



Forward Planning Department,
Mayo County Council,
Áras an Chontae,
The Mall,
Castlebar,
Co. Mayo,
F23 WF90.

RE: Draft Mayo County Development Plan 2021- 2027

Dear Senior Planner,

I refer to your notification on 23rd December 2020 confirming that the Draft Mayo County Development Plan 2021 – 2027 has been prepared and inviting submissions / observations.

The Northern and Western Regional Assembly wish to commend Mayo County Council on the publication of the draft Plan. It is a very important and timely policy intervention that shall shape the future of the county. It is also important to areas that lie beyond the county area.

It is the role of the Regional Assemblies to provide leadership and to identify regional development objectives and coordinating initiatives that support the delivery and implementation of national planning and economic policy. This is primarily achieved through the preparation and implementation of Regional Spatial and Economic Strategies (RSES) that are bespoke to the region and which implement and amplify the National Policy Objectives and National Strategic Outcomes of the National Planning Framework (NPF). The Northern and Western Regional Assembly adopted the Regional Spatial & Economic Strategy 2020 – 2032 (RSES) for the Northern and Western Region in January 2020. I would like to take this opportunity to thank Mayo County Council for their collaborative input to this strategy, which is available on our website www.nwra.ie/rses

The Regional Assembly is required under S.27B of the Planning and Development Act 2000 (as amended) to make submissions/observations, containing a report which shall offer its opinion on whether or not the Draft plan and its core strategy is consistent with the RSES and to make recommendations on what amendments are required to ensure consistency. This submission is being made within this context.

Format of Submission

Initially it is worthwhile to give an outline of the DMCDP. It is a large suite of documents broken into 6 volumes comprising a written statement, Development Management Standards, Book of Maps, Supporting Documentation (eg. housing strategy) Environmental Reports and IWAK SDZ. In addition to the above there are 3 appendices. The scope of the information outlined above is significant and this is typical of the presentations made by planning authorities in formulating their plans.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon
Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chtearnóg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie



It is not possible or practical to present a 'blow by blow' account examining every section, subsection policy and objective contained within the Draft. Instead, an examination of each chapter has been undertaken and a general report on the policies given on matters that are either not included or may not be included but are not fully consistent with the policies within the RSES. The introduction of each chapter of the DMCDP identifies relevant UN Sustainable Development Goals, National Strategic Outcomes in the NPF and Growth Ambitions in the RSES. This is evidence that the PA at the initial stages had full regard for its intention to achieve consistency with the higher order statutory plans.

Chapter 1

Chapter 1 is an introduction of the Draft and as well as setting out the Sustainable Development Goals, National Strategic Outcomes and Growth Ambition referred to above it provides a profile of the County. It also describes the Plan Making Process and the structure and comparison documents needed to fulfil the project. It demonstrates how compliance with Section 28 guidelines is made throughout the Draft. One fact in particular worth noting is that Mayo is a predominantly rural county with 71% of its population living in rural areas according to the 2016 Census. There are no policy or development objectives included in Chapter 1.

Chapter 2

Chapter 2 is the Core and Settlement Strategy for the County and as members are aware this is one of the most important and analysed part of the any development plan and it sets the agenda for many of the subsequent chapters. The cross-cutting themes identified in this Chapter (S2.4) mirror similar themes in Section 2.1 of our RSES. The Draft Plan also identifies economic zones within the county similar to the process at regional level where 6 subregions are identified.

The Draft plans for population growth for the plan period which accords with the range set for Mayo in the NPF Roadmap. This is similar to the data which informs RSES in respect of population growth. The 10 strategic aims set out in Section 2.3 of the Draft and the 12 strategic objectives set out in Section 2.6 of the Draft have comparative objectives within the RSES. The core strategy incorporates the regional and national ambitions to deliver brown field development. It also set ambitious targets to deliver compact development by dividing the population increase 60/40 between urban and rural dwellings. This appears to be based on the premise that urban development comprises tiers 1-4 in the core strategy table. The census uses towns with a population greater than 1500 as a cut off between urban and rural. It would be informative for the public if clarification was offered on this aspect of the Draft. The detail of how population growth is distributed throughout the county is set out in the Core Strategy Table (Section 2.5.7) as are targets for brown field development. The following observations are made in relation to the Table.

