



Draft Castlebar Local Area Plan
Planning Section
Mayo County Council
Aras an Chontae
Castlebar
Mayo F23WF90

Via online portal: consult.mayo.ie

5 April 2023

RE: DRAFT CASTLEBAR AND ENVIRONS LOCAL AREA PLAN 23-29 (CLAP)

A Chara

I refer to your notification on 28 February 2023 inviting a submission in respect of the Draft Castlebar and Environs Local Area Plan 2023-2029 (Draft LAP). The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

This submission will comment upon the Draft Castlebar and Environs Local Area Plan in the context of its consistency with relevant objectives in the RSES and with the ambitions and goals identified in Section 3.8 of the Strategy, as it relates to Castlebar and the identified Key Future Priorities. Reference will also be made to the RSES Two Year Monitoring Report, where relevant.

Issues and Considerations

There is a high level of consistency between the Draft LAP and the RSES. This, in itself is unsurprising, as there was a high level of consistency between the Mayo County Development Plan and the RSES. However, there are some areas where clarification would be welcome. In relation to housing provision, zoning of lands and population growth, there are different figures interspersed between the statutory plans. The CDP in the core strategy table (S2.7.7) estimates the quantum of lands zoned for New Residential at 29.73 Ha, the core strategy (S2.8) of the Draft LAP estimates the quantum of zoned lands required to be 36.87 Ha and Appendix 1 in the Settlement Capacity Audit estimates the quantum of New Residential Land at c.43 Ha. In addition to the uncertainty over the quantum required, there is further uncertainty over the densities that may be acceptable in different areas. There is

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an objective to prepare a building heights and density study for the town within a year of the adoption of the Draft LAP. The Assembly suggest that in order to bring increased certainty to the plan to develop the town, a building heights and density study should be undertaken as part of the LAP process.

The population increase planned is consistent with the CDP and RSES, but it is worth noting that the completion figures for new dwellings in Castlebar in the six years since 2016 stands at 160 units. This is a higher figure than other Key Towns, but if the rate of completions were to continue for the lifetime of the LAP, the delivery of new houses would only achieve 25% of the 708 units target for Castlebar, set out in the CDP core strategy table. The population of Castlebar has increased by a little over 1000 since the 2016 census, according to early release of data from the 2022 census. This is based on ED areas, which are not coincident with the plan area, but they do give an indication of how the town is progressing in terms of population growth. The Census 2022 results will be published from Tuesday, May 30th beginning with a summary report, with a series of themed reports, scheduled to follow. It would make for a better-informed plan if such information could be incorporated into/inform the LAP. In addition to the new dwellings referenced above, there has been a decrease of over 90 units in the numbers of vacant and derelict dwellings. However, the residual vacancy figures (over 100 units) do not seem to have been factored into the zoning requirement for new residential in the town. The contribution of other zoned areas to housing delivery are not quantified.

There is a consistent theme of delivering compact development throughout the plan area. The Draft LAP identifies 10 opportunity sites with potential to deliver regeneration. These are located within the identified four quarters in the town centre. This initiative is fully consistent with the RSES. The Draft LAP identifies what is considered appropriate uses for each of the opportunity sites. It also states that masterplans would be needed for the future development of the sites and has left preparation in the hands of the developers. The Assembly suggest that the masterplan process should be carried out on a phased basis and prioritised by the Council, as this would be a more acceptable form of plan-led development and would reduce the risk of developer bias in the preparation of plans. In the case of opportunity sites which are identified at risk of flooding (sites 1 and 3) it would better inform the public and other stakeholders if details of mitigations required were included and the justification tests amended accordingly.

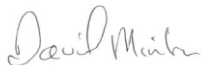
The Assembly note that zoning maps for the town are published and would suggest that more information would be made available as to the areas of each parcel of zoned land. It is noted that Appendix 1 contains some information of this nature on some residential land and opportunity sites. This is welcome but quite limited in the overall context of the plan. It would be beneficial to all stakeholders if a capacity map for all areas was completed. The information in relation to servicing could be more detailed and the rationale and analysis pertaining to each parcel could be made available, perhaps in a companion document or an appendix.

Recommendations

1. The Castlebar Local Transport Plan become an inherent part of the LAP.
2. That clarity be provided on the quantity of zoned residential land required and data on the areas of all zoned lands be provided.
3. A building heights and density study be undertaken as part of the LAP.
4. Data be provided on the quantum of housing that may be delivered from areas that are zoned other than residential.
5. Masterplans for opportunity sites be prepared by the Council on a phased and prioritised basis.
6. Mitigation measures for opportunity sites and amended justification tests be included in LAP where appropriate.

Finally, the Assembly wish to thank the Council for the opportunity given to engage in the process. If you have any queries in respect of the above, then do not hesitate to revert.

Mise le meas,



David Minton
Director