

Forward Planning Section

Chief Executives

Report Number: 1

Draft Consultation Phase

Castlebar Town & Environs

Local Area Plan

2023 -2029



Comhairle Contae Mhaigh Eo
Mayo County Council



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Section 1 Introduction

1.1 Requirement for Chief Executive's Report

In accordance with Section 20 of the Planning and Development Act 2000 (as amended), the Chief Executive (CE) of Mayo County Council (MCC) is required to prepare a report on the submissions and observations received during the public consultation period in respect of the draft Plan. This report should list the persons who made submissions and observations, summarise the issues, give the opinion of the CE in relation to the issues raised and make recommendations in relation to the draft Plan. The recommendations should take into account the proper planning and sustainable development of the area, the statutory obligations of the local authority and relevant policies or objectives of the Government or of any Minister of the Government.

1.2 Public Consultation

The Draft Castlebar Town & Environs Local Area Plan 2023-2029 was placed on public display from Tuesday, 28th February 2023 to Tuesday 11th April 2023. The draft Plan and accompanying documents were displayed on the County Council's dedicated online public consultation portal at: <https://consult.mayo.ie/en/consultation/draft-castlebar-town-environs-local-area-plan-2023-2029>

The Draft Castlebar Town & Environs Local Area Plan 2023-2029 comprises a written statement with maps and is accompanied by:

- Appendix 1 - Settlement Capacity Audit.
- An Environmental Report on the likely significant effects on the environment on implementing the Plan - pursuant to the Planning and Development (Strategic Environmental Assessment [SEA]) Regulations 2004-2011.
- An Appropriate Assessment (AA) Screening Report - pursuant to the EU Habitats Directive (92/43/EEC).
- A Strategic Flood Risk Assessment (SFRA) Report - pursuant to Section 28 of the Planning and Development Act 2000 (as amended).

A public notice was published in The Mayo News, The Western People and The Connaught Telegraph on Tuesday 21st February 2023 and the Mayo Advertiser on Friday 24th February 2023 notifying members of the public that a Draft Local Area Plan would be placed on public display from the 28th of February to 11th of April 2023.

Submissions/Observations were invited over the public consultation period. Copies of the draft Plan, associated documents and public notice were issued to prescribed bodies, including government departments and other agencies, as required by the Planning and Development Act 2000 (as amended).

A public consultation drop-in session was organised for the 21st of March 2023 at the Lannagh Suite in the Lough Lannagh Leisure Complex, Castlebar. The purpose of the meeting/drop-in session was to inform the public and interested parties of the plan making process and to discuss/identify issues arising for consideration in the preparation of the draft Plan.

Social Media channels (Facebook and Twitter) were used as mechanisms in promoting awareness of the draft Plan public consultation period. A dedicated webpage and a specific Public Consultation Portal were employed to keep members of the public up to date with the process of the preparation of the LAP. The majority of submissions received in relation to the draft Plan were via the consultation

portal. All valid submissions received were published for public viewing on the Mayo Consultation Portal for the draft Plan. Regular notifications relating to the Plan review were issued through the Council's Facebook and Twitter feeds.

1.2.1 Submissions and Observations Received

In total 46 submission/observations were received during the public consultation period, including 11 from prescribed authorities/Key Stakeholder.

The Elected Members of MCC are advised that the submissions are available for public viewing at <https://consult.mayo.ie/en/consultation/draft-castlebar-town-environs-local-area-plan-2023-2029>

1.3 Content of Chief Executive's Report

There are five sections in this report.

Section 1 (this section) gives a brief introduction and outlines the public consultation process on the draft Plan.

Section 2 List of persons or bodies who made submissions/observations and includes the CE's responses and recommendations.

Section 3 addresses the submissions made by the Office of the Planning Regulator, the Northern and Western Regional Assembly and Prescribed Bodies and includes the CE's responses and recommendations.

Section 4 addresses submissions relating to zoning and includes the CE's responses and recommendations.

Section 5 addresses the remaining submissions and includes the CE's responses and recommendations.

All submission numbers in the CE Report include an electronic link to the original submission received.

Recommended proposed new text as an amendment to the draft Plan is coloured in green in the CE Recommendations, whilst recommended text to be removed from the draft Plan is indicated by a strikethrough coloured in red in the CE Recommendations.

1.4 Next Steps

Within six weeks of receiving the CE Report, the Elected Members of MCC must consider this report and the draft Plan. Following consideration, the Members may, as they consider appropriate, by resolution, make, amend or revoke the local area plan.

If the Members decide to materially alter the draft Plan, a further period of public consultation will be necessary and the planning authority must screen the proposed material alterations to determine if a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) or both are required for any of the Material Alterations. This screening, and if necessary, the SEA or AA, must be carried out before proceeding to the further public consultation period.

The public display period of any Material Alterations is for a minimum of four weeks. Submissions or observations with respect to the proposed Material Alterations only will be taken into account, before the local area plan is made. The Elected Members must consider proposed Material Alterations to the

local area plan, any environmental reports and the CE Report on any observations/submissions received and decide whether to make the local area plan with or without the Material Alterations.

Section 20(3)(r) of the Planning and Development Act 2000 (as amended) states that the Members of the MCC are restricted to:

- Considering the proper planning and sustainable development of the area,
- The statutory obligations of any local authority in the area; and
- Any relevant policies or objectives for the time being of the Government or any Minister of the Government.

In addition, the Members, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the *'Code of Conduct for Councillors'* (July 2019) prepared under the Local Government Act 2001 (as amended), carry out their duties in a transparent manner, must follow due process and must make their decisions based on relevant considerations.

Section 2 List of Persons/Bodies who Made submissions

During the public consultation period of a total of 46 submissions/observations were received. The list of persons, prescribed bodies, groups and stakeholders who made valid submissions is listed in Table 2.1.

Table 2.1: Persons/Organisations who made Submissions/Observations

List of Persons, Bodies or Organisations who made Submissions or Observations		
Submission Number:	Name	Chapters/Topic
MYO-C63-1	Harry Barrett	Aarhus Convention
MYO-C63-2	Martin & Helen Geraghty	Rezone lands for Residential
MYO-C63-3	Michael Geraghty	Rezone lands for Residential
MYO-C63-4	Environmental Protection Agency	SEA content
MYO-C63-5	John O'Sullivan	Rezone lands for Residential
MYO-C63-6	Transport Infrastructure Ireland (TII)	Northern Orbital Ring Road & Rezoning lands for Residential
MYO-C63-7	Mulranny Amenity Centre Ltd	Rezone lands for Residential & Recreation
MYO-C63-8	Brian Moran	Northern Orbital Ring Road & Rezoning lands for Residential
MYO-C63-9	Grady Architects on behalf of Roonith Properties (TML Properties)	Rezone lands for Residential
MYO-C63-10	Mayo Dark Skies	Ecologically friendly lighting practices
MYO-C63-11	Northern and Western Regional Assembly (NWRA)	Local Transport Plan, Zoning Quantity, Building heights & density study,

		Masterplans, Justification Tests.
MYO-C63-12	New Castlebar Track Group	New Outdoor Running Track
MYO-C63-13	Department of the Environment, Climate and Communications	Climate Action
MYO-C63-14	Tom Bourke and Padraic Walshe	Rezone lands for Residential
MYO-C63-15	Heather McMeel on behalf of An Post	Local Transport Plan
MYO-C63-16	Margaret Coyne	Rezone lands for Residential
MYO-C63-17	RMLA Planning Consultants on behalf of: Tesco Ireland Ltd.Tesco Ireland	Draft Local Transport Plan
MYO-C63-18	Primbrook Investments Ltd.	Rezone lands for Mixed Use
MYO-C63-19	National Transport Authority (NTA)	Draft Local Transport Plan
MYO-C63-20	Brian Mac Donald	Rezone lands for Residential
MYO-C63-21	Francis Tuohy	Rezone lands for Residential
MYO-C63-22	Gene Mc Conway (Wyckam Ltd)	Castlebar Inner Relief Road
MYO-C63-23	Rosslee Residents Group	Rezone lands for Residential
MYO-C63-24	The Planning Partnership on behalf of John O'Donnell	Former Hat Factory
MYO-C63-25	John Flatley	Rezone lands for Residential
MYO-C63-26	Castlebar Athletic Club	New Athletics Track
MYO-C63-27	Michael McHale	Northern Orbital Ring Road & Rezoning lands for Residential
MYO-C63-28	Mary Kenny-Mulhare	Rezone lands for Residential
MYO-C63-29	Office of Public Works (OPW)	Flood Issues/SFRA of draft Plan
MYO-C63-30	Kathleen & Eamon Courell	Northern Orbital Ring Road & Rezoning lands for Residential
MYO-C63-31	Connie Durcan	The Waterways New Residential Zoning
MYO-C63-32	The Planning Partnership on behalf of: Lidl	Zoning to Reflect Existing Use
MYO-C63-33	Uisce Éireann (Irish Water)	SUDs, Road and Public Realm projects, availability of water services
MYO-C63-34	Mavenbrook Ltd	New Zoning Category
MYO-C63-35	Electricity Supply Board (ESB)	Access, Engagement, Electric Vehicle infrastructure
MYO-C63-36	Patrick Gallagher	Rezone lands for Residential
MYO-C63-37	Seamus Regan	Rezone lands for Residential
MYO-C63-38	David O'Malley and Associates on behalf of Seamus Neary	Rezone lands for Residential
MYO-C63-39	Office of the Planning Regulator (OPR)	Multiple Topics
MYO-C63-40	Maryland Residents Association	Enterprise and Employment Lands & Draft Local Transport Plan.

MYO-C63-41	Denise Magee	Rezone lands for Residential
MYO-C63-42	Grady Architects on behalf of Roonith Properties	Rezone lands for Residential
MYO-C63-43	Department of Housing, Local Government and Heritage	Built and Natural Heritage
MYO-C63-44	E. Mayock, F. Ó Clochartaigh, F. Nic Giolla Chatháin & T. Ruane	New Irish Secondary School
MYO-C63-45	Tom Murray	Northern Orbital Ring Road
MYO-C63-46	Department of Education	Education comments

Section 3 Office of the Planning Regulator & Prescribed Bodies

3.1 Office of the Planning Regulator

Submission No.	MYO-C63-39
Submission by:	Office of the Planning Regulator (OPR)
Issues Raised/Relevant Chapter(s):	See below.
Summary of Submission:	
<p>The submission sets out the role of the OPR and includes 5 no. Recommendations and 4 no. Observations under 10 no. Key Themes relating to the draft Plan, as follows:</p> <p>Key Theme 1: Consistency with the Regional, Spatial and Economic Strategy Key Theme 2: Consistency with Development Plan and Core Strategy Key Theme 3: Compact Growth, Zoning and Tiered Approach to Zoning (<i>Recommendations 1</i>) Key Theme 4: Town Centre Regeneration (<i>Recommendations 2 and Observations 1</i>) Key Theme 5: Economic Development and Employment (<i>Recommendation 3</i>) Key Theme 6: Transport & Mobility (<i>Recommendation 4</i>) Key Theme 7: Flood Risk Management and Surface Water Management (<i>Recommendation 5 and Observation 2</i>) Key Theme 8: Environment, Natural & Built Heritage (<i>Observations 3</i>) Key Theme 9: Implementation and Monitoring (<i>Observation 4</i>) Key Theme 10: General and Procedural Matters</p> <p>The submission states their recommendations as listed above relate to clear breaches of relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Section 28 Ministerial guidelines. The Planning Authority is required to implement or address recommendation(s).</p> <p>Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of the Plan on issues that are required to ensure alignment with policy and legislative provisions. The planning authority is requested by the Office to action these observations.</p>	
Key Theme 1: Consistency with the Regional, Spatial and Economic Strategy	
The OPR considers that the draft LAP is generally consistent with the regional policies contained RSES for the Northern and Western Region.	
Chief Executive's Response and Recommendation:	
<p>Response Comments noted</p> <p>Recommendation No change to draft Plan.</p>	

Key Theme 2: Consistency with Development Plan and Core Strategy

The OPR considers that the housing targets and policies/objectives of the draft LAP are generally consistent with the Mayo County Development Plan 2022-2028 & its Core Strategy, except where mentioned further in their report.

Chief Executive's Response and Recommendation:

Response

Comments noted.

Recommendation

No change to draft Plan.

Key Theme 3: Compact Growth, Zoning and Tiered Approach to Zoning – Recommendation 1

OPR Recommendation 1:

The OPR states having regards to section 19 (2) of the Act 2000 (as amended) sections 28 guidelines (*Development Plan Guidelines (2022)*, *Sustainable development of Urban Areas: Cities, Towns and Villages (2009)*), Town Centre First Policy and various National & Regional Policy Objectives that the planning authority is required to make 5 changes to the draft LAP.

- i. Provide a clear core strategy table setting out quantum of housing to be delivered in 'Town Centre', 'existing residential' and 'new residential' with appropriate densities applied.
- ii. Ensure residential zoned lands are in accordance with Core Strategy of CDP and that the zoning of 'New Residential' aligns with quantities of land necessary to accommodate housing targets within CDP Core Strategy.
- iii. Omit site RS13 (New Residential- (Waterways)) from plan due to its periphery location and proximity to flood zone.
- iv. Provide infrastructural assessment for lands zoned Strategic Residential Reserve.
- v. Omit two Strategic Residential Reserve sites to south of town
 - a. East of N84 and West of Milebush football pitch
 - b. North of L1704 and East of Lios na Circe

Chief Executive's Response and Recommendation:

Response:

- i. An additional table has been included in Chapter 2 – Development Strategy illustrating the Allocation of Residential Units / Land Requirements on Lands Zoned New Residential, Existing Residential and Town Centre.
- ii. Proposed Amendment CH 2.7 of the Material Amendment Stage of the Mayo County Development Plan 2022-2028 included a revised Core Strategy, which allocated 553 housing unit targets for Castlebar with a land requirement of 36.87 ha. This housing target was increased to 708 housing units by the Elected Members. However, no additional lands could be zoned at Material Amendment stage to accommodate the additional housing units. Therefore, in addition to New Residential lands, the surplus of 155 housing units for Castlebar

are to be accommodated on lands zoned Town Centre/Opportunity Sites and/or Existing Residential within the plan area.

Following a review of lands zoned ‘New Residential’, the land use zoning map for Castlebar have been amended to reduce the quantum of ‘New Residential’ zoned land, to meet housing targets over the plan period, as set out in the Core Strategy (36.87Ha). This results in a reallocation of the previously identified ‘New Residential’ to ‘Existing Residential’, which have also been mapped. Sites previously zoned New Residential sites have been rezoned ‘Existing Residential’ having regard to extant permissions where significant works have commenced. The redesignation of these sites have ensured compliance with the CDP Core Strategy Figures.

- iii. Previously zoned New Residential site at “Watersway’ (RS 13) has been rezoned Existing Residential as it is in fact an ‘Unfinished Housing Estate’ where significant works have already been carried out. The resolution of Unfinished Housing Estates such as The Waterways is an on-going priority of Mayo County Council, in conjunction with the Housing Agency. The Waterways is one of Mayo’s last Unfinished Housing Estates requiring resolution. Zoning the lands ‘Existing Residential’ is a vital tool in any such resolution.
- iv. An infrastructural capacity assessment for land zoned ‘Strategic Residential Reserve’ has been completed.
- v. The OPR requests the omission of two lands zoned ‘Strategic Residential Reserve’ as outlined below and the quantum of ‘Strategic Residential Reserve’
 - (a) – The ‘Strategic Residential Reserve’ lands have been reduced to exclude the existing residential dwellings and associated curtilages of two properties beside Solar 21 Park, Milebush and the property toward the southernmost point of the lands along the N84. The remaining ‘Strategic Residential Reserve’ lands along the N84 should be retained due to their fully serviced nature and proximity to the Castlebar Railway Station.
 - (b) – Comments noted. ‘Strategic Residential Reserve’ lands located North of L1704 and East of Lios na Circe have been removed.

Recommendation:

- i. Insert Table 2.2 and amend text in Section 2.8 Core Strategy as follows:

“It is critically important for the sustainable growth of Castlebar that future housing is delivered in a compact manner in accordance with sustainable principles and the NPF/RSES objectives, meeting housing need requirements. The allocation of residential units/land requirements is set out in Table 2.2 below. Furthermore, it is critically important to ensure that sufficient lands are zoned for employment uses in the town. This will provide employment for both people living in the town and within the wider catchment, which in turn will advance the economic growth of Castlebar.”

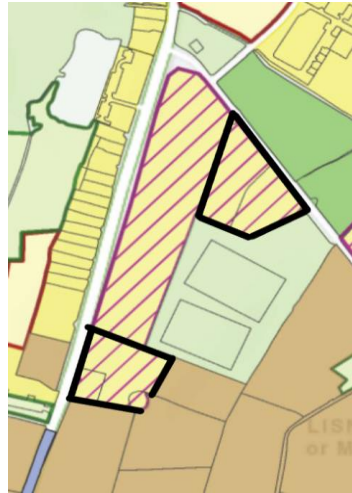
Allocation of Residential Units/Lands Requirements		
Land Zoning Category	Housing Units	Area
Town Centre /Opportunity Sites	55	3.66 ha
Residential Infill lands	100	10.33 ha
New Residential Lands	553	36.87ha.

Table 2.2 - Allocation of Residential Units/Lands Requirements

- ii. Amend the quantum of ‘New Residential’ lands in the Land Use Zoning Map to comply with the Core Strategy of the Mayo County Development Plan as set out in Appendix 1 of the CE

Report.

- iii. Amend Land Use Zoning Map to change 'New Residential' to 'Existing Residential'.
- iv. Amend Settlement Capacity Assessment (Appendix 1 of the draft Plan) to include an infrastructural capacity assessment and Map for 'Strategic Residential Reserve' lands as set out in Appendix 2 of the CE Report.
- v. Amend Land Use Zoning Map to remove parcels of 'Strategic Residential Lands' and rezone to 'Existing Residential' (a) and 'Agriculture' (b) as per Appendix 1 of the CE Report as follows:



(a)



(b)

Key Theme 4: Town Centre Regeneration – Recommendation 2 and Observation 1

OPR Recommendation 2:

The OPR recommends that the plan should have regard to NPO 6 & NPO 7 of NPF and the Town Centre First approach and states the planning authority is required to include & monitor measurable targets to reduce vacancy.

Chief Executive’s Response and Recommendation:

Response:

The Council (MCC) will have regard to the aforementioned documents referred to in Recommendation 2.

MCC will actively seek to reduce vacancy in Castlebar within the lifetime of the plan through progression of URDFs projects, reduced rates in the Development Contribution Scheme for Opportunity Sites and Vacant/Derelict Sites, RZLT sites and the Town Centre First Approach. A Town Centre Health Check for Castlebar carried out on Q3 of 2022 which showed a commercial vacancy rate of 16.2%. Furthermore, the Geodirectory established an overall commercial vacancy rate for Castlebar of 20.8% (Geodirectory Q4 – 2022). MCC will monitor the effectiveness of the aforementioned instruments in reducing vacancy. The GOAD classification to Castlebar Town Centre Health Check and the latest Geodirectory will provide the basis for the monitoring of the success of the aforementioned measures to reduce vacancy.

Recommendation:

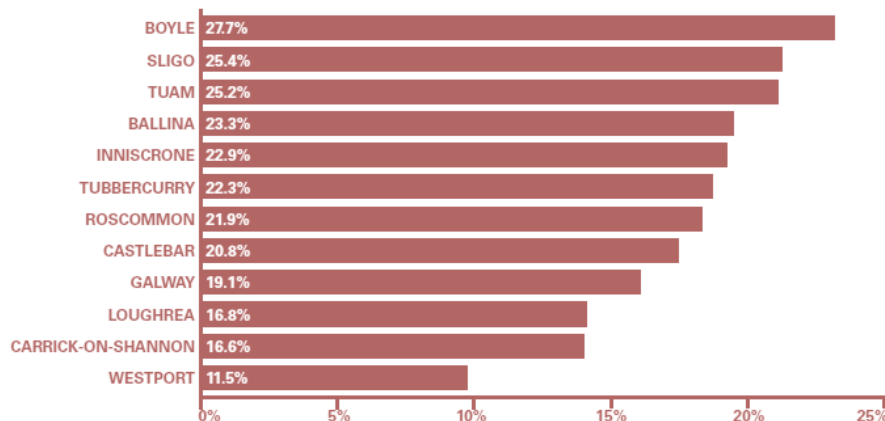
Amend last sentence of Section 4.3.2 as shown below:

“This shift has had adverse impacts on the traditional town centre area from an aesthetic and economic perspective leading to ~~due to~~ an increased vacancy rate of ~~20.85%~~ (Geodirectory Q2 of 2022).”

Amend last sentence of Section 5.6.2 (iii) as shown below:

“Figure 5.1 below shows the national vacancy rate stands at ~~14.3%~~ and the rate for the Castlebar stands at 20.85% (Q4 ~~2~~ 2022),”

Amend Figure 5.1 of draft Plan as shown below:



Source: GeoDirectory Database

Figure 5.1 – Commercial Vacancy Rate by Town Q4 2 of 2022

Amend paragraph under Section 5.6.2 (iii) Vacancy as shown below:

“Mayo County Council has carried out a building use survey of Castlebar town centre (See Figure 5.2 below) in Q3 of 2022. The survey showed the town centre of Castlebar contains a wide variety of activities from retail, office and residential uses to municipal buildings. It offers a range of convenience and comparison shops, pharmacies, cafés and restaurants, and public houses. The survey established a retail/commercial vacancy rate of the LAP town centre zoned area within the plan of the Castlebar town centre at 16.220.5%. The Geodirectory commercial vacancy rate for town of Castlebar is 20.8% (Q4 2022)“

Insert Castlebar Town Centre Health Check Map (GOAD Classification) as Figure 5.2 under Section 5.6.2 (iii) Vacancy as shown below:

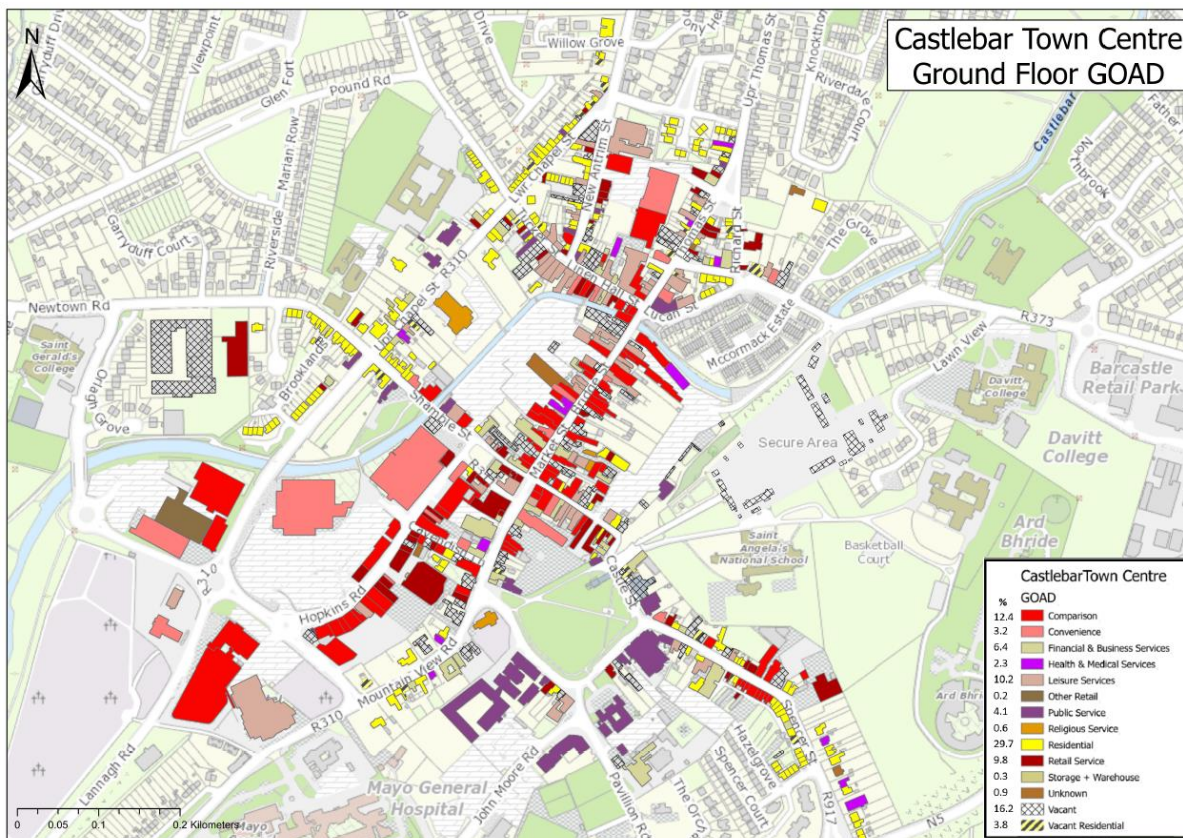


Figure 5.2 Castlebar Town Centre Health Check

OPR Observation 1:

The OPR advises to review and revise development frameworks for key opportunity sites and provide clearer parameters for their future development (layout, massing, materials etc.) having regard to NPO 6, Section 5.7 of Local Area Plan Guidelines for Planning Authorities (2013) and the Town Centre First, A Policy Approach for Irish Towns (2022).

Chief Executive’s Response and Recommendation:

Response:

The Opportunity Sites of the draft Plan have been reviewed and reduced from 10 to 6 Opportunity Sites. MCC will facilitate or coordinate preparation of urban design frameworks/masterplans for Opportunity Sites. Associated text on pages 44, 47, 51 and 57 have been amended. TCO 8 of the plan has been amended accordingly.

Recommendation:

Amend Chapter 4 to remove Opportunity Sites 2, 3, 6 and 10 and associated maps from the draft Plan and adjust accordingly.

Amend **TCO 8** as shown below:

“Mayo County Council ~~Developers will be required to~~ prepare, or coordinate as appropriate, urban design frameworks/masterplans for the Opportunity Sites in Castlebar Town Centre to inform future development proposals.”

Amend text to sentences 3 of paragraph two of Section 4.5.2 Regeneration Strategy Approach as shown below:

“Development proposal on Opportunity Sites ~~must be consistent with~~ will require developers to ~~prepare~~ urban design framework(s)/masterplan(s) to inform their future development.”

Amend text on pages 44, 47, 51 and 57 as shown below:

“Proposals for development on ~~an~~ appropriate opportunity sites shall be guided by the urban design frameworks/masterplans prepared by Mayo County Council ~~accompanied by a site brief~~ and should comply with national guidelines (as appropriate) towards achieving sustainable compact development and to integrate principles of good urban design and placemaking.”

