



**Proposed Ballina Flood Relief Scheme
Heritage Council Submission – 20th February 2023**

The Heritage Council supports the Ballina Flood Relief Scheme in principle. However, we have a number of concerns in relation to the proposed development, as set out below under the following headings:

- 1. Heritage Council and partners' Ballina Collaborative Town Centre Health Check (CTCHC) Report 2020 and Town Centre First Policy (2022);**
- 2. Need to consider Government Climate Policy: Climate Action Plan 2023 and National Adaptation Framework 2018;**
- 3. Need to consider Places for People: National Policy on Architecture, published by Department of Housing, May 2022;**
- 4. Need for a Design Palette and a Public Urban Design Panel;**
- 5. The Draft National Biodiversity Action Plan and the Need for a Nature-based approach to large-scale flood relief schemes in Ireland; and**
- 6. Heritage Council Conclusions.**

1. Heritage Council and partners' Ballina CTCHC Report 2020 and Town Centre First Policy (2022)

1.1 Ballina Collaborative Town Centre Health Check (CTCHC) Report 2020

As RPS Consulting and Mayo County Council are aware, the Heritage Council has been advocating for a heritage-led approach to historic town centre regeneration in Ireland for several years through its statutory planning policy advice role and its programmes and projects. Funding has also been provided through the Heritage Council's Historic Towns Initiative (HTI) to conserve and repair the streetscape in the Pearse Street Architectural Conservation Area (Pearse St ACA: 2019 €140,000 & 2020 €140,000) and to renovate Belleek Gate Lodge in Ballina (2021 €115,000 & 2022 €163,000). This investment builds on URDF funding secured for the transformation of Ballina's 1740s military barracks into a digital hub and innovation quarter. The conservation and re-use of the former bank building, which now hosts the Jackie Clarke Collection on Pearse Street is also a notable investment in the town's historic fabric.

In addition, the Heritage Council produced and published a Collaborative Town Centre Health Check Report for Ballina¹ in 2020 as part of Phase 1 of the CTCHC Programme. Extracts from the CTCHC Report 2020 are reproduced below. As part of the overall CTCHC-15 Step assessment, a consumer survey² (Step 5) was undertaken in Ballina in 2019 – the full report can be accessed from the Heritage Council's website.

¹ https://www.heritagecouncil.ie/content/files/Ballina-CTCHC-Summary-Report_Final.pdf

² https://www.heritagecouncil.ie/content/files/Ballina_Town_Centre_Consumer_Survey.pdf

Ballina CTCHC Report highlights the following in relation to heritage:

“Heritage Assets - Built, Cultural and Natural Ballina can take pride in its rich natural, built and cultural heritage. Current projects aim to build on this heritage and include creating a greenway alongside the River Moy estuary and the transformation of Mary Robinson’s childhood home into The Mary Robinson Centre, a visitor centre and academic research facility, focused on human rights and women’s leadership. Conservation works to several architecturally significant buildings are being undertaken under the Historic Towns Initiative (HTI).

Based on the key findings of the CTCHC surveys, the Heritage Officer and CTCHC Programme Co-ordinator met on-site in late 2019 to discuss the potential redesign of the existing car-dominated space outside Ballina Cathedral as this location is key to enhancing the historic town centre, along with the need to improve pedestrian connections across the River Moy, in order to link with the Mary Robinson House – see Derry’s Peace Bridge over the River Foyle as an exemplar of good urban design/enhanced permeability of a historic core area.

The Heritage Council recommends that this important CTCHC research informs the proposed flood relief scheme, particularly in relation to the public realm adjacent to the River Moy in the historic core, and that any [hard] engineering proposals ensure the protection and enhancement of important historic vistas, which have existed for hundreds of years and combine to create the unique ‘time-depth’ of this historic town.



1.2 Town Centre First Policy (2022)

The Heritage Council was the national champion for a Town Centre First (TCF) Policy in the country, which emerged through its detailed planning policy submissions^{3,4} - the heart of this national policy is to value, promote and enhance the cultural uniqueness and identity of historic towns and town centres throughout the country. The focus for the Heritage Council in this regard is to ensure that historic towns/town centres have a quality design-led approach to regeneration, which embraces all components of heritage at its core, particularly in relation to the historic setting, historic streets, laneways and slips and historic vistas.

