

Forward Planning Section

Chief Executives Report

Section 31AP(3)(b)

Draft Ministerial Direction

Castlebar Town & Environs

Local Area Plan 2023 -2029



Comhairle Contae Mhaigh Eo
Mayo County Council



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SECTION 1 - INTRODUCTION AND OVERVIEW

1.1 Introduction

On the 16th of January 2024, the Minister for Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator under Section 31AO (7) of the Planning and Development Act 2000 (as amended) (hereafter referred to as the Act), issued a Draft Ministerial Direction to Mayo County Council on the adopted Castlebar Town & Environs Local Area Plan, 2023-2029 (for full text see Appendix A).

1.2 Legislative Context for the Direction

In the Minister's notice dated 16th of January 2024, he stated that in his opinion, the adopted Local Area Plan has failed to implement the recommendations of the Office of the Planning Regulator under Section 31AO of the Act and the Plan, as made, fails to set out an overall strategy for the proper planning and sustainable development of the area. The Minister stated that in his opinion, the Plan is not consistent with National or Regional policy objectives as set out in the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly. The Minister also stated that in his opinion, the Plan fails to have regard to Ministerial Guidelines issued under Section 28 of the Act and that the Development Plan has not been made in compliance with the requirements of the Act.

Therefore, the Draft Ministerial requires the following steps to be taken by Mayo County Council on the Castlebar and Environs Local Area Plan:

- a.** Provide 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. Appropriate densities shall be applied to demonstrate yield.
- b.** Reinstate the following zoning objectives and associated text to that of the draft Local Area Plan:
 - (i) Material Alterations 10, 12, 14 and 21 – i.e. the subject lands revert to Agriculture from New Residential
 - (ii) Material Alterations 13 and 17 – i.e. the subject lands revert to Enterprise & Employment, and Agriculture from New Residential
 - (iii) Material Alterations 15 and 18 – i.e. the subject lands revert to Enterprise & Employment from New Residential
- c.** Delete the following zoning objective from the adopted Local Area Plan, i.e. the subject lands are unzoned:
 - i. Land zoned Enterprise and Employment at Cloonagh (Site EE 1) located to the southwest of Saleen Lough and to the immediate east of the rail line.

And apply all necessary consequential updates to the text of the plan consistent with the foregoing.

1.3 Public Consultation

Notice of the Draft Ministerial Direction was published on 30th January 2024, in the Mayo News, The Connaught Telegraph and The Western People.

Details of the Draft Ministerial Direction were available to view online on the Mayo County Council's public consultation portal (<https://consult.mayo.ie>), and a hard copy of the draft direction was made available for inspection at the following locations:

<u>Mayo County Council Offices</u>	<u>Mayo Public Libraries</u>
<ul style="list-style-type: none">• Áras an Chontae, Castlebar	<ul style="list-style-type: none">• Castlebar

Only submissions and observations related to the Draft Ministerial Direction made through the Online Consult or in writing to the Mayo Planning Department, received in the specified two-week public consultation period could be considered.

1.4 Purpose of the Chief Executive's Report

Section 31AP of the Act sets out the requirement for the Chief Executive to prepare a report on any submissions or observations received.

In this regard, the report of the Chief Executive must:

- a) Summarise the views of any person who made a submission or observation
- b) Summarise the views and recommendations (if any) made by the Elected Members
- c) Summarise the views and recommendations (if any) made by the Regional Assembly
- d) Make recommendations in relation to the best manner in which to give effect to the Draft Direction.

The report of the Chief Executive must be furnished to the Office of the Planning Regulator (OPR) and the Minister, no later than four weeks after the expiry of the public consultation period (i.e. 13th of February 2024).

1.5 Next Steps

In accordance with Section 31 AP (4) of the Act, the OPR shall consider the report of the Chief Executive on the submissions, together with any submission made under Section 31(10) of the Act, and shall recommend to the Minister that he or she issues the direction with or without minor amendments or where the Office is of the opinion that:

- i. A material amendment to the draft direction may be required;

- ii. Further investigation is necessary in order to clarify any aspect of the report furnished or submissions made; or,
- iii. it is necessary for any other reason, then the Office may, for stated reasons, appoint a person to be an inspector.

If the Minister agrees with the Recommendation, then he shall issue the direction with or without minor amendments. Pursuant to Section 31(17) of the Act, the direction issued by the Minister is deemed to have immediate effect and its terms are considered to be incorporated into the Plan, or, if appropriate, to constitute the Plan.

However, if a material change is to be made to the Draft Direction in advance of the Final Direction (FD), then the OPR will have to appoint an independent inspector 3 weeks after receipt of the CE Report (by April 2nd). The inspector then has 3 weeks to review the adopted plan and consultation documentation and furnish the OPR with a report (by April 23rd). The OPR then has 3 weeks to issue a FD to the Minister, who then has no set timeline to issue the FD.

SECTION 2 - LIST OF PERSONS/BODIES WHO HAVE MADE SUBMISSIONS/OBSERVATIONS

Submission No.	Name	Material Alteration Number / Draft Direction Ref
MYO-C93-1	Harry Barrett	No Material Alteration / Draft Direction referred to.
MYO-C93-2	Harry Barrett	No Material Alteration / Draft Direction referred to.
MYO-C93-3	Transport Infrastructure Ireland (TII)	Part 2(C) of Draft Direction Site
MYO-C93-4	Harry Barrett	No Material Alteration / Draft Direction referred to.
MYO-C93-5	John Flatley	MA 18
MYO-C93-6	Department of Education	Part 2(a) of Draft Direction
MYO-C93-7	Francis Tuohy	MA15 & MA17
MYO-C93-8	Grady Architects on behalf of Roonith Properties.	MA12
MYO-C93-9	National Transport Authority (NTA)	Part 2(C) of Draft Direction Site
MYO-C93-10	Northern & Western Regional Assembly (NWRA)	Part 2 of Draft Direction

SECTION 3 - SUMMARY OF SUBMISSIONS RECIVED IN RELATION TO THE DRAFT MINISTERIAL DIRECTION

A total of 10 no. submissions were received in relation to the Draft Ministerial Direction, during the statutory public consultation period, 30th of January 2024 to 13th of February 2024, inclusive. The submission received from the Northern and Western Regional Assembly is set out in Section 4 of the CE Report.

Submission Number:	MYO-C93-1
Submission by:	Harry Barrett
Material Alteration Number / Draft Direction Ref:	N/A
Summary of Submission:	
The submission discusses the Town Centre First Policy and how it should be applied to Castlebar and encourages Mayo County Council to be more proactive issuing Compulsory Purchase Orders for Vacant & Derelict Sites.	
Chief Executive's Response and Recommendation:	
Response: The submission does not refer to any element of the Draft Ministerial Direction.	
Recommendation: No change to plan.	

Submission Number:	MYO-C93-2
Submission by:	Harry Barrett
Material Alteration Number / Draft Direction Ref:	N/A
Summary of Submission:	
The submission seeks for any new plan to deal with dereliction in the town centre and increase the number of residential properties in the town centre.	
Chief Executive's Response and Recommendation:	
Response: The submission does not refer to any element of the Draft Ministerial Direction.	
Recommendation: No change to plan.	

