



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

28th March 2024

Mr. Kieran O'Donnell TD
Minister of State for Local Government and Planning,
Department of Housing, Local Government and Heritage,
Custom House,
Dublin 1,
D01 W6X0.

BY HAND AND BY EMAIL

Re: Notice pursuant to section 31AP(4) of the Planning and Development Act 2000 (as amended) – Castlebar Town and Environs Local Area Plan 2023-2029

A chara,

I am writing to you pursuant to section 31AP(4) of *the Planning and Development Act 2000* (as amended) (the "Act") in the context of the Castlebar Town and Environs Local Area Plan 2023-2029 (the "Local Area Plan"). In particular, I write arising from the consideration by this Office of the following:

- a) the Notice of Intent to issue a Direction pursuant to section 31(3) of the Act issued to Mayo County Council (the "Council") by your office on 16th January 2024, and
- b) the report of the Chief Executive of the Council issued to the Office on 12th March 2024 regarding the submissions and observations received by the Council and prepared in accordance with section 31(8) of the Act (the "CE's Report").

I refer also to the joint submission by seven (7) elected members of the Council made directly to this Office, and considered by this Office pursuant to section 31(10)(a) of the Act. This Office has carefully considered the CE's Report and the submission made directly to this Office.

Draft Direction

The draft Direction issued by the Minister contained three parts (a), (b) and (c):

Part 2

The Planning Authority is hereby directed to take following steps with regard to the Local Area Plan:

- (a) Provide a clear core strategy table which sets out the area and quantum of housing to be delivered on lands zoned Town Centre, Existing Residential and New Residential. Appropriate densities shall be applied to demonstrate anticipated yield.*
- (b) Reinstate the following zoning objectives and associated text to that of the draft Local Area Plan:*
 - (i) Material Alterations 10, 12, 14 and 21 – i.e. the subject lands revert to Agriculture and New Residential*
 - (ii) Material Alterations 13 and 17 – i.e. the subject lands revert to Enterprise and Employment, and Agriculture from New Residential*
 - (iii) Material Alterations 15 and 18 – i.e. the subject lands revert to Enterprise and Employment from New Residential*
- (c) Delete the following zoning objective from the adopted Local Area Plan, i.e. the subject lands are unzoned:*
 - (i) Land zoned Enterprise and Employment at Cloonagh (Site EE 1) located to the southwest of Saleen Lough and to the immediate east of the rail line and apply all necessary consequential updates to the text of the plan consistent with the foregoing.*

Having regard to the requirement under section 31(9)(d) of the Act that the CE's Report shall 'make recommendations in relation to the best manner in which to give effect to the draft direction', the CE's Report responds as follows:

Part 2(a):

- (i) Insert Table in final plan, similar to Table 2.2 below, as proposed in response to Recommendation 1(i) of the OPR in the CE Report on Draft LAP (appropriately*

altered as/if required pending the resolution of this stage of the LAP process) into the final LAP and amend Land Use Zoning Map Settlement Capacity Matrix in Appendix 1 of final LAP accordingly.

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

And,

(ii) Alter section 2.8.4 of the LAP to read as follows:

The Plan adopts a site-specific approach to development densities. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics, local conditions, design sensitivities, connectivity and overall quality of the scheme. ~~and having regard to the various provisions within the development management guidelines, as set out within the Mayo County Development Plan 2022-2028 and the relevant Section 28 Ministerial Guidelines.~~ The densities applied shall also be consistent with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

Having regard to (ii), above, the Office assumes the Chief Executive intended the word ‘connectivity’ rather than ‘connectively’ and that the Chief Executive may wish to make a minor amendment correcting this apparent error in publishing the final amendments in response to the final direction.

Part 2(b)

‘No change to plan’ in respect of MA 10, MA 12, MA 13, MA 14, MA 15, MA 17, MA 18 and MA 21.

Part 2(c)

Retain Enterprise & Employment zoning at Cloonagh with a minor amendment as set out below to restrict the potential uses to less intensive traffic uses of industry and rail freight related activities.

1. *Amend the Enterprise & Employment Land Use Zoning objective (LUZ 3) as below:*

<i>LUZ 3 – Enterprise & Employment</i>	<i>To provide land for industrial, enterprise and employment uses. *Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible with Rail Freight only. *</i>
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Additional text highlighted in green.

2. *Amend Land Use Zoning Matrix Table 11.2 (see appendix 1).*

The Office notes that the amendment to Table 11.2 introduces 'Enterprise and Employment Site EE 1 – Cloonagh Land' as a separate land use zoning objective where 'Logistics, Storage & Distribution Units' are 'permitted in principle' and 'Advertising Billboards', 'Industry – Heavy', 'Industry – Light', 'Utility Structures' and 'Warehousing' are 'Open for Consideration'.

Following detailed consideration of the CE's Report and the submissions made directly to the Office, the Office now recommends, pursuant to section 31AP(4) of the Act that you issue the attached final Direction in the same form as the draft Direction. The Office recommends no minor amendments in the final Direction.

In making this recommendation, the Office reiterates the submissions made to the Minister in the Notice which issued from this Office to your office 22nd December 2023 pursuant to section 31(AO)(7) of the Act.

Public Consultation on the Draft Direction

The public consultation on the draft Direction took place from 30th January 2024 to 13th February 2024 inclusive. The CE's Report summarised the views of members of the public and the prescribed authorities that made submissions to the planning

authority. The CE's Report did not summarise submissions from the elected members, which were subject of a joint submission on behalf of seven members to the Office under section 31(10) in respect of Part 2(c) of the draft Direction.