In relation to the importance of Ballina’s built heritage, the Heritage Council would recommend that a registered Conservation Architect is part of the overall project team for the proposed development.

³ <https://www.heritagecouncil.ie/content/files/Submission-to-Louth-County-Development-Plan-2021-2027.pdf>

⁴ <https://www.heritagecouncil.ie/content/files/Workshop-for-Owners-and-Leaseholders-of-Vacant-Property-in-Dundalk-Feedback-for-agreement.pdf>

2. Government Climate Policy: Climate Action Plan 2023 and National Adaptation Framework 2018

Since the publication of the Climate Action Plan 2019, there has been a significant strengthening of the governance structure to support ambitious climate action, underpinned by the enactment of the *Climate Action and Low Carbon Development (Amendment) Act 2021*. Ireland has a legally binding target to be climate neutral no later than 2050, and to reduce emissions by 51% by 2030. This is further emphasised in the Climate Action Plan 2023⁵.

The primary policy response to adaptation needs in Ireland is the National Adaptation Framework (2018) and the related Sectoral Adaptation Plans. The Sectoral Adaptation Plan for Flood Risk Management⁶ commits to fully exploring the potential of natural waters retention measures (NWRMs) aimed at reducing overland runoff and/or increasing the attenuation of flows down a river system, which can have a wide-range of benefits including for water quality, and biodiversity in addition to climate mitigation through enhanced carbon sequestration.

Objective 3, Adaptation Action 3.B states that The OPW, in coordination with other relevant stakeholders, will continue to enhance its knowledge and capacity with regards to NWRMs and will assess the potential for NWRMs as part of the development of the future flood relief schemes.

The Heritage Council understands that, as required, a Nature Based Catchment Management report has been completed, though this is not yet available. The Project Update (March 2022) states that while a number of measures have been identified that could *“substantially control runoff and provide flood storage upstream and could potentially reduce flood risk and sediment movements/discharges into the watercourses for the future climatic condition... The measures identified as part of the NbCM are unlikely to form part of the substantive options development for Ballina FRS and are most likely to be advanced separately (to the flood relief scheme), as part of climate change mitigation measures - E.g. MCC Climate Action Plan.”*⁷

The Heritage Council submits that to be in compliance with the aims of the Climate Action Plan 2023, putting off any nature-based catchment management to a later date, is not appropriate. The identified catchment wide measures, including woodland creation, improved land management practices such as re-wetting drained areas, river restoration works, such as riverbank restoration, construction of instream structures should be considered as an integral part of the proposed scheme.

The Climate Action Plan 2023 highlights the close link between climate change and biodiversity loss, which is identified in the IPCC 6th Assessment Report⁸ and rightly emphasises the need to safeguard biodiversity and ecosystems as a key part of all climate resilient development.

⁵ Government of Ireland (2022) Climate Action Plan 2023: CAP23 Changing Ireland for the better. Department of the Environment, Climate and Communications. <https://www.gov.ie/en/publication/7bd8c-climate-action-plan-2023/>

⁶ Office of Public Works (2019) *Flood Risk Management: Climate Change Sectoral Adaptation Plan*. Government of Ireland, Dublin. Available at <https://www.gov.ie/en/publication/97984b-climate-change-and-sectoral-adaptation-plan/>

⁷ Ballina Flood Relief Scheme Newsletter, March 2022 <https://www.floodinfo.ie/frs/en/ballina/project-info/project-documents/>

⁸ <https://www.ipcc.ch/assessment-report/ar6/>

3. Need to Consider - Places for People: National Policy on Architecture, published by the Department of Housing, May 2022

The proposed flood relief scheme should be informed by *Places for People: National Policy on Architecture*⁹, which was published by the Department of Housing, Local Government and Heritage in May 2022. This new policy speaks very much to the New European Bauhaus (NEB), which is a key EU initiative. This important policy contains four strategic objectives, namely:

