

Forward Planning Section

**Chief Executive's  
Report No. 1**

**Pre-Draft  
Consultation Phase**

**Mayo County  
Development Plan**

**2021 - 2027**



**MAYO.IE**

**This Chief Executive's Report (No 1) is submitted to the members for their consideration in accordance with Section 11(4)(c) of the Planning and Development Act 2000, as amended.**

**APRIL 2020**

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## 1. Introduction and Overview

### 1.1 Introduction

Section 11 of the Planning & Development Act 2000, as amended, requires each planning authority to give notice of its intention to review its existing Development Plan and to prepare a new Plan for its area not later than 4 years after the making of a Development Plan.

The current Mayo County Development Plan was adopted on 22<sup>nd</sup> April 2014, hence on 16<sup>th</sup> April 2018, Mayo County Council published notice of its intention to commence the review of the Mayo County Development Plan 2014-2020 and the preparation of a new plan for the period 2020 - 2026. The process of public consultation commenced as per Section 11(3) of the Planning & Development Act 2000, as amended, and submissions and observations were invited. The closing date for submissions/observations was 14<sup>th</sup> June 2018. Various service providers were also consulted separately as part of the consultation process.

This Chief Executive's Report (No. 1) forms part of the statutory procedure for preparing and making a new County Development Plan. Its purpose is to report on the outcome of the initial, pre-draft consultation process undertaken prior to the preparation of the Draft Plan.

Section 11 (4) Planning & Development Act 2000, as amended, requires the report to:

- list the persons or bodies who made submissions/observations and any persons or bodies consulted
- summarise the issues raised in the submissions and during the consultations, where appropriate; but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose
- give the opinion of the Chief Executive to the issues raised, taking account of 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 of the Government or any Minister of the Government and
- state the Chief Executive's recommendations on the policies to be included in the draft development plan.

### 1.2 Update on Pause in Plan Preparation Process & Resumption of Process

Under normal circumstances as regards statutory time frames for the plan preparation process, this Chief Executive's Report on the outcome of the first round of public consultations would have been circulated to the members in August 2018.

However, the National Planning Framework (NPF) was adopted on 29<sup>th</sup> May 2018 and the Regional Assemblies, including the Northern and Western Assembly, commenced the preparation of Regional Spatial and Economic Strategies (RSES) to provide regional level strategic planning and economic policy in support of the implementation of the NPF.

The County Development Plan must be consistent with the RSES. In order to enable each Local Authority to align the timeframe for the statutory review of their Development Plans with the relevant RSES, the Planning and Development (Amendment) Act 2018, which was enacted on July 19<sup>th</sup> 2018, contains a provision that requires the review process to be suspended where it is in progress until not later than 13 weeks after the relevant RSES is made.

Taking the above into account, the statutory development plan review process was suspended in August 2018 until after the RSES was finalised. The RSES was finalised on the 29<sup>th</sup> January 2020, consequently the Planning Authority has 13 weeks to recommence the development plan review process.

Following the publication of the RSES, the planning authority informed all who had made submissions that the review process had recommenced and also notified the public through the council's website, Facebook and Twitter accounts.

A total of 31 valid submissions were received on foot of this first round of public consultation.

The Council expresses its gratitude to all who made submissions or observations and/or attended the public consultation events.

### **1.3 Format of this Report**

The report comprises 4 Parts and 2 Appendices.

Part 1 is an introductory section which gives an overview of the process to date and of the legislative background and requirements for the plan preparation process, including pre-draft consultation, the Chief Executive's Report and environmental assessments.

Part 2 describes the consultation process undertaken during this initial, pre-draft stage of the plan preparation process. It also lists the persons and bodies who made submissions or observations.

Part 3 summarises the issues raised in the submissions, at the public information events and during the consultations under various themes. It also sets out the Chief Executive's opinion on these issues and his recommendations on the policies to be included in the draft development plan.

Part 4 outlines the next stages of the process towards the making of the new Mayo County Development Plan 2020 -2026.

Appendix 1 contains a summary of each individual submission.

Appendix 2 outlines the topics raised at the public information/consultation events.

#### **1.4 Current Stage of Plan Preparation process**

The entire development plan process normally takes up to two years<sup>1</sup> to complete and comprises broadly of four stages:

Stage 1: Pre-draft

Stage 2: Draft Plan

Stage 3: Amendments (if material amendments are proposed)

Stage 4: Plan is made (by resolution of the members).

Currently, Mayo County Council is at Stage 1: Pre-draft stage of the plan making process. This stage involves notifying the public, the Minister of Housing, Planning and Local Government, An Bord Pleanála, the Northern and Western Regional Assembly, adjoining Local Authorities and prescribed bodies of the intent to review the existing Development Plan and to prepare a new Plan and consultations with service providers and other stakeholders including the general public. A Chief Executive's Report (such as this) is then prepared on submissions or observations received during the pre-draft consultation period and submitted to the members for their consideration.

#### **1.5 Environmental Assessments**

Environmental assessments, namely Strategic Environmental Assessment (SEA), Habitat Directive Assessment and Strategic Flood Risk Assessment, will be undertaken in tandem with the preparation of the new Development Plan.

With regard to SEA, the prescribed environmental authorities were notified as per Article 13D of the Planning and Development (SEA)(Amendment) Regulations 2011 and issued with a SEA (Scoping) Consultation Document to assist in scoping of the environmental report.

Submissions were received from the EPA and DoEHLG, details of which are summarised in this Chief Executive's Report.

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<sup>1</sup> Note that the period may extend for longer than two years if Habitat Directive Assessment or Strategic Environmental Assessment are required in respect of any proposed amendments to the Draft Plan. Note also the pause to align the development plan process with the RSES has extended the 2-year time schedule.

## 2. Pre-draft Consultation

### 2.1 The Consultation Process to date

Consultation is an important and essential element in the preparation of the County Development Plan. During an eight-week period over the months of April, May and June 2018, Mayo County Council engaged in a formal process of public consultation.

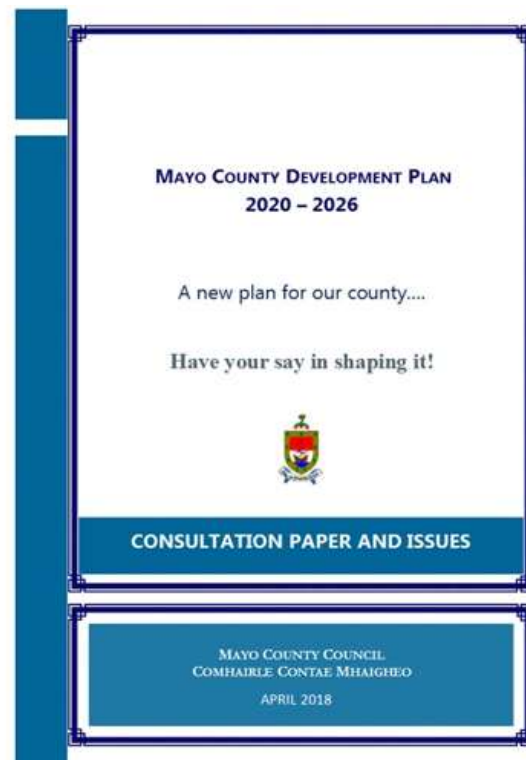
There are two or three opportunities during the plan making process where formal consultation takes place - at pre-draft stage; at draft stage; and at amendment stage if material alterations to the draft are proposed. A Chief Executive's Report on the submissions and observations received is prepared following each consultation period and submitted to the members.

