recommendation:	
<p>Response: 1-10 Comments noted - It should be noted all individual projects set out in the Ballina Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.</p> <p>Recommendation: No change to Draft Plan.</p>	

Appendix 1 Land Use Zoning & Location of Zoning Requests

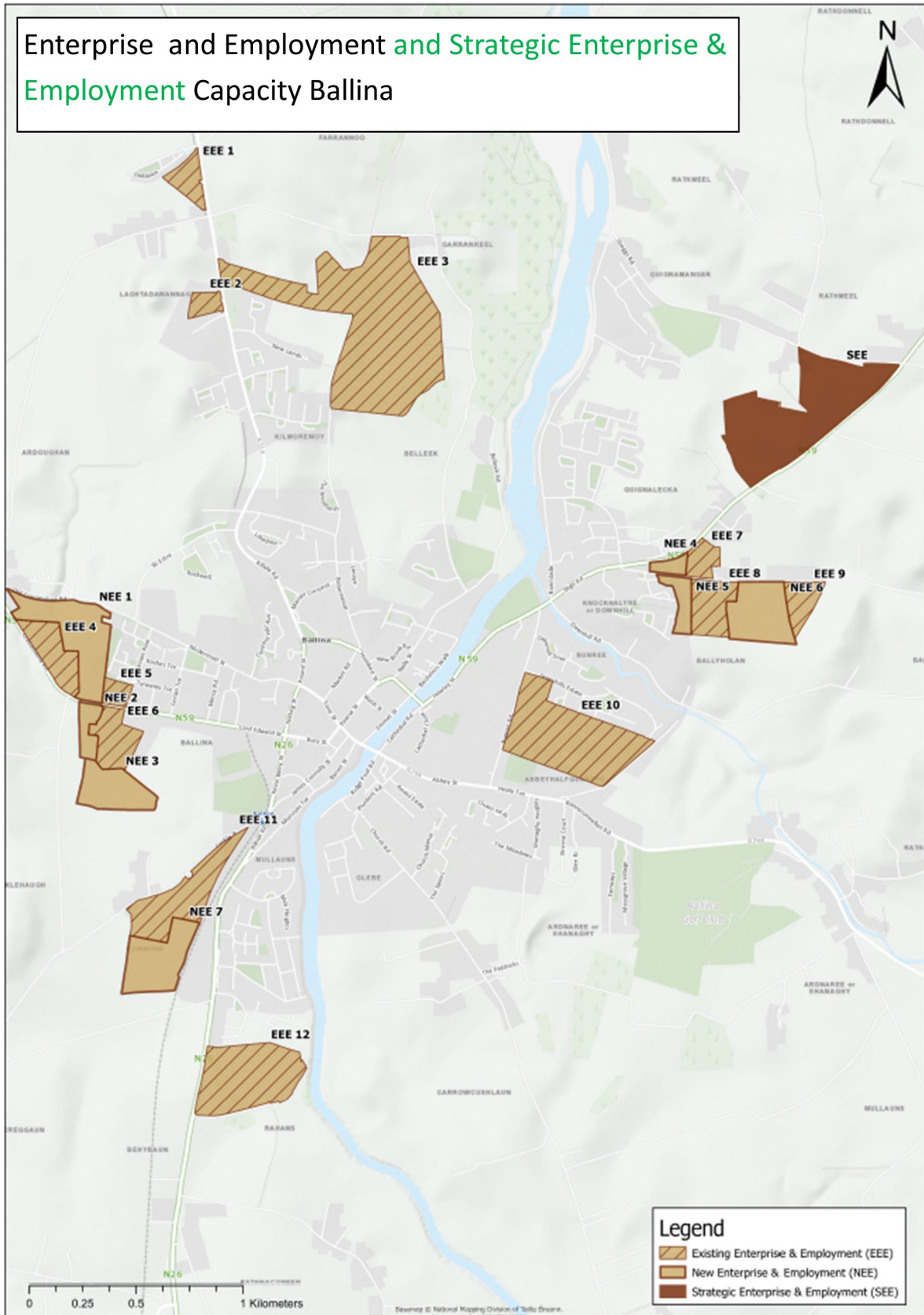
Land Use Zoning map of Ballina Draft LAP



Mapped location of zoning requests



Appendix 2 – Settlement Capacity Assessment & Maps



Map 1: New Enterprise and Employment, Existing Enterprise and Employment and New Strategic Enterprise and Employment

Settlement Capacity Assessment – Enterprise and Employment Lands

Ref: Submission MYO-C92-43 Recommendation 6(i)

New Enterprise and Employment Services							
Site No.	Area - Hectare	Lighting	Footpath	Water	Foul/Storm Sewer	Road	Tier
NEE 1	10.27	√	√	√	√	√	1
NEE 2	2.13	√	√	√	√	√	1
NEE 3	5.94	√	√	√	√	√	1
NEE 4	1.16	√	√	√	√	√	1
NEE 5	2.28	√	√	√	√	√	1
NEE 6	7.42	√	√	√	√	√	1
NEE 7	7.74	√	√	√	√	√	1
NEE 8	27.12*	✗	✗	✗	✗	✗	

*Lands adjacent to Hollister

Table 1: New Enterprise and Employment Services

New Strategic Enterprise and Employment Services							
Site No.	Area - Hectare	Lighting	Footpath	Water	Foul/Storm Sewer	Road	Tier
SEE 1	23.25ha	√	√	√	√	√	1

Table 1.1 New Strategic Enterprise and Employment Services