Submission Number:	MYO-C93-3
Submission by:	Transport Infrastructure Ireland
Material Alteration Number / Draft Direction Ref:	Part 2 (c) of Draft Direction Site
Summary of Submission:	
<p>The submission refers to their original submission to the Draft Plan and subsequent submission on the material alterations and how it remains unaddressed and that the TII's initial position remains unchanged. The submissions refers to their previous comments in relation to Enterprise & Employment lands zoned in the proximity to the N5/N84 junction.</p> <p>The TII makes the following comments:</p> <ol style="list-style-type: none"> 1. Review and demonstrate the proposed Enterprise & Employment lands near N5/N84 and ensure compliance with Section 2.7 of Spatial Planning and National Road Guidelines 2012 prior to inclusion to final LAP to ensure a plan-led approach to development and development within the vicinity of strategic national road network. 2. Undertake and complete an evidence base to demonstrate Enterprise & Employment lands to South-West of Saleen Lough and rail line including proposed access to R307 near N5/N84 and ensure compliance with Section 2.7 of Spatial Planning and National Road Guidelines 2012 prior to inclusion to final LAP. <p>The TII are not aware of any assessment undertaken/completed to support the extensive zoning and access proposals in the vicinity of the N5/N84 junction as required by guidelines.</p>	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <ol style="list-style-type: none"> i. Castlebar is designated as a Key Town in the RSES and has a role of a regionally strategic employment centre of significant scale that can act as a regional driver to support and complement the higher-order urban areas within the RSES settlement hierarchy. <p>The existing 'Enterprise & Employment' lands in Castlebar are at full capacity. Therefore, it is of critical importance for the economic growth of Castlebar to have sufficient strategic employment sites available in the plan area to attract and retain business/jobs and deliver a more balance, compact regional development.</p> <p>The proposed undeveloped 'Enterprise & Employment' lands in the plan area are fully serviced/serviceable and are supported by sustainable travel options / active travel measures in the Castlebar LTP. An infrastructural capacity audit of 'Enterprise & Employment' zoned lands both developed and undeveloped.</p> <p>The subject lands located to the south-west of the town and west of N84 are adjoining an established logistics enterprise (KOG Logistics) and are in close proximity to the recently opened N5 dual carriageway to Westport. This will allow for creation/further expansion of existing enterprises at this location which will further help promote and enhance the sustainable development of the Castlebar-Westport Growth Cluster (CWEG). Development proposals at this location will be accessed to ensure compliance with Policy MTP 23 of Volume I and Section 7.2 (Access onto National Roads) of Volume II of the Mayo County Development Plan 2022-2028.</p>	

- ii. The LTP has been amended to ensure sustainable transport alternatives are available to access these 'Enterprise and Employment' lands. The LTP proposes upgraded cycling and pedestrian facilities extended along the N84, with a proposed permeability links into the 'Enterprise and Employment' lands. In addition, following consultation with Irish Rail, the subject lands are under consideration as a Strategic Rail Freight Hub owing to the lands location adjacent the railway line and National Road network.

Recommendation:

Retain Enterprise & Employment zoning at Cloonagh with minor amendments as set out below to restrict the potential uses to less intensive traffic uses of industry / rail biased industries.

1. Amend the Enterprise & Employment Land Use Zoning objective (LUZ 3) as below:

LUZ 3 – Enterprise & Employment	To provide land for industrial, enterprise and employment uses. <i>*Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible for Rail Freight only. *</i>
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Additional text highlighted in green.

2. Amend Land Use Zoning Matrix Table 11.2 as below:

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Abattoir	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Advertisement Billboards	O	O	X	X	X	X	O	O	X	X	X	O	O	X
Agricultural Structures	X	X	X	X	X	X	X	X	X	X	P	X	X	X
Amusement Arcade	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Apartments	P	P	P	P	P	X	X	X	X	X	X	X	X	X
B&B/ Guesthouse	O	O	P	P	O	X	X	X	X	X	O	X	X	X
Bank/ Financial Institution	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Batching Plant (asphalt/ concrete)	X	X	X	X	X	X	X	X	X	X	O	X	X	O
Betting Office	O ¹	O	X	X	X	X	X	X	X	X	X	X	X	X
Boarding Kennels	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Caravan Park / Campervan Park / Camp Site/ Glamping (Tourism)	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Car Parking	O	O	O	O	X	X	O	X	O	X	X	O	O	X

¹ Shall be encouraged to be located off the primary Town Centre Central Spine.

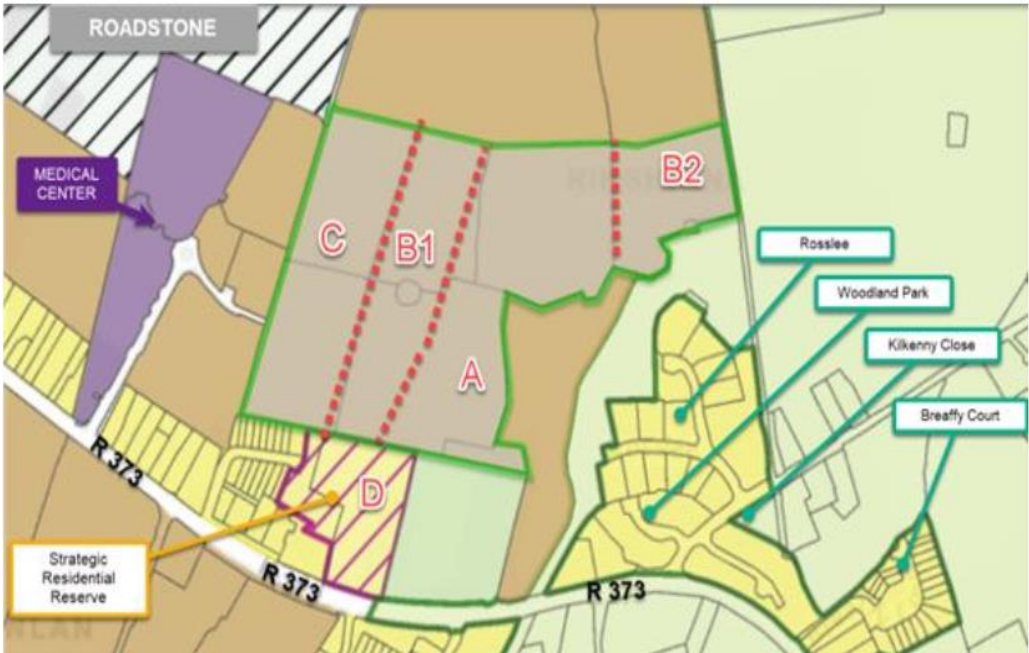
Cash & Carry Wholesale Outlet	X	X	X	X	X	X	P	X	X	X	X	X	X	X
Cemetery	X	X	X	X	X	X	X	X	O	X	O	X	X	X
Chemist/ Pharmacy	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Childcare Facilities – Crèche, Nursery and Playschool	P	P	P	P	P	P	O	X	P	X	X	X	X	X
Cinema/ Theatre	P	P	X	X	X	X	O	X	X	X	X	X	X	X
Community Facility (hall, centre or recreational use)	P	P	O	O	O	X	X	X	P	X	O	X	X	X
Conference Centre	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Dance Hall/ Disco/ Night Club	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Data Centre	X	X	X	X	X	X	O	X	X	O	X	X	X	X
Dentist/ Doctor Surgery	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Drive Through Restaurant	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Education – excluding a night-time use	O	O	O	O	X	P	X	X	O	X	X	X	X	X
Education – night-time education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Education – third level education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Education – training centre	O	O	X	X	X	O	O	X	P	X	X	X	X	X
Enterprise Unit/Workshop	P	P	X	X	X	X	P	X	X	X	X	X	X	X
Extractive Industry	X	X	X	X	X	X	X	X	X	X	X	X	X	P
Funeral Home	O	O	X	X	X	X	O	X	O	X	X	X	X	X
Fuel Depot	X	X	X	X	X	X	O	X	X	X	O	X	O	X
Garden Centre	O	O	X	X	X	X	O	X	X	X	O	X	X	X
Go-Kart Track	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Hospital	O	O	X	X	X	X	X	X	P	X	X	X	X	X
Hostel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Hotel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Industry – Heavy	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Industry – Light	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Leisure Centre/ Gym	P	O	X	X	X	X	O	X	O	O	X	X	X	X
Library	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Licenced Premises (Public House)	P	P	X	X	X	X	X	X	X	X	X	X	X	X