At pre-draft stage public consultation takes place with a number of parties including: Prescribed Bodies; Providers of services; and the public and interested parties. During this pre-draft consultation phase, the planning authority utilised various methods to consult with the public and other interested parties as described below.

#### 2.1.1 Consultation and Issues Document

In order to encourage as many individuals, organisations and communities as possible to become involved in shaping the new Plan, a Consultation Paper and Issues document was prepared and made available from the outset on Mayo County Council's website at [www.mayococo.ie/cdp2020](http://www.mayococo.ie/cdp2020), in hard copy at Mayo County Council Planning Office, Áras an Chontae, The Mall, Castlebar and Mayo County Council offices in Ballina, Belmullet, Ballinrobe, Claremorris, Swinford and Westport, during normal office hours.

The Consultation Paper and Issues document was linked to all public notifications, online/social media, information events, letters of consultation and emails issued to the elected members informing them of the formal commencement of the review of the Plan.



The Consultation Paper and Issues document includes guidance and information on the development plan process, including how to become involved. It also highlights some of the main issues that will be considered in preparing the plan and posed a series of questions, which it is hoped would stimulate debate and ideas about the future of Mayo.

### 2.1.2 Newspaper Notices

The formal process of the review of the Plan commenced with the publication of notices informing the public of the intent of Mayo County Council to review the existing County Development Plan and prepare a new plan in the three local newspapers circulating in the county, namely the Mayo News, Connaught Telegraph and the Western People on the week commencing 16<sup>th</sup> April 2018. Written submissions or observations were invited from the public and interested parties during the period 18<sup>th</sup> April 2018 to 14<sup>th</sup> June 2018.

### 2.1.3 Consultations with Prescribed Bodies and Service Providers

Statutory notices were issued to prescribed bodies as required under Section 11(2) of the 2000 Act, as amended. Thirty bodies were notified/consulted in writing, as listed in Table 1.

Section 11(3) of the Act provides for consultation with providers of energy, telecommunications, transport and other relevant infrastructure to ascertain any long-term plans for the provision of the infrastructure and services in the area of the planning authority. Twenty-two service providers, listed in Table 1, were consulted in writing and requested to make submissions on specific areas of interest.

| <b>Table 1<sup>2</sup> - Prescribed bodies &amp; Service Providers /others consulted</b> |                                     |
|--|-------------------------------------|
| <b>Prescribed Bodies</b>   | <b>Service Providers</b>            |
| Minister, Dept. Housing, Planning & Local Government                                     | Airtricity                          |
| An Board Pleanála  | Bord Gáis                           |
| Minister for Agriculture, Food and the Marine  | ESB                                 |
| Minister for Culture, Heritage and the Gaeltacht   | Department of Education & Skills    |
| Minister, Communications, Marine & Natural Resources                                     | Galway Mayo Institute of Technology |
| Minister for Defence   | Health and Safety Authority         |
| Minister for Education and Skills  | Health Service Executive            |
| Minister for Transport, Tourism and Sport  | Enterprise Ireland                  |
| An Chomhairle Ealaíon/The Arts Council   | IDA                                 |
| Office of Public Works   | Fáilte Ireland                      |
| Dublin Airport Authority   | Western Development Commission      |
| ESB (Electric Ireland)   | Inland fisheries                    |
| EPA  | Three Ireland                       |
| EirGrid  | Eir                                 |
| Forfás   | Virgin Media                        |
| Fáilte Ireland   | Vodafone                            |
| Health Service Executive   |                                     |
| Heritage Council   | Córas Iompair Éireann               |
| Health and Safety Authority  | Irish Aviation                      |
| Inland Fisheries Ireland   | Ireland West Airport Knock          |
| Irish Water  | Transport Infrastructure Ireland    |
| National Transport Authority   | National Transport Authority        |
| An Taisce  |                                     |
| Galway County Council  |                                     |
| Galway City Council  |                                     |
| Roscommon County Council   |                                     |
| Sligo County Council   |                                     |
| Southern Regional Assembly   |                                     |
| Northern and Western Regional Assembly   |                                     |
| Mayo Local Community Development Committee   |                                     |

<sup>2</sup> Some of the prescribed bodies were also consulted separately as service providers.



### 2.1.3.1 Newspaper Notices

Public notices informing the public of the intent of Mayo County Council to review the existing County Development Plan and prepare a new plan were published in the three local newspapers circulating in the county, namely the Mayo News, Connaught Telegraph and the Western People on the week commencing 16<sup>th</sup> April 2018. Written submissions or observations were invited from the public and interested parties during the period 18<sup>th</sup> April 2018 to 14<sup>th</sup> June 2018.

### 2.1.3.2 On-line

A dedicated webpage for the Mayo County Development Plan 2020-2026 was created within the main council website at [www.mayococo.ie/cdp2020](http://www.mayococo.ie/cdp2020).

This included relevant information relating to the Pre-Draft stage such as the public notice, closing dates for submissions, dates/times of public information evenings and a link to the Consultation Paper and Issues document. It will be updated as appropriate during the various stages of the plan preparation process.

Mayo County Council utilised social media platforms Facebook and Twitter for the first time during the review of the Development Plan process. It will continue to use these platforms to keep the public informed during the various stages of the plan preparation process.

These platforms were linked to the dedicated webpage [www.mayococo.ie/cdp2020](http://www.mayococo.ie/cdp2020) and the Consultation & Issues Document.

The review of the development plan was temporarily suspended until after the Regional Spatial & Economic Strategy (RSES) for the Northern & Western Regional Assembly (NWRA) was finalised, as provided for under the Planning and Development (Amendment) Act 2018, enacted on July 19<sup>th</sup>, 2018. The RSES was adopted by the NWRA on the 24<sup>th</sup> January 2020, therefore due to the suspension period of 18 months, the New Mayo County Development Plan will be adopted in 2021 as opposed to 2020. Therefore, any further public notices and dedicated development plan website will be updated with the correct plan period 2021 – 2027.



### 2.1.3.3 Information Leaflets



Copies of an information leaflet setting out details of the review process, how to make submissions etc. were placed in each of Mayo County Council's area offices (Belmullet, Westport, Ballina, Swinford, Claremorris and Ballinrobe) and Headquarters. Leaflets were also placed in libraries throughout the county, distributed at the Development Plan public information events and at PPN network information evenings which were ongoing during May 2018.

### 2.1.3.4 Public Information/Consultation Events

The Forward Planning Team organised a series of five public information/consultation events in the four Municipal Districts throughout the county between April 24<sup>th</sup> and May 3<sup>rd</sup> 2018 as outlined in Table 2 below. These events were informal in nature, with each session extending over five hours during which members of the public could drop in and meet the Forward Planning Team. All who attended were invited to watch a brief PowerPoint presentation and facilitated to engage on any issue they wished to raise, with the exception of matters relating to specific zoning requests as the planning authority is precluded from dealing with these at this stage in the process.

