



Castlebar LAP
Forward Planning Office
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The Mall
Castlebar
Co Mayo F23 EF90

via portal: consult.mayo.ie

13/02/2024

RE: DRAFT MINISTERIAL DIRECTION ON THE CASTLEBAR TOWN & ENVIRONS LOCAL AREA PLAN 2023-2029

A Chara,

I refer to the Department of Housing, Local Government and Heritage's Notice of Intention to Issue a Direction to Mayo County Council regarding the Castletown Town and Environs Local Area Plan 2023-2029 dated 16 January 2024.

The Assembly have prepared this report on the matter, noting the Assembly made two previous submissions to the planning authority during the LAP plan-making process, at Draft Plan, and Material Alteration to the Draft Plan Stage.

The report itself sets out the opinion of the Assembly in respect of each element of the Draft Ministerial Direction.

THE DRAFT MINISTERIAL DIRECTION

The draft Ministerial Direction states that planning authority is hereby directed to take the following steps with regard to the Local Area Plan:

2. (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 & 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 & Employment at Cloonagh (Site EE 1) located to the southwest of Saleen Lough and to the immediate east of the rail line.*

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and apply all necessary consequential updates to the text of the plan consistent with the foregoing. A Statement of Reasons for the required amendments is given in the draft Ministerial Direction and includes several reasons, including failure to provide an accurate Core Strategy table; inconsistent with National Planning Framework and Regional Spatial and Economic Strategy; excess zoning; zoning in peripheral non-sequential locations; zoning outside CSO boundary; flood risk; car-based locations; no justification provided; and capacity of infrastructure. A copy of the draft Ministerial Order is attached to this report.

ASSESSMENT OF THE DRAFT MINISTERIAL DIRECTION

Having assessed the draft Ministerial Direction and the relevant sections of the Castlebar Town & Environs Local Area Plan 2023-2029, the Assembly has the following opinions to make on the draft Ministerial Directions.

Draft Ministerial Direction 2 (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.

Opinion on 2(a)

The Assembly, in its submission dated 5 April 2023 to the draft LAP, highlighted the lack of consistency or clear data in the draft LAP and recommended that:

- *Clarity be provided on the quantity of zoned residential land required and data on the areas of all zoned lands be provided.*
- *A building heights and density study be undertaken as part of the LAP.*
- *Data be provided on the quantum of housing that may be delivered from areas that are zoned other than residential.*

While some of recommendations were addressed during the plan-making process, there is no Core Strategy Table in the adopted LAP. However, Table 2.1 *Population Change in Castlebar Agglomeration (Urban & Rural)* of the LAP provides some limited information on population growth, housing targets and quantum of land required for residential use. In addition, Appendix 1 of the LAP includes a Residential Settlement Capacity Audit that includes site sizes for land zoned Section 2.8.4 *Development Densities* of the LAP states that densities will be site-specific and determined at detailed design stage.

The Assembly is of the opinion that to determine if significant compact urban growth and development of derelict and underutilised sites, (with an initial focus within town cores, can be achieved as required by RPO 3.1 of the RSES) a clear Core Strategy Table setting out the area and quantum of housing to be delivered on lands zoned Town Centre, Existing Residential and New Residential with appropriate densities is required.

Therefore, the Assembly support 2 (a) of the draft Ministerial Direction.

Draft Ministerial Direction 2 (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***

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

Opinion 2(b)

The Assembly in their previous submission dated 5 April 2023 to the draft LAP, did suggest that more information be made available for each parcel of zoned land, including a capacity map, and the rationale and analysis for zoning the land. While part of this suggestion has been provided in the LAP, the rationale for including each parcel of land has not been made.

In a further submission by the Assembly dated 18 September 2023 on the proposed Material Amendments to the draft LAP, the Assembly stated that *“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.”*

When reviewing Table 2.1 of the LAP and Appendix 1 of the LAP - Residential Settlement Capacity Audit, it appears that there is a significant difference between the amount of land required for residential use (i.e. 36.87ha) and that zoned in the LAP (i.e. New Residential - 82.3ha; Strategic Reserve - 46.13ha; Opportunities Sites - not determined).