You might please note the following:

- The Office received a single joint submission from or on behalf of the following elected members of the Castlebar Municipal District:
 - 1) Councillor Al McDonnell (Cathaoirleach) – Fianna Fáil
 - 2) Councillor Blackie Gavin (Leas- Cathaoirleach) - Fianna Fáil
 - 3) Councillor Cyril Burke – Fine Gael
 - 4) Councillor Ger Deere – Fine Gael
 - 5) Councillor Michael Kilcoyne – Independent
 - 6) Councillor Martin McLoughlin – Fianna Fáil
 - 7) Councillor Donna Sheridan – Fine Gael

The joint submission received from the elected members opposed the draft Direction in respect of the following parts for the following reasons:

- Part 2(b)(i) in respect of MA 12, MA 14 and MA 21 - each site is fully serviced and can connect to water services locally, is within CSO 2022 Built Up Area boundary, would provide much needed housing, is close to services, facilities and employers, would promote compact growth and support sustainable travel options; in respect of MA 12 the site is already in use for storage ancillary to construction works, would complete the adjacent housing estate and secure its residential amenities; and in respect of MA 21, any flood areas will be conditioned as open space;
- Part 2(b)(ii) MA 13 - site will be serviced by footpaths and cycle path through approved Part 8, would promote sustainable travel options, is within CSO 2016 and CSO 2022 boundaries and promotes compact growth;

- Part 2(b)(ii) MA 17 – site is fully serviced, is mostly within CSO 2022 boundary and would promote compact growth, is adjacent to mature residential estate, is bounded by shared cycle / footpath, is close to major employers and town centre and promote sustainable travel, would provide an alternative to New Residential lands to the west, would provide much needed housing; and
- Part 2(c)(i) Site EE 1 – Local Authority has statutory role in supporting economic development and enterprise; consistent with National Planning Framework (NPF) objectives for sustainable mobility and regional accessibility; consistent with RSES designation of Castlebar as Key town, a regional driver on the Atlantic Economic Corridor and RPO 6.13 Western Rail Corridor; consistent with the Mayo County Development Plan 2022-2028 (the County Development Plan) vision for Castlebar and Westport as a Regional Growth Centre and urban place of scale between Galway City and Sligo Regional Growth Centre supported by upgrade N5 and rail services; consistent with All-Island Strategic Rail Review (AISRR) to increase rail freight through inland terminals, to reopen Athenry to Claremorris rail line, and the site is ideally suited as rail freight hub; the County Development Plan supports increased use of sustainable modes and MTO 8 of the County Development Plan supports rail freight for Castlebar; flood risk on site has been addressed in the Strategic Flood Risk Assessment (SFRA) and plan making justification test and should be dealt with at planning stage; the Local Transport Plan (LTP) incorporates sustainable travel measures for the site, supported by MTO 6 of the Local Area Plan.
- As set out in the CE’s Report, a total of ten (10) submissions were received from the public by the Chief Executive during the consultation period, including the Northern and Western Regional Assembly (NWRA), Transport Infrastructure Ireland (TII), the National Transport Authority (NTA), and the Department of Education.

Of these, the Chief Executive considered three (3) submissions not to address the matters of the draft Direction. The Office has reviewed the summary of those submissions and concurs with the opinion of the Chief Executive.

Of the seven (7) submissions that the Chief Executive considered to be relevant to the draft Direction:

- two (2) submissions received in respect of and in support of Part 2(a), core strategy table and appropriate densities, including from the NWRA and the Department of Education;
- two (2) submissions were received in respect of Part 2(b) (i):
 - o one in support, from NWRA;
 - o one opposed to the omission of MA 12;
- two (2) submissions were received in respect of Part 2(b) (ii):
 - o one in support, from NWRA;
 - o one opposed to omission of MA17;
- two (3) submissions were received in respect of Part 2(b) (iii):
 - o one in support, from NWRA;
 - o one opposed to omission of MA15;
 - o one opposed to omission MA 18;
- three (3) submissions were received in respect of Part 2(c)(i):
 - o two in support, from TII and NTA;
 - o one in support, from NWRA, in the absence of further justification being furnished.

In response to Part 2(a):

Two (2) submissions were received in respect of this part of the draft Direction, from the Department of Education and from the NWRA, both of which supports Part 2(a) of the draft Direction and seeks a clearer Core Strategy Table to be included in the Local Area Plan.

In response to the draft Direction, the CE’s Report states ‘*a core strategy table setting out the quantum of housing to be delivered on lands zoned Town Centre, Existing Residential and New Residential will be included in the final plan when the final quantum of lands have been finalised*’ and recommends that a table similar to Table 2.2 below be inserted into the final Local Area Plan.

This same table was proposed in the Chief Executive’s response to Recommendation 1(i) of the Office’s submission on draft Local Area Plan, which was ultimately rejected by the elected members. The Chief Executive states that the table will be ‘*appropriately altered as/if required pending the*’ Final Direction and that it is also intended to ‘*amend Land Use Zoning Map Settlement Capacity Matrix in Appendix 1 of final LAP accordingly*’. The Office notes that this will ensure consistency across the Local Area Plan.

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

The Report also recommends the alteration of section 12.8.4 of the Local Area Plan to read as follows:

The Plan adopts a site-specific approach to development densities. The density of development and number of units permissible will be determined at detailed design stage based on a full assessment of site characteristics, local conditions, design sensitivities, connectively and overall quality of the scheme. ~~and having regard to the various provisions within the development management guidelines, as set out within the Mayo County Development Plan 2022-2028 and the relevant Section 28 Ministerial Guidelines.~~ The densities

applied shall also be consistent with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024).

The Office is satisfied that the proposed alterations to the Local Area Plan would implement Part 2(a) of the Direction. It is noted that the figure for New Residential, as 36.87ha is inconsistent with the actual area of in excess of 45ha¹, assuming the omission of all New Residential land subject of the draft Direction, but that the Chief Executive has committed to amending the figures to reflect the outcome of the Final Direction.

In response to Part 2(b)(i):

MA 10 – Lands at New Antrim (RS 25 – Residential Settlement Capacity Assessment

The NWRA submission does however support Part 2(b)(i) the draft Direction in its entirety. The NWRA considers this peripheral site to contravene RPO 3.1 and 3.2, compact growth in Key Towns, and that the revision of this element of the Local Area Plan will contribute considerably to the delivery of places of urban scale, focusing on the urban cores initially and consolidation of the existing built up footprint of Castlebar. The Office concurs with the position of the NWRA.

The CE's Report also *'concurs with the opinion of the NWRA with regard to the zoning of the lands in question and that they should revert to Agricultural and Enterprise and Employment zoning as initially proposed in the draft LAP due to their location on the periphery of the town, which would mitigate [sic]² against the delivery of compact and sequential growth in the town, in contravention of RPO 3.1'*.

The Chief Executive concurs with the opinion of the NWRA. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

¹ For clarity, the section 31AO(7) Notice Letter stated that over 82ha of land had been zoned New Residential under the adopted plan and that the area of New Residential proposed under the MAs subject of this Direction cumulatively amount to 36.42ha. The Direction will therefore reduce the total area of land zoned New Residential to in excess of 45ha.