Key Theme 5: Economic Development and Employment – Recommendation 3

OPR Recommendation 3:

The OPR makes comment on the need to provide a focused and evidence-based approach to the ‘Enterprise & Employment’ zonings and demonstrate that such zonings are appropriately sequential and integrated with land use and transport planning. Multiple National Planning Objectives, Regional Planning Objectives, County Development Plan Objective SO 12 and various Section 28 Guidelines are quoted and the OPR recommends for the planning authority to:

- i. Provide robust evidence-based justification for extent and location of ‘Enterprise & Employment’ lands and an infrastructural capacity audit for zoning in line with *Development Plans, Guidelines for Planning Authorities (2022)*. Assessment of these lands should identify quantum and distinguish between types of commercial/industrial land uses that will generate different levels of employment. The OPR suggests reconsideration of lands on the back of the evidence-based assessment with particular reference to the lands located to the south-west of the town and west of the N84.
- ii. Omit ‘Enterprise & Employment’ zoned lands located south of Saleen Lough and east of rail line due to their peripheral and poorly serviced location and their risk of flooding and lack of active travel/public transport.

Chief Executive’s Response and Recommendation:

Response

- i. Castlebar is designated as a Key Town in the RSES and has a role of a regionally strategic employment centre of significant scale that can act as a regional driver to support and complement the higher-order urban areas within the RSES settlement hierarchy.
The existing ‘Enterprise & Employment’ lands in Castlebar are at full capacity. Therefore, it is of critical importance for the economic growth of Castlebar to have sufficient strategic employment sites available in the plan area to attract and retain business/jobs and deliver

a more balance, compact regional development.

The proposed undeveloped 'Enterprise & Employment' lands in the plan area are fully serviced/serviceable and are supported by sustainable travel options / active travel measures in the Castlebar LTP. An infrastructural capacity audit of 'Enterprise & Employment' zoned lands both developed and undeveloped (see Appendix 2 of CE report – Settlement Capacity Audit).

The subject lands located to the south-west of the town and west of N84 are adjoining an established logistics enterprise (KOG Logistics) and are in close proximity to the recently opened N5 dual carriageway to Westport. This will allow for creation/further expansion of existing enterprises at this location which will further help promote and enhance the sustainable development of the Castlebar-Westport Growth Cluster (CWEG). Development proposals at this location will be accessed to ensure compliance with Policy MTP 23 of Volume I and Section 7.2 (Access onto National Roads) of Volume II of the Mayo County Development Plan 2022-2028.

- ii. The draft LTP has been amended to ensure sustainable transport alternatives are available to access these 'Enterprise and Employment' lands. The LTP proposes upgraded cycling and pedestrian facilities extended along the N84, with a proposed permeability links into the 'Enterprise and Employment' lands. The draft Zoning Map and SFRA have been amended to remove any 'Enterprise & Employment' lands from Flood Zone A and B. In addition, 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.

Recommendation

- i. No change to draft Plan.
- ii. Amend Land Use Zoning Map (Appendix 1 of CE Report) for the 'Enterprise and Employment' lands located south of Saleen Lough and east of rail line to 'Open Space' located within Flood Zone A/B.

Key Theme 6: Transport & Mobility – Recommendation 4

OPR Recommendation 4:

The OPR recommends having regard to NPO's 27, 54 & 64 of the NPF, RPO 6.26 of RSES and MTO1 of CDP to review of Chapter 7 Movement and Transport chapter to provide clearer policies/objectives regarding the delivery and phasing of projects within the Local Transport Plan and clear mapping to illustrate key active travel schemes to be delivered during life of plan.

The OPR also comments that in the absence of robust evidence to support the delivery of the entire Northern Orbital Ring Road in the LTP, justification of the route should be reviewed and if necessary, omission of its reference in table 7.5 of LAP (and amend land use zoning map accordingly). Consultation with the National Transport Authority is recommended.

Chief Executive's Response and Recommendation:

Response:

Clearer policies/objectives regarding the delivery and phasing of projects within the Local Transport Plan and clear mapping to illustrate key active travel schemes to be delivered during life of plan through incorporation of the LTP into the LAP, both in Chapter 7 and as an Appendix. This will ensure that the LAP will align with the Local Transport Plan. Narrative to be updated accordingly and new mapping showing LTP proposals aligned with LAP zoning etc. will be included.

Table 7.1 (Schedule of Proposals) has been amended to align with the revised Castlebar LTP.

The Northern Orbital Ring Road is indicated as an indicative route under Policy MTO 7 of the draft LAP, which is subject to change. The LTP includes a rationale for the northern section of the Northern Orbital Ring Road (NORR). It is also a project listed in the Mayo County Development Plan 2022-2028.

The remainder of the NORR has been included in the LAP/LTP as a long-term aspiration for a future transport corridor that may be required for active travel, public transport and access for potential long-term future development within the principle of compact growth. The route could unlock potential in the future for additional management of traffic in the town centre area, enabling more allocation of road space on town centre streets to public realm enhancements, active travel and public transport, providing an overall positive mode shift. This route would be subject to further analysis in the future in line with normal application procedures and processes.

Section 7.7.2 of the draft Plan has been amended to indicate that the delivery of the remainder of the NORR is a long-term aspiration of MCC and will be subject to future analysis in line with normal application procedures and processes.

Objective MTO 8 and MTO 9 have been amended to ensure greater integration with the LTP.

Recommendation:

- Amend plan to replace Figures 7.2 and 7.3 with new Figure 7.2 – Map of Outline Proposals as shown below:

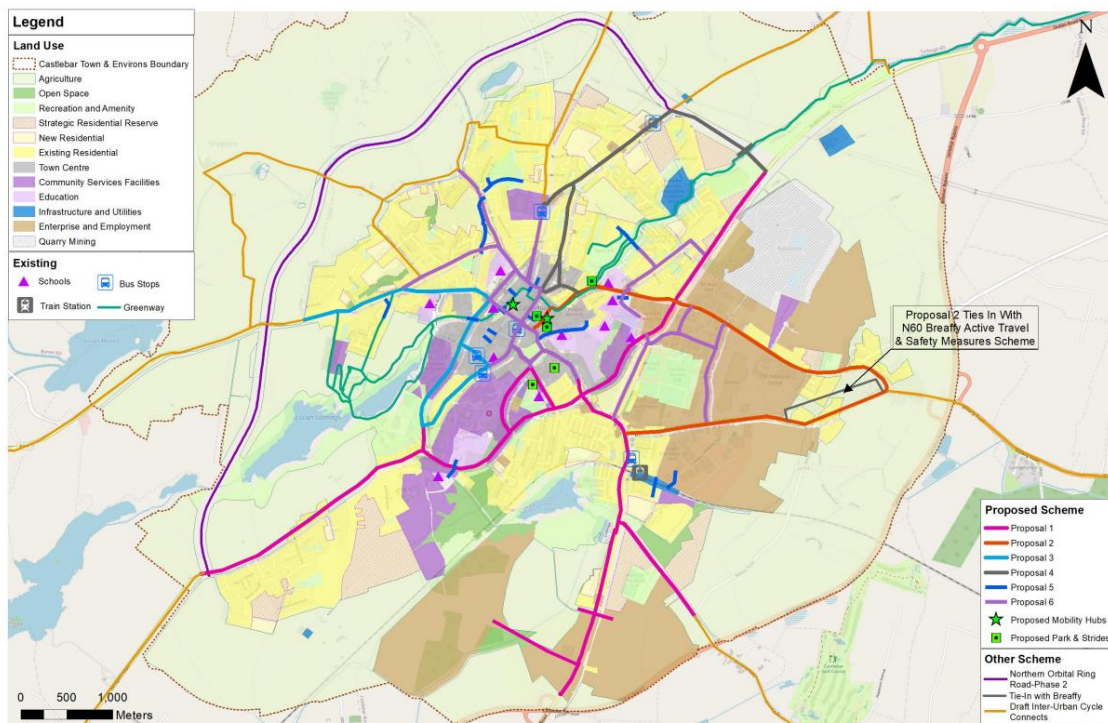


Figure 0-1 Map of Outline Proposals

- Amend Table 7.1 Schedule of Proposals as follows.

Scheme Infrastructure/Measures	Timeline			Total (quantity)
	Short (Proposals 1 & 2)	Medium	Concurrent/ Parallel	
Proposed/Upgraded Cycle Facilities (km per direction)	3027.26km	13.8km	4.3km	485.37km
Upgraded Pedestrian Facilities (km)	26.69km	12.3km	4.3km	43.25km
Proposed Pedestrian Facilities (km)	1.92km	1.5km	-	3.42km
Proposed Junction Upgrades	8	7	1	16
Proposed Traffic Management with One-Way Traffic Flow		2		2
Proposed Controlled Crossings	384	24	2	620
Upgraded Permeability Link	-	-	7	7
Proposed Permeability Link	42	1	119	162
Proposed Active Travel Bridge	-	-	1	1
Proposed Park & Stride	5	-	-	5
Proposed Mobility Hub	1	1	-	2
Road link (Phase 1 Northern Orbital Ring Road)		0.74km		0.74km

Table 7.1 Schedule of Proposals

- Insert new Appendix 2 into draft Plan to include the Castlebar Local Transport Plan.
- Amend paragraph 2 of Section 7.7.2 of the draft LAP to read as follows:

“A Northern Orbital Ring Road (NORR) aims at providing a regional route, by-passing the built-up area to the north and west of the town. The route runs from the immediate edge of the Plan boundary on the Westport side of the town and connects to the N5 east of the town. A specific section of this route (c. 0.74km) - ‘Phase 1’ of the NORR Northern Orbital Ring Road has been prioritised by the Castlebar LTP. This section provides an immediate link between the Turlough Rd and the N5 which will also include essential active travel infrastructure. The delivery of the reminder of the indicative NORR is a long-term aspiration of Mayo County Council and will be subject to future analysis in line with normal application procedures and processes.”

- Amend Castlebar Local Area Plan Objective MTO 8 as follows:

MTO 8

“Support the implementation of all sustainable transportation infrastructural schemes (1-6) ~~measures and actions set out proposed in the Castlebar Local Transport Plan as set out in Appendix 2 of the LAP. once completed and adopted by the council in accordance with proper planning and sustainable development~~”

- Amend Castlebar Local Area Plan Objective MTO 9 as follows:

MTO 9

“Support ~~the;~~ encourage and promote modal shift in Castlebar to meet mode share ambitions set out in Table 7.2 (Castlebar LTP Mode Share and Modal Shift Ambitions to 2029) by measures such as but not limited to the following:

- Reduction in dependency on the private car*
- Discouragement of vehicular through traffic*
- Enhancement the public realm through traffic management and transport interventions*
- Development of public transport services.*
- Provision of transport demand management measure”*

Key Theme 7: Flood Risk Management and Surface Water Management – Recommendation 5 & Observation 2

OPR Recommendation 5:

The OPR requires the planning authority to carry out the following having regard to Flood Guidelines (2009) and relevant regional and national policy objectives RPO'S 3.10/3.11 & NPO 57:

- i. Carry out revised Strategic Flood Risk Assessment (SFRA) for Draft LAP having regard to Flood Guidelines including a Stage 3 detailed Flood Risk Assessment (FRA) with most up to date flood modelling & climate change scenarios that align with Mid-Range Future Scenario set out by the OPW or with the High-End Future Scenario.
- ii. Review Justification Tests within SFRA to ensure compliance with box 4.1 of Flood Guidelines. In particular
 - a. Justification Tests should only apply zoned lands within or adjoining the urban centre and not in peripheral areas. Zonings should only be assessed against criteria for Plan Making Justification test when avoidance and substitution are not possible.
 - b. Specify structural/nonstructural measures as prerequisites for development, provide information on residual risks that would remain and how they are managed in the Plan-making Justification Test for **Opportunity Site 1 (The Hat Factory)**. The FRA must demonstrate that flood risk can be managed, and the development of The Hat Factory will not cause unacceptable impacts elsewhere.
 - c. Provide clarification that less vulnerable development is not appropriate in Flood Zone A of **Opportunity Site 3 (Lannagh Road)**.
 - d. Provide clarification that only water compatible development should be placed on Flood Zones A & B of Education zoning (SFRA ref. Site A.9.3) at St Anthony's Special School.
 - e. Should the Northern Orbital Route be included in plan, a full plan making Justification Test should be carried out.
- iii. Overlay Flood Zones A&B on land use zoning maps.
- iv. Ensure consistency between final land use zoning maps and Justification Tests and mapping in the SFRA.

Where lands fail Justification Test, the zoning objective should not facilitate highly (A/B) or vulnerable (A) development. Consultation with OPW is recommended.

Chief Executive's Response and Recommendation:

Response:

- i. Comments noted. JBA on behalf of MCC has consulted with the OPW in terms of the use of the OPW PFRA mapping, it was confirmed that the PFRA mapping should be removed. The SFRA report to be amended accordingly.
Add a Policy/Objective to apply an avoidance or Flood Risk Assessment (FRA) within a 30m margin from any unmapped watercourse.
- ii. Comments noted.
 - a. Comments noted. Justification Tests for the Agriculture and Recreation & Amenity zoned lands contained in the SFRA will be removed.
 - b. Opportunity Site 1 (The Hat Factory) a Site-Specific Flood Risk Assessment shall be

prepared for the redevelopment of the old Hat Factory site at development management stage in advance of any works on site. Structural/non-structural measure may include but not limited to the provision of a new surface water sewer off the existing culvert along the Newport Road.

- c. Opportunity Site 3 (Lannagh Road) has been removed.
- d. Comments noted. The extent of 'Educational' zoning has been revised to accurately reflect the school site. This adjustment ensures the educational zoning at this location is outside Flood Zone A/B.
- e. Comments noted. The SFRA will be amended to include a Justification Test for the Northern Orbital Route.

iii. Comments noted. Castlebar land use zoning map with flood (A/B) overlay to be included in Section 8 of the SFRA

iv. Comments noted.

Recommendation:

- i. Amend Strategic Flood Risk Assessment (SFRA) to remove PFRA mapping and update report accordingly.

Insert new sub-point f) to Objective IESO 1 of the Draft Castlebar LAP to read as follows:

“f) To apply the avoidance approach for new development vulnerable to flooding within a 30m margin from any unmapped watercourse within the plan area, or where an avoidance is not possible, require a detailed flood risk assessment to minimise the potential of future flood risk in accordance with the requirements of “The Planning System and Flood Risk Management Guidelines for Planning Authorities”, DECLG and OPW (2009) and any revisions thereof and consider the potential impacts of climate change in the application of these guidelines.”

- ii. The draft Plan and the Strategic Flood Risk Assessment (SFRA) will be adjusted accordingly.
 - a) Remove Justification Tests in the SFRA for lands zoned Agriculture and Recreation & Amenity.
 - b) SFRA to be adjusted accordingly.
 - c) Amend plan to remove Opportunity Site 3 (Lannagh Road). See CE Recommendation to [OPR Observation 1](#).
 - d) Amend land-use zoning map (See Appendix 1 of CE Report) for lands at St Anthony's Special School to exclude Flood Zone A and B
 - e) SFRA to be adjusted to include Justification Test Northern Orbital Ring Road.
- iii. Insert amended land-use zoning map with flood overlay of the beginning of Section 8 of the SFRA
- iv. SFRA will be adjusted accordingly.

OPR Observation 2:

The OPR request the carrying out of the following, having regards to RPO 8.22 and NPO 57 and the Flood Guidelines (2009):

- i. Provide a more prescriptive approach to surface water management policies/objectives where it will be required to implement SUDs and Nature Based Solutions in all developments throughout settlement.

- ii. Clearly reference Nature Based Solution to the *Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document (2022)*
- iii. Consider providing additional guidance on SUDs/Green Infrastructure for Opportunity Sites.

Chief Executive’s Response and Recommendation:

Response:

The Council will have regard to the aforementioned documents referred to in Observation 2.

- i. Comments noted. A more prescriptive approach has been applied to Surface Water Management.
- ii. Comments noted.
- iii. Comments noted. A new paragraph for SuDs/Green Infrastructure guidance for Opportunity Sites has been added.

Recommendation:

- i. Amend part (b) of TCO 3 as shown below

TCO 3:

(b) Ensure the highest quality of public realm and urban design principles are applied in the town centre, and the opportunity areas identified in this Proposed Plan. The success of the public realm is high quality, easily maintained street furniture, soft landscaping. Drainage solutions shall ~~should~~ be designed on the principles of SuDS.

- ii. Amend Section 3.4.7 to include the following:

“Nature based solutions shall have regard to the “Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document (2022)” and are defined by the International Union for Conservation of Nature as “actions to protect, sustainably manage, and restore natural or modified ecosystems that address societal challenges effectively and adaptively, simultaneously providing human wellbeing and biodiversity benefits”.

- iii. Amend last sentence in paragraph two of Section 4.5.2 Regeneration Strategy Approach as shown below:

“Proposals must also comply with national guidelines (as appropriate) towards achieving sustainable compact development and to integrate principles of good urban design, ~~and~~ placemaking, and implement Sustainable Drainage Systems (SuDS) and Green Infrastructure in Opportunity Sites, where appropriate.”

Key Theme 8: Environment, Natural & Built Heritage – Observation 3

OPR Observation 3:

The OPR states:

- i. Having regards to NSO 7, NPO 17 of NPF and RPO’s 5.13/5.14 of RSES, the Planning Authority should consider providing maps which identify zones of architectural potential, national monuments and properties on Record of Protected Structures.
- ii. Having regards to NPO 58 of NPF and RPO 3.5 of RSES and the Local Area Plan Guidelines, the Planning Authority should consider providing maps indicating clear green infrastructure which will provide an initial inventory of green resources to conserve/enhance green

resources and to climate change mitigation/adaptation.

Chief Executive's Response and Recommendation:

Response:

- i. Comments noted. Maps illustrating architectural potential, national monuments and properties on Record of Protected Structures will form part of the final Plan.
- ii. Comments noted. Maps illustrating Green Infrastructure will form part of the final Plan.

Recommendation:

- i. Insert new map(s) for architectural potential, national monuments and properties on Record of Protected Structures in final Plan.
- ii. Insert new map illustrating Green Infrastructure in final Plan.

Key Theme 9: Implementation & Monitoring – Observation 4

OPR Observation 4:

Having regard to Section 6.2 of the Local Area Plan Guidelines (2013), the OPR suggests that a clear implementation and infrastructural delivery schedule is included in the draft LAP to ensure implementation of objectives of the LAP and that development is consistent with core strategy of the plan.

Chief Executive's Response and Recommendation:

Response:

Comments noted. An implementation and Infrastructural delivery schedule will be included in the final plan.

Recommendation:

Insert an implementation and Infrastructural delivery schedule in final Plan.

Key Theme 10: General and Procedural Matters

OPR General Comments:

The OPR makes comment on a couple of minor matters which are listed below for consideration:

1. Greater clarity could be provided on the land use zoning map regarding the colour tones used to distinguish between agricultural lands, open space and recreation & amenity; and
2. Sections 1.3 & 4.5.1 of the SEA Report appears to refer to the incorrect core strategy figures in the County Plan for Castlebar

Chief Executive's Response and Recommendation:

Response:

1. The colour tones used in the Draft LAP follow the RGB colours set out in Appendix B of the Development Plans Guidelines for Planning Authorities (2022), an outline was added to the Agricultural Zoning to help distinguish between the zonings. Outlines/hatching are incorporated to help distinguish between zonings.
2. The figures in Sections 1.3 & 4.5.1 in relation to Core Strategy figures will be updated accordingly.

Recommendation:

1. Amend colour tones to distinguish between Agriculture, Open Space and Recreation & Amenity as illustrated in Land Use Zoning Map as per Appendix 1 of the CE Report.
2. Amend the relevant sentence in Section 1.3 to read as follows:
“The Core Strategy of the Mayo County Development Plan 2022-2028 provides for a population allocation of 2,583 ~~2,347~~ persons for Castlebar over the plan period, which equates to approximately 708 ~~917~~ new houses.”

Amend the relevant sentence in Section 4.5.1 of the SEA to read as follows:

“The Core Strategy of the Mayo County Development Plan 2022-2028 provides for a population allocation of 2,583 ~~2,347~~ persons for Castlebar over the plan period, which equates to approximately 708 ~~917~~ new houses.”

3.2 Northern and Western Regional Assembly

Submission Number:	MYO-C63-11
Submission by:	Northern & Western Regional Assembly
Issues Raised/Relevant Chapter(s):	See below.
Summary of Submission:	
<p>The NWRA submission comments on the high level of consistency between the draft LAP, the RSES and the CDP, and includes the following recommendations:</p> <ol style="list-style-type: none"> 1. The Castlebar Local Transport Plan become an inherent part of the LAP. 2. The 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. 	
Chief Executive’s Response and Recommendation:	
Response:	
<ol style="list-style-type: none"> 1. See CE Response to OPR Recommendation 4. 2. See CE Response to OPR Recommendation 1 (i) and (ii). 3. See Objective TCO 7 of the draft Plan and Objective SSO 16 of the Mayo County Development Plan 2022-2028. 4. See CE Response to OPR Recommendation 1 (i) and (ii). 5. See CE Response to OPR Observation 1. 6. See CE Response to OPR Recommendation 5. 	

Recommendation:

1. See CE Recommendation to [OPR Recommendation 4](#).
2. See CE Response to [OPR Recommendation 1 \(i\) and \(ii\)](#).
3. No change to draft Plan.
4. See CE Response to [OPR Recommendation 1 \(i\) and \(ii\)](#).
5. See CE Recommendation to [OPR Observation 1](#).
6. See CE Recommendation to [OPR Recommendation 5](#).

3.3 Office of Public Works

Submission Number:	MYO-C63-29
Submission by:	OPW (Oifig na nOibreacha Poiblí)
Issues Raised/Relevant Chapter(s):	<p>Issues:</p> <p>Strategic Flood Risk Assessment (SFRA) Flood risk management, Absence of inclusion of a flood zone map in the Plan Use of PFRA mapping as a data source informing Flood Zones Zonings, water compatible development National Indicative Flood Mapping (NIFM) – peripheral area areas include NIFM watercourses. SFRA/Justification Test for Plan Making/Zoning Preliminary Flood Risk Assessment (PFRA) SFRA Appendix A / Justification Tests (various locations) Climate Change Impacts/ data sources Nature Based Solutions</p> <p>Chapters/Section:</p> <p>Volume 2/Strategic Flood Risk Assessment</p>
Summary of Submission:	
<p>The submission is made specifically in relation to flood risk management. The OPW welcome the acknowledgement of the Guidelines and preparation of Strategic Flood Risk Assessment (SFRA).</p> <p>The submission makes a number of observations and recommendations, as follows:</p> <ol style="list-style-type: none"> 1. Flood Zone Map: The absence of a flood zone map in the plan is noted. Recommended is the inclusion of one overall flood zone map for Castlebar in order to illustrate how land use zoning in the context of Flood zone A and B, be to scale and clearly legible. 2. Preliminary Flood Risk Assessment (PFRA): (a) The submission highlights that PFRA indicative flood maps have been superseded by recently published national indicative fluvial, coastal and groundwater flood mapping. It is recommended that mapping from 2012 should no longer be used. It is stated that planning 	

authorities may have to undertake their own assessments to inform the definition of flood zoned for areas less than 5km² that were not included in the National CFRAM and NIFM Programmes. Specifically, it is pointed out areas of Castlebar including Snugboro, New Antrim and Rural South have used PFRA as a data source for flood zone mapping. It is recommended that all PFRA mapping should be removed, and more robust sources of data used to inform the flood zones.

(b) The OPW recommend that Mayo County Council rezone undeveloped lands in flood risk areas as 'water compatible' type zonings; and in existing developed areas - development should be limited to minor development as per Section 5.28 of the Guidelines as amended by Circular PL2/2014 until such time as a Flood Risk Assessment can be carried out to inform the Flood Zones and planning decisions.

(c) In relation to Table A3 (Technical Appendices) of the Guidelines, in particular a requirement to demonstrate that a planned development could pass the flood risk management elements of the Justification test. It is recommended that a review of the flood risk data available be undertaken by MCC or if Stage 3 flood risk assessments are required for the areas of Snugboro, New Antrim and Rural South that have used PFRA as a data source.

3. National Indicative Flood Mapping (NIFM):

The submission highlights that there are some NIFM extents at periphery areas within the LAP boundary, despite the statement in Section 4.3 PFRA & NIFA of the SFRA which states that there are no NIFM water courses within the settlement boundary and that NIFM has been a flood risk data source for some areas in the zoning reviews.

4. Justification Test:

The submission highlights that each of the criterion of the Plan Making Justification Test must be satisfied to justify the zoning type. Where any of the criteria is not satisfied, the test has not been passed. As the periphery area of the Plan does not conform to Criteria 2 (which requires only land use zonings within or adjoining the urban centre of settlements targeted for growth). Therefore, the justification Test would not be applicable to the periphery of urban areas as the zoning/development cannot satisfy Criteria 2. Zonings should only be accessed against the criteria of the Plan Making Justification Test when avoidance and substitution have not been possible. Only when it can be demonstrated that sub-criteria of the test are satisfied can it be deemed to have passed.

The Justification Tests relating to Agricultural and recreation and Amenity zoning mentioned cannot satisfy all of Criteria 2, in such cases where avoidance and substitution for a periphery urban area at flood risk is not possible and the test criteria cannot be met it is recommended that a policy objective be attached to such zoning limiting the existing development to minor development and new development to water compatible development in Flood Zone A and less vulnerable water compatible development in Flood Zone B.

5. SFRA Appendix A Justification Tests / Garryduff (Section A.2.2):

The submission points out that the flood maps in the settlement zoning reviews for Garryduff do not correspond with the Land Use Zoning map, in particular the Justification Test refers to *Recreation and Amenity* zoning, but the zoning map demonstrates the land as *Open Space* and *New Residential*. Review of the mapping is recommended to ensure consistence across the draft Plan and any updating and/or discrepancies addressed.

6. Appendix A Justification Tests / Town Centre Zoning (Section A.4.1):

Justification Tests for *Town Centre* zoning is commented on, where development is proposed to be limited. The submission specifically refers to Opportunity Site(s) 1 and 3, see below.

Opportunity Site 1: The submission identifies the former Hat Factory site in relation to flood risk and the Justification Test, where it says “...potential future flood mitigation work may open the possibility for development”. The site is within Flood Zone B where highly and less vulnerable type development is proposed. The Test states that “development of change of use is not appropriate until such time as flood risk here has been mitigated and the SFRA updated to apply the Justification Tests for any opportunity sites/significant redevelopment”

It is requested that Mayo County Council specify the structural or non-structural measures as prerequisites to develop and provide information on the residual risks that would remain and how they might be managed in the Plan-making Justification Test.