The purpose of the meetings/drop-in sessions 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. Regrettably, attendance at these events was poor, with a total of 26 individuals attending, a number of whom wished to discuss zoning matters only.

| Table 2: Review of Mayo County Development Plan<br>Timetable of Public Information Events |   |                                 |               |
|---|---|---------------------------------|---------------|
| Location  | Venue                                   | Date                            | Time          |
| Ballina   | Ballina Civic Offices<br>Arran Place    | Tuesday 24 <sup>th</sup> April  | 2.30 – 7.30pm |
| Westport  | Westport Civic Offices<br>Station Road  | Thursday 26 <sup>th</sup> April | 2.30 – 7.30pm |
| Castlebar   | Áras an Chontae<br>The Mall             | Monday 30 <sup>th</sup> April   | 2.30 – 7.30pm |
| Béal An Mhuirthead<br>Belmullet   | Belmullet Civic Centre<br>Church Street | Tuesday 1 <sup>st</sup> May     | 2.30 – 7.30pm |
| Claremorris   | Claremorris Offices<br>Kilcolman Road   | Thursday 3 <sup>rd</sup> May    | 2.30 – 7.30pm |

### 2.1.3.5 Mayo Public Participation Network (PPN)

All groups registered with Mayo PPN were informed by email that the review of the Plan had commenced, with each email including a link to the dedicated webpage for the Mayo County Development Plan 2020-2026. In addition, community groups were informed of the process and directed to the webpage at a series of five information evening meetings organised by Mayo PPN in each of the Municipal Districts between May 14<sup>th</sup> and May 23<sup>rd</sup>, 2018. Information leaflets were available at these meetings. In addition, information of the submission deadline was included in the PPN newsletter.

## 2.2 Submissions

A total of 31 valid submissions were received.

Table 3 lists the persons/organisations that made written submissions.

| Table 3: List of Persons or Bodies who made submissions |   |           |   |
|---|---|-----------|---|
| Reference   | Name/Authority  | Reference | Name/Authority                                      |
| PD-1  | Padraic Cafferty  | PD-21     | Keep Ireland Open                                   |
| PD-2  | Rónán Mac Gearailt  | PD-22     | Inland Fisheries Ireland                            |
| PD-3  | Seamus O' Dowd  | PD-23     | Family Resource Centre Programme- Mayo              |
| PD-4  | Vincent Brett   | PD-24     | Brookfield Renewable                                |
| PD-5  | Environmental Protection Agency   | PD-25     | Mulranny Community Futures Group                    |
| PD-6  | Electricity Supply Board (ESB)  | PD-26     | Tochar Valley Rural Community Network               |
| PD-7  | Department of Culture, Heritage, and the Gaeltacht                                | PD-27     | Dublin Airport Authority (DAA)                      |
| PD-8  | EirGrid   | PD-28     | Department of Culture, Heritage and the Gaeltacht   |
| PD-9  | Transport Infrastructure Ireland (TII)  | PD-29     | Department of Public Health, Galway (part of PD-12) |
| PD-10   | Northern and Western Regional Assembly  | PD-30     | Enterprise Ireland                                  |
| PD-11   | Department of Education and Skills  | PD-31     | David Melee   |
| PD-12   | Health Service Executive  |           |   |
| PD-13   | Ballyhaunis Chamber   |           |   |
| PD-14   | Irish Water   |           |   |
| PD-15   | Declan Brassil & Co Ltd. on behalf of Inishoo Management Ltd. & Westport Hs. Ltd. |           |   |
| PD-16   | Newport & District Development Company  |           |   |
| PD-17   | Fáilte Ireland  |           |   |
| PD-18   | Friends of Mayo Dark Skies  |           |   |
| PD-19   | Mountaineering Ireland  |           |   |
| PD-20   | Roadstone Ltd.  |           |   |

### 3. Summary of Issues raised, Chief Executive's Opinion and Recommendations

#### 3.1 Introduction

Section 11(4)(bc) of the Planning and Development Act 2000, as amended, requires the report to summarise the issues raised and recommendations made by the Northern and Western Regional Assembly (NWRA) in its submission and to outline the Chief Executive's recommendations in relation to the manner in which those issues and recommendations should be addressed in the draft development plan. Accordingly, the NWRA submission is addressed at the beginning of this section. Issues raised in all other submissions and through the consultation events are addressed collectively under the various themes that emerged from the consultation process under paragraph 3.3.

#### 3.2 Submission from the Northern and Western Regional Assembly

This submission states that the proposed Development Plan is being prepared during a period where the process of preparing a Regional Spatial and Economic Strategy (RSES) has commenced and is ongoing; and that the RSES will replace the Regional Planning Guidelines and may ultimately be an important informant for the future development of the Development Plan, as it will be necessary for all Planning Authorities to review their Development Plans to ensure consistency with the RSES when it is finalised.

The Assembly advises that the National Strategic Outcomes set out in the NPF should be used to inform the Draft County Development Plan and subsequently the RSES when it is published. The emerging strategic themes in the region concerning a Connected Place, a Vibrant Place, an Inclusive Place and a Low Carbon Place and the information surrounding them, published on the NWRA website could be used by the Council to inform the new draft development plan.

#### Chief Executive's Opinion

This submission (submitted when the RSES was being prepared) did not set out any recommendations on the matters specified under section 27(A)(3) (a) (b)(c) (d) of the Planning and Development Act 2000, as amended which would inform the plan in terms of matters such as, *inter alia* '...national and regional population targets, and the best distribution of residential development and related employment development' etc.

Notwithstanding the advice from the Assembly, the policy vacuum at the regional level warranted that the plan preparation process be temporarily suspended until after the RSES was finalised, as provided for under the Planning and Development (Amendment) Act 2018, enacted on July 19<sup>th</sup>, 2018. This pause allowed the planning authority to take account of data and policy contexts, as set out in the new RSES (adopted 29/01/2020), and enable a process of alignment between all the levels of spatial planning, from national to regional and to local.

**Chief Executive’s Recommendations on how issues and recommendations raised by the NWRA should be addressed in the draft development plan**

The Draft Plan will support the Strategic Growth Ambitions, as set out in the RSES for the Northern & Western Region, which include:

- Economy and Employment – Vibrant Region
- Environment – Natural Region
- Connectivity – Connected Region
- Quality of Life – Inclusive Region
- Infrastructure – Enabling Region

Policies/ objectives will be included in the Draft Plan which align with the relevant Regional Policy Objectives of the RSES.

**3.3 Summary of Issues raised in all other submissions**

A number of issues were identified during the course of the consultation process, including the drop-in events. The main issues and the Chief Executive’s opinion on those issues are outlined below. A summary of each individual submission is set out in Appendix 1 and the topics raised at the various consultation events are listed in Appendix 2.

A number of recurring themes emerged from the submissions and consultation events, which include tourism and recreational facilities, infrastructure development, town and village renewal, access to amenities, climate change, rural development and enterprise/employment. Therefore, the issues raised during the public consultation can be categorised broadly under the following themes:

|   |                                   |
|---|-----------------------------------|
| Statutory Obligations   | Environment & Natural Heritage    |
| Transport   | Climate Action & Renewable Energy |
| Brownfield sites/Town & Village Renewal/<br>accessibility to Community Facilities | Tourism                           |
| Access to/ Recreation in the Countryside  | Enterprise & Employment           |

**3.3.1 Statutory Obligations**

A number of submissions from statutory bodies and ‘Keep Ireland Open’ remind the Council of its obligation to ensure that the plan is prepared in accordance with EU and National legislation and is consistent with government policy and planning guidance.

### Chief Executive's Opinion

The plan will be prepared in accordance with EU and national legislation, the National Planning Framework, Regional Spatial and Economic Strategy and relevant national guidelines. The members will be advised of their statutory obligations where necessary throughout the plan making process.

### Chief Executive's Recommendations — Statutory Obligations

Policies and objectives will be prepared for inclusion in the Draft Plan, which will be in accordance with statutory requirements as set out in the Planning and Development Act 2000(as amended), national guidelines, and national (NPF) and regional policy (RSES). They will also seek to respond to the issues identified through the public consultation process, and the new and emerging issues that have been identified since the adoption of the current plan. As per statutory obligations, policies and objectives will be informed by Strategic Environmental Assessment, Habitats Directive Assessment and Strategic Flood Risk Assessment.

