



Draft Ballina Local Area Plan
Planning Section Mayo County Council
Aras An Chontae
Castlebar
Mayo

Via portal: consult.mayo.ie

30/01/2024

RE: DRAFT BALLINA LOCAL AREA PLAN 2024-2030 (BLAP)

A Chara,

I refer to your notification on 19 December 2023 that the Draft Ballina Local Area Plan (BLAP) had been published. The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission and set out below its report together with recommendations and observations in respect of the Draft Plan.

This submission will comment upon the Draft Ballina Local Area Plan in the context of its consistency with relevant objectives in the RSES and with the ambitions and goals identified in Section 3.8 of the Strategy, as it relates to Ballina and the identified Key Future Priorities.

Headline Issues and Considerations

This submission examines the Ballina Local Area Plan in the context of its consistency with relevant objectives in the RSES. The Regional Spatial and Economic Strategy (RSES) identifies Ballina as a **Key Town**, and the narrative associated with this delineation is as follows within Sec. 3.8:

KEY TOWN: Ballina has a population of 10,200 (CSO 2016) and is the second largest town in Mayo. The town has a strong focus on commerce and manufacturing with servicing and retail being the town's second principal function. The town also has an administrative function including Government Departments and national bodies as well as Mayo County Council. The town also serves a public health function provided by the district hospital. Ballina has nearly 5,000 jobs and a jobs/resident worker ratio of 1:36.

NWRA - RSES - 2020-2032

The Ballina Local Area Plan includes the Key Future Priorities for Ballina set out in Section 3.8 of the RSES, *Key Towns*:



- Build on Ballina’s strong enterprise and associated skills base, strong infrastructural base in terms of connectivity, Metropolitan Area Network (MAN) and proximity to the Atlantic Europe Connect sub-sea telecommunications cable, Ireland West Airport Knock and the Atlantic Economic Corridor (AEC).
- Build on the significant tourism potential of Ballina through investment in tourism related infrastructure, including Monasteries of the Moy Greenway from Beleek to Killala, incorporating EuroVelo1 Atlantic Coastal Route, Mountain Biking Trail via Ballina connecting the Wild Nephin Ballycroy National Park to the National Mountain Bike Trail at Coolaney.
- Regeneration within the town core particularly in the Market Square/Military Barracks area and regeneration of the riverside along the River Moy is crucial to facilitate an enterprise-led regeneration of the town centre.
- Promote and support the uptake of underutilised industrial and commercial space and expand upon the capacity of business parks/ industrial estates in the town.
- Removal of barriers to development through enhanced road and rail connectivity to and from Ballina including:
 - i. Priority upgrade of the N26/N58 linking Ballina and the north west of the county to the N5,
 - ii. Enhanced rail services (thereby supporting the transition to a low carbon region) to Dublin and commuter services between Ballina, Castlebar, Westport and Claremorris with connectivity to Galway and Limerick Metropolitan Cities and major international ports such as Shannon/Foynes, should the Western Rail Corridor be realised, and
 - iii. Continued investment in rail freight facilities at Ballina.
- To support and grow the role of Ballina as the key economic driver in the north-west of the county and for a cluster of smaller towns in its catchment, capitalising on its designation as a Key Town within the context of the Sligo Regional Growth Centre and its location in relation to the Atlantic Economic Corridor, in order to facilitate long-term economic growth within the context of a high-quality environment supporting a wide range of services and amenities, thereby making it attractive as a place to work, live and invest in.

There is, via the Mayo County Development Plan, a high level of policy consistency with the RSES, with the Local Authority adopting an approach which clearly delineates Westport, Castlebar and Ballina as the economic and social drivers for County Mayo into the medium term, with Core Strategy Growth allocations which reflect this hierarchy.

In overall terms, the Ballina Draft Local Area Plan could benefit from a recalibration in terms of its opening Chapters. The vision statement for Ballina is outlined at Sec. 2.3 and it could be augmented by the provision of reference to key enabling infrastructure. Whilst referenced throughout various areas of the Draft Plan, the key enablers / projects could be encompassed at the outset (or certainly in the opening Chapters) in a single location, or table. Such an addition to the Plan would assist the reader in providing a clear and coherent

vision, alongside the critical enabling projects / aims to realise the advancement of the vision for Ballina.

It is noteworthy that in a significant number of instances in the Draft Plan, there is a distinct lack of timeline(s) relating to Policy Objectives. To highlight one such example, Table 7.10 Outlines the Projects and measures associated with Sustainable Mobility and Modal Shift in Ballina, however there are no timelines assigned to any of these measures, nor are they defined in terms of Short / Medium / Long Term in their delivery.

Core Strategy

Sec. 2.8 of the Draft Plan outlines the current scenario and future demographic ambitions for Ballina. Census 2022 saw the Town increase its population to 10,500 from the 2016 figure (10,170). Table 2.1 in the Plan outlines a figure which is at variance to the CSO figure, however no elaboration or narrative is included in the Plan to clarify the differential involved. The level of growth (Census 2022) represents an annual increase of between 0.5% - 1% per annum. The future ambitions within the Core Strategy outline an overall growth rate of 24 % for Ballina during the lifetime of this Plan, bringing the population to 12,300 by 2028. It is the view of the Assembly the Core Strategy should, at a minimum, reference the Growth Ambitions for Ballina as a Key Town in the RSES, and provide commentary on the current and future growth trajectory in terms of how it achieves 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 should include reference to a core strategy table, referencing 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.

It is noteworthy that the Ballina/ North Mayo Growth Cluster Study (BNMGCS) 2021 referred to in 5.3 of the LAP has been borne out of the RSES designation of Ballina as a Key Town.