² In the context of the sentence, the Office understands this should read 'militates' against.

Following consideration of the submissions and CE's Report, there is no planning or policy basis to amend the recommendation of this Office in respect of MA 10.

MA 12 – Lands at Knockaphunta (RS 20 – Residential Settlement Capacity Assessment

Three (3) submissions were received in respect of MA 12. One (1) joint submission from the elected members under section 31(10) opposing the draft Direction, and one (1) from a member of the public also opposing the draft Direction. The third, from NWRA, supports Part 2(b)(i) of the draft Direction.

The joint submission received from the elected members opposes the draft Direction in respect of MA 12 on the basis that it is fully serviced / water services are adjacent; is in use for storage ancillary to recent building works; would complete the adjacent estate and secure its residential amenities; would provide much needed houses; is within the CSO 2022 boundary; and would promote compact growth and sustainable travel.

The submission from the member of the public opposed the draft Direction on the basis that the site is fully serviced and shovel ready subject to planning permission, and is a natural extension to the adjacent College View Estate. It argues that the lands should be zoned Strategic Residential Reserve or Low Density Residential.

In respect of servicing of the lands, the Office would point out that site servicing was not a reason for the inclusion of MA 12 in the draft Direction. Notwithstanding, the fact that the site is serviced does not justify zoning of lands for residential development in peripheral and non-sequential locations.

Regarding the use of the site for ancillary storage, the completion of the adjacent estate and neighbouring residential amenities, the Office found no record of extant planning permission for the subject site. The Office does not consider the use of this site for agricultural would significantly affect the residential amenities of neighbouring lands.

Regarding the CSO 2022 Built-Up Area boundary for Castlebar, the site falls outside the 2016 CSO Settlement Boundary, which boundaries have been defined based on specific criteria which have been adopted into NPO 3, compact growth, through

Endnote 17 of the NPF. The CSO 2022 Built-Up Area boundaries are not defined in accordance with the aforementioned criteria and are therefore not the relevant criteria in respect of compact growth.

Notwithstanding the adjacent College View Estate, the site is located in a peripheral and non-sequential location, at a distance from the centre of the town, and would result in the expansion of the town beyond the built up area rather than prioritising locations closer to the town centre consistent with compact growth and facilitating sustainable travel.

In terms of housing delivery, as stated in the section 31AO(7) Notice Letter dated 22nd December 2023, the zoning of land as New Residential in the Local Area Plan amounts to over 82 ha, well in excess of the planning authority's estimate of the New Residential land required, at 36.87 ha. As noted by the NWRA, the area of New Residential land would be reduced to c.45 ha through the implementation of the Direction, which is still c.25% in excess of that required.

Further, as can be seen from Table 2.2 (as proposed to be inserted in the Local Area Plan), the planning authority has applied very low densities to its determination of land requirements to implement its housing target – c.15 units per ha for LUZ 6 (New Residential) and LUZ 2 (Town Centre / Opportunity Sites), and 10 units per ha for LUZ 5 (Residential Infill Lands). This compares to 40-100uph for town centre sites, and 30-50uph for suburban sites in Key Towns, such as Castlebar, under the *Sustainable Residential Development Compact Settlements Guidelines for Planning Authorities* (2024). At the said recommended densities, the lands zoned New Residential in the Local Area Plan, in addition to the aforementioned zoned town centre and infill lands, could accommodate significantly more housing units than the core strategy housing target of 708 units set out in the County Development Plan.

The Office is satisfied therefore that the Local Area Plan, as proposed to be amended by this Direction, provides for a reasonably balanced distribution of New Residential lands having regard to the availability of suitable sites consistent with compact growth and having regard to the sequential approach to zoning.

Therefore, there is no justification to retain MA 12 (2.09ha) to meet housing demand.

The NWRA also supports the draft Direction for the reasons outlined under MA 10 above. The Office concurs with the position of the NWRA.

In response to the public submission, the Chief Executive reiterates that *'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, and it would be contrary to the Core Strategy.'* The Office concurs with the reasons of the Chief Executive. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

In response to the NWRA the Chief Executive states that he *'concurs with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 12.

MA 14 – Lands at Ballynaboll South (RS 18 – Residential Settlement Capacity Assessment)

Two (2) submissions were received in respect of MA 14. One (1) joint submission from the elected members under section 31(10) opposing the draft Direction, and one (1) from NWRA supporting Part 2(b)(i) the draft Direction.

The joint submission received from the elected members opposes the draft Direction in respect of MA 14 on the basis that it is serviced / water services are adjacent; it is within the town's built-up footprint and is within the CSO 2022 boundary; and would promote compact growth and sustainable travel; it would provide much needed housing and is close to the town centre and employers; and would promote sustainable travel.

As in the case of MA 12 above, site servicing was not a reason for the inclusion of MA 12 in the draft Direction.

Regarding the CSO boundary, the site falls outside the 2016 CSO Settlement Boundary and is therefore inconsistent with objectives for compact growth. The site is located in a peripheral and non-sequential location, at a distance from the centre of the town, and would result in the expansion of the town beyond the built up area rather than prioritising locations closer to the town centre consistent with compact growth and facilitating sustainable travel.

In relation to the need to provide housing, the Office reiterates the considerations set out in respect of MA 12 above.

The NWRA also supports the draft Direction for the reasons outlined under MA 10 above. The Office concurs with the position of the NWRA. In response to the NWRA, the Chief Executive states that he *'concurs with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 12.

MA 21 – Lands at Ballymacraha (referred to as Ballynaboll in MA 21) (RS 19 – Residential Settlement Capacity Assessment)

Two (2) submissions were received in respect of MA 21. One (1) joint submission from was received from elected members under section 31(10) opposing the draft Direction, and one (1) from NWRA supporting Part 2(b)(i) the draft Direction.

The joint submission received from elected members opposes the draft Direction in respect of MA 21 on the basis that it is serviced / water services are adjacent; would provide much needed houses; is within the town's built-up footprint and CSO 2022 boundary; would promote compact growth and sustainable travel; and any flood risk areas would be conditioned as open space.

As in the case of preceding zoning objectives, site servicing was not a reason for the inclusion of MA 21 in the draft Direction, although as set out in the section 31(AO)(7)

notice letter the Strategic Environmental Assessment (SEA) had noted that inefficiencies would arise in terms of additional services delivery costs.

