



Forward Planning
Mayo County Council
Áras an Chontae
The Mall
Castlebar
Co. Mayo
F23 WD90

25 April 2022

RE: PROPOSED MATERIAL ALTERATIONS (MAS) OF DRAFT MAYO COUNTY DEVELOPMENT PLAN

Dear Sir,

I refer to your notification on 31 March 2022 that Material Amendments were proposed to be made to the Draft Mayo County Development Plan and inviting submissions/observations.

The Assembly's submission to the Draft Mayo County Development Plan included a report by the Assembly on the proposed Draft Plan together with its recommendations/observations. This format is being followed in this submission on the proposed Material Alterations. At its meeting on 22 April 2022, the Assembly resolved to adopt the report and recommendations below and decided that it be issued to Mayo County Council as its response to the proposed material alterations of the Draft Mayo County Development Plan.

Report On Proposed Material Alterations (Mas) Of Draft Mayo County Development Plan

Process and Format

The Assembly, as a prescribed body, was notified of the proposed MAs on 31st March 2022. The closing date of submissions is 26/04/2022. This report will provide a brief reminder of the Assembly's engagement with the process heretofore and a commentary on the proposal vis-à-vis consistency or otherwise with the RSES.

The Assembly has engaged with the consultation process throughout and made one of the 1267 submissions on the Draft Plan. The Assembly's submission made on 2nd March 2021 comprised 3 recommendations and 14 observations. There was a high degree of consistency between the RSES and the Draft Plan.

The submissions received were considered at a Council meeting on 15/02/2022 at which decisions were made to publish the proposed MAs. There are 161 proposed MAs in volume 1 (written statement) of the Draft and 7 in volume 2 (Development Management Standards). In addition, there are a number of proposed changes to the zoning maps in volume 3. In keeping with our practice, it is

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not proposed to provide analysis or commentary on the zoning changes as they all relate to tier II towns (or below) and these were not specifically dealt with in the RSES. The Council also decided that the proposed MAs were such that an SEA and AA were required, and these have been published in volumes 4 and 5.

It is worthwhile to recall the nature of our submission on the Draft, there is a synopsis given below. The Council accepted all the recommendations made by the Assembly and agreed to take over 50% of the observations on board. A report under S12(5)aa was issued by the council in relation to our submission.

Recommendation 1: Improve the alignment between the Plan and the RSEs through the terminology associated with the designations in the Settlement Hierarchy and within the plan generally. Ballina and Castlebar are designated Key Towns in the RSES and Westport is identified as a place of Strategic Potential, is it not however a Key Town.

Recommendation 2: Include provision for brownfield development targets to CS06 to apply to all rural areas in order to be consistent with RSES RPO 3.3.

Recommendation 3: The plan should provide for lands to be zoned specifically for nursing homes and specialised housing in accordance with RPO 7.14 of the RSES.

The observations made by the Assembly will be referenced in the commentary below on the proposed MAs as and if they arise.

It is proposed in this report to concentrate on proposed MAs that have regional significance. There are a number of proposals which are minor in nature comprising updated information, references to technical guidelines and changes to narrative. These would generally be supported by the Assembly. There are quite a number of proposals, many of them technical in nature, in relation to rural housing. The Assembly, in dealing with similar issues in other plans took the view that the local Council is best placed to determine details of rural housing policy. It is recommended that this approach be followed in Mayo as well, and that unless it specifically states to the contrary below proposed MAs in relation to rural housing are supported by the Assembly.

Commentary on Selected Proposed MAs Volume 1

MA 1.1 – This proposal references RPO 5.5 in which regional policy in relation to protection of European sites is set out.

MA 1.3 – This proposed MA includes the inclusion of an implementation and monitoring table into Chapter 1 of the plan. It has delivery timeframes for many of the objectives in the plan. This approach is fully supported by the Assembly and is a response to issues raised in the NWRA submission.

MA 2.4 – This proposed MA relates to maintenance of the strategic function, capacity and safety of national roads and is similar to RPO 6.5.

MA 2.7 – This proposal includes the separation of the Key Towns into their own Category. The population growth targets show a small decrease for urban areas and a small increase in rural areas. It also includes areas of zoned lands to service population growth. The revised growth targets are consistent with those in the RSES.

MA 2.14 & 2.15 – This proposal is to omit the concept of the Compact Growth in the future development of the county (Refer CSP4). This would not accord with regional policy and would not be consistent with the RSES in particular section 3.3, and RPO 3.1, MA 2.15 also makes compact development conditional which would raise similar concerns.

MA2.16 – This proposal relates to the goal of having 30% of new homes in urban areas within the built up footprint. CSO5 is to be deleted and replaced with a diluted objective for 30% delivery using terminology ‘to encourage where possible’. This is not consistent with national policy or regional policy RPO 3.2 (c).

MA 2.17 – This proposes that 20% of all new homes in the rural area (rural towns/villages with population less than 1,500 and open countryside) will be on suitable brownfield sites – rather than being limited to the built up footprint as proposed in the draft plan. This is a welcome amendment that would be consistent with RPO 3.3.

MA 2.18 - This proposed MA is to delete CSO 7 which promotes a greener, low carbon and climate resilient county. This proposal is inconsistent with the whole thrust of the RSES and the Assembly recommend it be retained.

MA 2.21 – This proposed MA is to delete CSO 8 which requires monitoring of development to ensure alignment with the core strategy, regional and national policy, CSO 8 portrays a prudent approach and the Assembly recommends it be retained.