Furthermore, it is stated that the flood risk assessment must demonstrate that flood risk can be adequately managed, and the use or development of the lands will not cause unacceptable impacts elsewhere. It should be clarified when this Justification Test for the Hat Factory site will be prepared and when it will be available. The submission advises – that all Justification Tests should be completed and included at draft Plan Stage to allow for full review.

Opportunity Site 3: The opportunity site at Lannagh Road is identified as an infill site where the Justification Test indicates that development will be limited. It highlights the type of development (infill highly vulnerable development, demolition and reconstruction) considered in the justification test for Flood Zone C; and further points out that less vulnerable development is not appropriate for Flood Zone A. No comment provided to less vulnerable type development (offices, employment). It is recommended that MCC transfer any restriction on development in the draft Plan.

7. Appendix A Justification Tests / Enterprise and Employment Zoning (Section A.8.2):

The submission points out that the *Enterprise and Employment* zoning located in the peripheral area of the LAP and surrounded by *Agriculture* zoning does not satisfy Criteria 2 of the Justification Test. It highlights that there are other areas surrounding the lands that are undeveloped and not at risk of flooding.

8. Appendix A Justification Tests / New Residential Zoning (Section A.9.1):

The submission comments on the New residential zoning near Saleen Lough. The submission points out that the lands within Flood Zone A and B is zoned *Agriculture* on the Land Use Zoning map which differs from the SFRA map which shows this land as *Open Space*. It is also stated that land surrounded by Agricultural zonings may not satisfy Criteria 2 of Justification Test.

9. Appendix A Justification Tests / Education (Section A.9.3):

It is highlighted that a portion of the site appear to be in Flood Zone A and B, described as existing and undeveloped *Community Facilities*. It is noted that it is not clear if there are other suitable alternative lands in areas at lower risk. The submission further points out that it is stated that only water compatible development should be placed in Flood Zone B”.

It is recommended that this be updated to Flood Zone A and B.

10. Proposed Road Route:

The inclusion of the proposed route of the road on the Land Use Zoning map is noted, particularly where it impinges on Flood Zones. It is pointed out that the Guidelines classification for primary transport is ‘highly vulnerable’ and zoning would not be appropriate to Flood Zones A and B unless a Plan Making Justification Test is completed by the local authority can be satisfied. It is further pointed out that local transport is less vulnerable though would not be appropriate in Flood Zone A unless a justification test is employed and passed. Works on bridges and culverts is restricted and subject to consents.

11. Climate Change Impacts:

The submission points out the potential impacts of climate change, the consideration for local

authorities and provisions in the Guidelines in respect of flood zones. It is advised that MCC can use the flood maps prepared under the National CFRAM and the national indicative flood maps (incl maps for two potential future scenarios) taking into account the degrees of climate impact. These maps can be used to inform and avoid zoning development in areas potentially prone to flooding in the future.

It is clarified that the NIFM data source includes two potential future scenarios for climate change (inclusive of modelling) and is available.

12. Nature Based Solutions:

The OPW advises that the preparation of development plans should take account of nature passed solutions to reduce run-off and benefits to water quality and biodiversity. It is suggested that MCC refer to the Best Practice Interim Guidance Document '*Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas*' for further guidance.

It is highlighted that there are 10 Opportunity Sites identified in the draft Plan and large undeveloped zonings where integrated and area based provisions of SuDS and green infrastructure may be appropriate.

13. Arterial Drainage Schemes:

It is requested that MCC has regard to the access requirements and preservation of same for the maintenance of Arterial Drainage Schemes on zoned land for development. In particular where applications are made on lands identified as benefitting land prone to flooding and as such site-specific flood-risk assessment may be required.

14. Errata (Strategic Flood Risk Assessment):

It is pointed out that there are a number of referencing errors to be corrected in the Strategic Flood Risk Assessment, as follows:

- (a) The incorrect reference is cited in Section 4 of the SFRA, which references 'LCC' and should be 'MCC (Mayo County Council)'.
- (b) Objective IESO 1(b) (Section 6) refers to the 'River Shannon Catchment Flood Risk and Management Plan'. This should be corrected to the 'Moy-Killala Bay Catchment Flood Risk and Management Plan'.

Chief Executive's Response and Recommendation:

Response:

1. See CE Response to [OPR Recommendation 5 \(iii\)](#).
2. (a) Comments noted. See [CE Response to OPR Recommendation 5 \(i\)](#).
(b) Relevant undeveloped lands within the built-up area of Castlebar have been zoned/rezoned to the water compatible 'Open Space' zoning category.
(c) Comments noted. See response 2(a) above.
3. Comments noted. The SFRA has been amended accordingly.
4. Comments noted. Justification Tests for Agriculture and Recreation & Amenity zoned lands contained in the SFRA has been removed. New objective has been included to ensure only minor developments to existing developments and new water compatible developments are permissible.
5. Comments noted. The Justification Test for Garryduff (Section A.2.2) contained in the SFRA has been amended accordingly.
6. Comments noted. See CE response to [OPR Observation 1](#).
Town Centre Opportunity Site 1 – See [CE Response to OPR Recommendation 5 \(ii\) \(b\)](#).

Town Centre Opportunity Site 3 has been removed ([See CE Recommendation on OPR 5 \(ii\) \(c.\)](#))

7. Comments noted. See CE Response to [OPR Recommendation 3 \(ii\)](#).
8. The SFRA has been updated to remove the Justification Tests for the subject 'Agricultural' lands and lands surrounded by the agricultural zoning.
9. Comments noted. The extent of 'Educational' zoning has been revised to exclude flood zone A/B (See CE response to [OPR Recommendation 5 \(ii\) \(d\)](#)).
10. Comments noted. The SFRA has been amended to include Justification Test for the Northern Outer Ring Road.
11. Comments noted. The Climate Change future scenario mapping will be included in the SFRA.
12. Comments noted. See CE Response to [OPR Observation 2 \(ii\)](#).
13. Comments noted. An additional objective for riparian zones has been added.
14. Comments noted.

Recommendation:

1. See CE Recommendation to [OPR Recommendation 5 \(iii\)](#).
2. (a) See CE Recommendation to [OPR Recommendation 5 \(i\)](#).
(b) See CE Recommendation to [OPR Recommendation 3 \(ii\)](#) and [5 \(iii\)](#)
(c) See CE Recommendation to [OPR Recommendation 5 \(i\)](#).
3. Amend paragraph two of Section 4.3 (PFRA & NIFM) of the SFRA to read as follows:
"The PFRA fluvial data has now been replaced by NIFM fluvial flood extents, however, this is only the case where CFRAM flood outlines are not provided and where the catchment is greater than 5km². There are ~~no~~ some NIFM watercourses at periphery areas within the settlement boundary of Castlebar."
4. See CE Recommendation to Point 2(b) above. In addition, Justification Tests in the SFRA to 'Agricultural' zoned lands and 'Recreation and Amenity' zoned lands to be removed.
5. SFRA to be adjusted accordingly.
6. See CE Recommendation to [OPR Recommendation 5 \(ii\) \(b\) for Opportunity Site 1](#).
See CE Recommendation to [OPR Recommendation 5 \(ii\) \(c\) for Opportunity Site 3](#).
7. See CE Recommendation to [OPR Recommendation 3 \(ii\)](#).
8. Amend the SFRA to remove Justification Test A.9.1.
9. Amend the SFRA to remove Justification Test A.9.3 (See CE Recommendation to [OPR Recommendation 5 \(ii\) \(d\)](#)).
10. See CE Recommendation on [OPR Recommendation 5 \(ii\) \(e\)](#). Amend the SFRA to include a Justification Test for the route of the Northern Orbital Ring Road.
11. The SFRA will be amended to include a Climate Change future scenario mapping overlay on land-use zoning map.
12. See CE Recommendation on [OPR Observation 2 \(ii\)](#).
13. Insert new objective to Designated Site Objectives after NEO 1, as shown below:
"To promote and protect native riparian vegetation along all watercourses and ensure that a minimum 10m vegetated riparian buffer from the top of the riverbank is maintained/reinstated along all watercourses within any development site."

14. Amend the SFRA to correct all referencing errors.

3.4 Uisce Éireann (Irish Water)

Submission Number:	MYO-C63-33
Submission by:	Irish Water (Uisce Éireann)
Issues Raised/Relevant Chapter(s):	Issues: Sustainable Drainage; Road and Public Realm projects; Availability of Water Services; Zoning; Wastewater Infrastructure; and Water Supply Infrastructure
Summary of Submission:	
<p>The submission comments on the public water services as per the Draft Castlebar LAP 2023-2029. The following observations and comments have been provided:</p> <ol style="list-style-type: none">1. SuDS and Green/Blue Infrastructure is encouraged in new development, public realm and retrofitting of existing development being a cost effective and sustainable means of managing storm water/pollution. Uisce Éireann is happy to engage with the planning authority in progressing nature-based rainwater management in line with best practice guidance.2. Standards & Codes of Practice: The submission highlights that projects relating to the public realm, active travel and roads have potential to impact Uisce Éireann’s assets. Therefore, development in the vicinity of such assets must accord with their Standard Details and Codes of Practice; and Diversion Agreements will be required were Uisce Éireann assets require alteration or diversion, as appropriate.3. Water Service Availability & Zoning: the submission indicates that localised network upgrades may be required, particularly in areas served by sewers with a diameter of 150mm or less, or watermains with a diameter of 80mm or less; while more significant reinforcements are likely to be necessary to serve Strategic Residential Reserve Lands. Therefore, to maximise use of existing water services, phased sequential development is encouraged in areas with existing water services infrastructure and space capacity. 3(a) The discharge of additional surface water to the combined (foul & surface water) sewers is <u>not permitted</u>. 3(b) Network reinforcement i.e. upgrade or extension shall be developer driven unless there is a committed Uisce Éireann project in place to progress works. 3(c) All new residential and commercial/industrial development seeking connection to the network shall be assessed on a case-by-case basis via Uisce Éireann’s New Connections process and will be subject to the Uisce Éireann’s Connections Charging Policy. 3(d) Third party agreements will be required where a service to a new development is via private property or private water services infrastructure e.g. E&E lands on Breaffy Rd and Milebush. 3(e) In the design and layout of proposed new development proposals the assets of Uisce Éireann must be taken into account of in terms of protection and/or diversion. Diversion agreements may be required as appropriate. A number of sites are identified, within which there is important trunk watermains and sewers, including:	

- new residential site adjacent to Knights Park,
- Springfield new residential site,
- Knockaphunta strategic reserve site,
- McHale Road new residential site, and Opportunity Site 9.

3(f) The submission highlights the presence of several residential zoned sites adjacent to existing WWTPs i.e. Springfield new residential sites and strategic reserve site north of the WWTP). It is recommended that development of such lands should take into account the established use of the WWTP and potential for extension/intensification of its use in the future. Operation/capacity issues at Chestnut Grove pumping station are being addressed.

3(g) The submission states - that network reinforcements may be required to service the Enterprise and Employment zoned lands. The E&E site adjacent to Saleen Lake is not currently serviced and work to service this site may require network extensions of 300m+ through private lands, pumping and/or a rail crossing.

4. **Wastewater Infrastructure:** The submission indicates that it is envisaged that there is adequate WWTP capacity to meet the 2027 County Development Plan population targets for Castlebar. Uisce Éireann will continue to monitor performance of the networks, prioritizing most urgent works as required. Some localised constraints exist, though no known major constraints within Castlebar’s wastewater network. The Network Development Plan, drafted for Castlebar, will inform how zoned sites within the town could be serviced.

5. **Water Supply Infrastructure:** The water capacity for Castlebar is constrained at present, though an upgrade is underway to increase capacity at Lough Mask Water Treatment Plan, with completion due in 2024 which will meet the population targets of the Draft LAP. In the medium-long term an upgrade of the treatment plant will be required.

5(a) Leakage reduction, mains rehabilitation and capital maintenance activities are continually being progressed by Uisce Éireann and Mayo County Council along with continual monitoring of performance the network, with the most urgent works prioritised.

5(b) The Network Development Plan, drafted for Castlebar, will inform how zoned sites within the town could be serviced. The project to upgrade the outlet pipework at Castlebar reservoir is being progressed in line with forecasted growth.

6. **Reference to Irish Water (Uisce Éireann):** It is requested that all references to Irish Water be updated to reflect its Irish name – Uisce Éireann.

7. **Section 10.5.2** The submission proposes the following amendment to Section 10.5.2 Wastewater Treatment to include the most recent wastewater treatment capacity register figures to indicate the current capacity at c. 9,800p.e. (as issued June 2022)

10.5.2 Wastewater Treatment

Castlebar benefits from a public wastewater treatment system located at Knockthomas, which is designed to cater for a population equivalent (p.e) of 28,000. Based on current loading it is estimated there is approx. 11,839 p.e. capacity remaining in the plant. This capacity is sufficient to accommodate the projected increase in population for Castlebar and to facilitate enterprise. Future connections to this network from development on zoned and infill lands will be assessed through Irish Water’s Connection and Developer Services process. In unserved areas within the plan area, the main method of sewage disposal is by means of individual septic tanks and proprietary wastewater treatment systems. Mayo County Council is the competent authority for the assessment and approval of individual domestic on-site wastewater treatment systems in the county.

Capacity - today (PE)	Load - in 2019 (PE)	Headroom (PE)
28,000	16,161	11,839

Table 10.1: Existing Capacity of the Castlebar WWTP

Based on current loading it is estimated that there is approx. 11,839 p.e. capacity remaining

in the plant. *Replace the second sentence in Section 10.5.2 with the following wording:* “Based on current loading it is estimated that there is approx. 9,800p.e. capacity remaining in the plant. “

In addition, it is recommended that Table 10.1, be updated i.e. *replace the Headroom (PE) figure of 11,839 with the update headroom capacity of “9,800”*

8. **Section 10.9 Infrastructure and Environmental Services Policies and Objectives:** The submission highlights reference to development in un-serviced areas e.g. IESP 3 and objective IESO 2. The Draft Water Services Guidelines for Planning Authorities (2018) are cited, in particular the ‘general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not be generally considered by planning authorities.....’
The submission states that developments in non-serviced lands shall have particular regard for, and not adversely impact on, drinking water sources.
9. **Section 11.4 Land Use Zoning Objectives / Strategic Residential Reserve:** The submission refers to Land use zoning objective *LUZ 7 Strategic Residential Reserve* listed in Table 11.1. Where the development of Strategic Residential Reserve lands is being considered, it is considered that it should be in line with the principles of proper planning and sustainable development including sequential development, compact growth and prioritization of lands already served or easily serviced to optimize existing water services.
10. **Section 11.5 LUZ matrix / provisions for Utility Infrastructure:** The submission highlights that Utility structures will ‘Not Normally’ be permitted in Open Space zoning. It is requested that this be revised as provisions for upgrading public water services infrastructure in Open Space zoned lands be necessary to meet objectives of the Plan.
11. **Masterplans/Design Framework/Regeneration Areas:** The submission suggests that consideration should be afforded to how such sites will be serviced as well as potential impacts on Uisce Éireann’s infrastructure and projects. Pre-Connection Enquiry can be utilised in this regard.
12. **Nature-based solutions/Surface water:** The submission comments on Section 10.3 and suggests that reference to the national guidance be included ‘*Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document*’
13. **Section 4.7 Climate Action Policy/CAP 2 and Town Centre/Objective TCO 3:** In relation to this policy and objective, it is suggested that in order to maximise capacity of existing collection systems for foul and surface water to combined (foul & surface water) sewer is not to be permitted.
14. **Section 9.10/Riparian Buffer Zone/NEP 1:** the submission suggests the Draft LAP should allow for access along Riparian areas for the maintenance of existing Uisce Éireann’s infrastructure. Similarly, provision for new or upgraded assets should be accommodated in the LAP e.g new outfalls.
15. **Environmental Reports** accompanying the draft LAP: This submission recommends that the aforementioned details should be taken into consideration in the Environmental Reports. Particular attention to be given to MA5 of the NTS (Table 4) and SEA (p.91) as the text is

inconsistent with the Draft LAP where it is envisaged that there is capacity available for the forecasted population demand, though the need for an upgrade to the WWTP was not identified in the Draft plan.

16. **A list of suggested policies/objectives:** The addendum provided with this submission includes a menu of appropriate Objectives/Policies for Water Services in Development Plans, including general policies, water Supply, wastewater Services.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted see CE Response to [OPR Observation 2 \(ii\) and \(iii\)](#).
2. Comments noted.
3. Comments noted (a) In Castlebar there are instances where separation sewers feed into combined sewers due to no current alternative option being available. Accordingly, although alternative solutions are always considered at project level and SuDs is strongly supported in the draft LAP, it is currently not recommended to insert a policy prohibiting additional surface water from entering combined sewers.

(b) – (g) Comments noted.
4. Comments noted.
5. Comments noted.

(a) Comments noted.

(b) Comments noted.
6. All references to Irish Water in the draft Plan have been amended to reflect its Irish name, as requested.
7. Section 10.5.2 and Table 10.1 have been amended to indicate the most recent wastewater treatment capacity register figures.
8. Comments noted. Having regard to the nature of this Local Area Plan, consisting of town and environs there is a requirement to accommodate development proposals that may not be able to connect to the public water and wastewater infrastructure. Notwithstanding this, the policies and objectives provided in the County Development Plan and that of the draft LAP provide the alternative solutions in such instances. Therefore, the insertion of an additional policy or objective in this regard is not recommended.
9. Comments noted. All Strategic Residential Reserve (SRR) Lands identified in the draft Plan are located within the built-up area of Castlebar. These lands are zoned to protect and safeguard suitable lands for future residential development. A review of SRR lands has been carried out. This has resulted in the reduction in the quantum of SRR lands within the town plan area. In addition, the remaining SRR lands have been included in the Settlement Capacity Assessment in Appendix I of the draft Plan.
10. Comments noted. To allow access within riparian areas and other open spaces for the maintenance of existing Uisce Éireann infrastructure, including for new or upgraded assets, Table 11.2 (Land Use Zoning Matrix) has been amended to consider utilities structures in 'Open Space' zoned lands to be 'Open to Consideration'.
11. Comments noted. Mayo County Council will prepare the masterplans and/or urban design framework plans as appropriate to inform the future development of the Opportunity Sites

within the plan area. Due regard will be had to the service capacity and Uisce Éireann's infrastructure and projects.

12. Comments noted.
13. Comments noted.
14. Comments noted. See Response 10 above.
15. Comments noted. SEA to be amended to address these inconsistencies with the draft Plan.
16. Comments noted.

Recommendation:

1. See CE Recommendation to [OPR Observation 2 \(ii\)](#).
2. No change to the draft Plan.
3. No change to the draft Plan.
4. No change to the draft Plan.
5. No change to the draft Plan
6. Amend plan to change Irish Water to Uisce Éireann throughout plan.
7. Amend Section 10.5.2 Wastewater Treatment as follows:

“Based on current loading it is estimated that there is approx. 9800 ~~11,839~~ p.e. capacity remaining in the plant. “

Amend Table 10.1: Existing Capacity of the Castlebar WWTP as shown below:

Capacity - today (PE)	Load - in 2019 (PE)	Headroom (PE)
28,000	16,161	9,800 11,839

8. No change to draft Plan.
9. See CE recommendation to [OPR Recommendation 1 \(iv\)](#) and [\(v\)](#).
10. Amend Table 11.2 (Land Use Zoning Matrix) for Utilities Structures in 'Open Space' zoned lands from 'Not Normally Permitted' to 'Open for Consideration'.
11. No change to the draft Plan.
12. Amend Section 10.3 to read as follows:

10.3 Surface Water Drainage Infrastructure

“Mayo County Council is responsible for the management and disposal of surface water runoff within the public realm. All new development within Castlebar must account for how surface water runoff will be appropriately managed. The Council advocates surface water management through Sustainable Urban Drainage Systems (SuDS) and Nature Based Solutions in accordance with national guidance document ‘Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document’. SuDS is widely recognised as a green infrastructure-based approach to drainage and storm water management.”

13. No change to the draft Plan.
14. See OPW recommendation 13.

15. Amend SEA and NTS to be consistent with draft Plan.
16. No change to the draft Plan.

3.5 Environmental Protection Agency

Submission Number:	MYO-C63-4
Submission by:	Environmental Protection Agency
Issues Raised/Relevant Chapter(s):	See below.
Summary of Submission:	
<p>SEA Guidance document should be taken into account when preparing the LAP. The LAP should also be consistent with the policies and objectives of the National Planning Framework (NPF) and the Northern and Western Regional Spatial and Economic Strategy (RSES).</p> <p>The EPA recommend the following is included in the Environmental Report in line with SEA Regulations:</p> <ul style="list-style-type: none"> • Assessment of Alternatives • Assessment of Environmental Effects • Mitigation Measures • Monitoring (with effective and suitable remedial action where appropriate) <p>Any future amendments to the plan should be screened using the same method as applied in the 'environmental assessment' of the plan.</p> <p>The SEA Statement – 'information on the decision' should be issued upon adoption and should summarise:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>A copy of the SEA statement with the above information should be sent to any environmental authority consulted during the SEA process. The following should be consulted as per SEA Regulations:</p> <ul style="list-style-type: none"> • EPA • Minister for Housing, Local Government and Heritage • Minister for Environment, Climate and Communications • Minister for Agriculture, Food and the Marine • Any adjoining relevant adjoining planning authority 	
Chief Executive's Response and Recommendation:	
<p>Response: Comments noted.</p> <p>Recommendation: No change to the draft Plan.</p>	

3.6 Department of Housing, Heritage and Local Government

Submission Number:	MYO-C63-43
Submission by:	Department of Housing, Heritage and Local Government
Issues Raised/Relevant Chapter(s):	Cultural and Natural Heritage
Summary of Submission:	
<ol style="list-style-type: none"> 1. The submission recommends that the Local Area Plan contains a specific section on underwater archaeology and that the protection of underwater cultural heritage in all its forms is a core objective of Mayo County Council in relation to archaeological heritage. It states that climate change mitigation infrastructure such as flood relief schemes and other forms of flood defence can have significant impacts on both underwater and terrestrial archaeological heritage. 2. The submission recommends that the Council takes cognisance of the National Inventory of shipwrecks in relation to drafting of the new LAP. 3. The Department considers that the LAP should include reference to the pollinator friendly management of road verges and other areas managed by the Local Authority following the recommendations outlined in the All-Ireland Pollinator Plan. 	
Chief Executive's Response and Recommendation:	
Response:	
<ol style="list-style-type: none"> 1. There is specific text and an objective contained in the MCDP relating to underwater archaeology and that the protection of underwater cultural heritage including Section 9.4.1.1 and Objective BEO 5. It is not considered necessary to duplicate objectives contained in the MCDP in the CLAP. The SEA and SFRA contain mitigation measures for the protection of same. 2. It is not considered necessary to add text in relation to shipwrecks as this information is readily available on The Wreck Inventory of Ireland Database (WIID). 3. There are numerous objectives contained in the MCDP relating to pollinator friendly management including TVHO 7 and EDO 54. It is not considered necessary to duplicate objectives contained in the MCDP in the CLAP. 	
Recommendation:	
1. – 3. No change to the draft Plan.	

3.7 Department of the Environment, Climate and Communications

Submission Number:	MYO-C63-13
Submission by:	Department of the Environment; Climate and Communications
Issues Raised/Relevant Chapter(s):	Chapter 3 Climate Action
Summary of Submission:	
<p>This submission commences by stating that the Department will drive the climate agenda be engaging with local authorities, citizens and other stake holders to overcome challenges and maximise climate mitigation and adaptation opportunities and facilitate the transition to a circular economy. The submission is presented under the following headings:</p>	

1. Climate Action

The Department welcomes the inclusion of a separate chapter dedicated to climate action and states that the latest iteration of the Climate Action Plan, CAP 2023 was launched in December 2022. The Department therefore requests that the Draft LAP be updated by replacing any reference to the Climate Action Plan 2021 such as in Section 1.2 and 10.6.1 with reference to the CAP 2023 document.

The Department also notes and supports the promotion of active travel and public transport in policies/objectives such as DSO 4 and DSP 1.

2. District Heating

The Department supports the concept of compact growth in the LAP, as reflected in DSP 2 and feels that the Draft LAP should further emphasise the potential for compact urban development to reduce greenhouse gas emissions and recognize the potential for such a strategy to facilitate the development of low carbon district heating. The submission highlights a number of national, regional and local policies which might be used to strengthen this commitment in the Draft LAP and notes CAP 9 which supports district heating systems in new residential and commercial developments. The Department also welcome the commitment in the DLAP to the use of renewable energy technologies within new and existing building stock under IESP 7.

The submission encourages the LA to commit in the DLAP to carrying out a feasibility study to examine the feasibility of district heading, including heading derived from waste energy

3. Built Environment

The Department welcomes policies CAP 3, which seeks to reduce carbon dioxide emissions and DSP 3. CAO 4 and HSCO 5 which promote measures to retrofit existing buildings. The Department requests that the LA considers adopting policies in LAP that support the electrification of heating systems to help meet the targets in CAP 2023.

4. Renewable Energy

The Department notes the support of micro-generation in Section 3.4.1 of the DLAP and the support of small-scale wind renewable facilities and micro renewable energies in existing and proposed building stock under CAP 7 and IESP 7. The submission recommends that the LA elaborate on this issue, most particularly as regards self-consumers, in line with the increased targets for such energy generators under CAP 2023.

5. Waste

The Department policy CAP 4 which supports the transition to a circular economy, where waste and resources are minimised.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted
2. It is considered that LA actions regarding district heating from renewable energy sources are outlined in S 11.7.11 and objective REO 19 of the County Development Plan. There is also a commitment to carry out a feasibility assessment for district heating under objective REO 21 of the CDP.
3. It is considered that the promotion of the electrification of heating systems is more a matter for the relevant government agency and perhaps the building Regulations.
4. It is considered that the LA's commitment to promotion of micro-renewables for self-consumers is outlined in Section 11.7.10 of the County Development Plan

5. Comments noted.

Recommendation:

1. All references in the Draft Lap to the ~~Climate Action Plan 2021 (CAP 21)~~, will be replaced with **Climate Action Plan 2023 (CAP 2023)**.

2 – 5 No change to draft Plan.

3.8 National Transport Authority

Submission No.	MYO-C63-19
Submission by:	National Transport Authority (NTA)
Issues Raised/Relevant Chapter(s):	Issues: Transport, sustainable travel, zoning, national road policy Chapter(s): Chapter 7 (Movement & Transport), and Chapter 11 (Land Use Zoning Objectives of the Draft Castlebar LAP; and The Draft Castlebar Local Transport Plan.