Logistic, Storage & Distribution Units	X	X	X	X	X	X	P	P	X	X	X	X	X	X
Mart/ Co-operative	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Motor Sales/ Service	O	O	X	X	X	X	P	X	X	X	X	X	X	X
Nursing Home/Retirement Village/Residential Care	P	P	P	P	P	X	X	X	O	X	X	X	X	X
Office	P	P	X	X	X	X	O ²	X	X	X	X	X	X	X
Open Space (Public)	P	P	P	P	P	P	P	X	P	P	P	P	X	X
Park & Stride Facility	X	O	X	O	X	X	O	X	X	X	X	O	X	X
Place of Worship	P	P	O	O	X	X	X	X	P	X	X	X	X	X
Plant/ Tool Hire	O	O	X	X	X	X	O	X	X	X	X	X	X	X
Playground	P	P	P	P	P	P	O	X	P	P	X	O	X	X
Playing Pitches/ Sports Club	O	O	P	P	P	P	X	X	P	P	P	O	X	X
Primary Care Centre, Health Centre and Clinics	P	P	X	X	X	X	X	X	P	X	X	X	X	X
Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Professional Services	P	P	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
Residential – Single	P	P	P	P	P	X	X	X	X	X	O ³	X	X	X
Restaurant/ Café	P	P	X	X	X	X	O	X	O	X	X	X	X	X
Retail Warehousing	O	O	X	X	X	X	P	X	X	X	X	X	X	X
School / Third Level Education	P	P	O	O	X	P	X	X	O	X	X	X	X	X
Service Station	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Comparison)	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Convenience)	P	O	O	O	X	X	X	X	X	X	X	X	X	X
Shopping Centre / Supermarket	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Take Away	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Traveller Accommodation	O	O	O	O	O	X	X	X	X	X	X	X	X	X
Utility Structures	O	O	O	O	O	O	O	O	O	O	O	X	P	X
Veterinary Surgery	O	O	X	X	X	X	P	X	X	X	O	X	X	X
Warehousing	X	O	X	X	X	X	P	O	X	X	X	X	X	X

² Large offices which do not cater for visiting members of the public.

³ Subject to the Rural Housing Policy as outlined in the Mayo County Development Plan 2022-2028 (or subsequent plans)

Submission Number:	MYO-C93-4
Submission by:	Harry Barrett
Material Alteration Number / Draft Direction Ref:	N/A
Summary of Submission:	
The submission seeks for special dispensation for sons/daughters to build near their family home.	
Chief Executive's Response and Recommendation:	
Response: The submission does not refer to any element of the Draft Ministerial Direction.	
Recommendation: No change to plan.	

Submission Number:	MYO-C93-5
Submission by:	John Flatley
Material Alteration Number / Draft Direction Ref:	MA 18 -Rinshinna / Part 2(b) (iii) of Draft Direction
Summary of Submission:	
The submission requests that lands situated at Rinshinna on the Moneen Road be zoned New Residential or Strategic Residential Reserve(a) and Enhance Natural Environment (b1/b2) and Enterprise and Employment (c).	
	

The proposed rezoning is justified in the submission on the grounds that:

- There is a deficit in the LAP in the provision of residentially zoned lands to the south of Castlebar
- The proximity of the proposed site to employers, services, education providers and the national rail network
- The increased connectivity of the Rinshinna area to Castlebar town centre because of proposed measures in the LTP and the existing wide cycle/footpath in front of site.
- The ample provision of Enterprise and Employment zoned lands at alternative locations within the town, thereby negating the need to so zone the subject site.

Chief Executive’s Response and Recommendation:

Response:

The subject land parcel is situated along the eastern perimeter of the town in the townland of Rinshinna. The proposed rezoning of these lands which are located at a peripheral location would not promote compact growth in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to plan

Submission Number:	MYO-C93-6
Submission by:	Department of Education
Material Alteration Number / Draft Direction Ref:	Part 2(a) of Draft Direction
Summary of Submission:	
The submission supports Part 2(a) of the Draft Direction which seeks for a clearer Core Strategy Table to be included in the plan.	
Chief Executive’s Response and Recommendation:	
Response:	
A core strategy table setting out the quantum of housing to be delivered on lands zoned Town Centre, Existing Residential and New Residential will be included in the final plan when the final quantum of lands have been finalised.	
Recommendation:	
(i) Insert Table in final plan, similar to Table 2.2 below, as proposed in response to Recommendation 1(i) of the OPR in the CE Report on Draft LAP (appropriately altered as/if required pending the resolution of this stage of the LAP process) into the final LAP and amend Land Use Zoning Map Settlement Capacity Matrix in Appendix 1 of final LAP accordingly.	

Allocation of Residential Units/Lands Requirements		
Land Zoning Category	Housing Units	Area
Town Centre /Opportunity Sites	55	3.66 ha
Residential Infill lands	100	10.33 ha
New Residential Lands	553	36.87ha.

(ii) Alter Section 2.8.4 of the LAP to read as follows:

The Plan adopts a site-specific approach to development densities. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics, local conditions, design sensitivities, connectivity and overall quality of the scheme. ~~and having regard to the various provisions within the development management guidelines, as set out within the Mayo County Development Plan 2022-2028 and the relevant Section 28 Ministerial Guidelines.~~ The densities applied shall also be consistent with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

Submission Number:	MYO-C93-7
Submission by:	Francis Tuohy
Material Alteration Number / Draft Direction Ref:	MA 15 & MA 17 / Part 2(b)(ii) & (iii) of Draft Direction

Summary of Submission:

The submission requests that lands adjacent to the Rosslee housing estate at Rinshinna, Castlebar, which are currently zoned ‘Employment and Enterprise’ in the adopted LAP, be changed to ‘Residential’ zoning. Justification is provided including proximity to existing housing developments and services.



