

15th August 2022

Senior Planner,
Forward Planning,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo,
F23 WF90

Re: Adopted Mayo County Development Plan 2022 - 2028

A chara,

The Office of the Planning Regulator (the Office) acknowledges the adoption of the Mayo County Development Plan 2022 – 2028 (the Plan) by the members of Mayo County Council on 29th June 2022.

The Office also acknowledges receipt of your notice letter dated 8th July 2022, further to section 31(AM)(6) of the *Planning and Development Act 2000*, as amended (the Act). As advised in our letter from the Planning Regulator dated 7th July 2022, the letter was not submitted to the Office within the required five-day period as set out in the aforementioned section of the Act.

The Office has reviewed the adopted Plan, and notes the decision of the planning authority not to comply, in whole or in part, with a large number of the recommendations included in its submission.

Where the recommendations of the Office were not complied with, the Office carefully considered the single reason provided by elected members and, in several instances, could not accept that the reason provided an acceptable rationale for not addressing the matters raised by the Office.

In relation to recommendations of the Office concerning, amongst others:

- core strategy policies and objectives;

- housing policies and objectives;
- ‘Strategic Residential Reserve Tier II’ zonings in Claremorris;
- ‘Enterprise & Employment’ zoning objective in Ballinrobe;
- consolidated zoning and settlement boundaries changes in Kiltimagh; Bangor Erris and Belcarra; and
- the land use zoning objectives for Strategic Residential Reserve.

The Office has made a recommendation to the Minister in respect of a proposed draft direction in accordance with the legislative requirements set out in section 31(AM) of the Act.

The Office's recommendation to the Minister of a proposed draft direction and notice letter pursuant to section 31(AM), are available on the [Office's website](#), and this correspondence will also be published on the Office's website in the coming days.

As you will be aware, the matter is now to be determined by the Minister under section 31 of the Act.

The Office advises the planning authority that the ‘interim’ Plan submitted with the section 31(AM)(6) notice refers to the Plan covering the 2021 – 2027 period rather than the 2022 – 2028 period. In this regard, the planning authority should ensure that the Plan and information on the council's website and available for public inspection at its offices reference the correct plan period.

With the exception of the specific matters raised in the section 31AM(8) notice, the Office welcomes the making of a Plan which includes appropriate housing growth targets for the main towns of Ballina, Castlebar and Westport consistent with their designations in the Regional Spatial & Economic Strategy and to inform their upcoming local area plans.

The Plan also contains a positive strategy for regeneration and opportunity sites in the smaller Tier II settlements. In particular, the Office considers the framework plans included for the larger opportunity sites to be an extremely positive addition to the Plan. This approach will support and encourage residential and mixed use development close to town centre uses and services.

The Office also considers that the Plan provides a strong policy support for renewable energy development over the plan period consistent with the *Climate Action Plan 2021*.

While the Office fully acknowledges the scale of work involved in preparing the Plan, the 'interim' Plan submitted to the Office contains a number of errors and anomalies which should be addressed in the final Plan.

Firstly, while the Office considers that the Housing Supply Targets (HST) in the settlement hierarchy are acceptable in response to Recommendation 3, the Office notes some inconsistencies within Core Strategy Table 2.7.7, and between Table 2.7.7 and Table 2.3 (Targeted Population Ratio to 2027):

- The population increase figures for Total (64,461) and Open Countryside (81,239) are inconsistent with those for Urban (59,910) and Rural (85,790) in Table 2.3 and the target years are different;
- Regarding the above point, the population increase figures for Total and Open Countryside should be reviewed for consistency with their respective housing target allocations of 2,452 housing units and 800 housing units respectively;
- The population growth rate figure of 23.8% for Total in Table 2.7.7 appears to be incorrect and it appears that the rate is closer to 6%; and In addition to the above, Table 2.2 also references 2027 as its population target year rather than 2028.

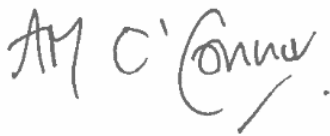
The Office also notes that clarification is required of the following:

- Strategic Residential Reserve Tier II zoning fronting the N60 in Claremorris the subject of Material Amendment Tier II CLARE3 was not shown on the interim Plan submitted to the Office, however it appears to have been included on the version of the interim Plan on the council's website; and
- The settlement plan for Attymass includes lands introduced as an extension of the consolidated zoning (Material Amendment Tier V ATT 1) to include lands partially affected by flood risk to the southwest of the settlement. It is unclear if this is a drafting error in the final Plan.

- The poor visual quality of some of the zoning maps for example Map SD4: Swinford¹ and Ballinrobe² made it difficult to determine whether the zonings had been sufficiently amended to take account of flood risk in response to MA Recommendation 9. This is in contrast to the high quality of some of the other maps for example the Tier III and IV settlement plans. The quality of the mapping in particular for the Tier II settlements should be addressed in the final Plan to provide for a consistent high quality of maps across the whole document.

With the exception of the specific issues detailed in the section 38AM(8) notice, the Office generally welcomes the adoption of the Mayo County Development Plan 2022 – 2028, and looks forward to continued positive engagement with the planning authority in relation to the forthcoming Local Area Plans.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations

¹ Proposed Amendments Tier II SFORD1 and Tier II SFORD2

² Proposed Amendment Tier II BROBE 4 - Opportunity Site