Summary of Submission:

This submission is made in respect of both the Draft Castlebar Town & Environs Local Area Plan 2023-2029 and the Draft Castlebar Local Transport Plan. The NTA have assessed and commented on both of the aforementioned draft Plans in tandem. The NTA considers the production of both plans in parallel should form the basis of an integrated approach to land use and transport planning in Castlebar. Such an approach is considered the best practice approach for achieving an integrated land use and transport orientated plan. The submission presents policy context for transport and land use planning including - National Investment Framework for Transport in Ireland (NIFTI), National Sustainable Mobility Policy, Climate Action Plan 2023, National Planning Framework (NPF) and the Northern and Western Regional Assembly – Regional Spatial and Economic Strategy (RSES).

1. Proposed Land Use Zoning:

The submission highlights lands adjoining the N84 Castlebar to Westport railway line with the zoning objective ‘*Enterprise and Employment*’, noting that development of employment intensive uses is ‘permitted in principle’ or ‘open for consideration’. It is indicated that *Enterprise and Employment* zoned land must be served by sustainable transport infrastructure (a) in order to avoid car-based dependence to such sites, and (b) to ensure consistency with the policy and objectives contained Mayo County Development Plan 2022-2028.

2. Development at National Road Junctions:

The submission also indicates that the policies outlined in Section 2.7 of the Departmental Guidelines ‘Spatial Planning and National Roads Guidelines for Planning Authorities (2012)’ be accounted for in relation to development proposals at national road junctions.

3. Land Use Zoning and Sustainable Transport:

The submission considers that the policies of the Mayo CDP and Government Guidance have not been adequately addressed in the Draft LAP. In addition, it states that the Draft LTP does not appear to address the transport requirements for the aforementioned lands in the southern portion of the town, pointing out the lack of proposals contained in the Draft LTP for public or active travel infrastructure serving this area of the town. The submission recommends that the southern lands which carry the Enterprise and Employment zoning objective should be reconsidered until such time as there is a clearly defined plan which indicates how these lands will be served by sustainable

transport options.

4. Strategic Roads Projects:

The submission states that the primary transport options detailed in the Draft LAP should directly relate to the proposals identified in the Draft LTP, as opposed to that set out in ABTA guidance.

The NTA is concerned with the inclusion of the Northern Orbital Ring Road project in the Draft LAP, which has not been identified under the Draft LTP. As the project was not identified through the detailed ABTA process for Castlebar, its inclusion could undermine the aims and objectives of the Draft LTP and range of sustainable transport interventions it contains. The submission recommends the removal of the Northern Orbital Ring Road project from the Draft LAP.

5. Interventions in the Draft Local Transport Plan:

The submission comments on town center interventions, in particular welcoming the introduction of parking charges. However considerable surface and on-street parking within Castlebar town is noted and suggests that more targeted interventions are necessary in relation to car-parking in line with car-traffic reduction measures, e.g. potential for removal of on-street parking and improvement measures for active travel and traffic management.

Further analysis is recommended on potential town-center measures, including specific measures which reflect the objectives of the Draft LAP's in relation to the creation of a people friendly environment and reduction of car dominance.

6. Public Transport:

The potential for a town bus service for Castlebar town is welcomed which holds the potential to improve accessibility levels across the town as well as prompt modal shift towards sustainable transport. The NTA recommend that the proposed town bus service is labeled as 'indicative only' in both draft Plans (LAP and LTP) and clearly state that - *any future town bus service will be developed in conjunction with the NTA under their Town Bus Service Programme*. The NTA make a recommendation for further analysis to be undertaken regarding a better approach to linking the proposed mobility hub and the potential bus network.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted. The draft LTP has been amended to ensure sustainable transport alternatives are available to access these 'Enterprise and Employment' lands. The LTP proposes upgraded cycling and pedestrian facilities extended along the N84, with a proposed permeability links into the Enterprise and Employment' lands.
A new map has been included in the draft LAP to show the revised LTP proposals overlaid on the revised land-use zoning map. The map shows the active travel measure provisions for the subject Enterprise and Employment' lands. [See CE response to OPR Recommendation 4.](#)
2. Comments noted. The proposed 'Enterprise and Employment lands adjacent to national road junctions within the plan area are supported by sustainable transport options in the LTP, which will reduce likely additional traffic levels that could potentially impact on the capacity, efficiency and safety of the national road interchanges/junctions. Furthermore, development proposals will be assessed to ensure compliance with Policy MTP 23 of Volume I and Section 7.2 (Access onto National Roads) of Volume II of the Mayo County Development Plan 2022-28.
3. Comments noted. The draft LTP has been amended to show how the proposed Active Travel measures align with the southern 'Enterprise and Employment' zoned lands, as addressed in response 1 above. In addition, it is of critical importance for the economic growth of Castlebar, as the County Town and a Key Town in the RSES, and for the wider catchment to have sufficient strategic employment sites available in the town to attract and retain business/jobs and deliver a more balance, compact regional development.

4. The Northern Orbital Ring Road is indicated as an indicative route under Policy MTO 7 of the draft LAP, which is subject to change. The LTP includes a rationale for the northern section of the Northern Orbital Ring Road (NORR).

The remainder of the NORR has been included in the LAP/LTP as a long-term aspiration for a future transport corridor that may be required for active travel, public transport and access for potential long term future development within the principle of compact growth. The route could unlock potential in the future for additional management of traffic in the town centre area, enabling more allocation of road space on town centre streets to public realm enhancements, active travel and public transport, providing an overall positive mode shift. This route would be subject to further analysis in the future in line with normal application procedures and processes.

Section 7.7.2 of the draft Plan has been amended to indicate that the delivery of the remainder of the NORR is a long-term aspiration of Mayo County Council and will be subject to future analysis in line with normal application procedures and processes.

5. A Parking Management Strategy will be proposed in LTP to establish enhanced management of parking in Castlebar, to encourage better use of existing parking available more removed from Town centre and thereby enabling a reduction of parking on town centre streets.
6. Comments noted. The draft Plan has been amended to indicate that any future town bus service will be developed in conjunction with the NTA under their Town Bus Service Programme.

The proposed mobility hub locations are indicative only with further analysis to be undertaken when the scheme is undergoing the feasibility/design process. This is highlighted in the LTP report as further analysis is outside the scope of the LTP.

Recommendation:

1. See CE recommendation to [OPR Recommendation 4](#).
2. No change to the draft Plan.
3. See CE recommendation to [OPR Recommendation 4](#).
4. See CE recommendation to [OPR Recommendation 4](#).
5. No change to the draft Plan.
6. Amend Section 7.9.1 of the Draft LAP to read as follows:

Bus

*“The provision of an **indicative** north/south and east/west linear bus routes incorporating two bus interchange stops at Stephen Garvey Way and at the Old Westport Road (Mayo University Hospital) would facilitate an inbound and outbound interchange. In addition, a mobility hub in Mill Street car park is included as part of the proposed bus network. See Figure 7.4 and Figure 7.5.*

*Two **indicative** bus routes are proposed - a north/south route and an east/west route covering a distance of c.1.9km. The routes are bi-directional and include 50 stops (approx. 12 stops for each route in each direction). The distribution of bus stops is indicative only with a proposed frequency of 1 bus every 30minutes. A local bus service within the town will provide a new transport alternative to residents. As such, the delivery of a local public bus service has the highest potential to encourage shift to sustainable modes. **Any future town bus service will be developed in conjunction with the NTA under their Town Bus Service Programme.**”*

3.9 Transport Infrastructure Ireland

Submission Number:	MYO-C63-6
Submission by:	Transport Infrastructure Ireland
Issues Raised/Relevant Chapter(s):	Chapter 7: Movement and Transport European, National and Regional Policies, Development Strategy and National Roads, Integration of LAP and LTP, Specific LAP Objectives, DoECLG Guidance and Standards, Traffic and Transport Assessments, Signage, National Road Drainage Regimes, Renewable Energy and Grid Connections, Noise.
Summary of Submission:	
<p>(1) EN, National and Regional and Regional Policies The TII commence their analysis of the Draft LAP by first referencing regulations and policies that relate to the Draft LAP such as:</p> <ul style="list-style-type: none"> • Ten-T Regulations, • National Planning Framework (NPF) • National Investment Framework for Transport in Ireland (NIFTI) • National Sustainable Mobility Policy • Spatial Planning and National Road Guidelines for Planning Authorities • Regional Spatial and Economic Strategy <p>The submission refers specifically to the on-going significant Exchequer investment in the N5 Westport to Turlough Road Scheme along with the N60 and the N84 which provide important national and regional access. The submission also refers to the Castlebar Local Transport Plan and the main body of the submission outlines how relevant elements of the above publications relate to the Draft LAP.</p> <p>(2) Development Strategy and National Roads The TII quote RPO 6.5 which gives effect to NSO 2 in maintaining the strategic safety and capacity of the national road networks. The submission subsequently welcomes the inclusion of Section 7.7.1 and Policy MTP 7 of the Draft LAP, which integrate this protection of the national road network into the Draft LAP.</p> <p>(3) Local Area Plan/Local Transport Plan Integration The TII refer to RPO 6.27 of the NWRA RSES, which supports the collaborative approach between local authorities and the NTA and other stakeholders in the preparation of LTP's. The submission also references RPO 6.28 which requires that policies, objectives and measures which emerge from LTP's, be incorporated into LAP's. While welcoming the preparation of an LTP, the TII expresses concern the LTP does not reference the safeguarding of the national road network and how measures in the LTP might affect the safeguarding of these routes in accordance with official policies referred to earlier.</p> <p>The submission references a central tenant of the TII/NTA area Based Transport Assessment Guidance which is that LTP's should be completed concurrent to LAPs to input directly into Land use proposals and objectives. This is not the case with the Draft LAP and Draft LTP for Castlebar and the submission references in particular proposed Enterprise and Employment zonings on the N84 to the south of the town, which do not appear to be identified or addressed in the LAP. The TII considers that the approach in relation to the preparation of the LAP and LTP is not integrated or complementary and make the following recommendations:</p>	

Demonstration of the integration of the LTP measures and Draft LAP objectives and Land use zonings is required.

Clarification is required in relation to the phasing and build out of the LAP lands with the active travel measures proposed in the LTP is required, both in terms of providing a clearer understanding of providing active travel and compact growth, and in terms of the safeguarding the role and safety of the national road network in the context of the proposed zoning of peripheral lands.

(4) Specific Local Area Objectives

The TII quote key priorities in the RSES regarding the utilisation and expansion of the capacity of the existing industrial and commercial estates in Castlebar, and similar priorities in the LTP. The submission also welcomes the proposals regarding town centre regeneration/opportunity sites in terms of achieving compact growth and the opportunities available upon the downgrading of the N5 on foot of the completion of the Turlough by-pass to address barriers to active travel in the town.

Notwithstanding this however, the submission notes that the LAP includes extensive enterprise and employment zoned lands in the vicinity of the N5/N84 junction, which are remote from residential areas, and are not identified or addressed in the LTP in terms of active travel proposals.

The TII therefore recommend that:

The proposed Enterprise and Employment zoning at the junction of the N5 and N84 is justified in accordance with Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines, Demonstrate that the proposed Enterprise and Employment zoning is in adherence with the NWRA's RSES key priority for Castlebar to utilise and expand upon the capacity of its existing industrial estates.

Demonstrate that the proposed zoning is addressed in the Draft LTP and served by active travel measures to reduce car dependency.

(5) Maintaining the Strategic Capacity and Safety of the National Road Network

The TII recommends that the LA considers and references, and incorporates into the LAP the following elements of the DoECLG Guidelines when exercising its development management functions:

(i) **TII Publications DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads'**

(ii) **The TII Traffic and Transport Assessments (TTA) Guidelines 2014**

Section 3.8 of the DoELGs Guidelines regarding to control the proliferation of non-road traffic signage on and adjacent to National Roads.

(iv) **Safeguarding National Road Drainage Regimes**, the TII recommend the inclusion of a new objective in the LAP outlining that; *The capacity and efficiency of the national road network drainage regimes in Mayo will be safeguarded for road and drainage purposes.*

(v) **(Renewable Energy Grid Connections;** The TII would welcome the consideration of an objective in the LAP requiring the consideration of alternative locations for grid connections as opposed to been placed along the strategic national road network.

(vi) **Noise; S.I. Number: 140 of 2006 Environmental Noise Regulations**

(vii) **Green Ways;** TII recommends consultation with internal project and design staff.

Chief Executive's Response and Recommendation:

Response:

1. Comments noted.
2. Comments noted.
3. Comments noted, see CE Response to [OPR Recommendation 4](#).
4. Comments noted, see CE Response to [OPR Recommendation 3](#).
5. (i) This document is referenced in objective MTO 9 of the Mayo Co. Development Plan 2002-2028.
(ii) This document is referenced in objective MTO 23 of the Mayo Co. Development Plan 2002-2008.
(iii) These guidelines will be consulted as required under normal Development Management/Planning enforcement procedures.
(iv) Drainage Regimes along national routes in the county are protected under MTO 27 of the Mayo Co. Development Plan 2002-2008.
(v) Consultation with internal project and design staff is an integral element of project within the LA, including greenways.

Recommendation:

1. No change to draft Plan.
2. No change to draft Plan.
3. See CE Recommendation to [OPR Recommendation 4](#).
4. See CE Recommendation to [OPR Recommendation 3](#).
5. (i) to (v) No change to draft Plan

3.10 Electricity Supply Board

Submission Number:	MYO-C63-35
Submission by:	ESB
Issues Raised/Relevant Chapter(s):	Issues: <ul style="list-style-type: none">• Access to location of engineering centre and road network• Accommodation of ESB restructuring facilities and its operational needs on zoned lands• Electric Vehicle Charging infrastructure• Early engagement in the future proofing for delivery of electricity infrastructure
Summary of Submission:	
The submission points out the ESB Depot located at Lower Charles Street, Castlebar is required to support the delivery of Capital works programmes and its operational activities. Good access to main road networks and areas of potential growth is essential both in providing an economic service	

and emergency response times for Castlebar & its environs, with a 1-hour response requirement. Speedy access to the engineering centre and to the road networks is therefore important.

1. Opportunity Site 2:

The submission notes the Opportunity Site on the adjoining lands at Richard Street (Opportunity Site 2). In particular, in the development potential outlined for the Opportunity Site where it is indicated that it could lead to redeveloping the adjoining ESB compound. The submission clearly indicates continued use of the site by the ESB for its Depot servicing the electricity transmission infrastructure of Castlebar.

2. ESB restructuring and accommodating of operational needs on zoned lands:

Outlining the ESB stations in and around the Castlebar area, the submission states that their requirements may change over time and therefore it is important that land use zonings can accommodate ESB restructuring of facilities to meet operational needs, while conforming to the Council's long-term vision for compact growth and consolidation of the town.

3. Electric Vehicle Infrastructure:

ESB supported by the Government's Climate Action Fund, is rolling out high power charging hubs, in this regard ESB strongly supports Objective MTO 4 and Policies MTP 5 & 6 and Objective TCO 6 of the Draft LAP, which supports the increasing of EV battery charging points on public and private lands in partnership with the ESB.

4. Future Proofing delivery of electricity infrastructure:

Policies IESP 6, 11 & 12 and Objective IESO 9 is welcomed and request that contact be made with the local ESB office in Castlebar to ensure input from the ESB Networks at an early stage of project design (e.g. new roads, public realm, greenways, etc.).

Chief Executive's Response and Recommendation:

Response:

1. Comments noted. Opportunity Site 2 has been removed from the Draft LAP.
2. Comments noted. The land use matrix contained in the Draft LAP provides for the consideration of Utility Structures across a wide spectrum of land uses. More specifically it provides an *Infrastructure and Utilities* zoning category for specific locations within the Plan Area.
3. Comments noted.
4. Comments noted.

Recommendation:

1. See CE Recommendation on [OPR Observation 1](#).
 2. See CE Recommendation to [Uisce Eireann recommendation 9](#)
- 3-4 No change to draft Plan.

3.11 Department of Education

Submission Number:	MYO-C63-46
Submission by:	Department of Education
Issues Raised/Relevant Chapter(s):	Reserving land for the expansion of Schools
Summary of Submission:	
<ol style="list-style-type: none"> 1. The submission notes the anticipated population growth for Castlebar to 2027 and 2031, respectively, as set out in the Mayo County Development plan, and highlights that there are 9 schools (4 Number: primary, 3 Number: post-primary & 2 Number: special) located in the town. 	

- The Department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places due to the planned population increases.
2. The Department requests the Planning Authority to examine the potential of protecting a land buffer around each of the schools, as outlined in Section 6.5 (Community, Arts and Educational Facilities) of the draft LAP to enable them to expand further if required to meet the future population growth in Castlebar town.
 3. The Department notes that the Plan supports the proportionate expansion of education facilities in the town and that land is zoned for this purpose.
 4. The Department notes and supports Sections 6.5, 6.7, 6.11, 7.10 and Table 11.1 (Land Use Zoning Objectives), of the draft LAP, and references several objectives, which seek to facilitate, support and secure the provision of social, recreational, community and other related infrastructure, including school sites to address emerging demands, and the provision of sustainable travel links between schools and residential areas.
 5. In terms of assessing current and future capacity, the Department is mindful of potential unforeseen circumstances, such as the Ukrainian crisis, which can put pressure on school place provision and could necessitate reassessments of school place provision.
 6. The Department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location. The Department also anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future. The Department will consult with the Council should additional SEN accommodation is required within specific locations.
 7. Finally, the Department welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasises the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose.

Chief Executive's Response and Recommendation:

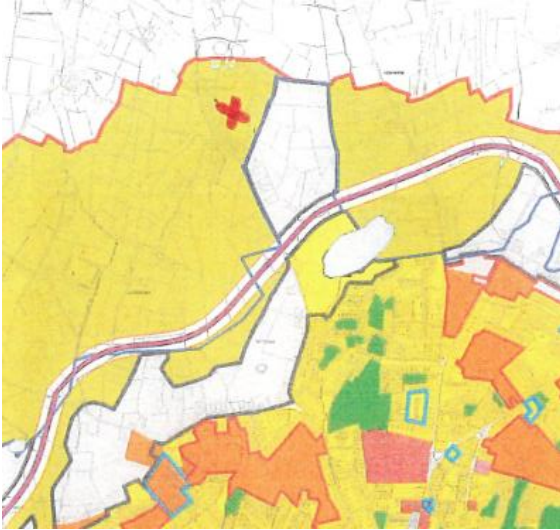
Response:

1. Comments noted.
2. The draft Plan includes an 'Education' land use zoning provision for existing school sites in Castlebar. This zoning provision essentially provides a buffer for future expansion by safeguarding existing schools and their associated lands. Furthermore, the provision of educational facilities is also 'Open to Consideration' in other land use zoning categories of the plan, as set out in land use zoning matrix (Table 11.2), such as town centre, residential and enterprise & employment lands.
3. to 7. Comments noted.

Recommendation:

- 1 – 7. No change to the draft Plan.

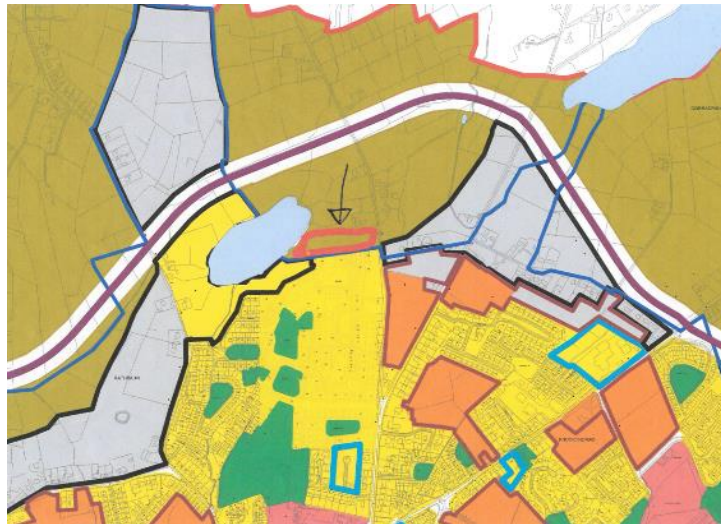
Section 4 Submissions relating to zoning. (See Appendix 1 of CE Report for Submission Maps.)

Submission Number:	MYO-C63-2
Submission by:	Martin & Helen Gaughan
Issues Raised/Relevant Chapter(s):	Rezone Agricultural Lands to Residential
Summary of Submission:	
<p>The submission requests that serviced lands be considered for low residential zoning. Map included. Proposed lands marked in red.</p>  <p style="text-align: center;">Site Location (marked with red X)</p>	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The subject land parcel is zoned 'Agriculture' in the Draft Castlebar LAP and is situated along the northern perimeter of the town, in the townland of Coarsepark.</p> <p>The submission requests a change of zoning to facilitate low density housing on these lands, which would not be permissible under the agricultural zoning category. It is considered that residential development at this peripheral location would not promote compact growth or sustainable travel options, by reason of its non-sequential out of town location. Furthermore, the rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.</p> <p>Recommendation:</p> <p>No change to draft Plan.</p>	

Submission Number:	MYO-C63-3
Submission by:	Michael Geraghty
Issues Raised/Relevant Chapter(s):	Rezone Agricultural Lands to Residential

Summary of Submission:

This submission is seeking to have his lands located off the Pontoon Road (outlined in red) considered for a residential housing estate, as it is stated that these lands are serviced by the town sewer and watermains.



Site Location (outlined in red)

Chief Executive’s Response and Recommendation:

Response:

The subject land parcel is zoned ‘Agriculture’ in the Draft Castlebar LAP and is situated along the northern perimeter of the town, in the townland of Rathbaun, off the Pontoon Road. These lands adjoining the northern boundary of the Blackrock Housing Estate.

The submission does request a change of zoning to facilitate a residential housing estate on these lands, which would not be permissible under the agricultural zoning category. Notwithstanding, a residential housing estate at this peripheral location would not promote compact growth or sustainable travel options, by reason of its non-sequential edge of town location. Furthermore, the rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to the draft Plan

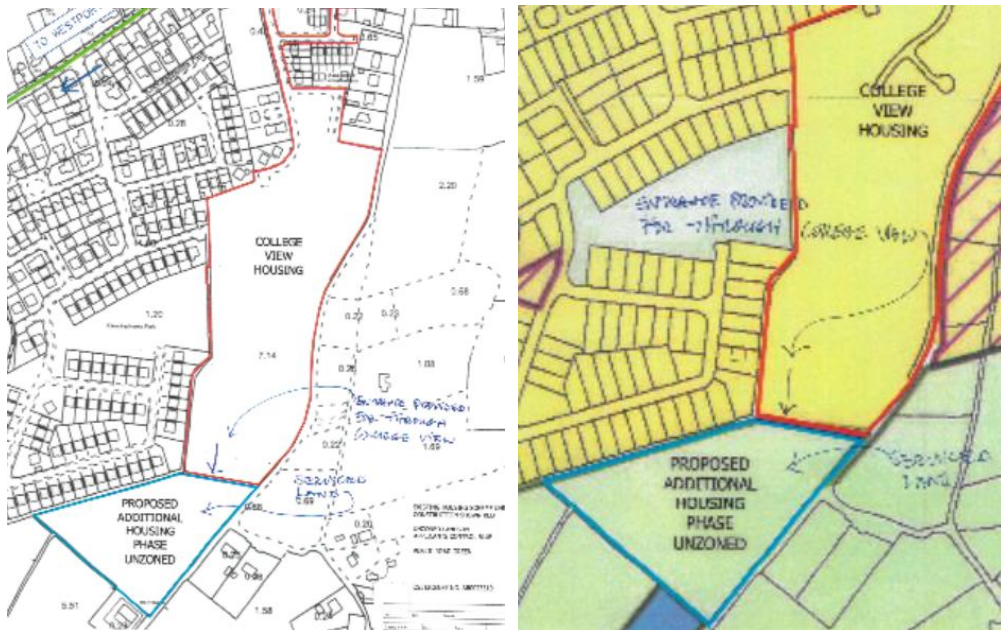
Submission Number:	MYO-C63-5
Submission by:	John O’Sullivan
Issues Raised/Relevant Chapter(s):	Rezoning of Land for Residential Development
Summary of Submission:	
<p>The submission indicates that an existing residential development at Lake Shore Drive in Saleen, comprising of seven residential sites, has been zoned recreation and amendment in the Draft Castlebar LAP (Note: No map provided). The submission also indicates that the Castlebar Urban District Council previously purchased three of these sites and expressed an interest in acquiring the remaining sites on a number of occasions.</p> <p>Finally, the submission indicates that the Council have expressed an interest in purchasing four sites at this location, with the view of constructing new houses. Having regard to the forgoing, the submission therefore requests that these sites be rezoned for residential purposes.</p>	
Chief Executive’s Response and Recommendation:	
<p>Response:</p> <p>In the absence of a map, it has been determined that the proposed sites in question are adjacent the sites referred to in submission MYO-C63-20 and will be responded to according. The submission requests a change of zoning from ‘Agriculture’ to ‘New Residential’ to facilitate housing on these lands.</p> <p>The sites are situated between the north-eastern banks of Lough Saleen and residential properties in Lake Shore Drive. The sites contain scrub lands and trees and adjoin the Local Biodiversity Area of Lough Saleen (LBA 14) namely Scrub (Fossitt Code: WS1) and wet willow-alder-ash woodland (Fossitt Code: WN6). Development and agricultural improvement within this Local Biodiversity Area is discouraged due to threat to the lake.</p> <p>It is considered that there are other lands within the town identified as being more appropriately located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Mayo County Development Plan 2022-2028.</p> <p>Recommendation: No change to draft Plan.</p>	

Submission Number:	MYO-C63-7
Submission by:	Mulranny Amenity Centre on behalf of: Teresa Cowley
Issues Raised/Relevant Chapter(s):	Rezone lands at Blackfort
Summary of Submission:	
<p>The submission requests that lands at between Blackfort Manor and Lough Lannagh are zoned for 'Residential and Recreation' purposes.</p> <p style="text-align: center;">Site Location</p>	
Chief Executive's Response and Recommendation:	
<p>Response: The subject land parcel is zoned 'Agriculture' in the Draft Castlebar LAP and is situated between Lough Lannagh and the Blackfort Manor housing estate. The site is elevated with limited access, taking this into account, it is considered that rezoning the site to 'Residential & Recreation' would have an adverse impact on the landscape surrounding Lough Lannagh, site access is also a concern as the access along the western boundary is from a narrow laneway which is not suitable for the proposed zoning. The proposed rezoning of these lands would not promote compact growth and sustainable travel options in Castlebar, by reason of its adverse impact on an exposed elevated site adjoining Lough Lannagh and its poor access. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.</p> <p>Recommendation: No change to draft Plan.</p>	

Submission Number:	MYO-C63-9
Submission by:	Grady Architects on behalf of: Roonith Properties (TML Properties)
Issues Raised/Relevant Chapter(s):	Rezoning lands for Residential

Summary of Submission:

The submission seeks to have unzoned lands to the south of College View zoned ‘New Residential’ in the Draft LAP, as these lands are fully serviced; accessible; are a natural extension of the College View Housing Scheme; and can be developed in the short term to meet housing demand, where there is an acute shortage of housing in Castlebar.