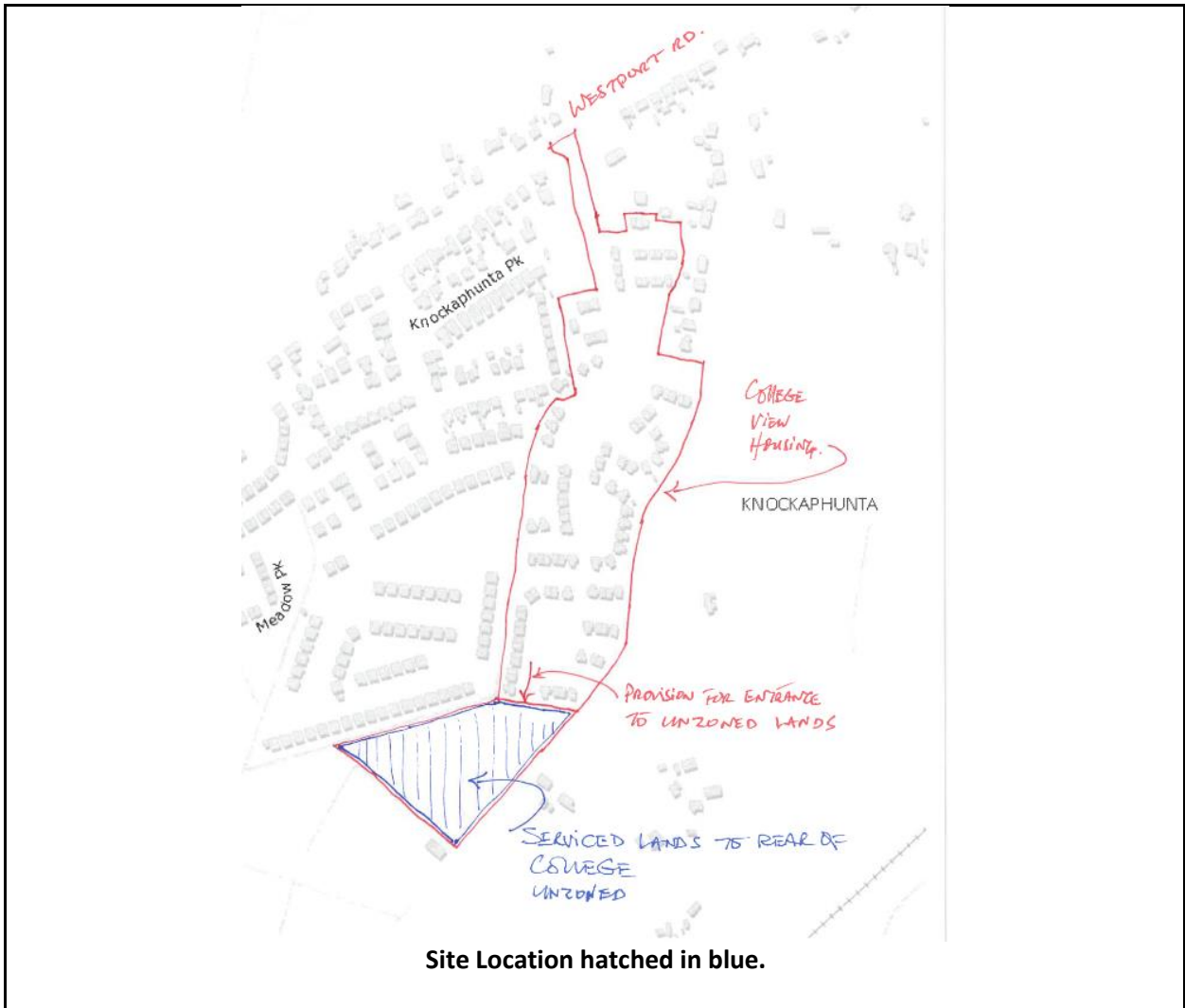
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Chief Executive’s Response and Recommendation:

Response:
 The subject land parcel is situated along the eastern perimeter of the town in the townland of Rinshinna. The proposed rezoning of these lands which are located at a peripheral location would not promote compact growth in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:
 No change to plan.

Submission Number:	MYO-C93-8
Submission by:	Grady Architects on behalf of Roonith Properties.
Material Alteration Number / Draft Direction Ref:	MA 12 / Part 2(b) (i) of Draft Direction
Summary of Submission:	
The submission discusses how the site is fully serviced and shovel ready subject to planning permission and is a natural extension to the College View Estate. The submission seeks for the lands to be zoned Strategic Residential Reserve or Low Density Residential.	



Chief Executive’s Response and Recommendation:

Response:

Development works have been carried out within this land parcel without the benefit of planning permission. Notwithstanding, the proposed rezoning of these lands situated at a peripheral location would not promote compact growth or sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to plan.

Submission Number:	MYO-C93-9
Submission by:	National Transport Authority (NTA)
Material Alteration Number / Draft Direction Ref:	Part 2(C) of Draft Direction Site

Summary of Submission:

The submission highlights lands at Cloonagh (2 (c) of Direction) which are zoned 'Enterprise and Employment', noting that zoning of this land is inappropriate given the peripheral location and lack of sustainable transport connections to the site from established residential areas and the town centre. The LTP measures in the area are noted but not considered sufficient to accommodate the potential large-scale development of trip intensive uses that could be granted under the 'Enterprise & Employment' zoning objective. The zoning of this land would further embed the reliance of use of the private car and hinder modal share targets. The submission concluding that they support Part 2 (c) of the Draft Direction.

Chief Executive's Response and Recommendation:

Response:

Alignment with International, National, Regional and County Policies/Objectives

A strategic aim of the Mayo County Development Plan 2022-2028 states:

"To support increased use of sustainable modes of transport; the integration of spatial planning with transport planning; enhanced county and regional accessibility; the transition to a low carbon energy efficient transport system; and the development of a safer, more efficient, effective and connected transport system within Mayo."

Modal shift and sustainable mobility are central pillars throughout the CDP in line with National & Regional Policy. The recognition of a potential freight hub is contained within MTO 18 of the plan, see below:

Rail Objectives	
	To liaise with and encourage Iarnród Éireann to:
MTO 18	a. Continue investment in rail freight facilities at Ballina & Westport (existing) and Claremorris & Castlebar (as potential freight hubs). b. Increase frequency of commuter services on the mainline rail network between Westport, Castlebar and Ballina.

The Cloonagh lands in question fully align with the Climate Action and Sustainable Transport Policies from all levels of the planning hierarchy National -> Regional -> Local. As can be seen in MTO 18 the Cloonagh site is in full accordance.

A rail freight hub at the lands in Cloonagh will echo the beneficial outcomes contained with the Rail Freight 2040 Strategy with specific regards to:

Regional Accessibility (P26 [Rail Freight 2040 Strategy](#))

"The provision of rail freight connectivity across the regions, particularly in the west of the country will improve the accessibility of companies to larger markets in the east and promote regional balance. Efficient rail freight services will increase the likelihood of investment and growth to establish a viable counterbalance to Dublin."

It is important that the occurrence of such a timeline is accommodated by the planning system. Time does not stand still with the publication of a strategy or a draft LAP. Circumstances change and strategies/plans are updated on a continuous basis in response. The All-Ireland Rail Review was held up by the lack of an Assembly in Stormont. Which has returned recently. Circumstances change and the system must accommodate these changes.

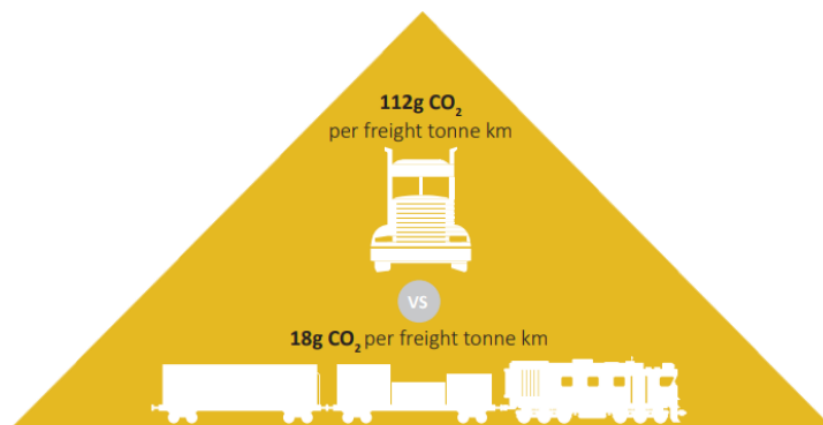
Similarly, the Castlebar LAP process should be able to accommodate a once in a lifetime opportunity to possibly allow a rail freight hub that would be a game changer in terms of freight modal shift to rail as well as a step in the direction of true regional development.