Regarding the CSO boundary, the site falls outside the 2016 CSO Settlement Boundary and is therefore inconsistent with objectives for compact growth. The site is located in a peripheral and non-sequential location, at a distance from the centre of the town, and would result in the expansion of the town beyond the built up area rather than prioritising locations closer to the town centre consistent with compact growth and facilitating sustainable travel.

In respect of flood risk, the section 31AO(7) Notice Letter dated 22nd December 2023 noted that the Justification Test undertaken has failed on the basis that there are more suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. Therefore, having regard to the Minister's Statement of Reasons, the Office is satisfied that the subject zoning is inconsistent with the objectives NEO 7 and NEO 24 of the County Development Plan, which state as follow:

NEO 7: To seek the protection of the riparian zones of watercourses throughout the county, recognising the benefits they provide in relation to flood risk management, their protection of the ecological integrity of watercourse systems and the role they play in the enhancement of the county's natural heritage and biodiversity;

NEO 24: To protect and enhance the county's floodplains and wetlands as 'green infrastructure' which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences [sic] in the future, subject to normal planning and environmental criteria;

and fails to have regard to the Flood Guidelines.

In relation to the need to provide housing, the Office reiterates the considerations set out in respect of MA 12 above.

The NWRA also supports the draft Direction for the reasons outlined under MA 10 above. The Office concurs with the position of the NWRA. In response to the NWRA

the Chief Executive states that he *'concurs with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 21.

In response to Part 2(b)(ii)

MA 13 – Lands at Breafoy Road, Knockraver (RS 22 – Residential Settlement Capacity Assessment)

Two (2) submissions were received in respect of MA 13. One (1) joint submission from the elected members under section 31(10) opposing the draft Direction, and one (1) from the NWRA supporting Part 2(b)(ii) the draft Direction.

The joint submission received from elected members opposes the draft Direction in respect of MA 13 on the basis that it will be fully serviced with a dedicated footpath and cycle path along the sites northern boundary through an approved Part 8 Scheme and would promote sustainable travel options. The members also submit that the site is within the CSO 2022 and CSO 2016 boundaries for Castlebar and would promote compact growth.

As in the case of preceding zoning objectives, site servicing was not a reason for the inclusion of MA 13 in the draft Direction. While the Office acknowledges the proposal to provide a dedicated footpath and cycle path, the site's peripheral location will militate against use of sustainable travel options relative to other lands zoned for development in less peripheral locations.

Regarding the CSO boundary, approximately half the site falls outside the CSO 2016 Settlement Boundary and is therefore inconsistent with objectives for compact growth. The site is located in a peripheral and non-sequential location, at a distance from the centre of the town, and would result in the expansion of the town beyond the built up area rather than prioritising locations closer to the town centre consistent with compact growth and facilitating sustainable travel.

The NWRA considers this peripheral site to contravene RPO 3.1 and 3.2, compact growth in Key Towns, and that the revision of this element of the Local Area Plan will contribute considerably to the delivery of places of urban scale, focusing on the urban cores initially and consolidation of the existing built up footprint of Castlebar. The Office concurs with the position of the NWRA. The Office concurs with the view of the NWRA.

In response to the NWRA the Chief Executive states that he '*concur with the opinion of the NWRA*' in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends '*no change to plan*'.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 13.

MA 17 - Lands at Rinshinna (RS 24 – Residential Settlement Capacity Assessment)

Three (3) submissions were received in respect of MA 17. One (1) joint submission from the elected members under section 31(10) opposing the draft Direction, and one (1) from a member of the public also opposing the draft Direction. The third, from the NWRA, supports Part 2(b)(ii) of the draft Direction.

The joint submission received from elected members opposes the draft Direction in respect of MA 17 on the basis that it is fully serviced, is within the town's built-up footprint and the majority is within the CSO 2022 boundary and would promote compact growth and sustainable travel. It is also submitted that it is adjacent mature residential housing estates, is close to major employers and that it is bounded to the south by the N60 which has a shared cycle / footpath to the town centre. It is further submitted that it provides for much needed housing and provides an alternative to New Residential lands located primarily to the west of the Town Centre.

The submission from the member of the public opposed the draft Direction on the basis that the Enterprise and Employment lands should be changed to Residential due to the proximity to housing developments and services.

As in the case of preceding zoning objectives, site servicing was not a reason for the inclusion of MA 17 in the draft Direction. While the Office acknowledges the proposal to provide a dedicated footpath and cycle path, the site's peripheral location will militate against use of sustainable travel options relative to other lands zoned for development in less peripheral locations.

In relation to the need to provide housing, the Office reiterates the considerations as to densities set out in respect of MA 12 above.

Regarding the CSO boundary, this was not a reason for the Office's recommendation for a Direction in respect of this site. However, notwithstanding this and the siting of MA 17 adjacent to existing housing estates, the site is located in a peripheral and non-sequential location, at a distance from the centre of the town, and would result in the expansion of the town beyond the built up area rather than prioritising locations closer to the town centre consistent with compact growth and facilitating sustainable travel.

In relation to the provision of residential lands as an alternative to lands zoned to the west of the town, the Office is satisfied that the Local Area Plan, as proposed to be amended by this Direction, provides for a reasonably balanced distribution of New Residential lands having regard to the availability of suitable sites consistent with compact growth and having regard to the sequential approach to zoning.

The Office is satisfied that it is appropriate to zone land for Enterprise and Employment use in proximity to housing development, subject to standard planning precautions to avoid adverse effect on residential amenity.

The NWRA also supports the draft Direction for the reasons outlined under MA 13 above. The Office concurs with the position of the NWRA.

In respect of MA 17, the CE's Report notes that *'the subject land parcel 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 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.'* The Office concurs with the reasons of the Chief Executive.

In response to the NWRA the Chief Executive states that he *'concur with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the chief executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 17.

In response to Part 2(b)(iii)

MA 15 - Lands at Rinshinna (RS 24 – Residential Settlement Capacity Assessment)

Two (2) submissions were received in respect of MA 15. One (1) from a member of the public opposing the draft Direction, and one (1) from NWRA supporting Part 2(b)(iii) of the draft Direction.

The member of the public opposes the draft Direction on the basis that the Enterprise and Employment land use zoning objective should be changed to residential due to proximity to existing housing developments and services. This submission does not address the substance of the reasons for the draft Direction as set out in the section 31AO(7) Notice Letter.