### 3.3.2 Transport

A list of schemes that are being developed/progressing in the County are included in the submission by the Transport Infrastructure Ireland (TII) and it is stated that these should be incorporated into the Draft Plan (These projects are listed in TII's submission PD-9 in Appendix 1 of this report). It is stated that policies/zoning etc. should not compromise the road planning/route option evaluation process where road planning is underway and potential routes have been identified and brought to the attention of the planning authority, including suspended schemes.

TII state that it is of particular importance that policies and objectives are drafted which allow the network of national roads to continue to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness and regional accessibility, by providing faster, more efficient and safer access to and from Ireland's major ports, airport etc, cities and larger towns. TII also state there is a critical need to manage these assets in accordance with national policy and that the Draft Plan should reflect the national policies and objectives and safeguard the strategic role of the national road network. The Plan should: -

- Protect undeveloped lands adjoining national roads and junctions
- Ensures capacity enhancement and traffic management in place to facilitate new development
- Improves operational efficiency of regional and local road and transportation infrastructure
- Clear policy to avoid additional access points to national roads which speed limits greater than 50kph apply. \*
- Zoning at locations at or close to junctions on the national road network which would generate significant traffic and compromise capacity

\*TII request that the Plan should make it clear that the policy of the planning authority will be to avoid the creation of additional access points from new developments or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 50kph apply.

Where the planning authority proposes to exercise a less restrictive approach to the control of development accessing national roads, this should be plan led, done in consultation with and subject to the agreement of TII in accordance with the provisions of Section 2.6 of the DoECLG Spatial Planning and National Roads Guidelines.

TII further requests that the Draft Plan would take the following points into account when developing policy and assessing planning applications:

- Design of development must address the functionality and safety of the road
- Refer to compliance with Road Safety Impact Assessment and Road Safety Audit
- Application for large development should be accompanied by TTA and RSA
- Reference NRA/TII Service Area Policy (2014) and DoECLG Guidelines
- Restrict non-road signage on roads in accordance with Spatial Planning and National Road Guidelines
- Developers should be obliged to provide noise mitigation measures to comply with statutory requirements
- Ensure carrying capacity, efficiency and safety of is maintained

The submission states that the Draft Plan should have reference to the DoECLG's Spatial Planning and National Roads Guidelines, which indicates the importance of evidence-based approach to development plan stage and impact on roads.

Five submissions were received relating to the re-opening of the Western Rail Corridor for use as a greenway for both leisure and everyday commuter use. The submissions reiterate that the preservation of the state-owned rail-line by developing a greenway on the closed rail line and would enable future re-opening of the line for rail use, and they request for such an objective/policy to be included in the Draft Plan.

Several submissions refer to provision of improved road infrastructure to improve access and parking. A submission by Newport & District Development Committee to create a disabled access to the viaduct bridge in Newport.

### **Chief Executive's Opinion**

The planning acts set out mandatory objectives to be included in the Development Plan, including objectives for the provision or facilitation of the provision of infrastructure including transportation; and the promotion of sustainable settlement and transportation strategies in urban and rural areas, in particular having regard to location, layout and design of new development. The existing plan contains policies and objectives similar to that proposed by the TII and it is recommended that such policies and objectives are updated where necessary and included in the Draft Plan.

The Plan will seek to support a transport system that encourages effective choices based on available options and will seek to direct growth around existing and planned services so that the demand for travel in general is reduced. The Plan is obliged to have regard to the policies set out in the Departments Spatial Planning and National Road Guidelines.

The National road network is of utmost importance to the development of the County as a whole. Significant public funds have been invested in the network over the past number of years and it is important that this investment is protected. Several key road projects have been listed in the National Development Plan and within Regional Policy Objectives 6.5 – 6.8 of the recently published RSES, the Council is fully supportive of the delivery of these key pieces of infrastructure including the N5 Westport to Turlough and the N17/N59 road proposals. It is anticipated that objectives and policies supporting same will be included in the new Plan.

The need for mentioned relief roads and bypasses will be examined as part of the review process, with the focus of any new road construction being to provide access and/or relief to communities and to support the county's economic development and tourism activities.

The Council will give consideration to National Policy Objective 27 of the NPF in the formulation of the Plan *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities by prioritising walking and cycling, accessibility to both existing and proposed developments and integrating physical activities facilities for all ages”*. This is also reiterated in the RSES through a variety of Regional Policy Objectives such as RPO 6.23 *“To provide sustainable travel which will be supported by providing walking and cycling facilities (including Greenway and Blueway projects) as a priority across the region”*.

Regarding the development of a greenway on the WRC, the many positive advantages and benefits associated with greenways are acknowledged. This Council has been to the forefront in developing greenway infrastructure and the success of the Great Western Greenway is widely acclaimed, both at home and on an international level. MCC is committed to extending its greenway network. The Greenway network proposed for County Mayo, and adopted by the Council under the Mayo Tourism Strategy *“Destination Mayo 2015-2021”*, adheres to the national cycle network identified in A Strategy for the Development of Irish Cycle Tourism – West Report 2006 (Fáilte Ireland), National Cycle Network Scoping Study 2010 (NRA)<sup>3</sup>, and the Strategy for The Future Development of National and Regional Greenways (July 2018). To date, the Council's greenway network has adhered to these national plans. The planning and development of future Greenways in County Mayo will adhere to completing the routes identified in both national plans and the network identified in the Tourism Strategy.

The need to facilitate and support cycling and walking in order to increase public health and wellness is accepted. Existing objectives and policies in this regard will be reviewed during the Plan review and should continue to support and promote walking and cycling and require good connectivity between destinations and within settlements.

MCC recognises the importance of ensuring that strategic assets, particularly sustainable transport assets such as the WRC (which can also play a crucial role in terms of meeting climate change obligations) are protected and promoted as a key enabler in facilitating the effective functioning of the Atlantic Economic Corridor.

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<sup>3</sup> Which followed from the Government's *“Smarter Travel – A sustainable Transport Future 2009*



Issues raised in relation to Newport are addressed by policies/objectives in the current plan which will be included in the Draft Plan. The Draft Plan will also build on current objectives which seek to continuously improve and maximise accessibility to persons with disabilities or other special requirements to public services, buildings and community facilities.

#### Chief Executive's Recommendations — Transport

Policies and objectives will be included which will —

- Facilitate the provision of the necessary physical infrastructure required to promote the sustainable development of the county having regard to the NPF & RSES
- Ensure that the Council complies with EU, National and all relevant legislation in relation to the protection of the environment and the pursuance of sustainable development
- Have regard to the Government policy as expressed in 'Smarter Travel: A Sustainable Transport Future', to promote and facilitate land use patterns, infrastructure works and other measures which: - reduce reliance on car usage, - improve safety, - support efficient public transport networks, - facilitate easy walking and cycling, - reduce social isolation, - maximise returns on public expenditure, and – support economic development
- Facilitate ease of movement for people with disabilities
- Facilitate new road construction (to include the protection of route corridors and route options), and to manage, maintain and enhance existing and proposed road network in a manner which has regard to the development of sustainable land use patterns, the promotion of public transport, cycling and walking and economic development
- Provide for the control of access onto national roads and have regard to 'Spatial Planning and National Roads Guidelines for Planning Authorities (DOECLG 2012)
- Facilitate and promote refuelling options for non-fossil fuel vehicles
- Support and promote sustainable modes of transport.

#### 3.3.3 Brownfield Development/Town and village renewal

It is suggested that the plan should include policies for the revitalisation of town centres including use of brownfield sites. It is also submitted that use of brownfield sites in rural areas should also be considered to reduce the need for greenfield sites and to generate employment in the rural areas.