The positive impact in terms of climate action and sustainability is self-evident.

In relation to the site being a hinderance on modal share targets and further embedding the reliance of the private car, it should be emphasised that getting heavily emitting polluting road freight off the road is equally if not more important than getting people in town out of their cars. It is increasingly likely that the Ireland will not achieve a 51% reduction in emissions by 2030.

Figures released by [EPA](#) in relation to Greenhouse gas emissions (GHG) have shown road transport GHG emissions have increased by 130.2% since 1990, commercial vehicles increased by 171% over the same period. Road Transport accounts for 94.7% of all transport emissions for 2022.

The enormous gap in emissions emitted by road freight vs rail freight is illustrated in [Irish Rails Rail Freight Strategy 2040](#) which shows road freight produces 84% more GHGs as opposed to Rail Freight which emphasise the importance of a modal share shift for industry towards Rail Freight.



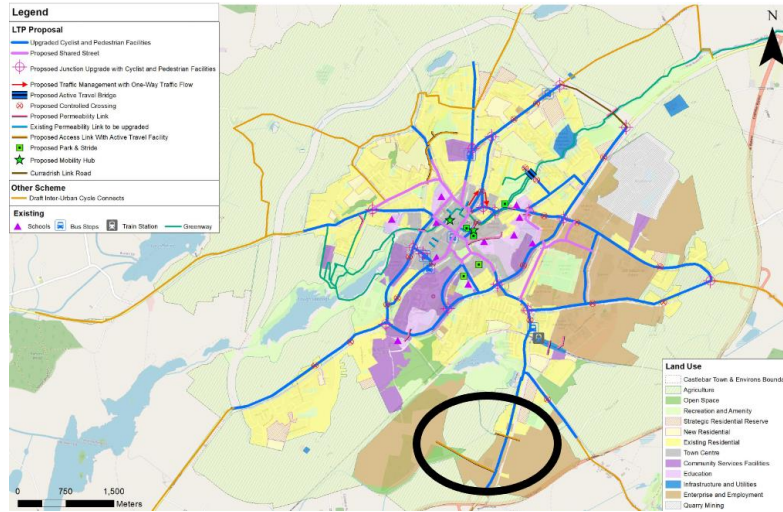
Source: [Irish Rails Rail Freight Strategy 2040](#) P-8

It should also be noted that the Rail Freight hub would have a regional reach and could be used by companies seeking freight not only from within all of Mayo but throughout the region. The environmental due diligence being introduced at a European level means that companies will now choose rail over road where possible and will not be bound by the traditional cost benefit analysis of a specific journey but will have regard to their overall environment footprint and reputation.

This has also been echoed by the current Minister of Transport Eamon Ryan who has stated: *“Large multi-national companies in the west, such as Baxter in Castlebar, have already begun the transition to rail freight. The reopening of the link from Athenry to Claremorris will now allow for the direct movement of freight to the southern ports of Waterford and Foynes for the first time in over twenty years.”*

Local Transport Plan

The Local Transport Plan was amended to extend the active travel measures to within the site with a 'Proposed Access Link with Active Travel Measures' as shown below outlined in black.



Updated LTP (extended network highlighted in blue/orange)

The above travel measure has been fully approved by the **National Transport Authority**, the following comment in the submission:

“Whilst it is noted that the associated Local Transport Plan proposes some upgraded sustainable transport infrastructure in this part of the town, this is not considered sufficient to accommodate the potential large-scale development of trip intensive uses that could be granted under the proposed zoning objective.”

This comment would be at odds to the **National Transport Authorities** approval of the Active Travel Measure in the Castlebar Local Transport Plan. The capacity of the 'Proposed Access Link with Active Travel Measures' servicing the Cloonagh lands hasn't been designed or defined at this stage, so comments that it is insufficient are premature.

Mitigating factors

It is not envisaged that the Cloonagh site would be open to all uses contained under Enterprise & Employment within the Land Use Zoning Matrix of the LAP. A minor amendment to the Matrix and or the Land Use Zoning Objective (LUZ 3) which would restrict the site to industry / rail biased development should alleviate fears of car intensive trips to/from the site.

Recommendation:

Retain Enterprise & Employment zoning at Cloonagh with minor amendments as set out below to restrict the potential uses to less intensive traffic uses of industry / rail biased industries.

- Amend the Enterprise & Employment Land Use Zoning objective (LUZ 3) as below:

<p>LUZ 3 – Enterprise & Employment</p>	<p>To provide land for industrial, enterprise and employment uses. *Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible for Rail Freight only.*</p>
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Additional text highlighted in green.

4. Amend Land Use Zoning Matrix Table 11.2 as below:

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Abattoir	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Advertisement Billboards	O	O	X	X	X	X	O	O	X	X	X	O	O	X
Agricultural Structures	X	X	X	X	X	X	X	X	X	X	P	X	X	X
Amusement Arcade	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Apartments	P	P	P	P	P	X	X	X	X	X	X	X	X	X
B&B/ Guesthouse	O	O	P	P	O	X	X	X	X	X	O	X	X	X
Bank/ Financial Institution	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Batching Plant (asphalt/ concrete)	X	X	X	X	X	X	X	X	X	X	O	X	X	O
Betting Office	O ⁴	O	X	X	X	X	X	X	X	X	X	X	X	X
Boarding Kennels	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Caravan Park / Campervan Park / Camp Site/ Glamping (Tourism)	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Car Parking	O	O	O	O	X	X	O	X	O	X	X	O	O	X
Cash & Carry Wholesale Outlet	X	X	X	X	X	X	P	X	X	X	X	X	X	X
Cemetery	X	X	X	X	X	X	X	X	O	X	O	X	X	X
Chemist/ Pharmacy	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Childcare Facilities – Crèche, Nursery and Playschool	P	P	P	P	P	P	O	X	P	X	X	X	X	X
Cinema/ Theatre	P	P	X	X	X	X	O	X	X	X	X	X	X	X
Community Facility (hall, centre or recreational use)	P	P	O	O	O	X	X	X	P	X	O	X	X	X
Conference Centre	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Dance Hall/ Disco/ Night Club	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Data Centre	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Dentist/ Doctor Surgery	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Drive Through Restaurant	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Education – excluding a night-time use	O	O	O	O	X	P	X	X	O	X	X	X	X	X

⁴ Shall be encouraged to be located off the primary Town Centre Central Spine.

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
	Education – night-time education use	O	O	X	X	X	P	O	X	O	X	X	X	X
Education – third level education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Education – training centre	O	O	X	X	X	O	O	X	P	X	X	X	X	X
Enterprise Unit/Workshop	P	P	X	X	X	X	P	X	X	X	X	X	X	X
Extractive Industry	X	X	X	X	X	X	X	X	X	X	X	X	X	P
Funeral Home	O	O	X	X	X	X	O	X	O	X	X	X	X	X
Fuel Depot	X	X	X	X	X	X	O	X	X	X	O	X	O	X
Garden Centre	O	O	X	X	X	X	O	X	X	X	O	X	X	X
Go-Kart Track	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Hospital	O	O	X	X	X	X	X	X	P	X	X	X	X	X
Hostel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Hotel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Industry – Heavy	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Industry – Light	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Leisure Centre/ Gym	P	O	X	X	X	X	O	X	O	O	X	X	X	X
Library	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Licensed Premises (Public House)	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Logistic, Storage & Distribution Units	X	X	X	X	X	X	P	P	X	X	X	X	X	X
Mart/ Co-operative	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Motor Sales/ Service	O	O	X	X	X	X	P	X	X	X	X	X	X	X
Nursing Home/Retirement Village/Residential Care	P	P	P	P	P	X	X	X	O	X	X	X	X	X
Office	P	P	X	X	X	X	O ⁵	X	X	X	X	X	X	X
Open Space (Public)	P	P	P	P	P	P	P	X	P	P	P	P	X	X
Park & Stride Facility	X	O	X	O	X	X	O	X	X	X	X	O	X	X
Place of Worship	P	P	O	O	X	X	X	X	P	X	X	X	X	X
Plant/ Tool Hire	O	O	X	X	X	X	O	X	X	X	X	X	X	X
Playground	P	P	P	P	P	P	O	X	P	P	X	O	X	X
Playing Pitches/ Sports Club	O	O	P	P	P	P	X	X	P	P	P	O	X	X
Primary Care Centre, Health Centre and Clinics	P	P	X	X	X	X	X	X	P	X	X	X	X	X

⁵ Large offices which do not cater for visiting members of the public.

