



Planning Department
Mayo County Council
The Mall
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Co Mayo
F23 WF90

5 September 2022

RE: DRAFT DIRECTION TO THE MAYO COUNTY DEVELOPMENT PLAN 2022 - 2028

A chara,

I refer to the public notification given on 11th August 2022 in respect of the above Draft Direction and the Northern and Western Regional Assembly wish to take this opportunity to make its submission in respect of the Draft Direction that the Minister intends to issue. The Assembly has made submissions to all stages of the plan preparation, including the proposed Material Amendments that are the principal focus of the Draft Direction.

In keeping with our practice heretofore, it is not the intention to comment on the merits or otherwise of the proposed zoning amendments as they relate to small settlements, involve small areas and, individually do not have regional direction within the RSES (Draft Direction Step (2) e. & f. refers).

In the context of the overall development plan, the Assembly would consider that the Draft Direction relates to very small elements of the plan, but they would have significant impact. This submission restricts itself to comments on consistency with the RSES, similar to all our responses to the consultation thus far. For the purposes of this submission, it is convenient to group the following parts to the Draft Direction – Chapter 2.12 – 2.18, 2.21 and CSP 5.8 and the text after S2.7.9. These elements of the Draft Direction are inter alia cited as being inconsistent to NPO3 and RPO 3.2 (Compact Development Supports).

The Assembly, whilst generally supporting the Draft Direction, wish to make the following more detailed comments:

1. Step (2) a. (i): Delete CH 2.12 and revert to the relevant text in the Draft Plan

The proposed wording of CSP 1 in the Draft Plan ensured that the development of sustainable communities was promoted and facilitated by managing the level of growth in each settlement in accordance with the Core Strategy. The Material Amendment proposes that the development of all communities will be promoted and facilitated with no qualification being given to the concept of sustainable development or the need to manage growth and ensure it occurs, where associated services are available. It is considered that the Draft Direction is appropriate, and it is supported by the Assembly.

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2. Step (2) a. (ii): Delete CH 2.13 and revert to the relevant text in the Draft Plan

The absence of this policy provision in isolation may not have a profound negative effect on the coherence of the plan in providing for the proper planning and sustainable development of County Mayo. Nonetheless, the support being given to the core strategy was a positive attribute of the plan and its retention as provided in the Draft Direction is fully supported by the Assembly.

3. Step (2) a. (iii): Delete CH 2.14 and revert to the relevant text in the Draft Plan

The Assembly support the Draft Direction in that compact growth is an important concept for development in rural areas. It would be important that the concept of density and sequencing of development be included and the emphasis upon brownfield development in all rural areas, including the countryside, should be embraced.

4. Step (2) a. (iv) & (v): Delete CH 2.15 & 2.16 and revert to the relevant text in the Draft Plan

The Assembly consider that this Draft Direction requiring that it reverts to the version of CSO 4 and 5 in the draft, strengthens the development plan and makes it more consistent with the RSES. This Draft Direction is consistent with the opinion given by the NWRA in its submission to the proposed MAs.

5. Step (2) a. (vi): Delete CH 2.17 and revert to the relevant text in the Draft Plan

CSO 6 has the intention of supporting brownfield development in rural areas, a concept that was introduced in the RSES. The Assembly consider that CSO 6 should be retained and that its wording be modified as follows:

To deliver at least 20% of all new housing in rural areas on suitable brownfield sites. For clarity, rural areas include towns/villages with a population of less than 1,500 persons and the open countryside.

6. Step (2) a. (vii): Delete CH 2.18 and revert to the relevant text in the Draft Plan

The Assembly support the Draft Direction to retain CSO 7 which promotes the core strategy, reduced carbon emissions and greener development. This reflects the opinion given by the NWRA in its submission to the proposed MAs.

7. Step (2) a. (viii): Delete CH 2.21 and revert to the relevant text in the Draft Plan

The Assembly support the Draft Direction to retain the requirement to monitor the implementation of the core strategy. This would be consistent with the RSES and the opinion given by the NWRA in its submission to the proposed MAs.

8. Step (2) b: Delete CSP 5 and CSP 8 and supporting text under section 2.79

CSP 5 and CSP 8 are identical policies and their wording is as follows:

'Where individual settlements are considered unlikely to reach their dwelling unit target within the lifetime of the plan the housing allocation may, if required, be utilized elsewhere within the Core Strategy provided that the overall development allocation for the county is not exceeded.'