The NWRA considers this peripheral site to contravene RPO 3.1 and 3.2, compact growth in Key Towns, and that the revision of this element of the Local Area Plan will contribute considerably to the delivery of places of urban scale, focusing on the urban cores initially and consolidation of the existing built up footprint of Castlebar. The Office concurs with the position of the NWRA.

In response to the NWRA the Chief Executive states that he *'concur with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the chief executive recommends *'no change to plan'*.

In respect of MA 15, the CE's Report notes that *'the subject land parcel 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 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'. The Office concurs with the reasons of the Chief Executive.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 15.

MA 18 - Lands at Rinshinna (RS 24 – Residential Settlement Capacity Assessment)

Two (2) submissions were received in respect of MA 18. One (1), received from a member of the public opposing the draft Direction, and one (1) from NWRA supporting Part 2(b)(iii) of the draft Direction.

The member of the public submits that the subject lands should be zoned part New Residential / SRR, Enhance Natural Environment and Enterprise and Employment. They oppose the draft Direction on the basis that there is a deficit of residential lands to the south of Castlebar; that the site is proximate to employers, services and facilities; that the LTP provides for increased connectivity to the town centre; and that there are ample employment and enterprise lands in other locations and so it is not needed here.

In relation to the provision of residential lands to the south of Castlebar, the Office is satisfied that the Local Area Plan, as proposed to be amended by this Direction, provides for a reasonably balanced distribution of New Residential lands having regard to the availability of suitable sites consistent with compact growth and having regard to the sequential approach to zoning.

In relation to proximity to employment uses and connectivity to the town centre, the Office is satisfied that there are ample lands zoned to accommodate residential development that are in proximity to employment sites, which lands are more favourably located relative to the town centre, including having regard to the sequential approach to zoning.

Regarding the increased connectivity of the site through the proposed LTP measures, the Office considers that future enterprise and employment uses, which attract significant numbers of trips by private car, will benefit from the measures proposed in the LTP.

Regarding lack of 'need' for Employment and Enterprise lands, in the section 31AO(7) Notice Letter, the Office accepted the rationale of the planning authority for the zoning land, of the extent proposed, for Enterprise and Employment uses in the adopted plan, except as related to site EE 1.

The NWRA also supports the draft Direction for the reasons outlined under MA 15 above. The Office concurs with the position of the NWRA.

The CE's Report notes that *'the subject land parcel 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 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'*.

The Office concurs with the reasons of the Chief Executive.

In response to the NWRA the Chief Executive states that he *'concurs with the opinion of the NWRA'* in respect of the proposed Material Alteration. Despite the Chief Executive's agreement on the draft Direction in respect of the subject Material Alteration, the Chief Executive recommends *'no change to plan'*.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of MA 18.

In response to Part 2(c)(i)

Lands zoned Enterprise and Employment (Site EE 1)

Four (4) submissions were received in respect of site EE 1: one (1) from the elected members, under section 31(10), opposed to the draft Direction; two (2) in support of the draft Direction, from TII and NTA; and one (1) in support of the draft Direction in the absence of further justification being furnished, from NWRA.

The elected members propose to retain the subject Enterprise and Employment zoning, subject to the following amendments:

Limit the allowed uses on LUZ 3 Enterprise & Employment, subject to caveat stating:

Site EE 1 (Cloonagh) as identified in the Settlement Capacity table and map shall be limited to uses associated and compatible for Rail Freight only.

In addition, the elected members propose to amend table 11.2 LUZ Matrix by inserting a new column 'Enterprise & Employment Site EE – Cloonagh Lands' which provides that 'Logistics, Storage & Distribution Units' are 'Permitted in Principle', and allows for consideration 'Advertisement Billboards', 'Industry – Heavy', 'Industry – Light', 'Utility Structures', 'Warehousing' as 'Open for Consideration'.

These proposals have been incorporated into the CE's Report as proposed 'minor amendments' to the subject zoning objective.

The revised zoning objective and restriction of uses within the subject site addresses some of the concerns raised by the Office in its section 31AO(7) Notice Letter.

The reasons given by the elected members for opposing the draft Direction relate to the role of the local authorities in economic development and enterprise support under the Local Government Reform Act 2014. The Office acknowledges the role of the local authority in this regard, however, in preparing a statutory local area plan the members are obliged and are restricted to considering the proper planning and sustainable development of the area, the statutory obligations – i.e. to ensure that the local area plan is consistent with the objectives of the development plan, the national and regional development objectives specified in the NPF and the RSES and SPPRs specified in guidelines – and relevant policies and objectives of Government and of any Minister.

The elected members reiterate the provisions of the RSES and County Development Plan concerning the role of Castlebar as a Key Town, a regional driver and strategic employment centre of significant scale, with Westport, on the Atlantic Economic Corridor (AEC), in addition to the strategic importance of the Western Rail Corridor (WEC) in consolidating the AEC under RPO 6.13; in addition to the vision for the

town as a linked Regional Growth Centre and Economic Growth Cluster with Westport supported by the upgrading of the N5 and by increased rail services. These provisions have previously been acknowledged by the Office.

They highlight the AISRR, which recommends increased rail freight through the development of a network of inland terminals close to major cities on the rail network, and also proposes to reopen the Athenry to Claremorris line which will provide a connection to the reinstated Shannon Foynes line. However, the Review was published as a draft form in July 2023 and a final report has not yet been published. It therefore is not the policy of Government or any Minister.

In respect of Castlebar not being referred to in Iarnród Éireann's Rail Freight Strategy 2040 (the 2040 Rail Strategy), the members submit that the 2040 Rail Strategy preceded the draft AISRR. Regardless, the 2040 Rail Strategy is not the policy of the Government or of a Minister. Therefore, notwithstanding assertions by the members that Iarnród Éireann has proposals for a freight hub with regional reach, and that the site is ideally suited in terms of location adjacent a straight stretch of rail line in excess of 500m, the Office remains of the opinion that the intention to develop the subject lands for this use is aspirational and not grounded by an appropriate policy context.

The members also highlight the County Development Plan objective MTO 18, which recognises the potential for a rail hub in Castlebar. The Office notes that MTO 18 seeks:

To liaise with and encourage Iarnród Éireann to:

- a. Continue investment in rail freight facilities at Ballina & Westport (existing) and Claremorris & Castlebar (as potential freight hubs).*
- b. Increase frequency of commuter services on the mainline rail network between Westport, Castlebar and Ballina.*

However, no evidence-base has been determined for the subject enterprise and employment lands at Cloonagh, having regard to section 6.2.5 of the Development Plan Guidelines 2022³.