Site Location (outlined in blue)


Chief Executive’s Response and Recommendation:

Response:

The subject lands are zoned ‘Agriculture’ in the Draft LAP. Development works have been carried out within this land parcel without the benefit of planning permission. Notwithstanding, the proposed rezoning of these lands situated at a peripheral location would not promote compact growth or sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to the draft Plan.

Submission Number:	MYO-C63-14
Submission by:	D Moran on behalf of: Walshe and Bourke Builders
Issues Raised/Relevant Chapter(s):	Rezoning of lands at Baloor/Kilkenny Castlebar
Summary of Submission:	
<p>The submission requests that lands at Baloor/Kilkenny, Castlebar which are currently zoned Agricultural and Employment and Enterprise in the Draft LAP be changed to a residential zoning. Map included with proposed lands outlined in red.</p>	
	
<p>Site Location (outlined in red)</p>	
Chief Executive's Response and Recommendation:	
<p>Response: The subject land parcel is partly zoned 'Agriculture' and partly zoned 'Enterprise and Employment' in the Draft Castlebar LAP and is situated along the eastern perimeter of the town. The proposed rezoning of these lands situated at a peripheral location would not promote compact growth and sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.</p>	
<p>Recommendation: No change to the draft Plan.</p>	

Submission Number:	MYO-C63-16
Submission by:	Michael Quinn on behalf of: Margaret Coyne
Issues Raised/Relevant Chapter(s):	Request to zone lands Residential.
Summary of Submission:	
The submission requests that property in Ms. Coyne's ownership should be zoned residential zoning. Justification provided. Map not included.	
Chief Executive's Response and Recommendation:	
<p>Response: No map submitted therefore cannot be considered.</p> <p>Recommendation: No change to the draft Plan.</p>	

Submission Number:	MYO-C63-18
Submission by:	The Planning Partnership on behalf of: Primbroke Investment Ltd.
Issues Raised/Relevant Chapter(s):	Rezone lands at Moneen / N5 Business Park Amend Land Use Zoning Matrix Designate site as Opportunity Site Additional Tourism Policy
Summary of Submission:	
<p>The submission refers to a corner site zoned Enterprise & Employment in the draft LAP, the site is located adjacent the Moneen roundabout and west of the N5 Business Park. The submission proposes a number of changes which are categorised below:</p> <ol style="list-style-type: none"> 1. The authors make reference to the downgrading of the adjacent N5 following the opening of the new N5 and requests the Council to create a new accesses along downgraded roads to promote development. Adopt DMURS in line with MTP 21 of CDP. Review potential linkages through site. 2. The separate of residential and employment zonings undermines the potential to avoid less sustainable travel. The submission proposed additional zonings to the LAP which are listed below: <p>MIXED USE <i>The objective of the Mixed-Use land use is to provide primarily for commercial, tourism, employment, recreational / leisure and low and middle order retail uses, with complementary ancillary uses also considered including an element of residential use. Permissible uses will be governed by the nature of the development proposed and its location and compatibility in relation to surrounding existing or permitted uses.</i></p> <p style="text-align: center;"><i>Or</i></p>	

GENERAL DEVELOPMENT

The objective of the General Development land use is to facilitate suitable developments, including a mixture of uses, in accordance with the proper planning and sustainable development of the areas designated. All proposals within these areas shall be assessed on their individual merits having regard to the proper planning and sustainable development of the area, the related land use objective and the overall objectives of the Local Area Plan. Permissible uses will be very much governed by the nature of the development proposed and its location in relation to surrounding uses. Uses in the General Development Zone will be required to be highly sensitive to the nature of existing uses on adjoining sites and the overall character of the area. Retail proposals shall be low and middle order and have regard to the sequential approach as appropriate to the form of offer envisaged.

3. In addition to proposing additional Land Use Zonings, the submission also requests to amend the Land Use Zoning Matrix to accommodate a large range of uses that would be Permitted in Principle and Open for Consideration these are shown below:

Permitted in Principle:

Conference Centre, Enterprise Unit/Workshop, Hostel, Hotel, Leisure Centre / Gym, Nursing Home/Retirement Village/Residential Care, Office, Park & Stride Facility, Primary Care Centre, Health Centre and Clinics, Professional Services, Restaurant/Café, Retail Warehousing, Service Station, Utility Structures, Veterinary Surgery and Warehousing

Open for Consideration:

Apartments, B&B/Guesthouse, Bank/Financial Institution, Betting Office, Caravan Park / Campervan Park / Camp Site/ Glamping (Tourism), Car Parking, Cash & Carry Wholesale Outlet, Chemist/ Pharmacy, Childcare Facilities – Crèche, Nursery and Playschool, Cinema/Theatre, Community Facility (hall, centre or recreational use), Dance Hall/Disco/ Night Club, Data Centre, Dentist/ Doctor Surgery, Drive Through Restaurant, Education – excluding a night-time use, Education – night-time education use, Education – third level education use, Education – training centre, Funeral Home, Garden Centre, Hospital, Industry – Light, Library, Licensed Premises (Public House), Logistic, Storage & Distribution Units, Mart/ Co-operative, Motor Sales/ Service, Open Space (Public), Place of Worship, Plant/ Tool Hire, Playing Pitches/ Sports Club, Residential – Multiple (two or more units), Residential – Single, School / Third Level Education, Shop/Retail (Comparison), Shop/Retail (Convenience), Shopping Centre / Supermarket and Take Away.

4. The submission refers to the Residential Zoned Land Tax and the fact that the proposed land uses zonings and proposed land use matrix regarding Residential development are *Open for Consideration* and therefore the RZLT would not be applicable.
5. The submission also requests that the site is designated as an Opportunity Site considering its strategic gateway location and proposes a range of uses (see point 4 above).
6. The submission also discusses the Tourism potential of the site and seeks to add the additional policy to the plan:
“EDP 13 – Promote the development of Castlebar as a nationally important events, conference and business tourism hub, including through leveraging existing local assets such as Breaffy House, the Royal Theatre and the Castlebar Regional Training Centre, and expanding the scale and capacity of hotel and other accommodation within the town.”

7. An additional Sustainable Transport policy is proposed see below:
“MTP 7 – Support residential development of an appropriate scale and format in and adjacent to employment hubs to reduce and/or avoid the need for travel, subject to a case by case assessment of suitability.”



Site Location

Chief Executive’s Response and Recommendation:

Response

- (1) This is not a matter for consideration as part of the Draft LAP procedures.
- (2) It is considered that a mixed-use zoning of the type proposed, (which is essentially a town centre type zoning), on a site that is located a considerable distance from the town centre; would impact negatively on the commercial viability of the town centre and mitigate against the rejuvenation of the town centre, which is the central tenet of the Town Centre Regeneration Strategy outlined in chapter 4 of the DLAP.
- (3) See response to point 2 above.
- (4) This is not a matter for consideration as part of the Draft LAP procedures.
- (5) Opportunity Sites are located within the town centre zoning to help regenerate and rejuvenate the town centre, in line with the NPF, RSES and Town Centre First Approach. The subject site is significantly removed from Castlebar town centre.
- (6) The proposed policy is already covered under Policy TRP 6 (f) of the Mayo County Development Plan (2022-28).
- (7) The draft Plan identifies appropriately located lands to accommodate the future housing requirements for Castlebar, in line with the Core Strategy of the Mayo County Development Plan (2022-28). These lands are underpinned by sustainable travel options, as set out in the Draft Castlebar Local Transport Plan.

Recommendation

1.to 7. - No change to draft Plan.

Submission Number:	MYO-C63-20
Submission by:	Brian MacDonald
Issues Raised/Relevant Chapter(s):	Rezone lands at Lake Shore Drive

Summary of Submission:

The submission indicates that lands at Lake Shore Drive in Saleen, comprising of seven residential sites, has been zoned 'Recreation and Amenity' in the Draft Castlebar LAP.

The author states he bought 2 of the 7 sites over 20 years ago, the sites were the last phase of Lake Shore Drive and the planning lapsed. Planning permissions was refused on the sites by Mayo County Council for the following reasons:

1. Open Area
2. Green Area
3. Sewage Pipes from the Bacon Factory
4. Frogs

The submission states Mayo County Council agreed to purchase their sites for housing, but the purchase never went through. The author also states that a copy of the Councils offer was attached to the submission.

Having regard to the forgoing, the submission therefore requests that these sites be rezoned for residential purposes.



Site Location

Chief Executive's Response and Recommendation:

Response:

The sites in question are adjoining sites referenced in MYO-C63-5. The submission requests a change of zoning from 'Recreation & Amenity' to 'New Residential' to facilitate housing on these lands.

The sites are located in between the north-eastern banks of Lough Saleen and residential properties in Lake Shore Drive. The sites in question contain scrub lands and trees and appear to be within the Local Biodiversity Area of Lough Saleen (LBA 14) which contains Scrub (Fossitt Code: WS1) and wet willow-alder-ash woodland (Fossitt Code: WN6). Development and agricultural improvement within this Local Biodiversity Area is discouraged due to threat to the lake.

It is considered that there are other lands within the town identified as being more appropriately

located closer to the town centre to deliver the Core Strategy housing allocation for the town over the lifetime of the Mayo County Development Plan 2022-2028.

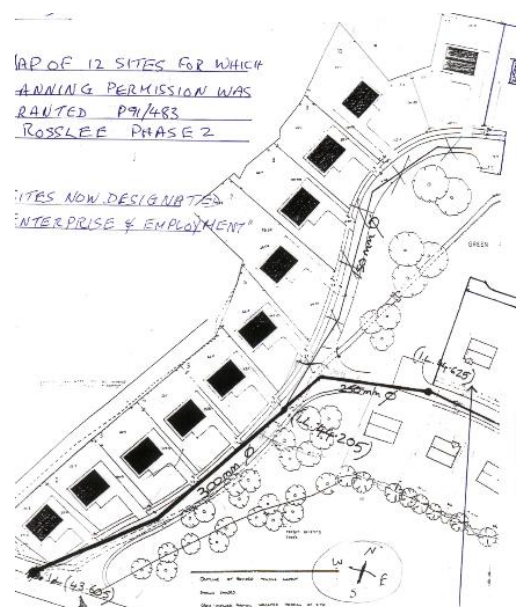
Recommendation:

No change to draft Plan.

Submission Number:	MYO-C63-21
Submission by:	Francis Tuohy
Issues Raised/Relevant Chapter(s):	Request to re-zone lands Residential

Summary of Submission:

The submission requests that lands adjacent to the Rosslee housing estate at Rinshinna, Castlebar, which are currently zoned 'Employment and Enterprise' in the Draft LAP, be changed to 'Residential' zoning. Justification is provided including proximity to existing housing developments and services.



Site Location

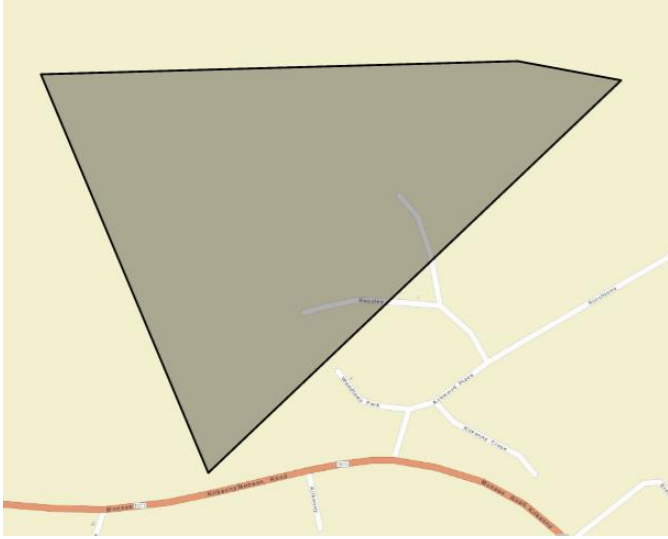
Chief Executive's Response and Recommendation:

Response:

The subject land parcel is zoned 'Enterprise and Employment' in the Draft Castlebar LAP and is situated along the eastern perimeter of the town in the townland of Rinshinna. The proposed rezoning of these lands which are located at a peripheral location would not promote compact growth and sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to the draft Plan.

Submission Number:	MYO-C63-23
Submission by:	Tom Mulchrone on behalf of: Rosslee Residents Group
Issues Raised/Relevant Chapter(s):	Land Use Zoning Map
Summary of Submission:	
<p>This submission requests that an area of land adjacent to the Rosslee Housing Estate, off the Moneen Road, that is zoned Enterprise and Employment in the DLAP, objects to the proposed zoning and requests that the land be rezoned New Residential.</p> <p>The map accompanying the submission is not adequate to accurately identify the lands in question.</p>	
	
Site Location Map.	
Chief Executive's Response and Recommendation:	
<p>Response</p> <p>The subject land parcel is zoned 'Enterprise and Employment' in the Draft Castlebar LAP and is situated along the eastern perimeter of the town in the townland of Rinshinna. The proposed rezoning of these lands which are located at a peripheral location would not promote compact growth and sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.</p> <p>Recommendation</p> <p>No change to draft Plan.</p>	

Submission Number:	MYO-C63-24
Submission by:	The Planning Partnership (Consultants) on behalf of: John O'Donnell
Issues Raised/Relevant Chapter(s):	Zoning of land at the Former Hat Factory Site, Newport Road. Phased masterplan requested for Opportunity Site 1 Land-use matrix Amendment to objectives TCO4 and TCO 8 Opportunity Site 1 – Designation (wording)

Summary of Submission:

The submission is made on behalf of the landowner of the former Hat Factory site. It is requested that the designation of the lands as an 'Opportunity Site' be reviewed and revised without materially altering the spirit and intent of the designation. Opportunity Site 1 is comprised of a large commercial land back including both the adjoining Griffith Motors premises. They consider the designation of the site appropriate in principle, however concern is expressed in relation to the phasing and compartmentalizing of the overall site and its ability to be developed as single scheme given the scale of the site and the level of development activity in Castlebar town.

Figure 1: Subject Site (Approx. Boundaries Outlined in Red)



Source: Google Maps, annotated by The Planning Partnership

1. Masterplan/Phasing:

The submission highlights that Opportunity Site 1 is in multiple ownerships with implications for the delivery of development. Suggested is a phased or staged masterplan for the site where orderly and complementary development is clearly defined, deliverable in stages/or phased by a number of parties. Concern is expressed with regard to the development of the site where early development of a portion of the site could be limited on the basis of prematurity due to lack of clarity or control over other parts of the site.

2. Land use matrix:

Range of Uses: The submission expresses concern with regard to the narrow range of use-types indicated for Opportunity Site 1, which could potentially restrict development including individual proposals for development throughout the site. It is requested that the wording be amended to reflect a broader range of land uses in accordance with the Town Centre zoning objective and associated land use matrix.

Retail Uses: The submission suggests that the Land Use Matrix be reviewed and revised in terms of the uses-types listed which are 'Open for Consideration' on this site.

The submission considers that the following list of uses should be 'Permitted in Principle' and the Matrix be revised accordingly on the basis that they are compatible with the site and its environs.

Leisure Centre / Gym, Hostel, Hotel, B&B / Guesthouse, Hospital, Garden Centre, Funeral Home, Education – training centre, Education – excluding a night-time use, Education – night-time education use and Education – third level education use

3. Working with Landowners/Stakeholders Objectives TCO4 & TCO8:

In addition to the concerns raised (as summarized above), the submission proposes a number

of revisions to the wording of Objectives TCO4 and TCO8 contained in the Draft Castlebar Town & Environs Local Area Plan, as follows:

3(a) TCO 4 Work with landowners and other stakeholders in the redevelopment of the identified 'opportunity sites' for appropriate town centre uses over the lifetime of the Plan.

Replace with the following wording (or similar):

"TCO 4 Work with landowners and other stakeholders in the redevelopment of the identified 'opportunity sites' for appropriate town centre uses over the lifetime of the Plan, recognising that they will in many instances be delivered over a series of independent stages by a combination of owners/developers, which will be facilitated by the Planning Authority."

3(b) TCO 8 Developers will be required to prepare urban design frameworks/masterplan for the Opportunity Sites in Castlebar Town Centre to inform future development proposals."

Replace with the following wording (or similar):

"TCO 8 Developers will be required to prepare urban design frameworks/masterplan for the Opportunity Sites in Castlebar Town Centre to inform future development proposals, without prejudice to the ability to bring forward (masterplanned) proposals for individual parcels within the Opportunity Sites."

- 4. Retail Objectives:** Retail is a listed potential use for the site. The submission considers the wording of the LAP unclear in this regard, given that there is an array of retail types and formats. Suggested it a structured approach (low, middle and higher order retail) in tandem with a review of the Land Use Zoning Matrix to bring clarity on the retail types and scales suitable at this location. The submission references the Retail Strategy and emphasizes the aim for higher order shopping functions in Castlebar town.

The submission considers that low and middle order retail is inappropriate at this location as it is within the Town Centre zoning. It is requested to revise the wording to reflect the above concerns and to bring clarity to the structure and rationale for assessment of future proposals.

5. Opportunity Site 1 Designation – wording:

The submission provides a revised wording for Opportunity Site 1, which they consider would be more appropriate of the site's characteristics and potential. Specifically, it is proposed to revise the table structure and wording for Opportunity Site 1 as follows:

To include/incorporate the following:

5(a) replace the text in the *Potential* section with the following:

The location of the site along Newtown / Newport Road provides potential for a logical extension of the town centre, including the provision of active street frontage delivered by a variety of potential uses and configurations.

The position of the overall site adjoining the Castlebar River also presents opportunities for greater engagement with the River (and Greenway) – Objective NEO11 and sustainable travel and mobility objectives refer.

Given the size of this brownfield site, and its proximity to both residential areas and the commercial core, along with its position on a key leisure and active travel route and within a cluster of education/training activities there are a wide range of compatible and complementary land uses that may be developed on the overall site.

The Strategic Flood Risk Assessment accompanying the Local Area Plan has deemed the site suitable for development subject to appropriate flood risk mitigation to be progressed by a Site Specific Flood Risk Assessment to accompany any proposals for the site, or part thereof.

5(b) Include an additional section (relating to Delivery) with the following text:

Delivery: *the overall site is significant in size and is in multiple ownership areas. As such its overall redevelopment would most likely be staged / phased over the medium to long term. The assessment of individual proposals within the overall site will therefore be considered in the context of an urban design framework(s) / masterplan(s), prepared by landowners / developers, individually or jointly, that have due regard to the overall long term potential of the site*

5(c) Include an additional section relating specifically to **Uses** as follows:

<p><i>Limited retail which does not impact negatively on the vitality and vibrancy of the Inner Town Centre (Retail) Core may be considered.</i></p> <ul style="list-style-type: none">• Residential• Offices• Commercial• Mixed-Use	<p>Potential Land Uses: <i>appropriate land uses will be considered having regard to the Land Use Zoning Matrix in the first instance. Without prejudice to the Matrix, the following core use categories are considered suitable in principle (in equal order):</i></p> <ul style="list-style-type: none">• Residential & Tourism / Visitor Accommodation;• Education & Training;• Offices & Employment;• Mixed-Use Commercial;• Healthcare & Leisure; and,• Low and Middle Order Retail uses.
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6. Strategic Flood Risk Assessment:

The submission highlights a point of confusion arising from the Strategic Flood Risk Assessment (SFRA) progression of development on site. It is accepted that there is need to mitigate against risks by means of Site Specific Flood Risk Assessment (SSFRA). However, it is highlighted that the SFRA states

“Development or change of use at the old hat factory site is not appropriate until such a time as flood risk here has been mitigated and the SFRA updated to apply the Justification Tests for any opportunity sites/significant redevelopment”.

As such it is suggested that this wording could be misinterpreted or suggest that a variation of the LAP would be required to progress any scheme on this site.

The submission proposes that the SFRA be revised to incorporate the following alternative wording (or wording to similar effect):

“ Development or change of use at the old hat factory is subject to mitigation of flood risk through the site specific FRA and Development Management process.”

Noting that the SFRA relies on the Development Management/SSFRA approach, the submission requests that such intent be made clear throughout the LAP in respect of the subject site and similar situations in the LAP.

7. Strategic Environmental Assessment:

The submission highlights references to the SFRA in relation to the subject site as contained in the Strategic Environmental Assessment, in particular the statement

“This area is within Flood Zone B, thus it cannot be redeveloped until such time as the flooding issue is alleviated.”

It is suggested that the description of the site conditions be updated to align to that of the SFRA, and the term ‘alleviated’ be replaced with ‘mitigated’ which would provide consistent terminology and avoid potential for interpretation difficulties.

Chief Executive’s Response and Recommendation:

Response:

1. Comments noted. Mayo County Council will be preparing Masterplans/Urban Design Framework for this site to guide its re-development (see, CE response on [OPR Observation 1](#))
2. The former Hat-Factory site is underpinned by objective *Town Centre* zoning, more specifically

it is located in the identified Town Centre Outer Area. Objective EDO42 of the MCDP 2022-2028 promotes and reinforce all town centres in the county as primary shopping area, furthermore EDO48 of the MCDP further supports retail in town and village centres through the sequential approach in tandem with the Retail Guidelines. In this regard, the request to change the range of uses (as listed in the submission) from 'open to consideration' to 'permitted in principle' would undermine the sequential approach.

3. (a) Comments noted. See, Response 1 above.
(b) Comments noted. See, Response 1 above
4. Comments noted. The draft LAP does not specify a hierarchy order of retail development, as it is considered premature pending the review of the Mayo County Retail Strategy. In the interim, new retail development will be guided by the town centre first sequential approach, as advocated by the retail planning guidelines, and by the policies and objectives of the LAP and Mayo County Development Plan.
5. (a), (b) & (c) Comments noted. The points raised in relation to the wording for Opportunity Site 1/Description Table have been considered, including the proposals for masterplanning/urban design framework, phased delivery and land uses. It is considered that the inclusion of some additional text to reflect the context and potential as proposed are appropriate in this instance.
6. Comments noted. It is recommended that the wording of the SFRA be amended accordingly.
7. Comments noted. It is recommended that the wording of the SFRA and SEA be amended accordingly.

Recommendation:

1. See CE recommendation on [OPR Observation 1](#)
2. No change to draft Plan.
3. (a), (b) See CE recommendation on [OPR Observation 1](#)
4. No change to draft Plan.
5. The following text contained in the description Table for Opportunity Site 1 – The Hat Factory shall be amended as follows:

[Opportunity Site 1 – The Hat Factory](#)



Map HF1 – Site Location

Area: 1.83 Hectares (approx.)

Description: Opportunity Site 1, locally referred to as The Old Hat Factory /Ford garage site, is located along Newtown Rd and contains several buildings/structures. It would appear that most of the old factory buildings are vacant, with only a few commercial units along the main road operational. The majority of the site is under Flood Zone B due to issues surrounding a culvert to the north-east of the site near Marion Row (see Map HF3).

Potential: The location of the site along Newtown Rd provides potential for a logical extension of the town centre, including the provision of active street frontage ~~(at ground level) with accommodation above~~. The position of the overall site adjoining the Castlebar River also presents opportunities for greater engagement with the River (and Greenway)



Map HF2 – Aerial Image of site



Map HF3 – Flood Extent

– Objective NEO 1 and sustainable travel and mobility objectives refer.

Given the size of this brownfield site, and its proximity to both residential areas and the commercial core, along with its position on a key leisure and active travel route and within a cluster of education/training facilities there is a wide range of compatible and complementary land uses that would ~~there is potential for residential purposes to further~~ contribute to the rejuvenation and revitalisation close to and within the town centre - ~~subject to Flooding Guidelines~~.

The Strategic Flood Risk Assessment accompanying the Local Area Plan has deemed the site suitable for development subject to appropriate flood risk mitigation to be progressed by a Site Specific Flood Risk Assessment to accompany any proposals for the site, or part thereof.

Delivery: the site is large and in multiple ownerships. Its overall redevelopment is likely to be incremental over the medium to long term. The assessment of individual proposals within this Opportunity site will be considered in the context of a phased masterplan/urban design framework for the site with due regard to the overall long-term potential of the site.

Potential Land Uses: Limited retail which does not impact negatively on the vitality and vibrancy of the Inner Town Centre (Retail) Core may be considered. The site is considered suitable, but not limited to the following core use categories:

- Residential
- Offices
- Commercial
- Mixed-Use

6. Amend the wording Appendix A (Justification Tests), Section Town Centre, A.4.1 of the SFRA as follows:
Development or change of use at the old hat factory site is ~~not appropriate until such a time as flood risk here has been mitigated and the SFRA updated to apply the Justification Tests for any opportunity sites/significant redevelopment~~ subject to mitigation of flood risk through the site specific FRA and Development Management process.
7. Amend the wording for Opportunity Site 1 – Hat Factory as per Annex A: Assessment Matrix Castlebar Local Area Plan 2022-2028 of SEA document Section as follows:
This area is within Flood Zone B, thus it can not be redeveloped until such time as the flooding issue is ~~alleviated~~ mitigated.

Submission Number:	MYO-C63-25
Submission by:	John Flatley
Issues Raised/Relevant Chapter(s):	Rezone lands to Residential

Summary of Submission:

The submission requests that a 9.71 hectare situated at Rinshinna on the Moneen Road and zoned Community and Enterprise on the DLAP be zoned New Residential.



The proposed rezoning is justified in the submission on the grounds that:

- There is a deficit in the LAP in the provision of residentially zoned lands to the south of Castlebar
 - The proximity of the proposed site to employers, services, education providers and the national rail network
 - The increased connectivity of the Rinshinna area to Castlebar town centre because of proposed measures in the DLTP and the imminent downgrading of a section of the N5
- The ample provision in the DLAP of Enterprise and Employment zoned lands at alternative locations within the town, thereby negating the need to so zone the subject site.