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
	Professional Services	P	P	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
Residential – Single	P	P	P	P	P	X	X	X	X	X	O ⁶	X	X	X
Restaurant/ Café	P	P	X	X	X	X	O	X	O	X	X	X	X	X
Retail Warehousing	O	O	X	X	X	X	P	X	X	X	X	X	X	X
School / Third Level Education	P	P	O	O	X	P	X	X	O	X	X	X	X	X
Service Station	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Comparison)	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Convenience)	P	O	O	O	X	X	X	X	X	X	X	X	X	X
Shopping Centre / Supermarket	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Take Away	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Traveller Accommodation	O	O	O	O	O	X	X	X	X	X	X	X	X	X
Utility Structures	O	O	O	O	O	O	O	O	O	O	O	X	P	X
Veterinary Surgery	O	O	X	X	X	X	P	X	X	X	O	X	X	X
Warehousing	X	O	X	X	X	X	P	O	X	X	X	X	X	X

⁶ Subject to the Rural Housing Policy as outlined in the Mayo County Development Plan 2022-2028 (or subsequent plans)

SECTION 4 – SUMMARISE THE VIEWS AND RECOMMENDATIONS OF THE REGIONAL ASSEMBLY

Submission Number:	MYO-C93-10
Submission by:	Northern & Western Regional Assembly (NWRA)
Material Alteration Number / Draft Direction Ref:	Part 2 of Draft Direction
Summary of Submission:	
<ol style="list-style-type: none"> 1. The Assembly supports part 2 (a) of the Draft Ministerial Direction which requires the provision in the plan of 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 densities to be applied to demonstrate anticipated need. The submission refers to the Authorities' earlier submission on the Draft Plan which highlighted the need for data on the quantum of housing that may be delivered from areas that are zoned other than New Residential. The Assembly is of the opinion that this is required to determine if significant compact urban growth development of derelict and underutilised sites can be achieved, in compliance with RPO 3.1 of RSES. 2. The submission also supports part 2 (b) (i)-(iii) of the Draft Ministerial Direction which requires the reinstatement of the zoning objectives and associated text to that of the draft Plan, i.e.: from New Residential to Agriculture/Enterprise and Employment, of the land plots that are the subject of proposed Material Alterations, 10,12,14 and 21 (2(b)(i), revert to Agriculture) and 13,15, 17 and 18 (2(b)(ii) and 2(b)(iii), revert to Enterprise and Employment). The Authority quotes directly from their earlier submission on these proposed Material Alterations which stated: <i>"The Assembly considers that the majority of the land use changes contravene RPO 3.1 requiring the delivery of compact growth in key towns and they area inconsistent with the RSES and are not supported by the Assembly."</i> The Assembly considers that the land parcels identified are on the periphery of the town and would cumulatively amount to an excess 36.42 hectares on New Residential zoned land above the 45.88 of land remaining as new residential in the LAP and that the revision of this element of the plan will contribute considerably towards the ambition of RPO 3.1 & 3.2 of the RSES which see to deliver places of urban scale, focusing on the urban cores initially and consolidation of the existing built up footprint of Castlebar. 3. As regards part 2(c)(i) of the Draft Ministerial Direction pertaining to the dezoning of the land zoned Enterprise and Employment at Cloonagh (Site (EE1) located to the southwest of Saleen Lough and to the immediate east of the railway line, the response from the NWRA in their submission is somewhat nuanced. The submission notes the designation of Castlebar as a Key Town in the RSES and refers to the most recently published data from the 2022 Census, which shows that Castlebar has a jobs to resident workers ration of 1.74, which is on track in relation to job creation within the plan period, as set out in Table 5.1 of the Plan. The Assembly consider therefore that, given the pivotal role of Castlebar as a key regional economic driver, the proposed net loss of 35 hectares of Enterprise and Employment lands of foot of parts 2 (c) (i) and 2 (b) (ii) of the Draft Ministerial Direction, it may be of benefit for Mayo Co. Council to, in 	

this document, to consider the implications of this recalibration of suitable lands for Enterprise and Employment on the potential to support the growth of Castlebar, in tandem with the town of Westport, as a driver of economic development for the region.

The submission also notes the response of the CE to Recommendation 3 of the OPR in the earlier CE Report of the draft LAP, where it is stated that “*following consultation with Irish Rail, the subject lands are under consideration as a strategic rail freight hub*” and consequently ask that the planning authority substantiate this statement and provide an update on the current statement regarding same in this document. The submission concludes by stating that in the absence of this of this further justification being furnished, they would support this element of the Ministerial Direction.

Chief Executive’s Response and Recommendation:

1. Response:

The Chief Executive concurs with the opinion of the NWRA in relation to Part 2 (a) of the Draft Ministerial Direction with regard to the necessity in the plan to establish the quantum of housing to be delivered at appropriate densities on lands zoned Town Centre, Existing Residential and New Residential, in order to determine if significant compact urban growth can be achieved in accordance with RPO 3.1.

Section 2.8.4 of the plan outlines the application of appropriate densities and reads:

The Plan adopts a site-specific approach to development densities. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics, local conditions, design sensitivities, connectively and overall quality of the scheme and having regard to the various provisions within the development management guidelines, as set out within the Mayo County Development Plan 2022-2028 and the relevant Section 28 Ministerial Guidelines.

Recommendation:

(i) Insert Table in final plan, similar to Table 2.2 below, as proposed in response to Recommendation 1(i) of the OPR in the CE Report on Draft LAP (appropriately altered as/if required pending the resolution of this stage of the LAP process) into the final LAP and amend Land Use Zoning Map Settlement Capacity Matrix in Appendix 1 of final LAP accordingly.

Allocation of Residential Units/Lands Requirements		
Land Zoning Category	Housing Units	Area
Town Centre /Opportunity Sites	55	3.66 ha
Residential Infill lands	100	10.33 ha
New Residential Lands	553	36.87ha.

(ii) Alter Section 2.8.4 of the LAP to read as follows:

The Plan adopts a site-specific approach to development densities. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics, local conditions, design sensitivities, connectively and overall quality of the scheme. ~~and having regard to the various provisions within the development management guidelines, as set out within the Mayo County Development Plan 2022-2028 and the~~

~~relevant Section 28 Ministerial Guidelines.~~ The densities applied shall also be consistent with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

2. Response

The Chief Executive concurs with the opinion of the NWRA with regard to the zoning of the lands in question and that they should revert to Agricultural and Enterprise and Employment zoning as initially proposed in the draft LAP due to their location on the periphery of the town, which would mitigate against the delivery of compact and sequential growth in the town, in contravention of RPO 3.1

Recommendation

No change to plan.

