



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

7th April 2021

Pre-Draft Public Consultation,

Castlebar Town and Environs Local Area Plan 2021-2027,

Forward Planning Department,

Mayo County Council,

Áras an Chontae,

The Mall,

Castlebar,

Co. Mayo,

F23 WF90.

Re: Issues Paper for the Castlebar Local Area Plan 2021-2027

A chara,

Thank you for your authority's work in preparing the Issues Paper for the Castlebar Local Area Plan 2021-2027 (LAP). The Office of the Planning Regulator (the Office) acknowledges and welcomes the publication of the Issues Paper and its role in informing the preparation of the LAP.

The Office would like to take this opportunity to congratulate the planning authority on its successful application for funding under the Urban Regeneration and Development Fund for the Castlebar Historic Core Reactivation Initiative Project and the old Military Barracks area. It is also clear that the Issues Paper acknowledges the importance of place making and regeneration to the quality of life and the economic development of the town.

The preparation of the LAP comes at an opportune time given both this and other public investments in the town and the concurrent draft County Development Plan. Castlebar is a designated Key Town within the regional and is the main administrative, public health,

education and commercial centre in the county. Its relationship with Westport and recent public investment in the upgrading of the N5, also mean that it has the potential to provide a vibrant and sustainable town for both existing and future populations, while creating a critical mass to support further economic development.

The planning authority will be aware that the Office made a submission in respect of the draft Mayo County Development Plan 2021 – 2027 dated 16 March 2021, and a number of the recommendations in that submission are referred to below, where considered relevant.

In accordance with the provisions of Section 31AO of the *Planning and Development Act 2000*, as amended, (the Act), the Office is obliged to evaluate and assess local area plans in the context of certain parameters including:

- Matters generally within the scope of section 19;
- consistency with the objectives of the relevant development plan, its core strategy, the regional spatial and economic strategy (RSES) that applies to the area and the transport strategy of the National Transport Authority;
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29;
- such other matters as the Minister may prescribe under section 262, or otherwise prescribe.

The Office has set out some broad areas for your authority to consider in formulating the LAP, under the following headings:

- Core Strategy
- Residential land zoning and compact growth
- Regeneration and Development
- Employment
- Retail
- Transport and Mobility
 - o Local Transport Plan
 - o Model Shift Targets

- Road Design for Urban Areas
- Existing and Proposed Road Infrastructure
- Strategic Flood Risk Assessment

These observations are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process, and do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

Core Strategy

Under section 19(2) the LAP must be consistent with the core strategy set out in the County Development Plan. In relation to the Mayo development plan, the Core Strategy is currently under review in the draft County Development Plan (CDP). As outlined in the Office's submission to the draft Plan a review of the draft core strategy and settlement strategy will be required to ensure consistency with the requirements of the Section 28 Guidelines: Housing Supply Target Methodology for Development Planning and Appendix One of the accompanying Ministerial Circular. This issue was addressed under Recommendation One of the OPR's submission of 16 March 2021.

The submission also identified the potential for a greater proportion of the overall population/ housing growth for the County to be focussed on Castlebar to achieve a more sustainable pattern of development that can be served by social and physical infrastructure, sustainable transport and mobility, and support economic development. This will be important if the town is to grow in line with the objectives set out in Section 3.4 and RPO 3.1 and 7.16 of the RSES. This issue was addressed under Recommendation Two of the OPR's submission of 16 March 2021.

Residential land zoning and compact growth

The review of the Core strategy will inform the requirement for land zoned for residential and a mix of residential and other uses. In undertaking this exercise it will be important that the basis upon which the land requirement is calculated applies densities consistent with

the Sustainable Residential Development in Urban Areas Guidelines. Whilst it is reasonable for the LAP to provide a tailored approach to the consideration of residential densities, it is nonetheless important that the residential densities within the ranges advised in the Guidelines are applied to support national and regional policy objectives for compact growth which can be more effectively served by social and physical infrastructure and facilitate active mobility across the town. NPO 3 and RPO 3.1 are relevant in this regard.

The LAP should also adopt a clear sequential approach to the zoning of lands that seeks to consolidate the physical extent of the town within the bypass so that lands identified for residential development in proximity to the town core are prioritised over land more removed from the town core promoting compact growth in accordance with NPO 3 and RPO 3.1. The principles of the tiered approach to zoning will also be important in term of consistency with NPO72 and to ensure that zoned land can be serviced within the life of the plan.

The specific role of any lands identified as Strategic Residential Reserve should also be clear, focussing on the evidence based future needs of the town to accommodate growth beyond the life of the draft LAP.

Regeneration and Development

Both the NPF (NPO 4 and 6) and RSES (section 3.3) provide a strong emphasis on the opportunities for urban regeneration, creating attractive, liveable, well designed, high quality urban places that provide for a high quality of life and well-being.

In addition to the regeneration proposals for the Historic Core Reactivation Initiative Project and the old Military Barracks area, the LAP provides an opportunity to put in place a strong policy framework to support the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites, including land activation measures such as the use of compulsory purchase and derelict site orders.