In its submission in support of the draft Direction TII submits that the planning authority must undertake and complete an evidence base to demonstrate that the subject lands, including access to the R307 near N5/N84 is required to ensure compliance with section 2.7 of the *Spatial Planning and National Roads Guidelines for Planning Authorities* (2012) (National Roads Guidelines). The proposed zoning therefore remains inconsistent with RPO 6.5.

The CE's Report responds that the existing Enterprise and Employment lands are all at full capacity and that the proposed zoning reflects the infrastructure capacity audit carried out to inform the draft Local Area Plan, and that the subject lands are supported by sustainable travel options / active travel measures in the LTP, as has been amended, all within the 60kph speed limit.

The Chief Executive considers TII's recommendations are essentially policy and evidence based. In respect of the 'policy criteria' under section 2.7 of the National Roads Guidelines, the CE's Report submits that these criteria⁴ are met by national and regional planning position, as set out in the NPF and RSES, the County Development Plan, the AISRR and the 2040 Rail Strategy, in addition to the provisions of the Local Government Reform Act 2014. These have already been set out in the elected members' submission.

In respect of 'evidence base', the CE's Report submits that the issues (such as traffic loading, compliance with road design standards, among others) can only be addressed at application stage, but that as the land is within the ownership of the

³ The Development Guidelines state '*where land use zoning is being undertaken as part of the preparation of a local area plan, the specified approach to zoning detailed in ... [Chapter [6] and in Chapter 4 of these Guidelines should be followed by the planning authority.*'

⁴ Demonstrate need for additional connectivity by reference to, and consistency with, the National Spatial Strategy, Regional Planning Guidelines and the NTA's GDATS; early identification of strategic land uses to benefit from high quality access; demonstrate that existing road and transport networks have been examined and exploited to fullest extent practical.

County Council and is within the 60kph speed limit, compliance is within the remit of the County Council.

However, the Office notes that this approach, to delay consideration of such issues to planning application stage, is inconsistent with the key principle of the National Roads Guidelines require that such development is plan-led, and that:

in preparing development and local area plans, planning authorities must assess the trip generation aspects of any land use zoning objectives and how such trip generation is to be catered for, promoting the use of sustainable modes, while protecting the strategic function of the national roads network.

Further, in its submission in support of the draft Direction the NTA stated that it considers the LTP measures not to be sufficient to accommodate the potential large-scale development of trip intensive uses that could be granted under Enterprise and Employment zoning objective, and that the zoning of this peripheral land would further embed the reliance of the use of the private car and hinder modal share targets.

The CE's Report responds that it is intended that the lands would be limited to industry that would avail of the rail freight hub and that the lands fully align with climate action and sustainable transport policies at all levels of the hierarchy, getting heavily emitting polluting road freight off the road. As the travel measures in the amended LTP have been fully approved by the NTA, the NTA's submission appears contrary to its work on Castlebar LTP. Further, the NTA's comments, that the measures are insufficient, are premature as the capacity of the 'Proposed Access Link with Active Travel Measures' serving the subject lands hasn't been designed or defined at this stage. The CE's Report also refers to the proposed minor amendments to limit the uses contained under the zoning objective to be mitigating factors.

The Office is satisfied that, cognisant of the current policy framework, the NTA has taken due account of the traffic generating implications of the lands concerned the likely capacity of LTP travel measures proposed and the likely consequences of the development of the subject lands for the uses proposed, cognisant of the current policy framework, in making its submission on the draft Direction

In its submission on the draft Direction, the NWRA stated that in the absence of the planning authority substantiating its statement that *'following consultation with Irish Rail, the subject lands are under consideration as a strategic rail freight hub'*, it supports this element of the draft Direction. The elected members' submission refers only to a newspaper article which refers to consultation between Irish Rail and *'Mayo Industrialists'*.

Therefore, notwithstanding the members proposed minor amendments to the subject zoning objective and the Chief Executive's recommendation that same be applied in implementing the Direction, the Office is satisfied that the zoning remains inconsistent with objective SO 12 of the County Development Plan for integrated land use and transport planning and with RPO 6.30 and RPO 6.31 of the NWRA RSES.

Regarding the flood risk on the subject site, the members consider the requirement to include the detail of the flood risk zones on the land use zoning map to be excessive as the matter had been identified in the SFRA, been subject of the plan making justification test, and would be complied with in any potential planning application through the development management process. Further, the members submit that the area concerned is very small and peripheral.

However, the members have not demonstrated that the plan making justification test has satisfied all the criteria set out in box 4.1 of the Flood Guidelines, that is, in particular, that there are no suitable alternative lands for the particular use in areas of lower flood risk. The subject zoning has not applied the sequential approach to flood risk management and therefore failed to have regard to the Flood Guidelines and remains inconsistent, with RPO 3.10 and RPO 3.11 of the NWRA RSES and with policy INP 14 of the County Development Plan.

Following consideration of the submissions and CE's Report, the Office considers that there is therefore no planning or policy basis to amend its recommendation in respect of Part 2(c)(i) Lands zoned Enterprise and Employment (Site EE 1).

Recommendation

In light of the above and for the reasons given in our section 31AO(7) Notice Letter dated 22nd December 2023, the Office remains of the view, as set out in this notice

letter, that the Local Area Plan is inconsistent with the objectives of the Mayo County Development Plan 2022-2028 and with the objectives of the NWRA RSES.

Having regard to section 31AP(4)(a) of the Act, the Office recommends the exercise of your function under the relevant provisions of section 31 of the Act to issue the Direction as per the attached proposed final Direction.

Please do not hesitate to contact the Office should you have any queries in relation to the above. Contact can be initiated through the undersigned or at plans@opr.ie.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Niall Cussen", is enclosed in a light grey rectangular box.

Niall Cussen
Planning Regulator

**DIRECTION IN THE MATTER OF SECTION 31
OF THE PLANNING AND DEVELOPMENT ACT 2000 (as amended)**

Castlebar Town and Environs Local Area Plan 2023-2029

“Local Area Plan” means the Castlebar Town and Environs Local Area Plan 2023-2029.

“Planning Authority” means Mayo County Council.