The BNMGCS outlines a recommended course of action to develop the 'Irish Market Town of the Future' for Ballina as a catalyst for regional growth in North Mayo based on the strength of its community, location, heritage, and natural resource assets. This policy reference is welcome, as it effectively replicates the concept contained within the RSES around Key Towns, and their role as drivers of a wider Region / Sub-Region.

Enterprise and Employment Zoning Provision

Enterprise and Employment Provision is included in the Settlement Capacity Assessment - Appendix 1 of the Written Statement and identifies Existing Enterprise and Employment Areas of 49.83 and New Enterprise and Employment (NEE) Areas of 64.06ha. Further, there is a Strategic Enterprise and Employment (SEE) zoning of IDA lands which is 23ha. on the N59 Sligo Road, adjacent to the Existing IDA sites.

All of these NEE Sites (eight in total), are serviced with connections to lighting footpaths, water foul / storm network and roads network. Therefore, the provision of suitable lands for

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Employment and Enterprise uses is considered adequate with 64.06ha. of NEE and 23 ha. of SEE.

There is a significant area of land zoned to the South of the Town (which is identified as a Key Employment Land Bank). This appears to be an extension of the lands associated with Hollister (Med Tech), who are a major employer in Ballina. The Zoning of this land to the South (outside) of the Road Line (Ballina Outer Relief) may be excessive in terms of extending the overall built up footprint of Ballina, however there may be justification for this designation straddling both sides of the road-line, and if there are, the reasons should be elaborated upon in the Plan.

Housing & Residential Density

Residential densities are generally to be determined on a site-to-site basis. *“The Plan adopts a fluid and site-specific approach to development densities”*. The Assembly consider that clarity should be given as to the range of densities which may be acceptable in different areas of the town. The Draft Guidelines for Sustainable and Compact Development (DHLGH) could be referenced in this respect. The Assembly further notes that Table 2.1 shows the quantum of lands zoned to the 29.73Ha (29.61Ha of lands zoned new residential lands in Appendix 1). Much of these land areas are towards the periphery of the town and could result in relatively low densities if fully developed and thus clarification on the envisaged densities would be of benefit to the plan.

The plan commits to monitoring of the number of residential units permitted and developed on an annual basis, to ensure compliance with the core strategy and its housing allocation for Ballina, and this is a welcome inclusion.

The target for housing completions for the plan are 551 units. The housing completions for Ballina for the year 2022 were 40 with 21 completions for 2021. The figures for 2023 are not available to date. If this rate is to continue, there is a likelihood that the overall target of 551 units over the lifetime of LAP would not be reached. However, it may be substantially achieved, with a slight increase in the rate and monitoring as referenced in the Plan is an important factor.

Table 1: Ballina- Housing Completion Figures 2012-2022 *

| Year | No. of completions |
|------|--------------------|
| 2012 | 5 |
| 2013 | 2 |
| 2014 | 5 |
| 2015 | 7 |
| 2016 | 5 |
| 2017 | 5 |
| 2018 | 8 |
| 2019 | 13 |
| 2020 | 21 |
| 2021 | 21 |
| 2022 | 40 |

* Source CSO

There are a number of references to serviced sites in the LAP and those are linked in their development to the RZLT. RPO 3.7 cites an ambition in this regard, however it is arguably orientated towards smaller towns and villages, and in this respect, it may not be judicial to request its inclusion in the Ballina LAP. However, given the current crises in Housing Supply across the Region, Local Authorities should examine all options around increasing supply, and this may well include some form of Serviced Sites initiatives in larger towns.

Place Making & Urban Regeneration

The Assembly welcome the identification of 11 opportunity sites in the town, and five character areas, as part of the town centre regeneration strategy and policy objective TCO 10, which outlines that Mayo County Council will prepare, or coordinate, as appropriate, urban design frameworks/masterplans for the Opportunity Sites in Ballina Town to inform future development proposals.

The Assembly suggest that the Local Authority assume the responsibility for preparing a rolling program of masterplans within a 12-18 months timeframe of the adoption of the plan.

The Eurovelo Route 1, should be referenced in EDO 8, as this potentially overlaps with Moy Greenway from Belleek to Killala; *i.e. incorporating EuroVelo1 Atlantic Coastal Route.*

EDO 8 Support and facilitate the development of an integrated network of greenways and heritage trails, including The Monasteries of the Moy from Belleek to Killala.

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. The plan would benefit from consideration of same.

Owing to the importance of Rail / Rail Freight to Ballina towards achieving its Key Town potential (and future potential connections to the Western Rail Corridor), there is merit in reviewing Policy MTP 2 with a view to the potential inclusion of a specific objective to Rail Travel improvements and expansion. RPO 6.11 in the RSES represents one of the regional ambitions of the Assembly, with regard to Rail (Western Rail Corridor).

RECOMMENDATIONS

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).

OBSERVATIONS

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.

Summary

The NWRA note the Draft Ballina Local Area Plan generally reflects the key principles set out to enable the Town to grow as a Key settlement for the Northern and Western region. The incorporation of the above recommendations / observations would assist in delivery of strong policy alignment with the RSES. The Assembly finally note the advancement and adoption of the Local Area Plan for Ballina will occur during a period of significant Policy adjustment, with the impending National Planning Framework (NPF) revision to be followed by a review and update of the Regional Spatial & Economic Strategies. The Assembly looks forward to a constructive collaboration with Mayo County Council in this regard.

I trust that the above is of assistance and the Assembly wish to thank Mayo County Council for the opportunity given to provide this submission. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas



Denis Kelly
Director