This will also be important in terms of supporting the policies in the draft CDP targeting population stagnation, rejuvenation and regeneration of settlements, including high vacancy rates in Castlebar.

It will also be important that the LAP provides for monitoring and evaluation of the success of the future plan in respect of clear and measurable targets in this area.

Employment

The existing Castlebar LAP includes large areas of land zoned for employment and enterprise, with significant historical development of large areas for retail warehousing. The LAP will need to review the extent and location of employment and enterprise and other commercial type land use zoning in order to provide a more integrated and sustainable pattern of development consistent with the Guidance Note on Core Strategies published by the DoECLG (2010). The preparation of a Local Transport Plan will also inform this evaluation.

The RSES identifies the potential within the commercial/industrial estates and the business and technology park as a key future priority. In this context, the LAP also provides the opportunity for further policy direction regarding the development of strategic opportunities for employment and enterprise zoned lands.

Retail

Castlebar is identified in the RSES as the principal retail town in Mayo with a real vibrancy within the town centre, and attracting shoppers from across the county. It is important therefore, that the retail approach is evidence-based and reflects the emerging challenges affecting the retail sector and its implications for the vibrancy and vitality of the town centre consistent with the Section 28 Retail Planning Guidelines. This issue is addressed under Recommendation 13 of the OPR submission in respect of the draft CDP.

Transport and Mobility

Local Transport Plan

The Office notes objective in the Draft County Development Plan (MTO 1) to prepare a LTP for towns, including Castlebar. The preparation of a LTP for Castlebar is also identified in RSES Objective RPO 6.27. The Issues Paper does not, however, refer to the intention to prepare a LTP as part of the LAP.

The Office is strongly of the view that a LTP should be prepared to inform zoning decisions for the LAP and to ensure that both existing and future development can be served by sustainable transport, and in particular active mobility such as walking and cycling.

In this regard, the Office advises consultation with NTA and TII in relation to the use of the Area Based Transport Assessments (ABTA). The planning authority's attention is drawn to the recent use of this approach by Kildare County Council in the preparation of the draft Athy Local Area Plan.

Modal shift targets

The issue of modal shift targets for the county as a whole, and the major settlements including Castlebar, was addressed under Recommendation 14 of the OPR submission on the draft CDP. Having regard to the provisions of section 10(2)(n) of the Act and to national targets for greenhouse gas emission reductions (NPO 54), it will be critical that the overall strategy set out in the LAP reflects and supports the achievement of these targets.

Road design for urban areas

Commitment to the proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019) in the LAP, consistent with RPO 6.26, will also assist sustainable and active transport modes, in addition to improvement of the street environment and the overall quality of life for the local community.

Existing and Proposed Road Infrastructure

The planning authority's attention is also drawn to Section 2.7 of the *DoECLG Spatial Planning and National Roads Guidelines*. This is particularly important in terms of protecting existing and future public investment in upgrading the N5.

Strategic Flood Risk Assessment

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft plan, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*. The office would also draw your attention to the associated *Department of Environment, Community and Local Government Circular PL 2/2014*.

Under section 4.23 of the Guidelines, where a planning authority is considering (in the plan) the future development of areas at risk of flooding, that would generally be inappropriate under the sequential approach (section 3.2), the planning authority must be satisfied that it can clearly demonstrate on a solid evidence base that the zoning will satisfy the Justification Test for the plan making stage (Box 4.1). It is not sufficient that a justification test is left solely to be undertaken at a planning application stage. Your authority's attention is also drawn to the *Department of Environment, Community and Local Government Circular PL 2/2014* which clarifies that the application of the justification test also applies to existing developed areas of towns and cities located in Flood Zone A and B.

Further advice in relation to the above and other matters relating to the SFRA can be obtained from the OPW, and the Office would advise direct consultation with the OPW in advance of the publication of the draft Plan.

The office would also advise that flood maps should be overlaid on proposed zoning maps to provide clarity and transparency and clarity for members of the public.

Summary

In summary, the Office commends your authority for the preparation of this Issues Paper. The Office advises your authority to pay particular attention to the following issues in the preparation of the LAP:

- The alignment of the quantity of land zoned for residential and a mixed residential and other uses with the proportion of the County housing supply targets for Castlebar.
- Sequential approach to residential zoning focusing on compact growth and consolidation of the physical extent of the town, so that future homes can be served by sustainable and active travel modes such as walking and cycling.
- Preparation of a Local Transport Plan to inform zoning decisions for the LAP and in order to ensure consistency with RSES Objective RPO 6.27.
- Review of land zoned for employment, enterprise, industrial and other commercial uses having regard to the creation of an overall strategy for sustainable land use and transport.
- Appropriate Strategic Flood Risk Assessment in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

The Office looks forward to reviewing the future draft local area plan and is committed to continued positive engagement with your authority in implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

A handwritten signature in black ink that reads "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor
Deputy Planning Regulator