Tochar Valley's submission focuses on clustering of development and shared services to provide a more centralised and cost-effective way of living. The ESB also refer to brownfield development in their submission and express support for the continuation of existing objective E-03 to be included in the new plan. ESB references its former Power Station at Bellacorrick which has potential for a number of industrial or employment generating

development. Brownfield lands often have a range of services in place already such as hardstanding and structures which could support new industries.

### Chief Executive's Opinion

The planning acts set out mandatory objectives to be included in the Development Plan including objectives for the development and renewal of areas in need of regeneration.

The current plan recognises the importance of redeveloping brownfield sites in the county. The National Planning Framework outlines several policies/objectives in support of brownfield development/compact growth, e.g. National Policy Objective 3c *“Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.”* National Strategic Outcome 1 of the National Development Plan refers to Compact Growth and the importance of urban/rural centralised development.

This commitment to the revitalisation of town centres and the use of brownfield sites is further expressed under RPO's 3.2 (c) and 3.3 of the RSES, which commit to the delivery of at least 30% of all new homes that are targeted in settlements with a population of at least 1,500 within the existing built-up footprints, and the deliver at least 20% of all new housing in rural areas on brownfield sites.

### Chief Executive's Recommendations — Brownfield sites/Town & Village Renewal

Policies/Objectives in the Draft Plan will be included which will —

- Expand on the policies in the current plan supporting the towns and villages,
- Support the strategic outcomes of the NPF with regard to compact development through the Area Plans
- Align with the policies & objectives of the NPF & RSES as regards the revitalisation of town centres and the use of brownfield sites
- Ensure there are sufficient zoned lands and infrastructure to accommodate population growth and housing provision through the Core Strategy and Area Plans
- Encourage enterprise/employment development to locate in brownfield sites or unoccupied buildings in town centres or where appropriate in existing industrial/retail parks/brownfield industrial sites in preference to undeveloped zoned or unzoned lands
- Seek to improve the quality of the built environment in the towns & villages, promote redevelopment, enhancement and renewal of the physical fabric
- Improve quality, usability and attractiveness of the public realm in towns and villages. Prepare public realm improvement plans and village design statements where possible.

### **3.3.4 Access to, and recreation in, the countryside**

Various issues were raised in relation to access to, and recreation in the countryside.

Keep Ireland Open (KIO) recommends several amendments to existing policies, objectives and development management standards, generally relating to access and recreational amenity in the countryside. Other Council's Policies/Objectives have been recommended to be incorporated into the new plan. The protection, mapping and identification of existing rights of way is the primary focus of the submission and their inclusion in the new plan is recommended.

Mountaineering Ireland also recommend numerous additions to the proposed development plan including the recognition and protection of Mayo's upland and mountainous environments, mapping of undeveloped and semi-developed landscapes. They suggest that the plan should recognise the importance of investing in the planning and management of outdoor recreation, so as to ensure these activities continue to deliver benefit to County Mayo in the years and decades ahead.

Inland Fisheries Ireland (IFI) highlight that water based recreational and tourism activities should not be developed at the expense of others. The submission states that the Draft Plan should address the need to regulate activities such as power boats and jet skis interfering with angling and identify and designate specific locations, where these activities will not interfere with established angling activities.

Access to recreational facilities is also raised by the IFI. It is recommended that public access routes adjacent to recognised angling locations are carefully considered to ensure no conflict occurs between the existing angling use and public health and safety (e.g. fly-casting areas along walking routes). The provision of parking areas should be considered at key (fishing) locations where new road or road improvements are planned.

IFI use many access roads to ports/harbours and piers and consider all roads to the public areas to be public areas are public rights of way. Many of the roads are not in common use but it is important that their status as public is retained, as also roads which lead to lake shore piers jetties, or river fiords. The IFI includes a list of suggested specific areas considered public rights of way.

#### **Chief Executive's Opinion**

The planning acts set out mandatory objectives to be included in the Draft Plan including an objective preserving, improving and extending amenities and recreational amenities. Many of the suggested policies and objectives will be considered in preparing the proposed draft development plan.

In relation to public rights of way, the Planning & Development Act 2000, as amended, require a mandatory objective to be included in the plan preserving, listing and mapping public rights of way which give access to seashore, mountain, lakeshore, riverbank or other place of natural beauty or recreational utility. Identifying public rights of way is a legally complex task as is evident from a number of high-profile court cases illustrating the difficulties involved in the process. Public rights of way are not currently identified on any mapping system or register in County Mayo. In this regard it is suggested that the Council include a policy to undertake, in

collaboration with Community and Enterprise and the Municipal Districts, a structured process that would allow for an accurate and legally robust list of rights of way (which give access to the aforementioned places) to be prepared within a specified timeframe following adoption of the plan and for the allocation of resources to enable this task to be completed within this timeframe.

#### Chief Executive's Recommendations — access to, and recreation in, the countryside

Policies/Objectives will be included in the Draft Plan which seek to —

- Identify, preserve and enhance existing accesses and public rights of way to recreational areas including the coast, upland areas, lakeshores, river-bank areas and heritage sites
- Identify and map a robust list of public rights of way in accordance with the Planning & Development Acts 2000-2018 within a specified timeframe in collaboration with C & E and the Municipal Districts during the course of the plan period
- Where necessary, establish new accesses and public rights of way to recreational areas including the coast, upland areas, lakeshores, river-bank areas and heritage sites in co-operation with landholders and the local community
- Ensure that new open space is integrated with good pedestrian, cyclist and disabled access
- Encourage public access to forests for amenity and recreation purposes
- Promote good quality open spaces and recreation and play facilities
- Investigate and identify potential Greenways which would provide new recreational opportunities for locals and tourists
- Employ best practice in accordance with the Strategy for the Future Development of National and Regional Greenways (2018), subject to Strategic Environmental Assessment, Environmental Impact Assessment and Appropriate Assessment to ensure the protection and preservation of all designated SACs and SPAs.

### 3.3.5 Environment and Natural Heritage

Issues relating to the natural environment include the need to protect and conserve the designated sites, habitats and species within the County and the requirement to prepare environmental assessments in conjunction with the plan making process. The Department of Culture, Heritage & Gaeltacht (DCHG) and the EPA state that the Plan requires both Appropriate Assessment (AA) and a Natura Impact Report (NIR).

The submission also recommends the use of available guidelines, such as the recently published (July 2018), Strategy for the Future Development of National and Regional Greenways, when drafting related plans or strategies.

On the importance of green infrastructure, the Department state that there should be a clear distinction between nature conservation obligations and other land uses.

The DCHG raise the need to protect conserve and prevent deterioration of natural habitats, the habitats of protected species and well as significant disturbances of species in European sites taking cognisance of the objectives of the Habitats Directive. It is suggested that the plan, includes a section with information and maps on key elements of the natural heritage and biodiversity of the plan area, which should include aims, objective and policies.

ESB's submission welcomes Goal 4 in the current plan '*to adopt green principles that promote a high quality of life*'. In this regard ESB wish to highlight that Mayo County Council can adopt green principles and encourage greater efficiencies in the use of energy in transport with the inclusion of specific policies and objectives in the new County Development Plan in relation to EV charging infrastructure.

Friends of Mayo Dark Skies highlights that Mayo is home to the only International Dark Sky Park in Ireland and received an international gold tier award for the quality of its night skies, an important asset of natural night sky heritage. It states that light pollution is an environmental issue and needs to be presented to the same extent as waste, noise pollution, air and water quality. Policies are recommended for inclusion in the Plan.