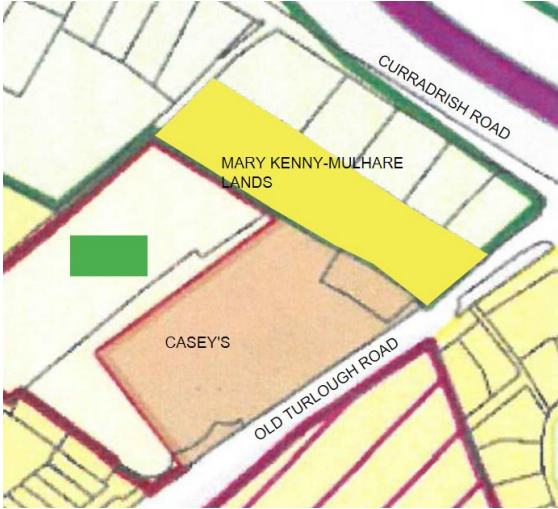
Chief Executive's Response and Recommendation:

Response

It is considered that the rezoning of the current site from Enterprise and Employment to New Residential as proposed, would not promote compact growth and sustainable travel options in Castlebar, by reason of its peripheral and non-sequential edge of town location. Furthermore, the proposed rezoning of these lands to New Residential, in addition to the lands so zoned in the DLAP, would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation

No change to draft Plan.

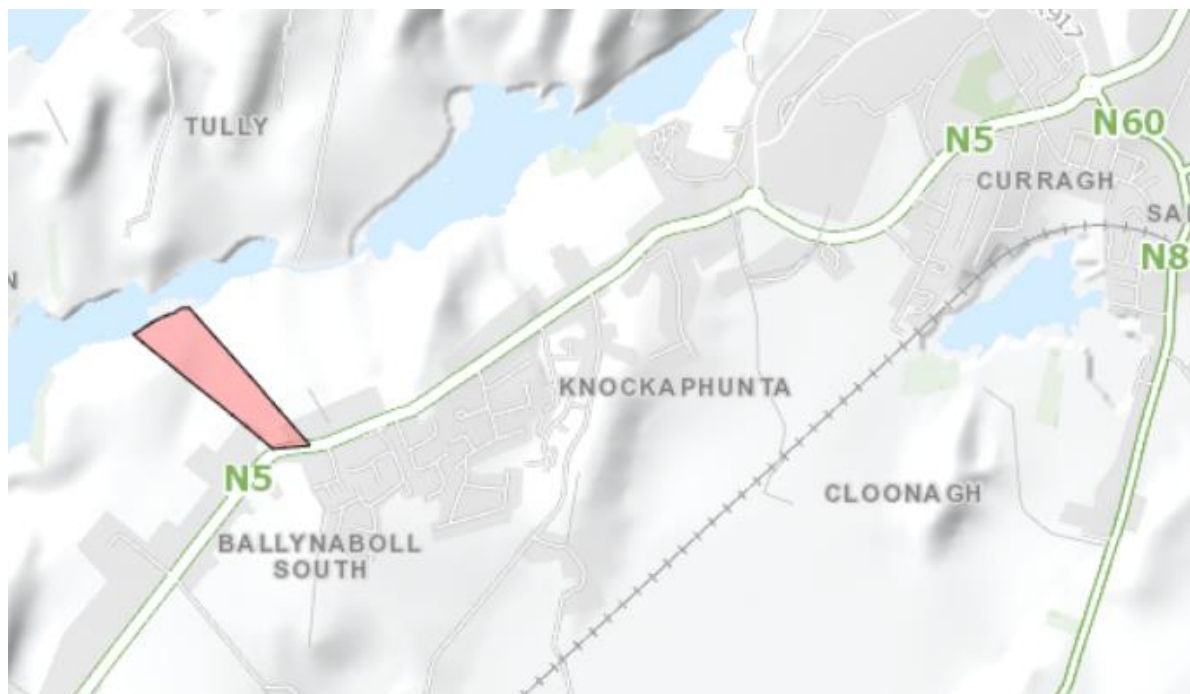
Submission Number:	MYO-C63-28
Submission by:	Mary Kenny-Mulhare
Issues Raised/Relevant Chapter(s):	Rezoning lands at Turlough Road (Knockthomas)
Summary of Submission:	
<p>The submission requests that their existing dwelling and lands at Turlough Road (Knockthomas) are rezoned from Agriculture to Existing Residential.</p> <p>The author also states that the detached dwellings along Curradrish Road are incorrectly zoned Agriculture and request re-zoning them to 'Existing Residential.</p>	
 <p>The map shows a street layout with Curradrish Road at the top and Old Turlough Road at the bottom. A yellow area is labeled 'MARY KENNY-MULHARE LANDS' and an orange area is labeled 'CASEY'S'. A green square is located to the left of Casey's. The roads are highlighted in purple and red.</p>	
Site Location	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The subject lands in question are on the periphery of the town along Turlough Road and others land referred to are on the Curradrish Road. The site in question contains a single one-off dwelling and the character of this area is rural and the other dwellings referred to along Curradrish Road are single on-off dwellings which are also rural in nature. It is therefore considered that due to their location and character that the Agricultural zoning is appropriate in this peripheral location.</p> <p>Recommendation:</p> <p>No change to draft Plan.</p>	

Submission Number:	MYO-C63-30
Submission by:	Kathleen & Eamon Courell
Issues Raised/Relevant Chapter(s):	Northern Orbital Ring Road & Rezoning lands for Residential

Summary of Submission:

The submission seeks to have lands at Ballynaboll North, Castlebar, zoned for residential development (see map below). The owners indicate that they have applied for planning permission on a number of occasions on these lands; however, because of the proposed indicative potential ring road (Northern Orbital Ring Road) these lands have been sterilised for the last 30 years.

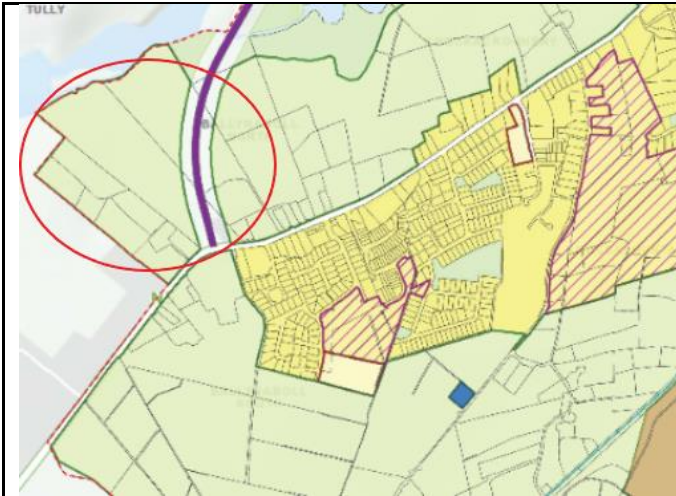
Due to the construction of the new road around Castlebar, they presume there is no need for the indicative road route. They consider their lands a natural geographical extension to the current residential area of Manor Village, Meadow Park etc.



Chief Executive’s Response and Recommendation:

Response:

The subject lands at Ballynaboll North are zoned ‘Agriculture’ in the Draft LAP. The map below shows that the indicative route for the Northern Orbital Ring Road passes through these lands and terminates at the public road (N5), which forms the public road frontage of said lands.



The proposed Northern Orbital Ring Road forms part of a suite of measures to improve traffic movement in Castlebar and delivery sustainable transport options in the town in the revised Draft Castlebar Local Transport Plan (LTP). The delivery of the proposed Northern Orbital Ring Road is a long-term project in the LTP. The opening of the N5 bypass route will not negate the need for the ring road.

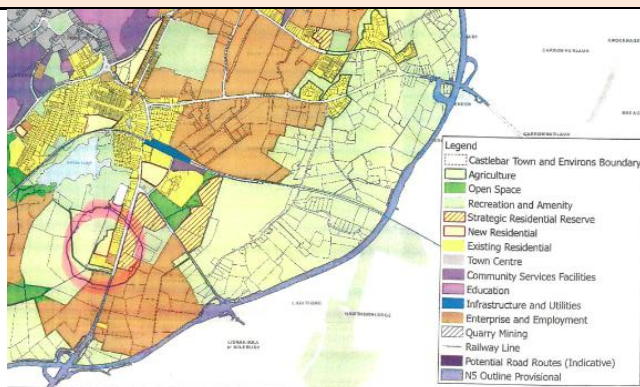
In addition, the proposed rezoning of the lands at Ballynaboll North located at a peripheral location would not promote compact growth and sustainable travel options in Castlebar, by reason of its non-sequential edge of town location. Furthermore, the proposed rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to the draft Plan.

Submission Number:	MYO-C63-31
Submission by:	Connie Durcan : on behalf of residents at Saleen, Ballinrobe Road, Castlebar.
Issues Raised/Relevant Chapter(s):	Zoning - Rezoning of land (from Agricultural to Residential), located to the rear of Kelly's Auto Point garage, Ballinrobe Road (N84).

Summary of Submission:



(map accompanying submission)

1. The submission expresses concern in relation to the zoning of the indicated lands for

residential uses on the basis that this area is a natural floodplain, with the area between Saleen lake and the rezoned area flooded/saturated for c.4 months in the year. It is considered additional building at this location would exacerbate the flood problem.

2. In addition to the above, the submission points out that the subject lands are currently rich in biodiversity and natural habitats, beneficial to climate change.
3. The submission indicates that the area of the zoned land has a past experience of landfilling, which includes, amongst other materials, asbestos and as such is concerned that disturbance of such land could endanger health and safety.
4. It is pointed out that this area, which is served by a major traffic route (N84), experiences very heavy volumes of traffic and congestion along the N84. Concerns is expressed over the potential additional traffic arising from more residential development.
5. In addition, concern is expressed in relation to the zoning of land for *Enterprise and Employment* on the other side of the N84 which, they consider would further contribute to the gridlock experienced at this location.
6. The submission considers that the zoning of the subject lands would render 'green' travel impossible due to high risk to safety, as well as poor air quality.

Chief Executive's Response and Recommendation:

Response:

1. The zoning of the draft Plan is informed by the Strategic Flood Risk Assessment to as to ensure the avoidance of flood risk.
2. Comments noted. This area is not within a designated local biodiversity area.
3. Comments noted. This is not a matter for the Land Use Plan. It can be appropriately addresses at Development Management Stage.
4. The recently opened N5 by-pass of Castlebar has facilitated the removal of volumes of traffic from this location. Furthermore, these lands consist of an unfinished housing estate within the built-up area of Castlebar Town, which is within reasonable cycling and walking distance of the town (and is served by existing walking/cycling infrastructure). Having regard to the size and location of the land/unfinished estate it is considered that development would not generate significant traffic volumes.
5. In regard to the concerns raised in relation to increase in traffic volumes that may potentially result from the *Enterprise and Employment* zoned lands along the N84, the Local Transport Plan for Castlebar (LTP) has consideration for the standards of TII in all development proposals on National Roads. The LTP will include Active Travel measures to align with the LAP land use zonings. In particular, active travel measures will be extended on the N84 to ensure sustainable transport alternatives are available to access Employment and Enterprise land zones. The LTP measures have been developed to safeguard the function and levels of safety of the strategic national road network.
6. Comments noted. There is existing walking and cycling infrastructure along the N84 to entrance of the Waterways residential estate, on both sides of the road. Furthermore, there is a suite of active travel measures included in the LTP for Castlebar that will augment and compliment the existing active travel network of the town.

Recommendation:

1. to 6. No Change to draft Plan.

Submission Number:	MYO-C63-32
Submission by:	The Planning Partnership on behalf of: Lidl
Issues Raised/Relevant Chapter(s):	<ul style="list-style-type: none"> • Zoning – to reflect existing uses on site • Retail (General), Retail (Site Specific), proposed amendments to matrix • Chapter 4 • Chapter 5, Section 5.6 Retail; Section 5.9 Economic Development Policy and Objectives (Retail & Town Centre Objectives) • Chapter 11, Section 11.4 Land Use Zoning Objectives, Section 11.5 Land Use Zoning Objectives
Summary of Submission:	
<p>It is stated that Lidl store provides an important retail function, playing an important role in the retail landscape of the town - given its location within the mixed-use Barcastle leisure and retail quarter as well as its strategic location proximate to residential, educational and town centre areas.</p> <p>The submission requests that the Local Area Plan reflect the extant function of the Lidl site and wider mixed-use nature of this location, in particular the long-established and existing use of the site as served by the Lidl store.</p> <p>1. <u>Zoning Policy/Objectives:</u></p> <p>Concern is expressed in relation to the use of the extensive use of <i>Enterprise and Employment</i> zoning objective throughout the Draft LAP, which leads to a degree of uncertainty as to the intended order of commercial-type development within the town. Outside of the Town Centre, the range of zoning objectives for commercial/private development is limited and non-specific, particularly for retail-type development.</p> <p>1(a) Additional Land-Use Zoning Objective:</p> <p>The submission is concerned with the extensive use of Enterprise and Employment zoning which promotes a more industrial form of development, rather than higher intensity uses. A more targeted approach to zoning including associated use-types that reflect the established use and function of the site is suggested. The submission proposes an additional Land-use Zoning Objective - to better reflect the context and potential of the Lidl site. Suggested is a <i>MIXED USE</i> or <i>GENERAL DEVELOPMENT</i> zoning objective to facilitate a more dynamic range of uses.</p> <p>A suite of use-types is proposed for inclusion into the Land Use Zoning Matrix, including types that are 'Permitted in Principle' and 'Open for Consideration' and suggests that specific retail categories listed in the Matrix should be clearly defined.</p> <p>1(b) Retail-Use (General):</p> <p>The submission refers to the provisions contained in the Retail Planning Guidelines 2012, in relation to the Town Core, as well as, the care required in relation to the retail need of towns and cities through policy and objectives in a development plan or retail strategy (as appropriate). The submission considers that blanket approach of 'all retail in the town core' is insufficient, given the retail ambition to establish a Regional Centre for higher order shopping in Castlebar by the Planning Authority (as per the Retail Strategy). The submission proposes that the final LAP should have a more targeted approach to Retail and Town Centre uses, including the identification of higher, middle and low order retail groups.</p> <p>1(c) Retail-Use (Specific to Lidl site):</p>	

The submission expresses concern in relation to the use of the *Enterprise and Employment* zoning objective underpinning the Lidl site/lands. Retail uses such as Shop/Retail (Comparison), Shop/Retail (Convenience) and Shopping Centre/Supermarket are 'Not Permitted' in principle. As such the use of the existing premises would be compromised - being reliant on a 'non-conforming use' approach to guide development. It is highlighted that this situation is not unique to the Lidl site but to other similar sites throughout the LAP area.

It is requested that the Lidl site/lands be identified as a whole (as outlined in red on the map contained in the submission) for development that is compatible with, and reflective of, its current retail use.

1(d) Retail use categories/Land Use Zoning Matrix:

The submission also draws attention to the land use zoning matrix and the potential for misinterpretation for the retail categories of development listed, e.g. Shop/Retail (Comparison), Shop/Retail (Convenience) and Shopping Centre/Supermarket. It is pointed out that the type and scale of development for each of the retail categories is undefined and therefore unclear as to what is envisaged in both the Land Use Matrix and throughout the LAP. For example, in the case of Shopping Centre/Supermarket, no definition is provided in relation to the threshold, which is important given the very different characteristics between a shopping centre and a supermarket. Hierarchy of retail scale should be provided; and be clearly defined in the Land Use Matrix in order to match the retail format to the land-use categories in order to promote appropriate retail types and scaled development. Examples as per the Retail Planning Guidelines are provided.

The submission, includes a proposed a matrix/table assessing location type against a hierarchical order of retail formats and proposes that such an approach be added to the Land Use Matrix in lieu of the current provision for retail formats.

2. Vacancy Policy & Objectives:

The submission considers that it is important to identify the constituent causes, solutions and contributing elements to vacancy.

Expresses concern in relation to sources of information determining Vacancy in Castlebar, i.e. over-reliance on GeoDirectory and suggests the use and inclusion of more accurate information sources e.g. town centre health checks and vacancy surveys to inform vacancy levels. It is suggested that vacancy is relevant across a range of use types (not solely retail) and therefore of itself should not present a barrier or preoccupation specifically relating to retail developments and should be considered in a balanced context. The absence of comprehensive data on Vacancy should not be a barrier to any form of new development and that vacancy of itself should not be a barrier to the development of new floorspace.

It is suggested that a database of Vacant Premises, informed by the Rates System, should inform the Vacancy levels in Castlebar. In addition, it is suggested that policies and objectives relating to urban vacancy should be positive and proactive rather than restrictive and reactive.

3. Mapping:

This submission proposes that the zoning map be updates to reflect a new land use for the subject site and/or other lands of similar characteristics as deemed appropriate.

4. Proposed amendments to policy and objectives contained in the Written Statement:

Based on the issues raised and rationale contained in the submission amendments are proposed for the following policies and objectives contained therein:

4(a) EDP 4 Support the retail function of Castlebar as a Regional Tier 2 Category town in the Retail Hierarchy, and to consolidate existing retail development within the town centre.

Replace with the following wording (or similar):

"EDP 4 Support the retail function of Castlebar town core as the only high order retail/service

destination in the Settlement, and implement a hierarchical approach to the distribution of middle and lower order retail functions outside the town core, where they would not undermine the primary function of the town core.”

4(b) EDP 6 Support and facilitate the development of retail led tourism associated with the natural and built heritage assets of Castlebar

Replace with the following wording (or similar):

“EDP 6 Support and facilitate the development of high order and experiential retail and leisure led tourism associated with the natural and built heritage asses of Castlebar.”

4(c) EDO 7 Support, promote and facilitates measures, such as town centre regeneration, implementation of the local transport plan to improve accessibility and public realm improvements and other town centre first initiatives over the plan period, to reduce retail and commercial vacancy in Castlebar town centre.

Replace with the following wording (or similar):

“EDO 7 Support, promote and facilitates measures, such as town centre regeneration, vacancy/occupancy monitoring and measurement, implementation of the local transport plan to improve accessibility and public realm improvements and other town centre first initiatives over the plan period, to reduce retail and commercial vacancy in Castlebar town centre.”

4(d) EDO 4 The Council, in accordance with the Retail Planning Guidelines for Local Authorities (DECLG, 2012 or as amended or superseded) will continue to protect and promote the vitality and viability of Castlebar town centre, including applying a ‘town centre first approach’ or sequential test for retail developments.

Replace with the following wording (or similar):

“EDO 4 The Council, in accordance with the Retail Planning Guidelines for Local Authorities (DECLG, 2012 or as amended or superseded) will continue to protect and promote the vitality and viability of Castlebar town centre, including applying a ‘town centre first approach’ or sequential test for retail developments, having regard to the type of retail in question and its specific suitability for the town centre”

Chief Executive’s Response and Recommendation:

Response:

1 . Comments noted. Objective(s) EDO 42 MCDP 2022-2028 promotes and reinforce all town centres in the county as primary shopping area and Objective 43 requires that the principle of ‘sequential approach’ must be adhered to in consideration of retail applications located outside of core retail areas. Furthermore, EDO 48 of the MCDP further supports retails in town and village centres through the sequential approach in tandem with the Retail Guidelines. In addition, Section 5.0 of the (Vol. 2) of the County Development Plan provides Development Management Standards in respects of Enterprise and Employment, including the various types of development types and uses. In particular, DM Standard 5.2 relates to Retail/Commercial Development and the type of developments on lands zoned Enterprise Employment which focuses on the fundamental objective to support the vitality and viability of the retail centres (town centre) and focus appropriate retail /commercial development in accordance with the role and function appropriate to its location. This focus is reflected in the Town Centre zoning for Castlebar, where it is a priority area to locate retail in both its Inner and Outer Town Centre areas. The land use matrix of the draft LAP is specific in terms of the type of retail type in each of the zoning categories, including that on Enterprise and Employment zoned land.

1(a) It is considered that a *mixed-use* or *general development* zoning of the type proposed, (which is essentially a town centre type zoning), or a on a site that is located at a distance from the

town centre; would impact negatively on the commercial viability of the town centre and mitigate against the rejuvenation of the town centre, which is the central tenet of the Town Centre Regeneration Strategy outlined in chapter 4 of the Draft LAP.

1(b) It is an objective of the Mayo County Development Plan 2022-2028 under Objective EDO 41 - To implement/review the Mayo County Retail Strategy in accordance with the Retail Planning Guidelines 2012, as amended or superseded, within 3 no. years of the final adoption of the Mayo County Development Plan, which will, the Retail approach for the County, including Castlebar.

1(c) The existing use of the Lidl development on the subject site is established. Future development of Retail formats on Enterprise and Employment zoned land will not permitted in principle on such lands, as it would impact negatively on the commercial viability of the town centre and mitigate against the rejuvenation of the town centre, which is the central tenet of the Town Centre Regeneration Strategy outlined in chapter 4 of the draft Plan.

1(d) See response under point(s) 1, 1(a) and 1(b) above. Retail uses will be directed to the Inner and Outer Town Centre areas to promote and reinforce town centre as primary shopping areas (as per EDO 42 of the MCDP 2022-2028).

2. Comments noted.

3. See response to Point 1(a) above.

4(a)-(d) See response to Point 1(b) above. Until such time as the Retail Strategy is reviewed and adopted, it is considered that the proposed wording is premature.


Recommendation:

1- 1(d) No change to draft Plan.

2. No change to draft Plan.

3. No change to draft Plan.

4(a)-(d). No change to draft Plan.

Submission Number:	MYO-C63-34
Submission by:	The Planning Partnership on behalf of: Mavenbrook Ltd.
Issues Raised/Relevant Chapter(s):	Land Use Zoning Map, Chapter 11 Land Use Zoning Objectives, SFRA
Summary of Submission:	
<p>The submission seeks the rezoning of a c. 2.8-hectare site on the Ballinrobe Road.</p>  <p style="text-align: center;"><u>Site Location</u></p> <ol style="list-style-type: none"> 1. The northern three quarters of the site is zoned New Residential in the DLAP and the submission requests that this be changed to what is essentially a mixed-use commercial type zoning, on the grounds of its strategic location, especially in terms of the new N5 by-pass, enhanced permeability plans in the Draft LTP and Irish Rail plans for a Freight Hub in the immediate vicinity. The submission also states that the site is zoned Neighbourhood Centre as what was in the previous Castlebar Town and Environs Plan. 2. The southern quarter of the site is zoned Recreation and Amenity in the DLAP and the submission contends that while this zoning is most likely as a result of this portion of the site having being identified in the SFRA, as being in Flood Zone B, that the mixed use zoning proposed for the northern section of the site, if also applied to this section, would allow for less vulnerable commercial type water compatible uses on site. 3. The submission concludes by suggesting that as residential uses under the new proposed zoning would only be "Open for Consideration", then the RZLT tax would not be applicable to the site. 	
Chief Executive's Response and Recommendation:	
<p>Response</p> <ol style="list-style-type: none"> 1. It is considered that a mixed-use zoning of the type proposed, (which is essentially a town centre type zoning), on a site that is located a considerable distance from the town centre; would impact negatively on the commercial viability of the town centre and mitigate against the rejuvenation of the town centre, which is the central tenet of the Town Centre Regeneration Strategy outlined in chapter 4 of the DLAP. 2. See Above. 3. This is not a matter for consideration as part of the Draft LAP procedures. <p>Recommendation</p> <ol style="list-style-type: none"> 1. to 3. No change to draft Plan. 	

Submission Number:	MYO-C63-36
Submission by:	Patrick Gallagher
Issues Raised/Relevant Chapter(s):	Rezone lands for Residential

Summary of Submission:

The submission requests to extend the 'Existing Residential' zoning to the existing residential development (The Waterways) located off the Ballinrobe Road (N84) to include the entrance road to this housing estate, which is 80% complete, as shown in the zoning map and aerial image below.



Chief Executive's Response and Recommendation:

Response:

The Waterways residential development is an unfinished housing scheme. The existing entrance to the existing residential development is zoned 'Agriculture' in the Draft LAP. New Residential zoned lands are proposed in the draft Plan to appropriate complete this development. Therefore, the proposed zoning amendment of the entrance road from 'Agriculture' to 'Existing Residential' accurately reflects the existing residential development, as built, and therefore is considered acceptable.

Recommendation:

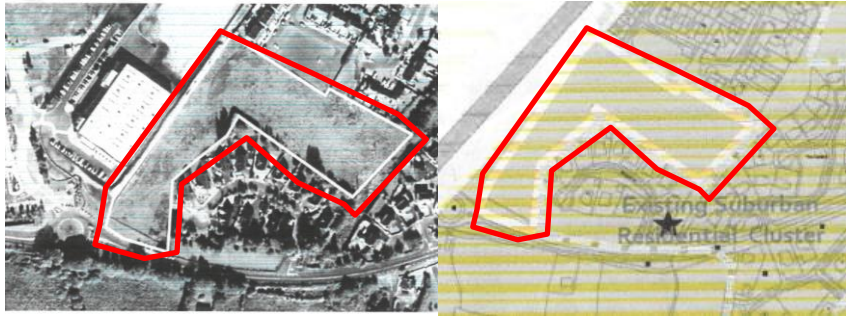
Change of zoning of the existing entrance road to the existing 'The Waterways' residential development from 'Agriculture' to 'Existing Residential'.

Submission No	MYO-C63-37
Submission by:	Seamus Regan
Issues Raised/Relevant Chapter(s):	Zoning of land at Ashwood, Breaffy Road

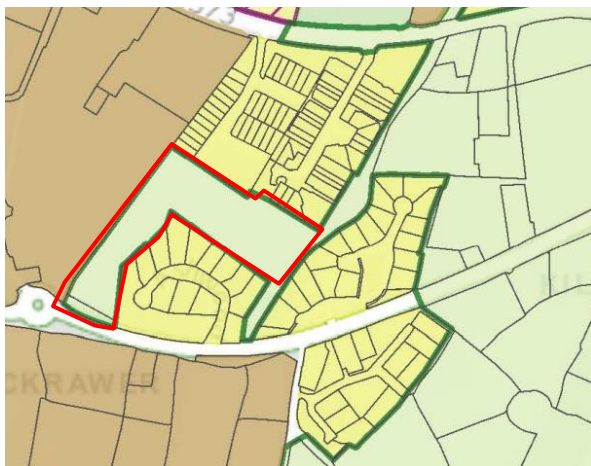
Summary of Submission:

This submission consists of a letter from Seamus Regan accompanied by an Issues Paper prepared by The Planning Partnership consultants. The submission is seeking the re-zoning of land at Ashwood, Breaffy Road, Castlebar from 'Agricultural' to 'Residential (Medium Density)' zoned land.

Subject Site at Ashwood (Approx. Boundaries Outlined in Red)



(maps included in submission)



(map extract from Draft Castlebar T&E LAP. Location of subject land is indicated in red)

The submission highlights the location of the land, adjoining the IDA Business & Technology Park, its proximity to existing residential development and means of access along the Breaffy Road.