MA 2.30 – This proposed new objective states inter alia that increased building heights would be a feature of future development in Ballina and Castlebar. This is supported by the Assembly and it would encourage the preparation of a building heights study to inform forthcoming LAPS.

Chapter 3. Housing

These have been commented on above and predominantly deal with rural housing and are supported by this Assembly.

Chapter 4. Economic Development

These proposals generally supported by the Assembly, two of note are MA 4.1 which references the ratio of 0.66:1 between jobs and population growth and MA 4.5 which undertakes to review the Mayo Retail Strategy. The Assembly would have concerns with proposed MA 4.3 which amends EDO22 to support not only the use of town centre core for new service focused enterprises but also ‘other suitable locations’. This shift in focus potentially dilutes the development of town centres first and compact development and would, if implemented liberally, be inconsistent with the RSES.

Chapter 5 – Tourism

The proposed MAs are generally consistent with the RSES and supported by the Assembly. The prospect of a National Marine Park in Killala Bay is interesting and consistency with the Marine planning hierarchy should be a goal for it.

Chapter 6 – Transport and Movement

The proposed MAs are generally consistent with the RSES. The Assembly note that MA 6.10 includes modification to an objective that provides for a feasibility study to be conducted for the development of a Greenway ‘linking the Great Northern Greenway at Collooney to the Great Western Greenway via the high amenity areas of the Ox mountains, with a link point to the Ballina -

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Castlebar - Westport interurban Greenway at Foxford, Co. Mayo. It also includes the following paragraph: *'That the Western Rail Corridor (WRC) is protected and preserved for the delivery of Rail Infrastructure to develop the region and is excluded from any feasibility study for the WRC.'*

However, the feasibility study is not for the WRC and therefore this wording would benefit being reviewed and perhaps its inclusion is unnecessary as there are numerous alternatives that may also be excluded in a feasibility study due to constraints and it could affect the value of the study if it is seen that the outcome is predetermined. MA 6.16 proposes to relax the restrictions on access to national roads on the basis of economic or social reasons. These reasons are not specified and in any event the proposal would not be consistent with RPO 6.5 which seeks to ensure optimal use of national roads from a capacity and safety viewpoint.

Chapter 7 – Infrastructure

The proposed MAS are generally consistent with the RSES and are supported by the Assembly. The Assembly would suggest that some clarification on MA 7.5 be given as to whether this policy is related to the removal of combined sewers from networks.

Chapter 8 – Sustainable communities

The proposed MAS are generally consistent with the RSES and are supported by the Assembly.

Chapter 9 – Built Environment

The proposed MAS are generally consistent with the RSES and are supported by the Assembly.

Chapter 10 Natural Environment

The proposed MAs in this chapter amend a number of objectives to reference biodiversity which would be supported by the RSES. The amendments also reference Landscape Appraisal in the context of renewable energy sites of scale RPO 4.16 and collaboration between local authorities RPO 5.2. There is support provided for anaerobic digesters which would align with RPOs 4.27 and 8.7. Overall, this chapter will be consistent with the RSES if the MAs are accepted.

Chapter 11 Climate Action and Renewable Energy

These proposed MAs include a number of textual changes, an undertaking to review the renewable energy strategy and a conditional target of producing 600MW in Mayo. These proposals are all consistent with the RSES and are supported by the Assembly.

Chapter 12 Settlement Plans

The proposed MAs include recognition of Key Towns, objectives to protect the character of settlements, inclusion of nursing homes in the zoning matrix and policies specific to particular settlements. The general proposals are consistent with the policies in the RSES and are supported by the Assembly.

Commentary on Selected Proposed MAs Volume 2

The proposed MAs include to make density guidance a maximum rather than a minimum value, reference to DMURS and EV charging points. The proposals would be consistent with the RSES and supported by the Assembly. The Assembly suggest that DMS1 on density be conditional on the outcome of any building heights that may emerge from MA 2.30.

Summary of Recommendations

Having considered the above report the Assembly resolved to adopt it and to make a submission to Mayo County Council on the proposed material alterations of the Draft Mayo County Development Plan, incorporating the report which includes recommendations that are in summary:

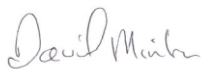
1. Not to make the plan with the proposed amendments as set out in MA 2.14 or MA 2.15, for the reasons set out in above report.
2. Not to make the plan with proposed amendments in MA 2.16, for the reasons set out in above report.
3. Not to proceed with proposed MA 2.18, for the reasons set out in above report.
4. Not to make the plan with proposed amendments in MA 2.21, for the reasons set out in above report.
5. Not to make the plan with proposed amendments in MA 4.3, for the reasons set out in above report.
6. Review the wording to MA 6.10, for reasons set out in above report, with a view to omitting the following paragraph 'That the Western Rail Corridor (WRC) is protected and preserved for the delivery of Rail Infrastructure to develop the region and is excluded from any feasibility study for the WRC.'
7. In MA 7.5, provide clarification as to whether this policy is related to the removal of combined sewers from networks.
8. In MAs to Volume 2, that DMS1 on density be conditional on the outcome of any building heights that may emerge from MA 2.30.

Conclusion

The Assembly commend Mayo County Council on the consistency of its draft plan with the RSES. It is also of the view that the proposed Material Amendments, except in the few instances outlined above, will strengthen the levels of consistency and recommend they be adopted by the Council.

The Assembly wish to thank Mayo County Council for the opportunity given to engage in the process and are available should any clarification on the above submission be required.

Yours Sincerely



David Minton