### Chief Executive's Opinion

The Plan will be prepared in accordance with EU and national legislation and will be consistent with government policy and planning guidance. The SEA will be used to inform policies and objectives in the new Plan in relation to the protection and conservation of designated sites and the natural assets of the County. One of the strategic aims of the current plan is to ensure the County is developed in a manner that does not compromise the value of our natural and cultural resources through the implementation of policy and objectives.

The existing Plan affords a high level of protection and includes a comprehensive section relating to natural heritage, including wildlife and biodiversity, this policy focus will be carried forward into the new Plan. Additionally, this section of the Plan will be reviewed, and existing policies will be strengthened as necessary to reflect emerging environmental issues and more recent legislation/guidelines as appropriate to ensure that Mayo's natural assets are protected and enhanced, including the protection of the Mayo Dark Skies.

In relation to 'green infrastructure', policies and objectives will be dealt with under a number of headings including; natural heritage, parks and open spaces, built heritage, archaeology and water management. Measures to achieving a 'green space' approach will be incorporated into the plan.

The relevant national and regional policy objectives which will be incorporated into the development plan will include:

- NPO's 52 re: compliance with all relevant environmental legislation and the sustainable management of our natural capital,
- NPO 58 re: integrated planning for Green Infrastructure,

- NPO 59 re: the implementation of EU Environmental Directives and the protection and enhancement of biodiversity.
- RPO 3.5 re: Identifying and developing quality green infrastructure, within and adjacent to Key Towns.
- RPO 5.7 re; Ensure that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.

#### Chief Executive's Recommendations — Environment and Natural Heritage

Policies and objectives will be included which aim to —

- Conserve, protect and enhance the special character of the county as defined by its natural heritage and biodiversity, built environment, landscape and culture
- Reflect the policies adopted in the heritage plan with specific actions prioritised in the County Development Plan
- Seek to achieve a balance between the needs of the community in terms of development and environmental needs
- Support the implementation of the National Biodiversity Plan
- Ensure protection of national and EU designated sites from development that would adversely affect their conservation status, ecological or scientific value
- Review and enhance relevant policies in the current Plan where necessary
- Seek to maintain the International Dark Skies status awarded to Ballycroy National Park and the adjoining Wild Nephin Wilderness
- Align with the relevant environmental policies and objectives of the NPF and the RSES
- Comply with Best Practice as outlined in the Strategy for the Future Development of National and Regional Greenway Strategy (2018).

#### 3.3.6 Climate Change and Renewable Energy

EirGrid states that the Plan should contain policies and objectives which support a safe, secure and reliable supply of electricity, as it is imperative to the delivery of national targets for electricity generation, climate change targets and security of energy supplies.

ESB state that the focus on recent investment in the network was on continuing the reinforcement of the system to facilitate the connection of new renewable electricity generation.

ESB Networks highlights that Mayo County Council can adopt green principles and encourage greater efficiencies in the use of energy in transport with the inclusion of specific policies and objectives in the Plan in relation to EV charging infrastructure.

ESB Networks also reference their partnership with Bord na Mona in delivering 172MW of electricity at the Oweninny Wind Farm, where Phase 1 of the project is expected to be completed in 2019.

The HSE considers an energy management programme for all public buildings and that energy efficiency should be incorporated into the design of projects.

Brookfield Renewables urge the Council to draft a new landscape appraisal report which is in line with the Mayo Renewable Energy Strategy.

### **Chief Executive's Opinion**

The transition to a low-carbon and climate-resilient society is one of the strategic investment priorities recognised in the National Development Plan. It is an objective in the current development plan to integrate climate change considerations into all areas of the Council's roles and responsibilities and into all its works and operations where feasible. The Council will place emphasis on the role of adaptation in tackling and adapting to climate change. Mayo County Council has prepared a Climate Change Adaptation Strategy (this strategy will inform the County Development Plan where appropriate in addition to the National Climate Action Plan (2019)).

In relation to transport, the Government is targeting at least 500,00 electric vehicles on the road by 2030 with additional charging infrastructure to cater for planned growth. The Council will support the use of electric vehicles by facilitating/promoting the provision of appropriate infrastructure including electric charging points at accessible locations throughout the County. The Council will review and give consideration to the inclusion of the development standards proposed by ESB Networks in the development plan.

The landscape appraisal for County Mayo was carried out in compliance with the Draft Landscape and Landscape Assessment Guidelines prepared by the DoEHLG. The process being undertaken at this time is the review of the County Development Plan. Mayo County Council had commenced a review of the Renewable Energy Strategy (RES) but ceased this review pending the publication of Guidelines on Renewable Energy and Climate Change, as advised under Department Circulars PL 20-13 and PL 5-17. It is anticipated that the forthcoming guidance will be published during the course of the development plan review and it will be an objective in the Plan to review the Renewable Energy Strategy within the lifetime of the Plan. One of the key policy priorities for the Northern and Western Region in the National Planning Framework includes harnessing the potential of the region in renewable energy terms across the technological spectrum from wind and solar to biomass and wave energy.

When the review of the Renewable Energy Strategy commences, interested parties will have an opportunity to make observations and submissions for consideration. The statutory SEA process will be an invaluable aid in assessing whether or not the Landscape Appraisal for Mayo requires to be reviewed.

Energy efficiency within buildings is a matter under Building Control Legislation and Mayo County Council recognises their statutory responsibility in that legislation.

### Chief Executive's Recommendations — Climate Change & Renewable Energy

The issue of climate change and mitigation/adaptation will be given a stronger emphasis in the new plan. The necessity to transition to a low carbon economy cuts across all policy areas and will be addressed throughout the Draft Plan under the various strategies e.g. the Core Strategy and Settlement Strategy, Infrastructure, Economic Development, Environment and Heritage, Social and Community. The plan will also set out policies that will be informed by the Mayo Climate Adaption Strategy.

Policies/Objectives in the Draft Plan will be prepared which will promote sustainable development through the core strategy, integrated land use and sustainable transport and the various strategies as set out above. Policies will also —

- Have regard to the National Mitigation Plan, National Climate Change Adaptation Framework
- Promote green infrastructure, energy efficiency and sustainable transport options
- Promote the development and use of electric vehicles and facilities the provision of appropriate infrastructure including electric charging points at accessible locations throughout the county consider same for new developments
- Recognise the development potential of our natural environment and to promote the development of renewable energy projects maximising Mayo's resources.
- Updated Government Guidance is awaited in relation to Renewable Energy generally to include for wind and solar energy. It will be a policy in the Draft to review the existing Renewable Energy Strategy within a year of the adoption of the Development Plan

### 3.3.7 Tourism

Fáilte Ireland references several issues in its submission. It refers to the importance of identifying the significance of the tourism sector and the contribution it makes to economic development. It also suggests that the new plan provides a spatial dimension to tourism development by building tourism considerations into the settlement hierarchy. The submission also promotes the incorporation of sustainable tourism within the tourism policy section of the County Development Plan to ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability.

The development of Visitor Experience Development Plans (VEDPs) through collaboration with various stakeholders is proposed by Fáilte Ireland. The VEDP approach involves identifying 'hero' products for the area and provides a framework to present the experiences and stories of that area in a way that tourists can readily and easily understand. It clearly



identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area. It is hoped that the VEDPs would be incorporated into the new plan.

Since the publication of the last development plan, the Wild Atlantic Way has been further developed, which stretches 2,500km along the West Coast of Ireland, including the Mayo coastline. It is acknowledged that Mayo is an integral part of the Wild Atlantic Way and is in a significant advantageous position to attract further visitors to the county. Fáilte Ireland request that objectives/policies for the Wild Atlantic way should be incorporated into the new plan.