“RSES” means the Regional Spatial and Economic Strategy for the Northern and Western Region.

The Minister of State at the Department of Housing, Local Government and Heritage in exercise of the powers conferred on him by section 31 of the Planning and Development Act 2000 (No.30 of 2000) and the Housing, Local Government and Heritage (Delegation of Ministerial Functions) Order 2023 (S.I. No. 116 of 2023), and consequent to a recommendation made to him by the Office of the Planning Regulator, hereby directs as follows:

- (1) This Direction may be cited as the Planning and Development (Castlebar Town and Environs Local Area Plan 2023-2029) Direction 2024.
- (2) The Planning Authority is hereby directed to take the following steps with regard to the Local Area Plan:
 - (a) Provide a clear core strategy table which sets out the area and quantum of housing to be delivered on lands zoned Town Centre, Existing Residential and New Residential. Appropriate densities shall be applied to demonstrate anticipated yield.
 - (b) Reinstate the following zoning objectives and associated text to that of the draft Local Area Plan:
 - (i) Material Alterations 10, 12, 14 and 21 – i.e. the subject lands revert to Agriculture from New Residential
 - (ii) Material Alterations 13 and 17 - i.e. the subject lands revert to Enterprise and Employment and Agriculture from New Residential

- (iii) Material Alterations 15 and 18 - i.e. the subject lands revert to Enterprise and Employment from New Residential
- (c) Delete the following zoning objective from the adopted Local Area Plan, i.e. the subject lands are unzoned:
 - (i) Land zoned Enterprise and Employment at Cloonagh (Site EE 1) located to the southwest of Saleen Lough and to the immediate east of the rail line

and apply all necessary consequential updates of the text of the plan consistent with the foregoing.

STATEMENT OF REASONS

- I. The Local Area Plan as adopted fails to include an accurate core strategy table and in particular, does not set out a table which estimates the quantum of housing that will be delivered on lands zoned Existing Residential, the quantum to be delivered on mixed use town centre and opportunity sites and the quantum to be delivered on lands zoned New Residential. This is inconsistent with RPO 3.1 and 3.2 for compact growth and Objective SSO 3 of the Mayo County Development Plan 2022-2028 to promote town centre regeneration, which aligns with the Government's *Town Centre First: A Policy Approach for Irish Towns* (2022).
- II. The Local Area Plan as adopted includes material alterations to the draft Local Area Plan, which zone additional residential land in excess of what is required for the town having regard to the growth targets for Castlebar under the core strategy of the Mayo County Development Plan 2022-2028. These material alterations are inconsistent with Objective CSO 1 of the County Development Plan to secure the implementation of the population and housing growth set out in the core strategy and settlement strategy, and Objective CSO 3 to adopt a Local Area Plan for Castlebar that aligns with the National Planning Framework, Regional Spatial and Economic Strategy, and the core strategy of the County Development Plan.

These material alterations are located in peripheral and non-sequential locations, some of which are outside the CSO boundary, and would encourage a pattern of development in particular locations which is inconsistent with the objectives of the County Development Plan to implement a sequential approach to development and promote compact growth (Objective SSO 3 and Objective SSO 6), and is inconsistent with RPO 3.1 and RPO 3.2 of the RSES, and demonstrates that the Planning Authority has failed to have regard to the *Development Plans, Guidelines for Planning Authorities* (2022) issued under section 28 of the Act.

- III. The absence of a detailed core strategy table, and extensive zoning of land in peripheral and non-sequential locations represents a piecemeal and ad hoc approach that individually and cumulatively fails to set out an overall strategy for growth that is consistent with the objectives of the Mayo County Development Plan 2022-2028 to deliver compact and sequential growth and the regeneration of the town centre under Objective SSO 3 and Objective SSO 6.
- IV. The Local Area Plan as adopted includes a material alteration (MA 21) to the draft Local Area Plan which zones land at Ballymacraha (referred to as Ballynaboll in MA 21) for vulnerable uses within flood zone A and B which lands have not passed the plan making Justification Test. This material alteration is inconsistent with NPO 57 of the National Planning Framework, RPO 3.10 and 3.11 of the RSES, and Objectives NEO 7 and NEO 24 of the Mayo County Development Plan 2022-2023, and fails to have regard to *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) issued under section 28 of the Act.
- V. The Local Area Plan as adopted also includes an extensive area of land zoned for Enterprise and Employment at Cloonagh which could accommodate a range of high intensity employment uses. This zoning lacks a clear evidence basis, and the peripheral location of these lands would encourage primarily car based development that will not support the modal shift to active and sustainable modes, inconsistent with RPO 6.30 and 6.31 of the RSES. The zoning objective would, therefore, be inconsistent with Objective SO 12 of the Mayo County Development Plan 2022-2028 to integrate land use planning and sustainable

transportation planning, promote the consolidation of development, encourage sustainable travel patterns by reducing the need to travel particularly by private transport, while prioritising walking, cycling and public transport.

This zoning objective, by reason of its location, extent and the nature of uses that are permissible on such lands under the zoning matrix, also has the potential to generate significant additional traffic movements with consequent adverse impacts on the national road network, inconsistent with RPO 6.5 of the RSES to maintain the strategy capacity of the national road network, and section 2.7 (Development at National Road Interchanges or Junctions) of the *Spatial Planning National Road Guidelines* (2012) issued under section 28 of the Act.

Furthermore, this zoning objective is inconsistent with NPO 57 of the National Planning Framework, RPO 3.10, RPO 3.11 of the RSES, and Objectives NEO 7 and NEO 24 of the Mayo County Development Plan 2022-2028. Part of the lands of the lands are located within flood zones A and B and the criteria of the Justification Test have not been adequately addressed in accordance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) issued under section 28 of the Act.

- VI. The Local Area Plan has not been made in a manner consistent with, and has failed to implement, the recommendations of the Office of the Planning Regulator under section 31 AO of the Act.
- VII. In light of the matters set out at I-V above, the Minister is of the opinion that the Local Area Plan as made is inconsistent with the objectives of the Development Plan of the area.
- VIII. The Local Area Plan a made is not consistent with the objectives of the RSES contrary to section 19(2) and section 27(1) of the Act.
- IX. The Minister is of the opinion that the Local Area Plan as made is not consistent with the objectives of the National Planning Framework, including National Policy Objective 33 and National Policy Objective 57.