3. Response

The CE notes and echoes the concern expressed by the NWRA concerning the impact a net loss of 35 hectares of lands zoned Enterprise and Employment as a consequence of the draft Ministerial Direction, might have on the ability of Castlebar fulfil its designated role as a Key Town and key economic driver in the region, in tandem with Westport. The CE also notes the somewhat guarded, yet genuine enthusiasm expressed in the submission for the emerging potential to develop the lands in question as a freight rail hub and the wish to be furnished with greater detail in relation to this matter, the provision of which would colour the support of the Assembly for this element of the draft Ministerial Direction. It is therefore considered critical at this juncture to confirm that negotiations have taken place and are continuing to take place with Iarnrod Eireann in relation to the is matter and to reassure the Assembly and the Minister that the recommended changes to the LAP. As outlined in the responses above to the submissions received from the TII and NRA, if implemented would limit uses on the land in question to those that are compatible with rail freight only. This rail freight facility, were it given the opportunity to develop under the changes to the LAP already proposed in this document and reiterated below could be a crucial element in Castlebar fulfilling its role as a Key town and major economic driver in the region.

Recommendation

Retain Enterprise & Employment zoning at Cloonagh with minor amendments as set out below to restrict the potential uses to less intensive traffic uses of industry / rail biased industries.

Amend the Enterprise & Employment Land Use Zoning objective (LUZ 3) as below:

LUZ 3 – Enterprise & Employment	To provide land for industrial, enterprise and employment uses. *Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible for Rail Freight only. *
---------------------------------------	--

Additional text highlighted in green.

Recommendation:

Retain Enterprise & Employment zoning at Cloonagh with minor amendments as set out below to restrict

the potential uses to less intensive traffic uses of industry / rail biased industries.

1. Amend the Enterprise & Employment Land Use Zoning objective (LUZ 3) as below:

LUZ 3 – Enterprise & Employment	To provide land for industrial, enterprise and employment uses. *Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible for Rail Freight only. *
---------------------------------------	--

Additional text highlighted in green.

2. Amend Land Use Zoning Matrix Table 11.2 as below:

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 -Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Abattoir	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Advertisement Billboards	O	O	X	X	X	X	O	O	X	X	X	O	O	X
Agricultural Structures	X	X	X	X	X	X	X	X	X	X	P	X	X	X
Amusement Arcade	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Apartments	P	P	P	P	P	X	X	X	X	X	X	X	X	X
B&B/ Guesthouse	O	O	P	P	O	X	X	X	X	X	O	X	X	X
Bank/ Financial Institution	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Batching Plant (asphalt/ concrete)	X	X	X	X	X	X	X	X	X	X	O	X	X	O
Betting Office	O ⁷	O	X	X	X	X	X	X	X	X	X	X	X	X
Boarding Kennels	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Caravan Park / Campervan Park / Camp Site/ Glamping (Tourism)	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Car Parking	O	O	O	O	X	X	O	X	O	X	X	O	O	X
Cash & Carry Wholesale Outlet	X	X	X	X	X	X	P	X	X	X	X	X	X	X
Cemetery	X	X	X	X	X	X	X	X	O	X	O	X	X	X
Chemist/ Pharmacy	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Childcare Facilities – Crèche, Nursery and Playschool	P	P	P	P	P	P	O	X	P	X	X	X	X	X
Cinema/ Theatre	P	P	X	X	X	X	O	X	X	X	X	X	X	X
Community Facility (hall, centre or recreational use)	P	P	O	O	O	X	X	X	P	X	O	X	X	X

⁷ Shall be encouraged to be located off the primary Town Centre Central Spine.

Conference Centre	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Dance Hall/ Disco/ Night Club	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Data Centre	X	X	X	X	X	X	O	X	X	O	X	X	X	X
Dentist/ Doctor Surgery	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Drive Through Restaurant	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Education – excluding a night-time use	O	O	O	O	X	P	X	X	O	X	X	X	X	X
Education – night-time education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Education – third level education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry/ Mining
Education – training centre	O	O	X	X	X	O	O	X	P	X	X	X	X	X
Enterprise Unit/Workshop	P	P	X	X	X	X	P	X	X	X	X	X	X	X
Extractive Industry	X	X	X	X	X	X	X	X	X	X	X	X	X	P
Funeral Home	O	O	X	X	X	X	O	X	O	X	X	X	X	X
Fuel Depot	X	X	X	X	X	X	O	X	X	X	O	X	O	X
Garden Centre	O	O	X	X	X	X	O	X	X	X	O	X	X	X
Go-Kart Track	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Hospital	O	O	X	X	X	X	X	X	P	X	X	X	X	X
Hostel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Hotel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Industry – Heavy	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Industry – Light	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Leisure Centre/ Gym	P	O	X	X	X	X	O	X	O	O	X	X	X	X
Library	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Licensed Premises (Public House)	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Logistic, Storage & Distribution Units	X	X	X	X	X	X	P	P	X	X	X	X	X	X
Mart/ Co-operative	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Motor Sales/ Service	O	O	X	X	X	X	P	X	X	X	X	X	X	X
Nursing Home/Retirement Village/Residential Care	P	P	P	P	P	X	X	X	O	X	X	X	X	X
Office	P	P	X	X	X	X	O ⁸	X	X	X	X	X	X	X

⁸ Large offices which do not cater for visiting members of the public.

Open Space (Public)	P	P	P	P	P	P	P	X	P	P	P	P	X	X
Park & Stride Facility	X	O	X	O	X	X	O	X	X	X	X	O	X	X
Place of Worship	P	P	O	O	X	X	X	X	P	X	X	X	X	X
Plant/ Tool Hire	O	O	X	X	X	X	O	X	X	X	X	X	X	X
Playground	P	P	P	P	P	P	O	X	P	P	X	O	X	X
Playing Pitches/ Sports Club	O	O	P	P	P	P	X	X	P	P	P	O	X	X
Primary Care Centre, Health Centre and Clinics	P	P	X	X	X	X	X	X	P	X	X	X	X	X
Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 -Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry/Mining
Professional Services	P	P	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
Residential – Single	P	P	P	P	P	X	X	X	X	X	O ⁹	X	X	X
Restaurant/ Café	P	P	X	X	X	X	O	X	O	X	X	X	X	X
Retail Warehousing	O	O	X	X	X	X	P	X	X	X	X	X	X	X
School / Third Level Education	P	P	O	O	X	P	X	X	O	X	X	X	X	X
Service Station	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Comparison)	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Convenience)	P	O	O	O	X	X	X	X	X	X	X	X	X	X
Shopping Centre / Supermarket	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Take Away	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Traveller Accommodation	O	O	O	O	O	X	X	X	X	X	X	X	X	X
Utility Structures	O	O	O	O	O	O	O	O	O	O	O	X	P	X
Veterinary Surgery	O	O	X	X	X	X	P	X	X	X	O	X	X	X
Warehousing	X	O	X	X	X	X	P	O	X	X	X	X	X	X

⁹ Subject to the Rural Housing Policy as outlined in the Mayo County Development Plan 2022-2028 (or subsequent plans)

SECTION 6 - RECOMMENDATIONS ON THE BEST MANNER TO GIVE EFFECT TO THE DRAFT DIRECTION.