It is also suggested that a standalone tourism chapter should be incorporated into the new plan and the Local Authority should supply maps of the county's tourism locations, transport routes, scenic routes, facilities etc within the plan.

The Plan should include policies to encourage the preparation of a Coastal Zone Management Plan to protect the county's rich natural coastline resource.

Numerous submissions highlight the importance of outdoor/recreational tourism to County Mayo and suggest strengthening objectives/policies relating to walking and cycling trails.

#### Chief Executive's Opinion

It is not envisaged that a separate chapter would be dedicated to Tourism in the new CDP. It is considered more appropriate that tourism would be incorporated into an economic development and employment chapter.

The Council acknowledges that the tourism strategy of the RSES supports the preparation and implementation of Visitor Experience Development Plans (VEDPs), as set out in Regional Policy Objective RPO 4.3 of the RSES. Therefore, the new CDP will support the preparation and implementation of VEDPs to promote the natural and cultural assets of the county.

The Council is fully committed to supporting Fáilte Ireland in developing the Wild Atlantic Way and supporting its roll out across the country and internationally, where appropriate, as reflected in the current plan under Objective AC-02 *"It is an objective of the Council to work in partnership with Fáilte Ireland to facilitate the development of the Wild Atlantic Way including appropriate road upgrading, picnic sites and on-road interpretation, as well as increasing awareness of other key flagship projects in the County subject to no significant adverse effects on the environment including the integrity of any Natura 2000 site"*. The new CDP will align with the policy objectives of the RSES supporting the Wild Atlantic Way, in particular; RPO 4.4, RPO 4.5, RPO 4.15 and RPO 5.15.

The Mayo County Council "Destination Mayo, A Strategy for the Future Development of Tourism in County Mayo 2016-2021", includes a number of actions and measures that will strive to address many of the issues raised in the submissions. The policies and objectives in the Plan should seek to facilitate and promote the development of tourism in Mayo and ensure that the policies, objectives and measures identified in the Tourism Strategy are aligned with and supported by policies and objectives in the Draft Plan, where appropriate.

The Council acknowledges the positive contribution that tourism makes to the economic and social wellbeing of the county and seek to expand the existing tourism offer and brand for the county, in conjunction with the Tourism Office, Fáilte Ireland and other key stakeholders.

It is acknowledged that walking/cycling infrastructure needs to be further developed for both visitors and residents and this will be a cross-cutting theme in many chapters in the plan.

There is a strong policy focus on coastal zone management in the existing Plan and these policies and objectives will be further developed in the new CDP. It is recognised that the protection of the coast would benefit from a formal management plan endorsed by all relevant stakeholders in the coastal zone. National Policy Objective 41a of the NPF supports the management of Ireland's coastal resource. Regional Policy Objective 4.15 of the RSES seeks to protect and preserve the coastal heritage of the region. Additionally, the new CDP will support the implementation of the tourism policies and objectives of the forthcoming National Marine Planning Framework.

#### Chief Executive's Recommendations — Tourism

Policies/Objectives will be included in the Draft Plan which will seek to —

- Preserve and improve recreational amenities to facilitate the development of rural tourism
- Align with the relevant tourism policy objectives of the NPF & RSES.
- Facilitate and promote the development of sustainable tourism in the County
- Promote the county's significant spiritual/pilgrimage tourism resources, e.g. Knock Shrine, Croagh Patrick, Ballintubber Abbey
- Develop, strengthen and promote Mayo's countywide destination tourism brand strategy
- Capitalise on Mayo's strengths as a tourist destination for domestic and overseas visitors, harnessing the potential offered by the County's rich cultural heritage, natural amenities, position along the Wild Atlantic Way and proximity to Ireland West Airport
- Encourage and facilitate sustainable forms of activity tourism through the development of blueways, greenways and other recreational opportunities subject to Appropriate Assessment in accordance with the requirements of the EU Habitats Directive 92/43/EEC to ensure the protection and preservation of all designated SACs and SPAs, Strategic Environmental Assessment in accordance with the requirements of Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment and Environmental Impact Assessment Directive 2011/92/EU
- To create a tourism strategy map identifying Mayo's strategic tourism locations, transport routes, scenic routes and views, tourism attractions and facilities

- Further develop the existing Coastal Zone Management Policies/Objectives – this may also be relevant to Climate Change section, taking into account recommendations/policies in the Climate Change Adaptation Strategy.
- 
- Support the implementation of the tourism policies and objectives of the National Marine Planning Framework

### 3.3.8 Enterprise and Employment

A number of submissions refer to enterprise and employment as an important consideration in the preparation of the Draft Plan.

Enterprise Ireland outline several emerging trends with respect to enterprise development in Mayo over the past number of years and promote an enterprise specific goal to be included within the Draft Plan for:

- sustaining and growing indigenous enterprise across the county and
- entrepreneurship and innovation at the heart of future development policy in the county.

ESB welcomes the view set out in the Issues Paper in relation to electricity infrastructure: *“infrastructure development and investment in .... telecommunications are critical to promote Mayo as an attractive location for enterprise investment and a place to live, work and visit”*.

#### Chief Executive's Opinion

The changes introduced by the Local Government Reform Act 2014 recognise and strengthen the important role of Local Authorities in encouraging and promoting local economic development. The availability of employment is crucial for sustaining communities, personal wellbeing and quality of life.

The promotion of economic development in Mayo is a strategic corporate goal for the Council, with the central challenge being to create more jobs so that more people who live in Mayo can work in Mayo, and that the county is seen not only as a place to visit and live in, but also to invest and work in. As outlined in the submissions received, the Plan should also support the county's entrepreneurial spirit, particularly in relation to small scale indigenous industry, and explore the availability of appropriate locations for the development of premises, particularly at readily accessible locations.

The Draft Plan will build on the policies and objectives of the current plan (set out in its Economic Development Strategy) and will align with the economic objectives and actions identified in the Mayo Local Economic and Community Plan 2015-2021. The role of a high level of infrastructure (transport, water services, energy, telecommunications etc) is crucial to economic development and in supporting employment creation and enterprise development in the county. Therefore, the plan will also set out policies which support a high standard of infrastructure and addressing existing infrastructural deficits.

#### IWAK SDZ

One of the main vehicles for future economic development within the county, and indeed the region as a whole; is the Ireland West Airport Knock Strategic Development Zone (IWAK SDZ), which came into effect on October 7<sup>th</sup>, 2019. The SDZ is of national significance and will secure

the long-term development of Ireland West Airport Knock as a strategically important hub for transport, tourism, business and employment in the region. The SDZ has the real potential to be a key driver of the Atlantic Economic Corridor (AEC) in the region, helping to increase its potential to function as a cohesive model for balanced regional economic development. The SDZ will also form part of the CDP.

The policies/objectives of the future development plan will consider the Economic/Enterprise content and align with the relevant objectives/policies set out in the National Planning Framework and the Regional Spatial & Economic Strategy. These policy objectives include;

- NPO's 21 which seeks to enhance the competitiveness of rural areas,
- NPO 24 which supports the delivery of the National Broadband Plan and
- RPO 3.8.1-3.8.3 which seek to promote the IWAK SDZ as a regional economic and enterprise hub by supporting the facility with the required infrastructure for both the expansion of the Airport and in the delivery of the regional business and enterprise hub.