- There is an inconsistency in the language between the Draft and the RSES in terms of Tier 1 Towns, Ballina and Castlebar are designated key towns in the RSES and are designated as strategic growth centres in the Draft. This has the potential to cause confusion as to the definition of hierarchy and undermines the RSES/NPF in terms of their designated Regional Growth Centres.

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- The inclusion of Westport as strategic growth centre on a par with Ballina and Castlebar also has the potential to further undermine the hierarchy. Westport is recognised in the RSES as a place of strategic potential, it is not however a key town like Ballina and Castlebar. Consistency in language is important to properly inform the public.
- The proposal to make an LAP for Castlebar, Ballina and Westport creates a delay in planning for the important towns at the top of the county settlement hierarchy and could place these towns at a disadvantage. There is no data provided on zoning lands at the top of the hierarchy.
- The tier two towns have data provided on zoned lands, it appears however that there are excessive lands zoned which could have implications on compact development targets and densities.
- The tier three towns are dealt with as a group with no individual assessment. It would inform the stakeholders much better if specific data for each town was provided particularly in relation to ease of monitoring and implementation. Plan led development is preferable.
- Brownfield development targets CSO6 should equally apply to all rural areas to comply with similar RSES RPO.

The core strategies and objectives set out in Section 2.6.10 are consistent with policies in the RSES subject to qualifications bullet pointed above.

The Draft provides a very comprehensive settlement strategy which builds on and extends the high level strategy set out in the MPF and RSES.

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. In this regard, Ballina and Castlebar are designated Key Towns in the RSES and Westport is identified as a place of strategic potential, it is not however a Key Town.*

Recommendation 2: *Include provision for the brownfield development targets CSO6 to apply to all rural areas in order to be consistent with similar RSES RPO 3.3.*

Observation 1: *Should the Draft Plan be adopted in its present form there will be an absence of zoned lands and policy direction for Ballina, Castlebar and Westport. The planning authority should consider options to fill this vacuum and provide greater certainty, enabling planned sustainable development to occur.*

Observation 2: *Review the quantum of land zoned within tier two towns, ensuring it is commensurate with its functional needs and provides for achievement of compact growth appropriate to the settlement.*



Chapter 3

Chapter 3 of the Draft deals with housing. The early part of the chapter provided a synopsis of the Housing Strategy (full version is in volume 4 of the Draft). The Housing Strategy policies and objectives are set out in Section 3.4.7, they are broadly consistent with the relevant RPOs in the RSES particularly in chapters 3 and 7. The Draft promotes compact development and higher densities throughout the county and it is nuanced to reflect the scales of existing development. It also promotes variety in housing type, tenure and sizes in towns and villages. The monitoring and implementation of the delivery will be discussed below. It is noted that the Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended) was issued after the decision to issue the Draft Plan. Accordingly, it would be appropriate to suggest that the draft plan be reviewed within the context of those Guidelines.

Observation 3: The planning authority should satisfy itself that the plan provisions are not significant divergence between generally consistent with the Section 28 'Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities'.

Chapter 4

Chapter 4 is the economic development chapter. This chapter takes into account and identifies the data/policies at National and Regional level and uses them to inform their policies and objectives. It makes reference to Mayo Co. Council's own economic strategy as a base line document. The various policies and objectives set out in Section 4.3 follow the goals of compact and integrated development. There is an obvious preference and bias towards the creation of employment in proximity to residential development and public transport. The overarching guidance in the NPF that job creation should follow population increase at a ratio of 0.66:1 (NPO 1c) is not reference and it would be informative if this was included to provide clarity and as an indicator that can be monitored. Similar to concerns identified in Chapter 2 in relation to consistency in language, the identification of Westport as a key town (EDP8) is confusing and should be examined in order to ensure consistency with the RSES. There are similar concerns with using economic growth terminology.