The issues paper puts forward a rationale for the re-zoning based on the following:

- a) a previous zoning objective for Residential-Infill which once applied to a substantial portion of subject lands (since changed by Variation to the original Castlebar Town & Environs Development Plan 2008-2014 to its current zoning as 'Rural Character').
- b) its location, considered as proximate to the town centre (5-minute drive) and the adjoining commercial area;
- c) the sequential location: it is argued that the location is sequentially comparable to other residential clusters and zoned locations in Castlebar and as such would accord with the sequential approach for residential development as advocated by national policy guidance.
- d) available means of access to/from the site along the Breaffy Road.
- e) As the N5 by-pass is now complete, the constraints associated with the reserved route corridor is now removed from lands at this location.
- f) The NPF's National Policy Objective(s) 11, 13, 3a, 32, 33 and 35 in relation to a suite of

national measures including - urban development/targeted growth; building height, parking and quality outcomes; delivery of housing within built-up urban footprints; national targets for 550,000 additional households; and increased residential density through a range of targeted measures.

Having regard to the forgoing, the submission therefore requests that the subject land be zoned as New Residential (Medium Density only) on the basis that it would assist in the national target for the delivery of houses, provide for infill-residential development in this sub-urban location, and would conform to the (residential) pattern of development in the area.

Chief Executive’s Response and Recommendation:

Response:

The subject land is location on lands zoned ‘Agriculture’ in the Draft Castlebar Town and Environs LAP 2023-2029. Notwithstanding any previous zonings that once applied to these lands, it is considered that residential development at this edge of town, peripheral location would not promote compact growth or sustainable travel options, by reason of its non-sequential edge of town location.

Furthermore, the rezoning of these lands for residential development would be contrary to the Core Strategy as set out in the Mayo County Development Plan 2022-2028.

Recommendation:

No change to the draft Plan.

Submission Number:	MYO-C63-38
Submission by:	David O’Malley and Associates on behalf of: Seamus Neary
Issues Raised/Relevant Chapter(s):	Request to rezone lands from Strategic Reserve to Residential.

Summary of Submission:

The subject land parcel is zoned ‘Strategic Reserve’ in the Draft Castlebar LAP and is situated along the northern perimeter of the town, in the townland of Carrowcurry, off the Pontoon Road. The submission requests that this zoning be changed to ‘Residential’ zoning. Justification is provided including issues with residentially zoned lands.



Site Location

Chief Executive’s Response and Recommendation:

Response:

See CE response on [OPR Recommendation 1 \(V\)](#).

Recommendation:

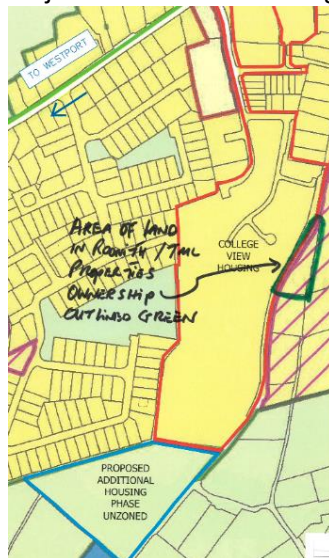
See CE recommendation on [OPR Recommendation 1 \(V\)](#).

Submission Number:	MYO-C63-42
Submission by:	Grady Architects on behalf of Roonith Properties (TML Properties)
Issues Raised/Relevant Chapter(s):	Rezoning lands for Residential

Summary of Submission:

The submission relates to lands (outlined in green below) at College View Housing Estate, situated on the east side of the L-5756-0 road. These lands are currently zoned ‘Strategic Residential Reserve’ in the Draft LAP.

The submission indicates that these lands will not be developed in the short term due to the absence of an acceptable access from the L-5756-0 road onto the Westport Road. Therefore, it is requested to reconsider the zoning of the lands to the south of College View Housing Estate (outlined blue below) in lieu of the subject lands zoned ‘Strategic Residential Reserve’.



Site Location

Chief Executive’s Response and Recommendation:

Response:

Strategic Residential Reserve lands are not generally development during the lifetime of the plan. These lands are zoned to protect and safeguard suitable lands for future residential development. The subject lands to the south of the College View Estate are zoned ‘Agriculture’ in the Draft LAP and have been considered in MYO-C63-9 above. Notwithstanding the above, the subject site has been rezoned to ‘Agriculture’, see CE response on [OPR Recommendation 1 \(V\)](#).

Recommendation:

See CE recommendation on [OPR Recommendation 1 \(V\)](#).

Section 5 Remaining Submissions

Submission Number:	MYO-C63-1
Submission by:	Harry Barrett
Issues Raised/Relevant Chapter(s):	Aarhus Convention
Summary of Submission:	
<ol style="list-style-type: none"> 1. This submission relates to the strengthening of the rights of local people to have their concerns heard about a development; especially where a development contravenes the Castlebar Town and Environs Plan, as passed by Elected Members. 2. The submission also highlights that the UN's 1998 Aarhus Convention guarantees citizens' rights to seek reviews of decisions made by public authorities on environmental matters, and requests that this right would be committed to and respected, in the new Plan for the Castlebar Environs. 	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <ol style="list-style-type: none"> 1. Comments noted. 2. The plan-making process for local area plans includes statutory public consultation periods, wherein members of the public can have their say through making a submission or observation on the plan and associated environmental reports. The Draft Castlebar Town and Environs LAP and supporting environmental reports were placed on public display from the 28th of February 2023 to the 11th of April 2023. Any material amendments to the draft Plan with also be. <p>Recommendation:</p> <p>1-2 No change to the draft Plan.</p>	

Submission Number:	MYO-C63-8
Submission by:	Brian Moran
Issues Raised/Relevant Chapter(s):	Ring Road & Rezoning lands for Residential

Summary of Submission:

The submission seeks to omit Objective MTO 7 (Northern Orbital Ring Road) from Section 7.10 (Movement and Transport Policy & Objectives) of the draft Plan for the following reasons:

- Since the publication of the 1980 Castlebar and Environs Plan, his lands (outlined in red on map below) have been seriously affected by the reservation of land for the Ring Road.



- There has been little or no progress to construct the over the last 40 years. Objective MTO 7 of the draft Plan does not propose to construct the road but rather reserve the line free from development.
- The continual objective to reserve land for the ring road over a protracted period contravenes the principles and practice of planning, is in contravention of the Government’s Guidelines on Development Plans and is contrary to natural justice, in terms of the impact on this property rights.
- The need for the ring road has been superseded by the construction of (1) the N5 Westport to Turlough Road Scheme, and (2) Castlebar Inner Relief Road, which takes traffic from the N5 to the R311.
- The rationale for the Northern Orbital Ring Road ring road is questionable, given the limited population growth, climate change, reduction of greenhouse gas emissions, sustainable transport polices and compact urban growth. Any Cost/Benefit Analysis of the 12km ring road would show the road being uneconomical.

Chief Executive’s Response and Recommendation:

Response:

The LTP includes a rationale for the northern section of the Northern Orbital Ring Road (NORR). The remainder of the NORR will be included in the LAP as a long-term aspiration for a future transport corridor that may be required for active travel, public transport and access for potential long-term future development within the principle of compact growth.

The route could unlock potential in the future for additional management of traffic in the town centre area enabling more allocation of road space on town centre streets to public realm enhancements, active travel and public transport providing an overall positive mode shift.

This route would be subject to further analysis in the future in line with normal application procedures and processes. See CE response to [OPR Recommendation 4](#).

Recommendation:

See CE recommendation to [OPR Recommendation 4](#).

Submission Number:	MYO-C63-10
Submission by:	Mayo Dark Skies
Issues Raised/Relevant Chapter(s):	Ecologically friendly lighting practices
Summary of Submission:	
<ol style="list-style-type: none"> 1. The submission requests the inclusion of policies and objectives for the use of Dark Sky Friendly lighting for all new lighting and lighting upgrades in Castlebar as the current levels of light pollution stemming from Castlebar's urban environment is affecting the protected site. Standards for lighting for planning applications is included along with standards for pedestrian/cycle routes, sports facilities, unlit areas, public buildings, lighting for architectural features and water bodies. 2. The submission also requests the alignment with UN SDG's. 	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <ol style="list-style-type: none"> 1. DM standards for dark sky friendly lighted are included in the MCDP 2022-2028 and cover all areas of the county including Castlebar. It is not considered necessary therefore to include or repeat standards and policies in the Draft Castlebar Local Area Plan. 2. Noted <p>Recommendation:</p> <p>1 -2. No change to the draft Plan.</p>	

Submission Number:	MYO-C63-12
Submission by:	New Castlebar Track Group
Issues Raised/Relevant Chapter(s):	Running track and associated facilities.
Summary of Submission:	
The submission requests the inclusion of a policy/objective for the development of a modern running track and facilities. Justification for same is set out.	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>An objective is already included in the CLAP under HSCO 16 which states 'To Support and facilitate the provision for the development of an outdoor running track for Castlebar'.</p> <p>Recommendation:</p> <p>No change to the draft Plan.</p>	

Submission Number:	MYO-C63-15
Submission by:	Heather Mc Neel on behalf of: An Post
Issues Raised/Relevant Chapter(s):	Local Transport Plan
Summary of Submission:	
<p>The submission requests the following –</p> <ol style="list-style-type: none"> 1. The inclusion of provisions for An Post postal facilities (An Post Customer & An Post e-Commerce) as ‘Permissible in Principle’ or ‘Open for Consideration’ land uses across all zoning objectives in the Castlebar Local Area Plan. 2. The inclusion of policies to support An Post’s ambition to enhance postal facilities. 3. It is requested that MCC recognise the specific operational requirements of An Post with regards the operation of post offices and mail sorting offices and identifies the issues of car parking and deliveries and access to be considered. It is requested that Mayo County Council provide flexibility with car parking standards for postal facilities. 4. Regarding deliveries and access MCC are requested to recognise that Postal facilities which are located in urban areas have specific requirements to be recognised in the future assessment and preparation of planning policy. 5. The submission also notes the importance of adequate vehicular access for An Post sites and requests that during the preparation of any future public realm and Active Travel strategies that Mayo County Council consult with An Post. 6. The submission made as part of the LTP is included with this submission. 	
Chief Executive’s Response and Recommendation:	
<p>Response:</p> <ol style="list-style-type: none"> 1. Postal facilities are covered in Enterprise and Employment and Town Centre zoning objectives, which is considered sufficient. It is not considered appropriate to make specific changes to facilitate one organisation over another. 2. It is not considered necessary to include policies regarding the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, as this has been addressed in the MCDP. 3. Parking standards for all developments are set out in Volume 2 – Development Management Standards. Parking will be assessed during the planning application process. It is not considered appropriate to make specific changes to facilitate one organisation over another. 4. Access requirements are set out in Volume 2 – Development Management Standards. Access will be assessed during the planning application process. 5. Opportunities to make submissions are available during the preparation of public realm plans and the Castlebar LTP, which An Post have availed of. 6. The proposals made in the LTP submission will be considered in the design stage of the individual projects as they are developed. It is noted that the individual projects will be subjected to public consultation, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders. <p>Recommendation:</p> <p>1– 6. No change to the draft Plan.</p>	

Submission Number:	MYO-C63-17
Submission by:	RMLA Planning Consultants on behalf of: Tesco Ireland Ltd.
Issues Raised/Relevant Chapter(s):	Draft Local Transport Plan
Summary of Submission:	
<p>This submission refers specifically to details contained in the Draft Castlebar Local Transport Plan, on public display concurrently which informs the Draft Castlebar Town & Environs Local Area Plan 2023-2029 (LAP). Tesco Ireland have made submission to the Draft Castlebar Transport Plan and welcomes the opportunity to engage with the Local Authority in respect of the preparation of the Draft LAP. A copy of the submission made to the Draft Castlebar Transport Plan forms the basis for this submission, summarized below:</p> <p>The submission comments on transport issues raised in relation to <i>Proposal No. 3</i> of the Draft Castlebar Local Transport Plan, which relates directly to site access arrangements for the Tesco Superstore at Market Street/Hopkins Road. In particular, three main areas of consideration are raised – Junction Upgrades; Segregated Pedestrian & Cyclist Facilities; and Mobility Hub.</p> <p>1. Junction Upgrades:</p> <p>Two options are being considered by Tesco Superstore in relation to Junction 1A:</p> <ol style="list-style-type: none"> (1) ‘Dutch Style roundabout with existing access to carpark being retained; (2) Traffic signals with existing site access being relocated to Lannagh Road. <p>Tesco consider that ‘Dutch Style Roundabout’ could be delivered whilst maintaining safe & effective access for all users.</p> <p>However, they have concerns in relation to the proposal for ‘Traffic Signals with relocation of access’ and how it can deliver safe & effective access to all users. In particular they are concerned that the proposed relocation of the site access presents design issues relating to the following:</p> <ul style="list-style-type: none"> - Indicative access adjoining an area of the carpark that is not designed as an entry/exit point to safely manage conflict; - Conflict with existing pedestrian ramped access from Lannagh Road Roundabout. - Gradient between carpark and Lannagh Road and ability to accelerate to join Lannagh Road on egress - Impact on mature trees - Visibility splays on Lannagh Road affected by dense vegetation - Capacity of Lannagh Road for a full movement junction - Integration with future segregated pedestrian/cyclist facilities on Lanangh Road. <p>Notwithstanding further design progression and consultation, in principle Tesco could support a Dutch Style Roundabout option, but do <u>not</u> support the Traffic Signal with Relocated Site Access as indicated in the Draft Castlebar Local Transport Plan.</p> <p>2. Segregated Pedestrian & Cyclist Facilities:</p> <p>In principle, Tesco Ireland supports provision of enhanced pedestrian and cyclist facilities. The following consideration are put forward:</p> <ul style="list-style-type: none"> - Generous sightlines should be provided along Hopkins Road (as a major route), mainly between drivers and cyclists, to ensure safe use of junction by the various mode users. - The shared street proposal along Hopkins Road could be supported by localized junction improvements to facilitate reduction of vehicular speeds and promote pedestrian priority i.e. raised tables, etc.). Improved connectivity between the Greenway and Hopkins Road would benefit all users. 	

3. Mobility Hub:

The Draft LTP refers to provision of a Mobility Hub (e-cycles charging and parking). It is suggested that such mobility hubs should include facilities for adaptive and cargo bikes.

Having regard to the forgoing, the Tesco Ireland support initiatives to enhance sustainable transport infrastructure that encourages more public transport and active travel and welcomes the ability to take part in the public consultation.

Chief Executive's Response and Recommendation:**Response:**

1-3 Comments noted.

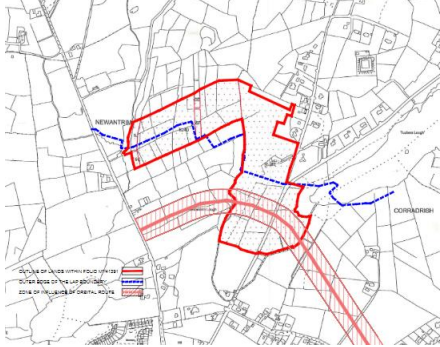
In respect of all points raised, it should be noted that the proposals made in the submission will be considered in the design stage of Local Transport Plan projects as they are developed. All individual projects set out in the Castlebar Local Transport Plan will be subjected to public consultation, technical assessments, environmental assessments, heritage studies, relevant statutory procedures and consultation with the relevant statutory stakeholders.

Recommendation:

1-3 No change to draft Plan.

Submission Number:	MYO-C63-22
Submission by:	Gene McConway on behalf of: Wyckam Limited
Issues Raised/Relevant Chapter(s):	Chapter 7 – Movement & Transport
Summary of Submission:	
<ol style="list-style-type: none"> 1. The current submission questions the inclusion in the DLAP, in Table 7.5, of a commitment to build the R311-R310 Inner Relief Road. 2. The author states that this proposed road line in impacting on his ability to develop two housing schemes that are currently under consideration by the planning authority, developments which he believes would contribute positively towards meeting the current shortfall in housing provision, and government targets for reduction in transport emissions, as outlined in Climate Action Plan 2021. 3. The submission also references plans in current planning applications under consideration, to re-direct a stream that currently traverses one of the application sites. 	
Chief Executive's Response and Recommendation:	
Response:	
<ol style="list-style-type: none"> 1. The R311-R310 Inner Relief Road is also listed in Table 6.5 Road Projects in Co. Mayo, of the Mayo County Development Plan 2023-2029 and as such cannot be removed under LAP procedures. 2. This is a matter for consideration under development management procedures. 3. This is a matter for consideration under development management procedures. 	
Recommendation:	
1 - 3. No change to draft Plan.	

Submission Number:	MYO-C63-26
Submission by:	Castlebar Athletic Club
Issues Raised/Relevant Chapter(s):	Running Track for Castlebar
Summary of Submission:	
<p>The submission welcomes Objective HSCO 16 and requests the following additional text be added to Section 6.7-</p> <p><i>“The provision of a regional athletic facility including an 8 lane, 400 meter running track will greatly enhance Castlebar as a great location to live, work and study. As a foundation sport in fitness its provision will assist all the other sports along with athletics and assist as a facility that will be used by the schools, clubs and local community groups. We see this as a key Sports and Recreation objective.”</i></p>	
Chief Executive’s Response and Recommendation:	
<p>Response:</p> <p>An objective is included in the CLAP under HSCO 16 which states ‘To Support and facilitate the provision for the development of an outdoor running track for Castlebar’. It is not considered necessary to add additional text in relation to this.</p> <p>Recommendation:</p> <p>No change to the draft Plan.</p>	

Submission Number:	MYO-C63-27
Submission by:	O’Grady Consulting Engineering Ltd on behalf of Michael McHale
Issues Raised/Relevant Chapter(s):	Chapter 7 Movement and Transport
Summary of Submission:	
<p>The submission requests that the northern orbital route be removed from the draft Plan on the basis that it will not be constructed within the lifetime of the Plan. The submission notes that the Draft Castlebar LTP does not identify or make a case for the orbital route but rather identifies isolated permeable links, one of which connects the L1719, old Turlough Road and the N5. The submission states that the long-term proposal for the orbital route sterilises much of their lands at New Antrim, Castlebar (see subject lands outlined in red in map below). The orbital route is also placing an unacceptable burden on their lands, which is impacting their current need for housing for family members.</p>	
	
Site Location	

Chief Executive’s Response and Recommendation:**Response:**

The LTP includes a rational for the northern section of the Northern Orbital Ring Road (NORR). The remainder of the NORR will be included in the LAP as a long-term aspiration for a future transport corridor that may be required for active travel, public transport and access for potential long term future development within the principle of compact growth.

The route could unlock potential in the future for additional management of traffic in the town centre area enabling more allocation of road space on town centre streets to public realm enhancements, active travel and public transport providing an overall positive mode shift.

This route would be subject to further analysis in the future in line with normal application procedures and processes. See CE response to [OPR Recommendation 4](#).

Recommendation:

See CE recommendation to [OPR Recommendation 4](#).

Submission Number:	MYO-C63-40
Submission by:	Maryland Residents Association
Issues Raised/Relevant Chapter(s):	Land Use Map/Zonings
Summary of Submission:	
<p>The current submission raises concerns in relation to the following aspects of the proposed LAP and how these might impact on the residential amenity of the Maryland housing estate and other residential areas in the Castlebar as a result of the proposed Enterprise and Employment zoning, LUZ 3. The submission is specifically concerned as to how the range of commercial and industrial uses permitted under this zoning might impact on the residential amenity of the Maryland estate, which adjoins the Golden Mile Industrial estate.</p> <ol style="list-style-type: none"> 1. The residents consider that the range of permitted under LUZ 3, which range from heavy industry to creches, are often contradictory and do appear to give consideration to the safety aspects and appropriateness of permitting such uses under the same zoning. The submission compares this situation with previous plans which differentiated between areas suitable for heavy and light industries which allowed for planned areas within industrially zoned areas. 2. The residents fear that many existing long-established business in proposed Enterprise and Employment zoned lands, that are not heavy/light industry of retail/warehousing, would not now be permitted under the new zoning and would be considered as non-conforming uses, with consequent negative impacts on established local convenience. 3. The uses permitted under LUZ 5 should be expanded to allow service and amenity related uses and these could act as buffer zones to lessen the impacts of the heavier industrial type uses permitted on the amenity adjoining residential areas. 4. The submission sees contradictions between the stated objective for LUZ 3 Residential Amenity, which is; <i>“to improve the amenity and character of existing residential areas</i>, when such lands are immediately adjacent to lands zoned L5 Enterprise and employment, which allow logistics, storage and distribution, uses that can impact on the residential amenity of adjoining estates due to noise pollution. 	

5. The submission contends that, unlike the zoning in previous town plans, the LUZ 3 Enterprise and Employment zoning in the Draft LAP does not differentiate between areas that are suitable for heavy industry as opposed to light industries and that amenity and service style uses are not permitted under the matrix for this zoning, thereby removing the opportunity to locate buffer type, more compatible uses closer to the boundaries with existing residential areas.
6. The Maryland Residents in their submission highlights the current situation in the Golden Mile Industrial estates which adjoins the northern boundary of their estate, where they say that state that in recent years the permitted offices type uses close to their boundary have been replaced with non-permitted heavier warehousing and logistic type uses which have impacted and continue to impact on their residential amenity. The residents see the new LUZ 5 zoning therefore, legitimising what they see as this unauthorised and incompatible use.
7. The submission also asks for the inclusion of provisions in the LAP to protect existing green areas in lands zoned for enterprise and employment, measures that could also act as buffers to protect the amenity of any adjoining residential lands.
8. The submission concludes by highlighting what it sees as the lack of co-ordination between the draft LAP and the Draft LTP, most especially in relation the proposal in the LTP for the construction of a new road over the railway line from the Castlebar Retail Park, the route of which they feel would exacerbate traffic issues at peak times at Milebush/Saleen. The residents also recommend that all new proposed routes in the LTP be also shown in the LAP to bring them to the attention of the public.

Chief Executive's Response and Recommendation:

Response:

1. It is considered that the range of permitted uses under LUZ 3 is extensive and appropriate for such a zoning and that any apparent contradiction between proposed and adjoining uses therein can be considered as part of the development management process.
2. It is considered that any established/non-conforming use within the proposed Enterprise and employment zoning would be considered under LUZ 15 – Established/Non-Conforming Uses: *To generally support reasonable extensions and improvements to premises that accommodate established/non-conforming uses, where it is considered by the Planning Authority that the proposed development would not be injurious to the amenities of the area and would be consistent with the proper planning and sustainable development of the area.*
3. It is considered that a more appropriate and effective way to ensure the continued amenity of adjoining properties adjacent to areas zoned Enterprise and Employment, is to include in the narrative of the plan, a requirement the “good neighbour principal” be fundamental to all planning application assessments.
4. See response No. 3
5. See response No. 3
6. This is a matter to be dealt with under enforcement procedures.
7. This matter will be dealt with on a site-specific basis as part of development management procedures.
8. The LTP will be amended to show how the proposed Active Travel measures align with the LAP land use zonings. See CE response to [OPR Recommendation 4](#).

Recommendation:

1. No change to draft Plan
2. No change to draft Plan
3. Insert following sentence at the end of the first paragraph Section 11.5:
“All proposed developments will be assessed in terms of the good neighbour principle, to protect existing and future amenities.”

4. See recommendation No. 3
5. See recommendation No. 3
6. No change to draft Plan.
7. No change to draft Plan.
8. See CE recommendation to [OPR Recommendation 4.](#)

Submission Number:	MYO-C63-41
Submission by:	Denise Magee
Issues Raised/Relevant Chapter(s):	Chapter 7 Movement and Transport

Summary of Submission:

The current submission requests that an area of land at The Curragh, immediately to the north of the railway line and adjoining Saleen Lough be re-zoned from Recreation and Amenity to New Residential on the grounds that the site was previously zoned Residential in the 2000-2004 Town and Environs Plan.



Site Location

Chief Executive's Response and Recommendation:

Response

The subject land parcel is located at the terminus of a long access road that runs from Humbert Way, a stretch of road through a residential area that is largely devoid of any green/amenity areas up to this point. It is considered therefore, that the parcel of land in question contributes positively to the physical and visual amenity of the immediate area and that the proposed Recreation and Amenity zoning be maintained.

Recommendation

No change to draft Plan.

Submission Number:	MYO-C63-44
Submission by:	Emer Mayock, Frainc Ó Clochartaigh, Freda Nic Giolla Chatháin, Thérèse Ruane on behalf of Feachtas Ghaelcholáiste Mhaigh Eo
Issues Raised/Relevant Chapter(s):	<ul style="list-style-type: none"> - Meánscoil nua lán-Ghaeilge (New all Irish Secondary School) - Imperial Hotel (athrú criosaithe/sealadach) (Imperial Hotel (change of zoning/temp)) - Tailte a athchriosú - N84 E&E tailte (Fadtéarmach) (Rezoning of lands - N84 E&E lands (Long term))

Summary of Submission:

Tá an aighneacht seo ag iarraidh go gcuirfí suíomh ar fáil do mheánscoil lán-Ghaeilge i mBaile Chaisleán an Bharraigh. Léiríonn an aighneacht go bhfuil tacaíocht ag an bhfeachtas do Ghaelcholáiste ó roinnt eagraíochtaí náisiúnta lena n-áirítear An Foras Pátrúnachta, Conradh na Gaeilge, Foras na Gaeilge agus Gaeloideachas. Tar éis cruinniú poiblí níos luaithe i mbliana, taispeánann an aighneacht go bhfuil 682 páiste trí Ghaeilge i gceantair Chaisleán an Bharraigh, Chathair na Mart, Chlár Chlainne Mhuiris agus Bhéal an Átha, ach nach bhfuil deis ar fáil d'oideachas meánscoile trí Ghaeilge. Ina theannta sin, aibhsítear go bhfuil Maigh Eo ar cheann de na 13 contae nach bhfuil iar-bhunscoil Ghaeilge acu.