- X. The Minister is of the opinion that the Local Area Plan as made fails to set out an overall strategy for the proper planning and sustainable development of the area.
- XI. The Local Area Plan is not in compliance with the requirements of the Act.

GIVEN under my hand,

Minister of State for Local Government and Planning

Day of Month, year.



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

Appendix 1: Proposed amended Land Use Zoning Matrix Table 11.2

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
Abattoir	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Advertisement Billboards	O	O	X	X	X	X	O	O	X	X	X	O	O	X
Agricultural Structures	X	X	X	X	X	X	X	X	X	X	P	X	X	X
Amusement Arcade	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Apartments	P	P	P	P	P	X	X	X	X	X	X	X	X	X
B&B/ Guesthouse	O	O	P	P	O	X	X	X	X	X	O	X	X	X
Bank/ Financial Institution	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Batching Plant (asphalt/ concrete)	X	X	X	X	X	X	X	X	X	X	O	X	X	O
Betting Office	O ¹	O	X	X	X	X	X	X	X	X	X	X	X	X
Boarding Kennels	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Caravan Park / Campervan Park / Camp Site/ Glamping (Tourism)	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Car Parking	O	O	O	O	X	X	O	X	O	X	X	O	O	X
Cash & Carry Wholesale Outlet	X	X	X	X	X	X	P	X	X	X	X	X	X	X
Cemetery	X	X	X	X	X	X	X	X	O	X	O	X	X	X
Chemist/ Pharmacy	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Childcare Facilities – Crèche, Nursery and Playschool	P	P	P	P	P	P	O	X	P	X	X	X	X	X
Cinema/ Theatre	P	P	X	X	X	X	O	X	X	X	X	X	X	X
Community Facility (hall, centre or recreational use)	P	P	O	O	O	X	X	X	P	X	O	X	X	X
Conference Centre	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Dance Hall/ Disco/ Night Club	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Data Centre	X	X	X	X	X	X	O	X	X	X	O	X	X	X
Dentist/ Doctor Surgery	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Drive Through Restaurant	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Education – excluding a night-time use	O	O	O	O	X	P	X	X	O	X	X	X	X	X
Education – night-time education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X
Education – third level education use	O	O	X	X	X	P	O	X	O	X	X	X	X	X

¹ Shall be encouraged to be located off the primary Town Centre Central Spine.

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
	Education – training centre	O	O	X	X	X	O	O	X	P	X	X	X	X
Enterprise Unit/Workshop	P	P	X	X	X	X	P	X	X	X	X	X	X	X
Extractive Industry	X	X	X	X	X	X	X	X	X	X	X	X	X	P
Funeral Home	O	O	X	X	X	X	O	X	O	X	X	X	X	X
Fuel Depot	X	X	X	X	X	X	O	X	X	X	O	X	O	X
Garden Centre	O	O	X	X	X	X	O	X	X	X	O	X	X	X
Go-Kart Track	X	X	X	X	X	X	O	X	X	X	X	X	X	X
Hospital	O	O	X	X	X	X	X	X	P	X	X	X	X	X
Hostel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Hotel	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Industry – Heavy	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Industry – Light	X	X	X	X	X	X	O	O	X	X	X	X	X	X
Leisure Centre/ Gym	P	O	X	X	X	X	O	X	O	O	X	X	X	X
Library	P	P	X	X	X	X	X	X	O	X	X	X	X	X
Licenced Premises (Public House)	P	P	X	X	X	X	X	X	X	X	X	X	X	X
Logistic, Storage & Distribution Units	X	X	X	X	X	X	P	P	X	X	X	X	X	X
Mart/ Co-operative	X	X	X	X	X	X	X	X	X	X	O	X	X	X
Motor Sales/ Service	O	O	X	X	X	X	P	X	X	X	X	X	X	X
Nursing Home/Retirement Village/Residential Care	P	P	P	P	P	X	X	X	O	X	X	X	X	X
Office	P	P	X	X	X	X	O ²	X	X	X	X	X	X	X
Open Space (Public)	P	P	P	P	P	P	P	X	P	P	P	P	X	X
Park & Stride Facility	X	O	X	O	X	X	O	X	X	X	X	O	X	X
Place of Worship	P	P	O	O	X	X	X	X	P	X	X	X	X	X
Plant/ Tool Hire	O	O	X	X	X	X	O	X	X	X	X	X	X	X
Playground	P	P	P	P	P	P	O	X	P	P	X	O	X	X
Playing Pitches/ Sports Club	O	O	P	P	P	P	X	X	P	P	P	O	X	X
Primary Care Centre, Health Centre and Clinics	P	P	X	X	X	X	X	X	P	X	X	X	X	X

² Large offices which do not cater for visiting members of the public.

Land Use Zoning Matrix Table 11.2	Town Centre Inner	Town Centre Outer	New Residential	Existing Residential	Strategic Residential Reserve	Educational	Enterprise & Employment	Enterprise & Employment Site EE 1 - Cloonagh Lands	Community Services	Recreation & Amenity	Agriculture	Open Space	Infrastructure & Utilities	Quarry / Mining
	Professional Services	P	P	X	X	X	X	X	X	X	X	X	X	X
Residential – Multiple (two or more units)	P	P	P	P	P	X	X	X	X	X	X	X	X	X
Residential – Single	P	P	P	P	P	X	X	X	X	X	O ³	X	X	X
Restaurant/ Café	P	P	X	X	X	X	O	X	O	X	X	X	X	X
Retail Warehousing	O	O	X	X	X	X	P	X	X	X	X	X	X	X
School / Third Level Education	P	P	O	O	X	P	X	X	O	X	X	X	X	X
Service Station	O	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Comparison)	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Shop/Retail (Convenience)	P	O	O	O	X	X	X	X	X	X	X	X	X	X
Shopping Centre / Supermarket	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Take Away	P	O	X	X	X	X	X	X	X	X	X	X	X	X
Traveller Accommodation	O	O	O	O	O	X	X	X	X	X	X	X	X	X
Utility Structures	O	O	O	O	O	O	O	O	O	O	O	X	P	X
Veterinary Surgery	O	O	X	X	X	X	P	X	X	X	O	X	X	X
Warehousing	X	O	X	X	X	X	P	O	X	X	X	X	X	X

³ Subject to the Rural Housing Policy as outlined in the Mayo County Development Plan 2022-2028 (or subsequent plans)