The identification of town centres as generally being the location for retail development is welcome and consistent with the regional policies in Chapter 4 of the RSES. The identification of a methodology for the assessment of over concentration of uses (EDO46) would be helpful. The chapter goes on to identify smart economic policies and objectives which resonate and are consistent with policies in the RSES. Elaboration on the criteria for the successful siting of data centres (EDO 49) would be informative. The chapter also examines agriculture policies and extractive industry policies in the context of the rural economy. These are broadly consistent with regional policies. There is reference to the potential of remote working as a boost to the rural economy, this is to be delivered at an appropriate scale, further guidance on what constitutes an appropriate scale would be welcome. The final parts of the chapter deal with the blue and green economy, the policies are consistent with those in the RSES and just like the RSES promise variation if such is necessitated by the forthcoming National Marine Planning Framework.

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon

Tionól Réigiúnach an Tuaiscirt agus an Iarthair
An Chlearróg, Bealach an Doirín, Co. Ros Comáin

+353 (0)94 9862970

+353 (0)94 9862973

info@nwra.ie

Observation 4: *Include reference to the overarching guidance in the NPF that job creation should follow population increase at a ratio of 0.66:1 (NPO 1c) – thus enabling it to be an indicator that can be monitored.*

Observation 5: *Consider inclusion of a methodology for the assessment of over concentration of uses (EDO46).*

Observation 6: *Elaboration on the criteria for the successful siting of data centres (EDO 49) would be informative.*

Observation 7: *The identification of the potential of remote working as a boost to the rural economy is welcome. It is stated that this is to be delivered at an appropriate scale and further guidance on what constitutes an appropriate scale would benefit the plan.*

Chapter 5

Chapter 5 deals with tourism. There are comprehensive descriptions of the potential of many tourism products in the County. The Draft acknowledge the national role of Bord Fáilte in developing potential. It drills down to identify the locations for concentrated investment and sets out appropriate policies (refer section 5.4 of the Draft) at a general and specific level. It would be accurate to describe the totality of the chapter as ambitious in all respects with vision of where the county can go. The policies and objectives are consistent with those in the RSES and take them to a much finer grain, and include such topics as culture, culinary, festivals, infrastructure, marine and adventure.

Chapter 6

Chapter 6 examines movement and transport. The background from a National Policy perspective is set out in section 6.3 and goes on to develop a suite of policies and objectives for integrated land use and transport. These are consistent with regional policy objectives and include Local Transport Plans for Ballina, Castlebar and Westport. The chapter then goes on to describe the modal split as regards travel in the county and outlines sustainable mobility policies with emphasis on pedestrians, cyclists and public transport. These policies have taken their lead from national and regional objectives and are complementary to compact development ambitions. The majority of regional policy objectives are in chapter 6 of the RSES.

The latter part of chapter 6 deals with road, air transport and ports respectively. The policies are consistent with the RSES. The ambitions for port development may extend beyond those in the RSES depending on the outcome of the proposed feasibility study.

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Chapter 7

Chapter 7 is the infrastructure chapter and examines the areas of Water Services, Waste Management, Surface Water, Broadband and Information Technology and Energy (electricity and gas). The policies in relation to water and wastewater are consistent with those in the RSES. It appears that there is generally adequate capacity for the further development of the vast majority of settlements in the county and certainly in all the major settlements. The elimination of combined sewers in the county could be included as an additional policy in this section to mirror same in the RSES. It is noted that it is included as part of the surface water policies. The policies and objectives in relation to waste management are consistent with those in the RSES but they could be expanded to give guidance on the siting of waste infrastructure and the proximity principle (refer Section 8.4 of the RSES).