*The aim of **Objective 1** is to prioritise and support sustainable practices with respect to reuse, refurbishment and conservation of buildings as well as well-considered interventions and infill, and new buildings and places, where necessary. Carbon neutrality and built longevity, flexibility and adaptability are essential to environmental sustainability;*

*The aim of **Objective 2** is to deliver quality architecture and places, planned and designed with wider engagement and accessible to all, in rural area and villages, towns, cities and suburbia as an essential element of social sustainability;*

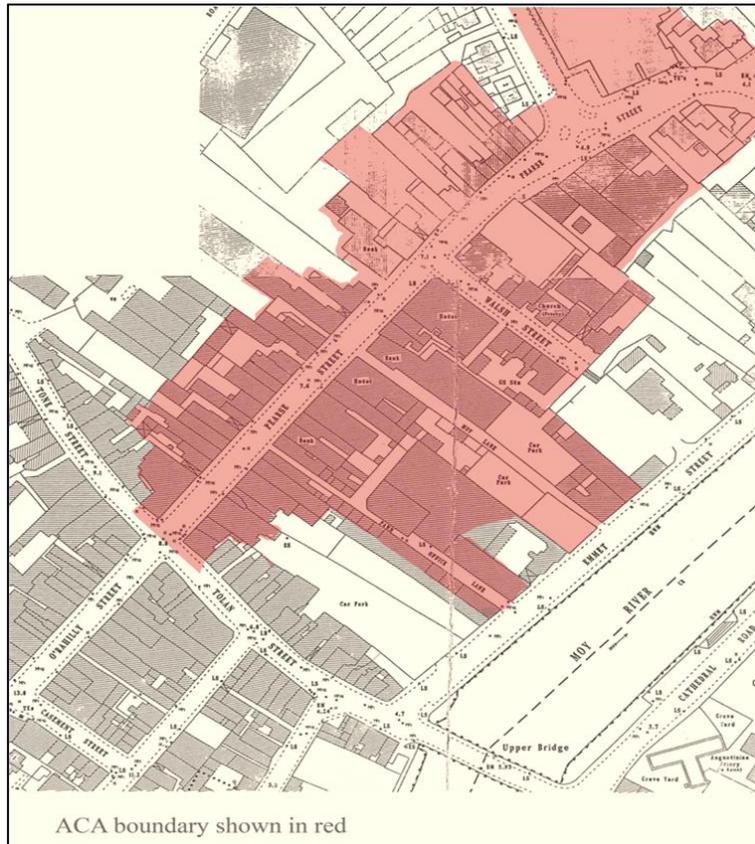
*The aim of **Objective 3** is to encourage leadership within the public sector and to show the importance of leadership at all governance levels and across the community of architects, architectural technologists and architectural conservation professionals in practice, education, engagement and policy/advisory/regulatory roles to support the delivery of high-quality built environment;*

*The aim of **Objective 4** is to promote the architecture as a continuum, inextricably linked to society's past, present and future as both an art form and a science. This objective recognises the contribution that architecture makes to the form, character and health of places, communities and livelihoods.*

The Heritage Council submits that the proposed flood relief scheme should embrace the recent 'cultural shift' towards *quality* design-led, people-focused urban areas. This can only be demonstrated through envisaging all uses (private and public) and valuing urban morphology, i.e., understanding the towns's unique historic form and fabric AND materiality. As noted above, the project team needs to involve appropriate disciplines including urban design and conservation.

According to Mayo County Council, Ballina has one designated Architecture Conservation Area (ACA) – Pearse Street, which includes the historic commercial core of the town centre and features several historic laneways that run down to Emmet Street and the River Moy, e.g., Moy Lane. The Heritage Council would strongly recommend that these important historic vistas and pedestrian routes, particularly where they include views across the Moy River to Cathedral Road and Ballina Cathedral beyond, are considered in any environmental impact assessment (EIA).