1. Suíomh Iar-Óstáin an Imperial a athchriosú ó thailte Lár an Bhaile go dtí Oideachas:

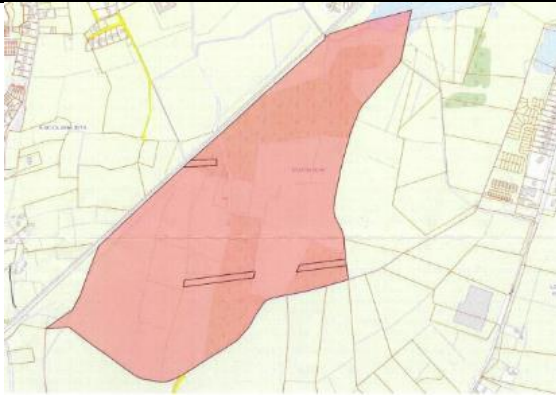
Rinne Feachtas an Ghaelcholáiste iarratas foirmiúil ar iarbhunscoil lán-Ghaeilge a bhunú i gCaisleán an Bharraigh, áit a bhfuiltear ag súil go n-eisefar freagra fabhrach i rith na scoilbhliana reatha. Ar an mbonn seo, nuair a bheidh sé ceadaithe ag an Roinn, beidh foirgneamh scoile ag teastáil agus beidh sé comhdhéanta d'fhoirgneamh atá ann cheana ón stoc reatha d'fhoirgnimh thráchtála i gCeantar Uirbeach Chaisleán an Bharraigh le freastal air sa téarma láithreach. Léiríodh san aighneacht iarshuíomh an Imperial Hotel mar shuíomh oiriúnach dá gcríocha. Mar sin, tá an aighneacht seo ag iarraidh go ndéanfaí an criosú atá mar bhonn agus thaca ag suíomh an 'The Imperial Hotel' a athchriosú ó '*Lár an Bhaile*' go '*Oideachais*' chun freastal ar scoil ar bhonn gearr/meántéarmach, go dtí go mbeidh an Ghaelcholáiste ann. bunaítear.



Léarscáil san áireamh san aighneacht a fuarthas, a thaispeánann suíomh iarshuíomh an Imperial Hotel (léirithe i dearg).

2. Tailte 'Fiontar agus Fostaíocht' a Athchriosú go 'Oideachas':

Sa mheántéarma agus san fhadtéarma, meastar go mbeidh suíomh nua ag teastáil ón scoil chun freastal ar éileamh láidir ó Chaisleán an Bharraigh agus ó Chathair na Mart. Is rogha láthair an láithreáin suíomh Chluain Each, gar do Bhóthar nua an N5. Tá an aighneacht ag iarraidh mar sin go gcuimseofaí cuspóir criosaithe talamhúsáide do shuíomh (5 heicteár ar a laghad) ar thailte atá criosaithe faoi láthair sa Dréacht-LAP mar '*Fiontar agus Fostaíocht*' le hathrú go '*Oideachas*'.



Léarscáil san aighneacht chun an suíomh is fearr le freastal ar champas Ghaelcholaiste Mhaigh Eo a léiriú.

English Version:

This submission is seeking that a site for the provision of an all Irish secondary school in Castlebar Town. The submission highlights that the campaign for a Gaelcholáiste is supported by a number of national organisations including An Foras Pátrúnachta, Conradh na Gaeilge, Foras na Gaeilge and Gaeloideachas. Following a public meeting earlier this year, the submission highlights that there is 682 children through Irish in the Castlebar, Westport, Claremorris and Ballina areas, however there is no opportunity for a secondary school education through Irish. Furthermore, it is highlighted that Mayo is one of the 13 counties that does not have an Irish post-primary school.

1. Rezoning of former Imperial Hotel Site from *Town Centre* lands to *Education*:

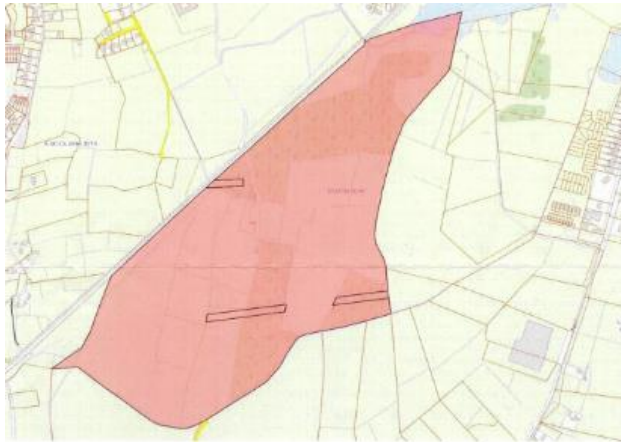
The Gaelcholáiste Campaign formally applied to establish an all-Irish Post Primary school in Castlebar, where it is anticipated that during the current school year a favorable response will issue. On this basis, once approved by the Department, a school building will be required and will constitute an existing building from the current stock of commercial buildings in the Castlebar Urban Area to serve in the immediate term. The submission has identified the former Imperial Hotel site as a suitable location to serve their purposes. Therefore, this submission is seeking that the zoning underpinning the site of the former 'The Imperial Hotel' be rezoned from '*Town Center*' to '*Educational*' so as to accommodate a school on a short/medium-term basis, until it the Gaelcholáiste is established.



Map included in the submission received, showing the location of former Imperial Hotel site (highlighted in red).

2. Rezoning of '*Enterprise and Employment*' lands to '*Education*':

In the medium to long term, it is envisaged that the school will require a new site to meet strong demand from Castlebar and Westport. The location of Chluain Each, near to the new N5 Road is a preferred location of the site. The submission is therefore seeking the inclusion of a land use zoning objective for a site (minimum of 5 hectares) on lands currently zoned in the Draft LAP as '*Enterprise and Employment*' to be change to '*Education*'.



Map included in submission to indicate the preferred location to accommodate a new site for the Gaelcholaiste Mhaigh Eo campus.


Chief Executive's Response and Recommendation:

Response:

1. The location of the Imperial Hotel is within the Town Centre (outer area) and is underpinned by the zoning objective - *Town Centre*. The Imperial Hotel forms part of Opportunity Site 7 containing a number of protected structures, including the Imperial Hotel (RPS ref no: 1964:14:78).
The objective of the *Town Centre* zoning is to maintain and enhance the vitality, viability and environment of the town centre with appropriate town centre uses.
The accompanying LUZ matrix provides for a wide range of land uses including those '*permitted in principle*' and those '*open for consideration*'. **School/Third level Education** uses are '*permitted in principle*' in the Town Centre area (inner & outer) and therefore it is considered that there is ample scope within the draft Plan to consider a development proposal as per the request of this submission at the site of the Imperial Hotel, temporary or otherwise, without the requirement to change the zoning provisions. Furthermore, it is considered that the imposition of a single use specific zoning category would place undue restrictions that would greatly limit the scope of potential for these lands/site.
2. The *Enterprise and Employment* zoned land contained in the Draft LAP is based on the role of Castlebar as a Key Town to accommodate enterprise and employment needs. On the basis of the submission received, which has yet to obtain approval from the Dept. of Education, it is premature to ring-fence a specific location for a new education campus/site of the scale required. Mayo County Council is happy to engage and work with the Department of Education and Feachtas Ghaelcholáiste Mhaigh Eo to identify a suitable site to meet their long-term needs.

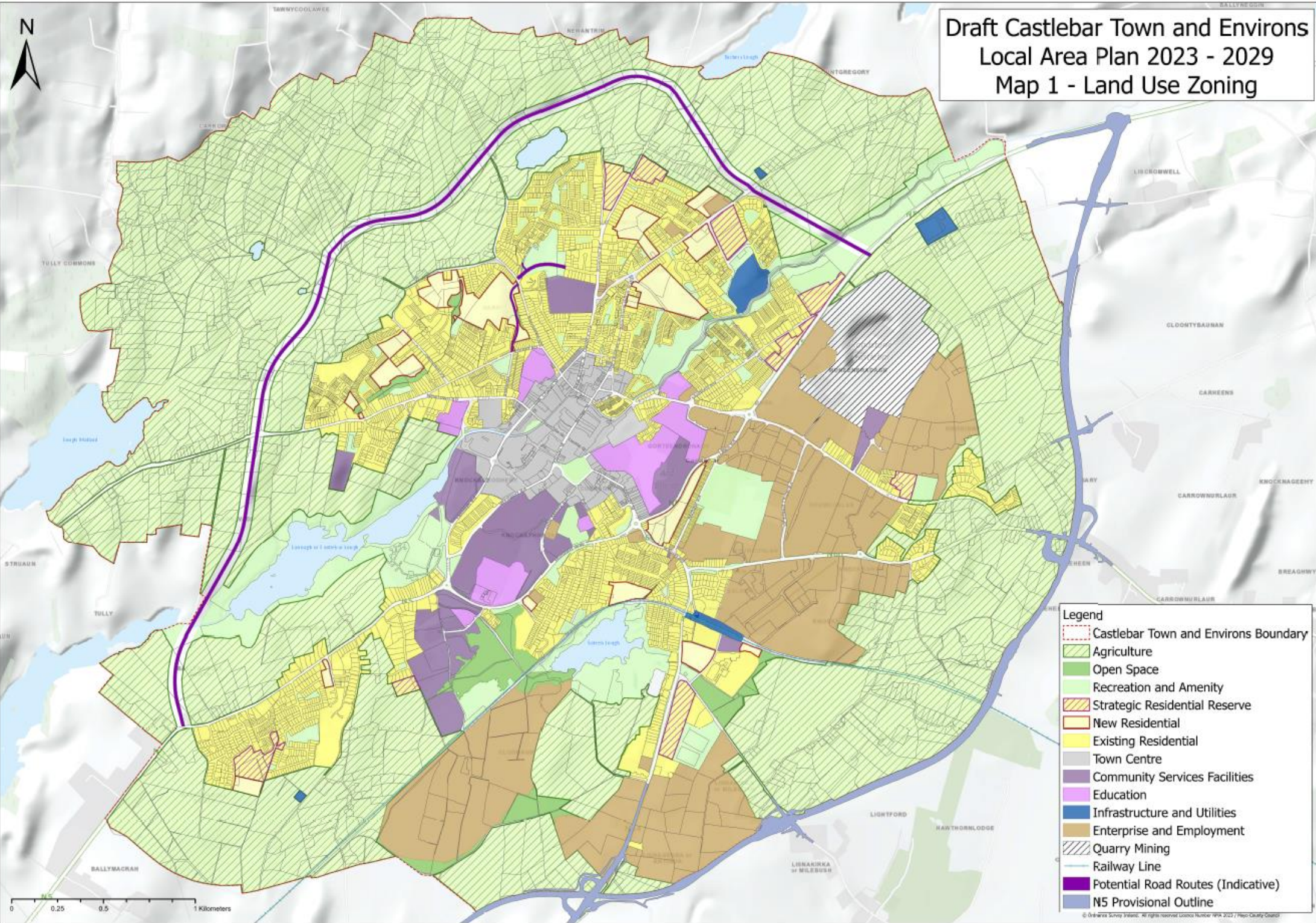
Recommendation:

1. No change to draft Plan.
2. No change to draft Plan.

Submission Number:	MYO-C63-45
Submission by:	Tom Murray
Issues Raised/Relevant Chapter(s):	Northern Orbital Ring road, Coarsepark
Summary of Submission:	
<p>The submission seeks to clarify on the boundaries and route of the proposed Northern Orbital Ringroad in the vicinity of their lands. No specific lands were outlined, see map submitted below.</p> 	
Site Location	
Chief Executive's Response and Recommendation:	
<p>Response:</p> <p>The LTP includes a rationale for the northern section of the Northern Orbital Ring Road (NORR). The remainder of the NORR will be included in the LAP as a long-term aspiration for a future transport corridor that may be required for active travel, public transport and access for potential long-term future development within the principle of compact growth.</p> <p>The route could unlock potential in the future for additional management of traffic in the town centre area enabling more allocation of road space on town centre streets to public realm enhancements, active travel and public transport providing an overall positive mode shift.</p> <p>This route would be subject to further analysis in the future in line with normal application procedures and processes.</p> <p>Recommendation:</p> <p>No change to the draft Plan.</p>	

Appendix 1 – Land Use Zoning Map
&
Location of Zoning Requests

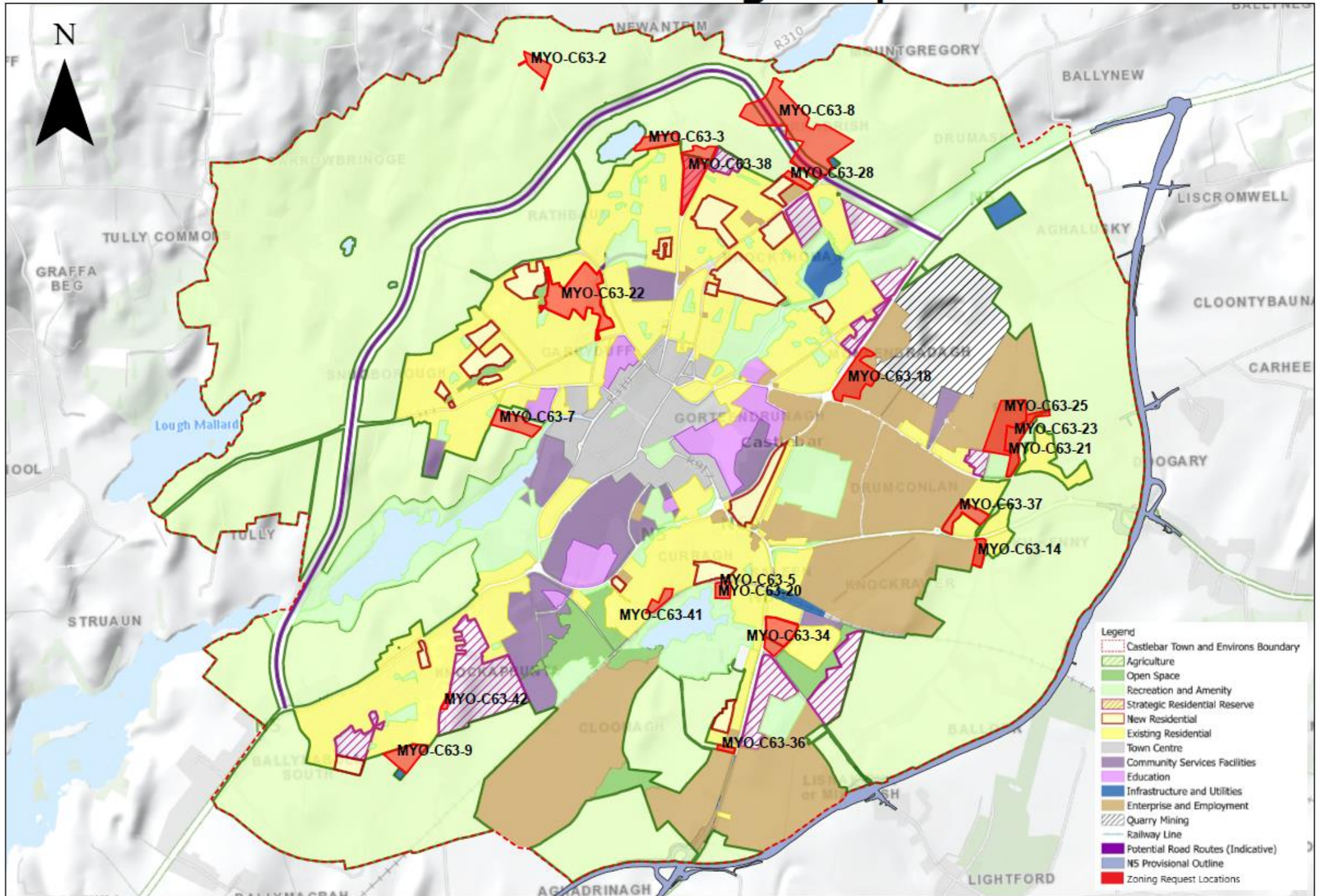
Draft Castlebar Town and Environs Local Area Plan 2023 - 2029 Map 1 - Land Use Zoning



- Legend**
- Castlebar Town and Environs Boundary
 - Agriculture
 - Open Space
 - Recreation and Amenity
 - Strategic Residential Reserve
 - New Residential
 - Existing Residential
 - Town Centre
 - Community Services Facilities
 - Education
 - Infrastructure and Utilities
 - Enterprise and Employment
 - Quarry Mining
 - Railway Line
 - Potential Road Routes (Indicative)
 - N5 Provisional Outline

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Location of Zoning Requests



Appendix 2 – Settlement Capacity Assessment & Maps

New Residential					Services				
Site No.	Location	Area - Hectare	Zoning	Tier	Lighting	Footpath	Water	Foul/Storm Sewer	Road
RS 1	Newport Rd	0.48 65	New Residential	1	√	√	√	√	√
RS 2	Garryduff	3.89 5.39	New Residential	1	√	√	√	√	√
RS 3	Glenfort/ Rathbawn/ Ballinaglough	10.02 11.1	New Residential	1	√	√	√	√	√
RS 4	Watersville	0.71	New Residential	1	√	√	√	√	√
RS 4 5	Turlough Rd	3.5 5 6	New Residential	1	√	√	√	√	√
RS 5 6	Turlough Rd	1.25	New Residential	1	√	√	√	√	√
RS 6 7	Turlough Rd	2.02	New Residential	1	√	√	√	√	√
RS 7 8	Rowan Drive	5.8	New Residential	1	√	√	√	√	√
RS 8 9	Upper Thomas Street	0.3 9 41	New Residential	1	√	√	√	√	√
RS 10	Cherrington Place	0.89	New Residential	1	√	√	√	√	√
RS 9 11	Station Rd / Lawn Rd	3.76	New Residential	1	√	√	√	√	√
RS 10 2	Lios na Circe	2.04	New Residential	1	√	√	√	√	√
RS 13	The Waterways	1.18	New Residential	1	√	√	√	√	√
RS 11	<u>Lios na Circe North</u>	<u>0.44</u>	<u>New Residential</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
RS 12 4	Chestnut Grove	1.87	New Residential	1	√	√	√	√	√

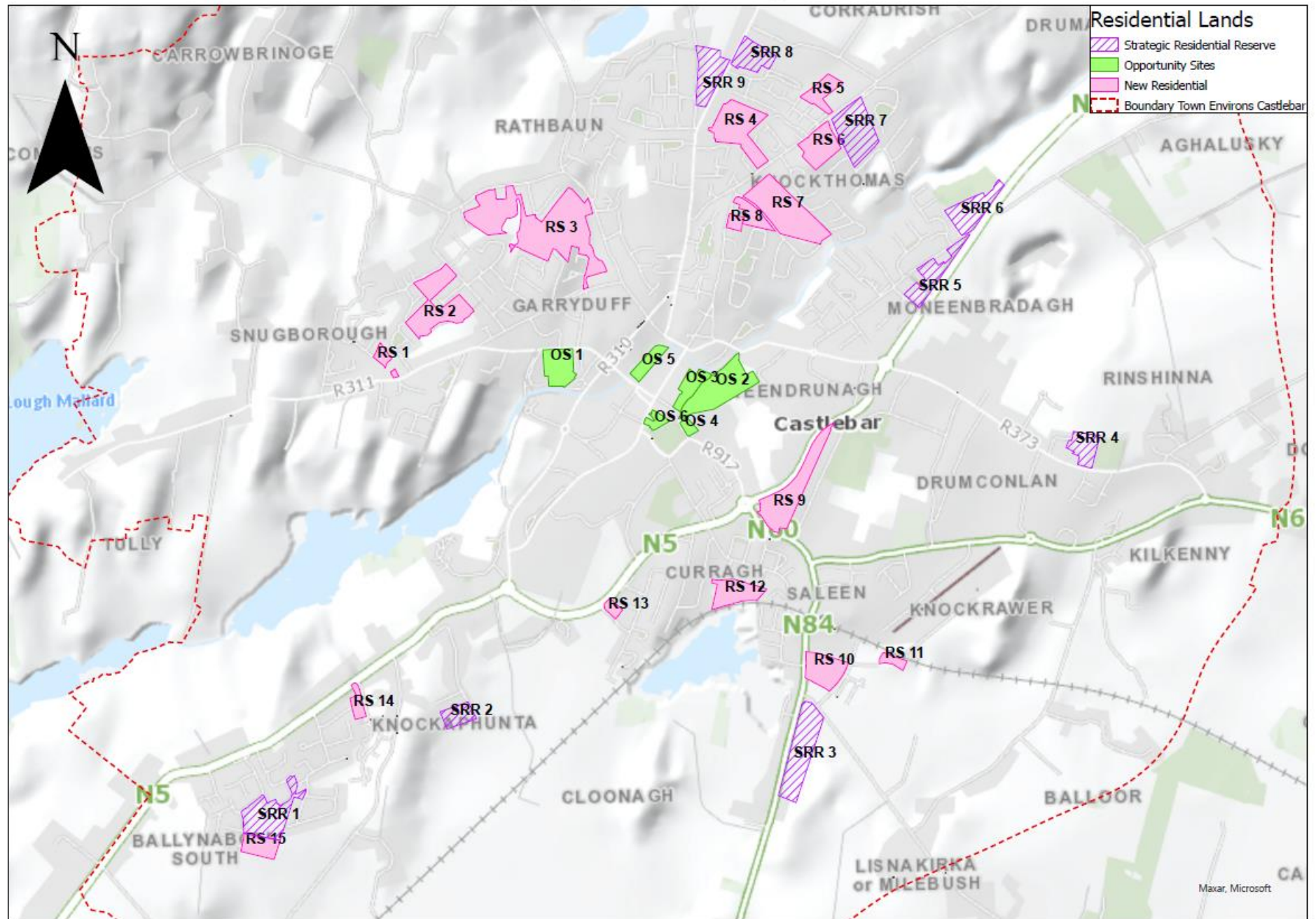
RS 135	Aglish	0.37	New Residential	1	√	√	√	√	√
RS 146	College View	0.55	New Residential	1	√	√	√	√	√
RS 157	Manor Village	1.25	New Residential	1	√	√	√	√	√

<u>Strategic Residential Reserve</u>					<u>Services</u>				
<u>Site No.</u>	<u>Location</u>	<u>Area - Hectare</u>	<u>Zoning</u>	<u>Tier</u>	<u>Lighting</u>	<u>Footpath</u>	<u>Water</u>	<u>Foul/Storm Sewer</u>	<u>Road</u>
SRR 1	<u>Manor Village</u>	<u>3.19</u>	<u>Strategic Residential Reserve</u>		<u>√*</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 2	<u>East of College View</u>	<u>1.04</u>	<u>Strategic Residential Reserve</u>		<u>√*</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 3	<u>N84 / Milebush</u>	<u>3.85</u>	<u>Strategic Residential Reserve</u>		<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 4	<u>N60</u>	<u>1.4</u>	<u>Strategic Residential Reserve</u>		<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 5	<u>Fortlands / N5</u>	<u>1.94</u>	<u>Strategic Residential Reserve</u>		<u>√*</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 6	<u>East of Summerfield</u>	<u>2.22</u>	<u>Strategic Residential Reserve</u>		<u>√*</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 7	<u>Turlough Road</u>	<u>3.3</u>	<u>Strategic Residential Reserve</u>		<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 8	<u>Turlough Road, North of Brambles</u>	<u>1.69</u>	<u>Strategic Residential Reserve</u>		<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
SRR 9	<u>Windy Gap / Pontoon Road</u>	<u>2.52</u>	<u>Strategic Residential Reserve</u>		<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>

* Reasonably extendable

Opportunity Sites					Services				
Site No.	Location	Area - Hectare	Zoning	Tier	Lighting	Footpath	Water	Foul/Storm Sewer	Road
OS 1	Hat Factory	1.83	Town Centre	1	✓	✓	✓	✓	✓
OS 2	Richard St	0.30	Town Centre	1	✓	✓	✓	✓	✓
OS 3	Lannagh Rd	0.40	Town Centre	1	✓	✓	✓	✓	✓
OS 24	Military Barracks	3.68	Town Centre	1	✓	✓	✓	✓	✓
OS 35	Backlands / Castle St Car Park	1.32	Town Centre	1	✓	✓	✓	✓	✓
OS 6	Hazel Grove	0.33	Town Centre	1	✓	✓	✓	✓	✓
OS 47	The Mall / Rock Square	0.33	Town Centre	1	✓	✓	✓	✓	✓
OS 58	Backlands / Mill Street	1.2	Town Centre	1	✓	✓	✓	✓	✓
OS 69	The Mall / Ellison Street	0.45	Town Centre	1	✓	✓	✓	✓	✓
OS 10	Adj McDonalds	0.22	Town Centre	1	✓	✓	✓	✓	✓

Settlement Capacity Assessment Map 1 - Residential



<u>Undeveloped Enterprise & Employment</u>					<u>Services</u>				
<u>Site No.</u>	<u>Location</u>	<u>Area - Hectare</u>	<u>Zoning</u>	<u>Tier</u>	<u>Lighting</u>	<u>Footpath</u>	<u>Water</u>	<u>Foul/Storm Sewer</u>	<u>Road</u>
EE 1	<u>Cloonagh</u>	<u>48.09</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 2	<u>South of KOG Logistics (N84)</u>	<u>4.97</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 3	<u>North of KOG Logistics (N84)</u>	<u>3.51</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 4	<u>N84 / Milebush</u>	<u>33.78</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 5	<u>East of Breaffy Retail Park</u>	<u>18.51</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√**</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 6	<u>Quarrypoint Business Park</u>	<u>22.87</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EE 7	<u>Moneen Industrial Estate</u>	<u>8.3</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>

* LTP active travel measures

** LTP active travel measure + Part 8 approved N60 Breaffy Active Travel & Safety Measures Scheme

<u>Established Enterprise & Employment</u>					<u>Services</u>				
<u>Site No.</u>	<u>Location</u>	<u>Area - Hectare</u>	<u>Zoning</u>	<u>Tier</u>	<u>Lighting</u>	<u>Footpath</u>	<u>Water</u>	<u>Foul/Storm Sewer</u>	<u>Road</u>
EEE 1	<u>KOG Logistics (N84)</u>	<u>4.61</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√*</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 2	<u>Breaffy Retail Park</u>	<u>20.24</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 3	<u>Baxter / IDA Park</u>	<u>24.87</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 4	<u>Castlebar Industrial Estate</u>	<u>21.31</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 5	<u>Quarry Point Business Park</u>	<u>2.8</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 6	<u>Elverys Warehouse</u>	<u>4.3</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 7	<u>N5 Retail Park</u>	<u>4.09</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 8	<u>Moneen Road</u>	<u>4.58</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 9	<u>Moneen Road (across from Lidl)</u>	<u>0.06</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 10	<u>Springfield</u>	<u>0.44</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 11	<u>Connors Grocers, Knockthomas</u>	<u>0.06</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 12	<u>Turlough/Pontoon Road</u>	<u>0.38</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>

EEE 13	<u>John Moore Road</u>	<u>0.5</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 14	<u>Humbert Way</u>	<u>0.4</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 15	<u>Station Road</u>	<u>0.34</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 16	<u>McHale Road</u>	<u>0.06</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 17	<u>Turlough Road (Caseys)</u>	<u>0.94</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>
EEE 18	<u>Turlough Road (Tractor garage)</u>	<u>0.57</u>	<u>Enterprise & Employment</u>	<u>1</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>	<u>√</u>

* LTP Active Travel Measures

Settlement Capacity Assessment Map 2 - Enterprise & Employment Lands