The policies and objectives in relation to surface water infrastructure are consistent with those in the RSES. The identification of specific projects similar to the section on road projects would be informative and they could be included with the schedule of municipal district projects. The policies and objectives for broadband and telecommunications are consistent with those in the RSES (refer Section 6.5). The policies in relation to electricity and gas are generally consistent with those in the RSES, in order to ensure certainty, the strategic projects for Mayo included in Table 11 of the RSES should be included in the County Development Plan.

Observation 8: Consider the opportunity for the policies and objectives in relation to waste management to be expanded to give guidance on the siting of waste infrastructure and the proximity principle (refer Section 8.4 of the RSES).

Chapter 8

Chapter 8 is titled Sustainable Communities and is wide ranging in the topics it examines. These include Community development and infrastructure, social inclusion, health and wellbeing, recreation, education, arts and the Gaeltacht. The RSES does not contain an individual chapter that deals with all these topics even though chapter 7 of the RSES has many similarities. The RSES does not have specific policies in relation to emergency services, places of worship and burial grounds for example. There is consistency between the policies for social inclusion, health and wellbeing and education. The Assembly recommends that lands be zoned specifically for nursing homes and specialised housing (refer RPO 7.14). The policies in relation to the Gaeltacht are consistent with those in the RSES (refer section 3.5 and 5.6).

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.



Chapter 9

Chapter 9 provides policies in relation to the built environment. It contains policies and objectives for the protection of archaeology and architecture from a heritage viewpoint. These are comprehensive and consistent with regional policies set out in Section 5.7. The chapter goes on to develop policies around environmental sustainability for buildings, through retention and improvement of existing buildings, through modern design and better energy efficiency. The RSES does not include many pertinent policies on this aspect of development but is still has some relevant policies, for example RPO 3.8 and 4.21 (Energy Efficient Design). The chapter then looks at good urban design policies and objectives incorporating regeneration which is consistent with the principal aims of the RSES promoting compact development, regeneration, town centre consolidation and brownfield development. This part of the Draft provides a comprehensive suite of policies which will deliver the sought-after improvements in the public realm.

Chapter 10

Chapter 10 deals with the Natural Environment. It outlines strong policies on the protection of biodiversity including peatlands throughout the county including designated sites. It sees environmental designations as an asset which brings advantages to the county through tourism and as a bulwark against degradation and the impacts of climate change. This is consistent with the Assembly's overarching environmental regional policy objectives in Section 1.5 and the policies outlined in Section 5 Natural Region.

The chapter goes on to examine green and blue infrastructure by recognising their potential in the areas of biodiversity, water management, recreation and quality of life. The development of these types of infrastructure is to become an inherent part of the development of the county. This policy is consistent with and expands on the policies in the RSES (refer RPOs 3.5 and 9.4).

The next part of this chapter examines landscape including scenic views and its protection and importance. This is rather like the RSES and its objective to do a landscape character assessment following a lead at national level through the production of national guidelines (refer RPO 5.2). The Assembly recommends that an examination of the designated landscape along the county boundary to check compatibility with designation in adjoining counties.

The next issues examined include protection for coastal areas, water bodies including ground waters and air emissions generally. The RSES also supports some of these objectives refer RPOs 4.1,5,15 and RPO 8.18.

Observation 9: *That the landscape appraisal be reviewed to ensure the designated landscape along the county boundary is compatibility with designation in adjoining counties.*



Chapter 11

Chapter 11 Climate Action and Renewable Energy. These are overarching elements of development for the foreseeable future and will influence all types of development to an increasingly greater degree. The Draft outlines the international and national programs to address these issues and provides a detailed analysis of how the development plan policies are to the forefront in climate action mitigation and adaptation. It also sets out the role of CARO and the development and decarbonising zones. This approach is similar to the one followed by the RA whereby Climate Action is an inherent and recurring part of the RSES. The Draft has a comprehensive schedule of policies and objective in respect of Climate Action policies.