I have had regard to:

- I. The Planning and Development Act 2000 (as amended);
- II. Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), including the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the Development Plans, Guidelines for Planning Authorities (2022);
- III. Submissions, observations and recommendations received from the Office of Planning Regulator, Transport Infrastructure Ireland and the National Roads Authority and Office of Public Works to the Draft Development Plan and Material Alterations;
- IV. Submissions received during the public consultation of the Draft Ministerial Direction;
- V. The policies and objectives of the National Planning Framework and Regional Spatial and Economic Strategy for the Northern and Western Region;
- VI. The previous recommendations set out in the Chief Executive's Reports on the draft LAP and the Material Alterations to the draft LAP and the views and recommendations of the Elected Members

Having regard to the requirement to provide recommendations on the best manner to give effect to the Draft Direction, the following commentary should be considered.

The forgoing elements of the report sets out the various statutory requirements pursuant to the draft Ministerial Direction including a synopsis of the public submissions received and the views of the Elected Members following further consideration of the issues.

I consider that the approach taken by the Members in their views expressed in respect of the Draft Direction as outlined above is measured and reasonable and while most of the proposed changes are not opposed the Members have requested small modifications in a small number of instances which I suggest should be considered.

Appendix I

DRAFT DIRECTION IN THE MATTER OF SECTION 31
OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended)

Castlebar Town and Environs Local Area Plan 2023-2029

Local Area Plan" means the Castlebar Town and Environs Local Area Plan 2023- 2029.

"Planning Authority" means Mayo County Council.

"RSES" means the Regional Spatial and Economic Strategy for the Northern and Western Region

The Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Planning and Development Act 2000 (No.30 of 2000) and the Housing, Local Government and Heritage (Delegation of Ministerial Functions) Order 2023 (S01. No. 116 of 2023), and consequent to a recommendation made to him by the Office of the Planning Regulator, hereby directs as follows:

(1.) This Direction may be cited as the Planning and Development (Castlebar Town and Environs Local Area Plan 2023-2029) Direction 2024.

(2.) The Planning Authority is hereby directed to take the following steps with regard to the Local Area Plan:

(a) Provide 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. Appropriate densities shall be applied to demonstrate anticipated yield.

(b) Reinstate the following zoning objectives and associated text to that of the draft Local Area Plan:

(i) Material Alterations 10, 12, 14 and 21 -- i.e. the subject lands revert to Agriculture from New Residential

(ii) Material Alterations 13 and 17 -- i.e., the subject lands revert to Enterprise and Employment, and Agriculture from New Residential

(iii) Material Alterations 15 and 18 --i.e. the subject lands revert to Enterprise and Employment from New Residential

(c) Delete the following zoning objective from the adopted Local Area Plan, i.e. the subject lands are unzoned:

(i) Land zoned Enterprise and Employment at Cloonagh (Site EE 1) located to the southwest of Saleen Lough and to the immediate east of the rail line

and apply all necessary consequential updates to the text of the plan consistent with the foregoing.

STATEMENT OF REASONS

- I. The Local Area Plan as adopted fails to include an accurate core strategy table and in particular, does not set out a table which estimates the quantum of housing that will be delivered on lands zoned Existing Residential, the quantum to be delivered on mixed use town centre and opportunity sites and the quantum to be delivered on lands zoned New Residential. This is inconsistent with RPO 3.1 and 3.2 of the RSES for compact growth and Objective SSO 3 of the Mayo County Development Plan 2022-2028 to promote town centre regeneration, which aligns with the Government's *Town Centre First: A Policy Approach for Irish Towns (2022)*.
- II. The Local Area Plan as adopted includes material alterations to the draft Local Area Plan, which zone additional residential land in excess of what is required for the town having regard to the growth targets for Castlebar under the core strategy of the Mayo County Development Plan 2022-2028. These material alterations are inconsistent with Objective CSO 1 of the County Development

Plan to secure the implementation of the population and housing growth set out in the core strategy and settlement strategy, and Objective CSO 3 to adopt a Local Area Plan for Castlebar that aligns with the National Planning Framework, Regional Spatial and Economic Strategy, and the core strategy of the County Development Plan.

These material alterations are located in peripheral and non-sequential locations, some of which are outside the CSO boundary, and would encourage a pattern of development in particular locations which is inconsistent with the objectives of the County Development Plan to implement a sequential approach to development and promote compact growth (Objective SSO 3 and Objective SSO6), and is inconsistent with RPO 3.1 and RPO 3.2 of the RSES, and demonstrates that the Planning Authority has failed to have regard to the *Development Plans Guidelines for Planning Authorities (2022)* issued under section 28 of the Act.

- III. The absence of a detailed core strategy table, and the extensive zoning of land in peripheral and non-sequential locations represents a piecemeal and ad hoc approach that individually and cumulatively fails to set out an overall strategy for growth that is consistent with the objectives of the Mayo County Development Plan 2022-2028 to deliver compact and sequential growth and the regeneration of the town centre under Objective SSO 3 and Objective SSO 6.
- IV. The Local Area Plan as adopted includes a material alteration (MA 21) to the draft Local Area Plan which zones lands at Ballymacraha (referred to as Ballynaboll in MA 21) for vulnerable uses within flood zone A and B which have not passed the plan making Justification Test. This material alteration is inconsistent with NPO 57 of the National Planning Framework, RPO 3.10 and RPO 3.11 of the RSES, and Objectives NEO 7 and NEO 24 of the Mayo County Development Plan 2022-2028 and fails to have regard to *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)* issued under section 28 of the Act.

- V. The Local Area Plan as adopted includes an extensive area of land zoned for Enterprise and Employment at Cloonagh which could accommodate a range of high intensity employment uses. This zoning lacks a clear evidence basis, and the peripheral location of these lands would encourage primarily car based development that will not support the modal shift to active and sustainable travel modes, inconsistent with RPO 6.30 and 6.31 of the RSES. The zoning objective would, therefore, be inconsistent with Objective SO 12 of the Mayo County Development Plan 2022-2028 to integrate land use planning and sustainable transportation planning, promote the consolidation of development, encourage sustainable travel patterns by reducing the need to travel particularly by private transport, while prioritising walking, cycling and public transport.

This zoning objective, by reason of its location, extent and the nature of uses that are permissible on such lands under the zoning matrix, also has the potential to generate significant additional traffic movements with consequent adverse impacts on the national road network, inconsistent with RPO 6.5 of the RSES to maintain the strategic capacity of the national road network, and section 2.7 (Development at National Road Interchanges or Junctions) of the *Spatial Planning and National Roads Guidelines* (2012) issued under section 28 of the Act.

Furthermore, this zoning objective is inconsistent with NPO 57 of the National Planning Framework, RPO 3.10 and RPO 3.11 of the RSES, and Objectives NEO 7 and NEO 24 of the Mayo County Development Plan 2022-2028. Part of the lands are located within flood zones A and B and the criteria of the Justification Test have not been adequately addressed in accordance with the *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) issued under section 28 of the Act.

- VI. The Local Area Plan has not been made in a manner consistent with and has failed to implement; the recommendations of the Office of the Planning Regulator under section 31AO of the Act.
- VII. In light of the matters set out at I-V above, the Minister is of the opinion that the Local Area Plan as made is inconsistent with the objectives of the Development Plan of the area.
- VIII. The Local Area Plan as made is not consistent with the objectives of the RSES contrary to section 19(2) and section 27(1) of the Act.
- IX. The Minister is of the opinion that the Local Area Plan as made is not consistent with the objectives of the National Planning Framework, including National Policy Objective 33 and National Policy Objective 57.
- X. The Minister is of the opinion that the Local Area Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.
- XI. The Local Area Plan is not in compliance with the requirements of the Act.

GIVEN under my hand,

Minister of State for Local Government and Planning

Day of Month, Year.