The Assembly consider that the LAP, at this juncture, retains significant excess of land for residential use. Land parcels identified in 2 (b)(i), 2(b)(ii) and 2 (b)(iii) of the draft Ministerial Direction are on the periphery of the town and cumulatively amount to approximately 36.42ha of land. Removing these parcels of land from New Residential will result in 45.88 ha of land remaining in New Residential in the LAP area.

The revision of zoning of land outlined at 2 (b) (ii) and 2 (b) (iii) will increase the amount of land zoned for Enterprise and Employment and the Assembly opinion on this is set out below under Draft Ministerial Direction 2 (c)(i).

The Assembly support paragraphs 2(b)(i), 2. (b)(ii) and 2. (b)(iii) of the draft Ministerial Direction. The Assembly consider the revision of this element of the Plan will contribute towards the achievement (at least in part) of the ambition of RPO 3.1. & 3.2 of the RSES, which seeks to deliver places of urban scale, focusing on Urban Cores initially, and consolidation of the existing built up footprint of Castlebar.

Draft Ministerial Direction 2(c): Delete the following zoning objective from the adopted Local Area Plan, i.e. that the subject lands are dezoned:

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

Opinion 2(c)

The RSES designates Castlebar as a Key Town, and highlights that it is the main Administrative, Public Health, Education and Commercial centre in the county. In 2016, the town provided employment to over 9,000 people, with a jobs to resident workers ratio of 1.920 (CSO 2016 based on “Settlement” boundaries). This position is well reflected in the Local Area Plan. The most recent Census Data (2022) – which reflect the new “Built-Up-Area” boundaries – show that Castlebar has a Jobs to resident workers ratio of 1.74.

Having assessed the Census 2022 data-sets it appears that Castlebar is generally on track in relation to job creation within this Plan Period (2028 - 2029) as set out in Table 5.1 of the LAP.

Key Future Priorities articulated in the RSES for Castlebar include the following:

- Building on Castlebar’s strong enterprise and associated skill base,
- Building on the strong infrastructure base in terms of road, rail, fibre-optic and proximity to IWAK and the AEC which positions the town as a location for further inward investment.
- The Atlantic Technological University Mayo Campus and Mayo University Hospital are also of significant importance to the town.

Given the pivotal role of Castlebar as a Key Regional Economic driver, it is vital over the coming decade that sufficient Enterprise and Employment land banks are identified for future expansion. In the event of the future expansion of Health-care facilities, as well as the ongoing growth of the ATU Castlebar Campus, there may be a requirement for additional lands to facilitate same.

Given that the draft Ministerial Direction 2 (c) (i) omits approximately 48 ha of land for Enterprise and Employment and the draft Ministerial Direction 2 (b) (ii) and 2 (b)(iii) reverts approximately 13 ha. of land back to Enterprise and Employment, the Assembly consider given the net loss involved, it may be of benefit for Mayo County Council to consider, in their submission, any implication of this recalibration on the availability of suitable lands for Enterprise and Employment land uses necessary to support the growth and Regional role of Castlebar, in tandem with the town of Westport, as a driver of economic development for the region. Furthermore, it is noted that the Chief Executive’s report, in considering the submission to the Office of Planning Regulator’s ‘Recommendation 3’ to the Draft Plan (Report No.1), stated that... ‘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.’ Accordingly, it would be important that the planning authority substantiate this statement and provide an update on the current position regarding same in their submission to the Draft Ministerial Direction. In the absence of further justification being furnished, the Assembly would support the Draft Direction.

CONCLUSION

The Assembly support the ongoing and future role of Castlebar as a Key Town in the county and Region as set out in the RSES. In pursuit of compact and sustainable growth, the Assembly unequivocally support 2 (a), 2 (b) (i), 2 (b) (ii) and 2 (b) (iii) of the Draft Ministerial Direction. In relation to element 2 (c) (i) of the Direction, the Assembly supports this element of the Draft Direction unless the planning authority can provide robust justification for the development of these lands.

I trust that the attached is of assistance and the Assembly wish to thank Mayo County Council for the opportunity given to provide this submission. If you have any queries in respect of the attached, then do not hesitate to revert.

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