The latter part of this chapter deals with renewable energy and it identifies the potential of Mayo as a location to develop renewable energy technology especially, but not exclusively, wind and wave. It also supports community involvements in development proposals. Overall the Draft has an integrated response to renewable energy and power generation. The policies in the Draft are consistent with those in the RSES (refer RPO 4.16, 17, 18, 19 20, 21, 22, 29 and 8.3).

Chapter 12

Chapter 12 deals with settlement plans. It sets out in greater detail the hierarchy designated in chapter 2. It proposes LAPs as stated previously and settlement plans for all other tiers. The Tier 2 towns have zoning Maps. The areas of land zoned are well in excess of that needed to meet population projections and it is proposed to change the zoning of the lands to residential reserve as projections are achieved The Assembly would have concerns with regard to such an approach as it is not ostensibly plan led development and it does not provide much in the line of prioritisation and controlled release of development land. Prioritisation is a constant theme through the strategic plans in the RSES and the Draft Plan would not be consistent with the RSES in this respect. It would also be more informative for the public if the flood areas were included as a layer on the zoning maps together with the areas in hectares allocated to different uses. The proposals for lower tier settlements are very light on detail and outside of a development envelope they have little by way of guidance through the designation of zoned lands. It is difficult to imagine the overall approach as having anything but the most tenuous links with planning.

Observation 10: *As set out in Observation 2 - Review the quantum of land zoned within tier two towns and where necessary provide prioritisation of its release, ensuring it is commensurate with its functional needs and provides for achievement of compact growth appropriate to the settlement.*

Observation 11: *Consider inclusion of flood areas as a layer on the zoning maps together with the areas in hectares allocated to different uses.*

Observation 12: *Consider inclusion of greater level of guidance for the development of lower tier settlements below tier 2.*

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+353 (0)94 9862973

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Monitoring and Implementation

This aspect of the plan is set out in S1.11 and it sets out the statutory requirements for the implementation and monitoring of the plan. There are no policies or objectives proposed. The Regional Assembly devoted chapter 10 of the RSES to implementation and inter alia has adopted 4 PROs (RPO 10.1 – 10.4) to deliver appropriate monitoring and has set up an oversight committee to that end.

The Assembly recommend that the monitoring proposal be re-examined to see if it could be strengthened. It sets out below examples of how some policies and objectives could be amended to make them more specific and more suitable for monitoring purposes.

- **C806** Objective for 20% of new homes in rural towns and villages with existing footprint. This could be extended to include houses in the open countryside.
- **C809** Monitoring of Permitted Development. This could be extended to include commenced and completed development.
- **GS04** Provision of Serviced Sites. This could be extended to include proposed locations for serviced sites and timelines for their delivery.
- **INP9** Separation of Combined Sewers. Specific Projects could be identified and prioritised and targeted timelines included.
- **G301** Development Progress in a Sequential Manner. The identification and prioritisation of land delivered for development. There should also be an optimisation exercise carried out as 'sequential manner outward' is not automatically the best development option.

The above list is not in any way exhaustive and the additions proposed would contribute towards consistency with the RSES.

Observation 13: Section 1.11 of the Draft Plan would benefit from the implementation and monitoring regime being strengthened. It could provide co-ordination and direction for investment that delivers on the necessary infrastructure for the county.

Observation 14: The plan would benefit from a review of policies/objectives to ensure they are sufficiently specific for monitoring purposes. **Conclusion:** The RA commends Mayo County Council on the scope and content of the DMCDP and is of the view that a very high level of consistency with the RSES exists. The content above identifies areas where consistency is less than full, but it can, in most cases, be quite easily remedied.

I hope that the above observations are of assistance in shaping the new County Development Plan in a manner that shall be of benefit to our communities. The Assembly look forward to further engagement with Mayo County Council as the preparation of the plan is progressed and as we move towards the preparation of a Joint Plan for Athlone. If you have any queries in respect of the above observations, then do not hesitate to revert.

Yours Sincerely,

David Minton
Director

Northern & Western Regional Assembly
The Square, Ballaghaderreen, Co. Roscommon

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