⁹ <https://www.gov.ie/en/publication/f9879-places-for-people-national-policy-on-architecture/>



4. Need for a Design Palette and a Public Urban Design Panel

In addition, it is important that any proposed materials for the flood relief scheme are linked to an agreed quality design palette for the historic town centre. Such a design palette, along with a detailed scheme to deliver a vibrant public space in front of Ballina Cathedral linking to the Mary Robinson House, would involve significant input and direction from local and national heritage experts and from key stakeholders including civic and business leaders - to ensure that the unique character, [historic] materiality and distinctiveness is being valued, understood and enhanced.

The proposed flood relief scheme, which involves significant public monies and is of huge public interest to Ballina's citizens and its diaspora, would also benefit from the establishment of a Public Urban Design Panel, as per other developed countries – see Vancouver's Urban Design Panel which was set up in the early 1970s¹⁰.

Given the lack of these key design components, the Heritage Council submits that the proposal requires more consultation and engagement and detail to ensure that any proposal brought forward is for a high-quality addition to the historic built environment, i.e., the receiving environment in Ballina.

¹⁰ <https://vancouver.ca/your-government/urban-design-panel.aspx>

5. The Draft National Biodiversity Action Plan and the Need for a Nature-based approach to large-scale flood relief schemes in Ireland

The Draft National Biodiversity Action Plan¹¹ (currently out to public consultation) acknowledges the importance of conserving biodiversity in the wider countryside, and not limiting conservation actions to designated areas.

Outcome 2B of the plan includes conservation actions for the wider countryside, highlighting the importance of areas that may not be legally protected but, which do, nevertheless provide habitat and connectivity for protected species and are often in themselves areas of importance for biodiversity. These include actions on farming, forestry, flood risk and peatlands.

Action 2B14 of this Plan commits that “OPW will work with relevant authorities to ensure that Flood Risk Management planning and associated SEA, EIA and AA, minimises loss of biodiversity and ecosystem services through policies to promote more catchment wide and non-structural flood risk management measures”. The indicator for this action is “Inclusion of catchment-wide and non-structural measures within the options assessed by Flood Risk Management Plans”.

The constraints study for the Ballina Scheme notes: *“The following requirements of the IFI should be considered in the design of the proposed scheme:*

- *Strong emphasis given to natural flood management techniques; and*
- *An assessment of the impact of the existing drainage schemes should be carried out to enhance natural flood management.”*

The Heritage Council concurs with these recommendations and is concerned that the opportunity to deliver on Action 2B14 of the National Biodiversity Action Plan may not be fully grasped by this proposed scheme.

In addition to the missed opportunity for nature-based catchment management, the Heritage Council is concerned about any proposed culverting of streams that are currently open water, and the likely impacts of this on amenity as well as biodiversity. Specifically, more detail is sought in relation to the proposed design of the scheme and impacts on the Bunree and Quignamanger. This information may be contained in the catchment study which was unavailable to the Heritage Council at the time of drafting this submission/observation.

There is also considerable biodiversity importance in the tree, scrub and wetland vegetation growth along the river Moy and Brusna – identified in the Ballina Local Biodiversity Action Plan¹² as ‘reed and large sedge swamps, depositing/lowland rivers, dry meadows and grassy verges and wet grassland habitat types’. In addition to their value in themselves, these are important ecological corridors, an importance also emphasised in the plan.

The Heritage Council would recommend these habitats being treated with care in the proposed flood scheme, e.g., the scheme should ensure that valuable wildlife corridors are not removed and include a commitment that where trees must to be removed as part of the works, that mature replacements are installed well in advance of commencement of works.

¹¹ <https://www.gov.ie/en/consultation/1566c-public-consultation-on-irelands-4th-national-biodiversity-action-plan/#documents>

¹² <https://www.mayo.ie/en-ie/your-council/services/heritage-conservation/biodiversity-natural-heritage/ballina-biodiversity-plan>

6. Heritage Council Conclusions

In conclusion, the Heritage Council submits that the proposed flood relief scheme needs to be based on sound design rigour and rationale, particularly the section of the scheme that is to be located within the historic town centre of Ballina. We request that full consideration be given to integrating nature-based catchment management to the delivery of the scheme, as required in the Draft National Biodiversity Action Plan and the Climate Change Sectoral Adaptation Plan for Flood Risk Management.

The Heritage Council would welcome further input as the proposal develops.

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