The Assembly consider that ongoing monitoring of the performance of the plan will be necessary and should issues arise at that stage then it is open to the planning authority to consider a review of the

Development Plan or a Variation to it. The Assembly support the Draft Direction to remove these provisions.

9. Step (2) c: Delete material amendment DMS.1 and revert to the relevant text in the Draft Plan

Guidelines provide for average minimum densities within a range and this is considered an appropriate approach that should be followed. (See Sustainable Residential Development in Urban Areas (2009) Guidelines and Circular Letter: NRUP 02/2021). The heading to the table should reflect that the Densities are Minimum Densities but in addition the narrative to this Table should reflect that the densities are minimum average densities. The Assembly is supportive of the Draft Direction.

10. Step (2) d: Delete the following material amendments CH 2.12 & CH 12.3

This provides for limited and conditional development of Strategic Residential Reserve Tier II. The Assembly suggest that if consideration needs to be given to this type of development, the best mechanism to do so would be a formal variation process and it supports the Draft Direction.

Proposals to amend zonings in Tier III and Tier IV towns do not individually have regional significance and the Assembly has no observation on this part of the Draft Direction.

11. Step (2) g. (i) & (ii): Delete material amendments CH 2.28 and CH3.1 and revert to text in the Draft Plan.

Ch 2.28 refers to Chapter 3, rather than Chapter 2 as stated. Nonetheless, the Draft Direction requires reversion to the draft in respect of both matters, which the Assembly consider to be better balanced and more consistent with the RSES. The Draft Direction is considered appropriate and is supported by the Assembly.

12. Step (2) g. (iii): Delete material amendment CH 3.8 and revert to text in the Draft Plan.

This part of the Draft Direction relates to rural housing and those changes to the emphasis from 'facilitating' to 'encouraging' rural housing and the change from 'retention' of rural population to an 'increase' of rural population.

It should be noted that the NPF National Policy Objective 15 supports the sustainable development of rural areas by 'encouraging growth' and 'arresting decline'. It highlights the need to manage the growth of areas that are under strong urban influence, to avoid over-development, while sustaining vibrant rural communities.

The RSES also recognises in section 3.5 that the management of rural areas is challenging and that the vibrancy and vitality of our rural areas need to be conserved, with the regeneration of our smaller towns and villages being a major priority action for our region.

The encouragement of growth is considered by the Regional Assembly to be consistent with national policy and the RSES, as the wording is set within the context of the principle of proper planning and sustainable development. Thus, the amended wording is, of itself, not considered incompatible with the RSES.

However, it is noted that the evidence base for proposed changes by Mayo County Council to Map 3.1 do not appear to be readily accessible and this presents a difficulty with understanding the coherence of these changes.

13. Step (2) g. (iv): Delete material amendment CH 3.10 and revert to text in the Draft Plan.

The Assembly acknowledge that the capacity of the receiving environment to accommodate development is an important material consideration that should be included and thus support the Draft Direction. Reference to natural resources could be replaced with the term 'receiving environment'.

14. Step (2) h: Insert new objectives

The inclusion of new objectives to incorporate flood mitigation in lower tier settlements is consistent with the RSES and this Draft Direction is supported.

15. Step (2) i: Amend Policy MTP 23 consistent with the recommendation of the Chief Executive

The Draft Direction arises from the consideration of proposed material amendment CH 6.16, which was to amend Policy MTP16. The Draft Direction refers to it as Policy MTP 23 but it now appears as Policy MTP 24 in the version published on the Mayo County Council website. In any case, the Draft Direction propose to omit a relaxation of policy on creation of access onto national roads which includes the following provision:

...Special consideration will be given to access required to the renovation or replacement of existing residential properties or the accommodation of a son/daughter taking up the running of a family farm, utilising an existing access, in cases where access to a more minor road is not possible and provided that right sight distances can be achieved.

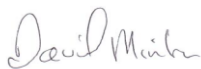
The Draft Direction proposal to omit this provision is consistent with the RSES and is supported by the Assembly.

Conclusion

The Assembly is generally supportive of the Draft Direction and has outlined hereinabove its opinion in respect of those with regional significance and suggested a limited number of minor modifications that retain the thrust of the Draft Direction and would be of benefit to the plan in the round.

I hope that the above is of assistance in consideration of the next steps.

Mise le meas,



David Minton
Director