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18 September 2023

## RE: PROPOSED MATERIAL ALTERATIONS (PMA) TO THE CASTLEBAR LOCAL AREA PLAN.

A Chara,

I refer to your notification on 23 August 2023 of the Proposed Material Alterations (PMAs) to the Castlebar Local Area Plan 2023-2029 (CLAP). The Northern and Western Regional Assembly ('the Assembly') wish to thank you for the opportunity to make this submission.

Castlebar is a Key Town in the Regional Spatial and Economic Strategy for the Northern and Western Region (RSES) and is an important retail centre regionally.

The purpose of this submission is to comment upon the proposed Material Alterations 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.

The Assembly's submission on the Draft LAP inter alia recommended the following:

1. The Castlebar Local Transport Plan would become part of the LAP
2. Clarification on the quantities of residential zoned lands
3. Building Heights and Density Study
4. Quantity of housing generated from other lands
5. Masterplan Prioritisation
6. Amended Justification tests.

The issues raised have been partially addressed in the Chief Executive's report on the submissions, although the yield from undeveloped existing residential land will be quite similar to the yield from new residential land. The issues raised by the Assembly were also raised by the OPR. A copy of our submission on the Draft LAP is attached to this submission for your convenience.

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There are 26 PMAs, 18 of these deal with the zoning of particular parcels of land in the vast majority of proposals new residential zoning. The majority of the remainder are recommendations from prescribed bodies such as NTA and UE, relating to uses supported in various land zonings. These are supported by the Assembly.

The proposed zoning changes as referenced above deal with the creation of New Residential Zonings for the most part. It is not proposed in this submission to comment in detail on individual parcels of land, except where they may have a regional significance. We will however examine them at a macro level and comment on their consistency or otherwise with RSES objectives.

The proposed Material Alterations include proposals to zone over an additional 54Ha as new residential. The locations are dispersed throughout the plan area and are located generally near the periphery of the built-up area and most of the proposed areas are presently in agricultural use. There have not been any proposed deletions of residential zonings from the draft plan. The quantities of lands, if the PMAs were adopted, would mean that the targets for population growth in the core strategy and the RSES would not be matched by the quantity of residential zoned land and result in a significant surplus of residential zoned land. The amount of zoned land would also be well in excess of the amounts required to meet the residential completion trends in Castlebar since 2016. The proposals would be inconsistent with the RSES and are not supported by the Assembly.

The PMAs also include 3 proposals to remove parts of an internal link road and two areas from the proposed Northern Orbital Route. The proposed Local Transport Plan (LTP) is to become part of the LAP and these proposals would be contrary to the delivery of the indicative routes in the LTP. The preparation of an LTP is an objective of the RSES.

### **Conclusion**

The Assembly consider that the majority of the land use changes contravene RPO 3.1 requiring the delivery of compact growth in key towns and they are inconsistent with the RSES and are not supported by the Assembly. In addition, the removal of the Northern Orbital Route should be reconsidered as it is in conflict with the LTP element.

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

Mise le meas,



**Denis Kelly**  
**Director**

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