#### Chief Executive's Recommendations —Enterprise & Employment

Policies/Objectives in the Draft Plan will seek to —

- Facilitate the actions and implementation of the Local Economic and Community Plan, where appropriate
- Promote the regeneration of obsolete and/or underutilised buildings and lands that could yield economic benefits, with appropriate uses subject to the proper planning and sustainable development of the area.
- Promote new ways of working remotely, either in our rural settlements and villages or home based facilities
- Facilitate expansion of existing business in accordance with the proper planning and sustainable development of the area
- Sustain and grow indigenous enterprises throughout the County
- Ensure adequate lands are zoned for employment uses, enterprise and industrial development.
- Support the further development of appropriate third level educational and research and development centres within the county
- In conjunction with Enterprise Ireland, support opportunities for enterprise development and the expansion of innovating companies
- Facilitate the cultivation of entrepreneurship among children, the provision of jobs-focused further education programmes and entrepreneur-focused training and mentoring to business owners in partnership with Mayo LEO and other appropriate stakeholders

- Continue to work in partnership with the IDA, Enterprise Ireland, the Local Enterprise Office (LEO) and Údarás na Gaeltachta to promote and facilitate the location for the provision of the industry and enterprise in the county.

## 4. Next Steps

In accordance with the Planning Acts the members are required to consider this report and following consideration of this report the members may issue directions to the Chief Executive regarding the preparation of the draft development plan. Any such directions are required to be strategic in nature and shall take account of the statutory obligations of the Local Authority and any relevant policies or objectives of the Government or of any minister of the Government. The members are also restricted to considering the proper planning and sustainable development of the area of the plan.

Any directions shall be issued not later than 10 weeks after the circulation of this report to the members. It is recommended that any directions be issued at the July Council meeting.

Following the issue of any directions, a proposed draft development plan shall be prepared and submitted to the members for their consideration not later than 12 weeks after issuing the directions.

It is anticipated that the proposed draft county development plan will be prepared and circulated to the members for consideration by late September/early October 2020.

It should be noted that this document is a report of the outcome of the pre-draft public consultation process. Other issues may arise during the course of preparing the Draft Plan.

## **Appendix 1**

### **Summary of Submissions**

**PD-1, PADRAIC CAFFERTY**  
**PD-2, RONAN MAC GEARAILT**  
**PD-3, SEAMUS O'DOWD**  
**PD-4, VINCENT BRETT**  
**PD –31, DAVID MALEE**

The above submissions relate to the provision of a greenway on the disused Western Rail Corridor which runs between Collooney and Athenry. These submissions are collectively summarised below;

- Development of Greenway on rail line would preserve rail alignment for potential future reopening of the WRC for rail use
- Rail unlikely to open ever again north of Claremorris
- Local roads unsafe for pedestrians/cyclists, greenway would provide safe pedestrian/cyclist environment
- Greenway would attract more visitors from Ireland and beyond as well as serving local school children and commuters
- Greenway sections can be developed between Kiltimagh & Sligo along a parallel route to the Velo-Rail
- Health and wellbeing of population
- Tourism boost to region
- Should be utilised as a greenway as part of the National Cycle Network
- Knock Airport could be a gateway to National Cycle Network
- Potential for pilgrim route to Knock Shrine via Kiltimagh similar to the Camino de Santiago (Spain)

**PD – 5, ENVIRONMENTAL PROTECTION AGENCY (EPA)**

This submission relates to the SEA Scoping carried out for the preparation of the proposed Development Plan. The submission states the role of the EPA in the SEA process. It acknowledges that the basis for the new environmental report will be information within the current Plan. MCC should consider whether environmental improvements or deterioration occurred over the existing plan period with a view to reviewing the robustness of the existing mitigation measures or plan policies/objectives and strengthening where necessary. It states urgent action is required to address climate change. It indicates key aspects plus plans and legislation to be considered in the preparation of the CDP, together with a list of sources of potential information in the preparation of the SEA.

Cognisance should be had to the EPA publication "Ireland's Environment – An Assessment (EPA 2016) and the key actions described therein - Environment, Health and Wellbeing, Climate Change, Implementation of Legislation, Restore and Protect Water Quality, Sustainable Economic Activities, Nature and Wild Places and Community Engagement. Integration of these actions will be important to deliver environmental protection and sustainable development. The EPA describes key thematic areas, Air Quality & Transboundary Air Emissions, Climate Change, Nature



Inland & Marine Waters, Waste and Land Use & Soil. The plan should consider how to implement the key actions, considering the thematic areas.

It is indicated that the River Basin Catchment Management Tool is a useful platform for catchment science and management purposes.

The submission reminds the Council of its obligations to ensure that the plan is prepared in compliance with statutory EU and national legislation. The submission includes Separate Guidance notes for integration of environmental considerations under the following headings;

- Water
- Biodiversity
- Climate Change/Climatic Factors
- Air and Noise related Factors
- Waste Management
- Energy Conservation/Renewable Energy
- Landscape
- Geology/Geomorphology
- Human Health/Quality of Life
- Transportation
- Infrastructure Planning
- Environmental Impact Assessment

It is stated that the EPA will further comment on both the Draft Environmental Report and Draft CDP at the next consultation phase.

#### **PD – 6, ESB GROUP PROPERTY**

The submission gives a brief overview of the ESB and highlights that it is Ireland's leading electricity utility and telecommunications infrastructure provider, is also a landowner and employer in Mayo. It states that investment in infrastructure is crucial to the economic and social well-being of Ireland. Investment creates jobs, stimulates economic activity and provides modern efficient facilities that provide the services that people need. The ESB has a long history of electricity generation at Bellacorick and, partnered with Bord na Móna, is to deliver 172MW at the Oweninny Wind Farm. Phase 1 of that development has commenced and is expected to be completed in 2019. The former ESB power station site at Ballacorrack is not used for electricity purposes but has the potential to provide several future uses, such as an electricity peaking plant and compatible uses. ESB consider brownfield sites offer significant opportunities to contribute to the county's stock of available economic assets.

The ESB's open policy of sharing infrastructure limits the overall number of telecoms structures appearing in urban and rural settings.

The ESB is the company responsible for the EV charging infrastructure in Ireland. It generally supports existing policies and objectives that accommodates electricity and telecommunications in the current plan, it requests that a number of observations be taken into consideration in the plan. In order to meet the Government's *Electric Transport Programme* Mayo County Council should strengthen their support for EV charging infrastructure. It should include specific policies and objectives for EV charge points and parking provisions at residential/commercial developments and

on-street to ensure EV points are achieved. Indicative parking standards are included in the submission.

**PD – 7 & 28, DEPARTMENT OF CULTURE, HERITAGE AND THE GAELTACHT**

The submission is made in the context of the Department's role in relation to nature conservation and as an environmental authority under SEA legislation. The submission includes observations to the proposed CDP on Appropriate Assessment (AA) /Natura Impact Report (NIR) and the Strategic Environmental Assessment (SEA) under a number of headings:

**Duties of authorities in relation to Nature Conservation and matters relating to the Plan**

The submission highlights the duties of authorities in relation to nature conservation and the key legislative framework and requirements in relation to biodiversity. The Department welcomes the Council's commitment to the short and long-term protection of the natural environment, the European sites and Natura 2000 network in particular.

It recommends that the plan should have a section with information and maps on key elements of the natural heritage and biodiversity of the plan area and objectives for their conservation.

Key recommendations /advises are set out as follows; —

- Natural heritage and biodiversity to be reflected in the Plan/AA mitigation and SEA measures to safeguard European sites biodiversity and the environment.
- On the importance of green infrastructure, there should be a clear distinction between nature conservation obligations and other land uses. Changes to land uses or increased pressures can lead to or perpetuate habitat loss. Good land-use planning should seek to anticipate and manage such competing requirements.
- Clarify the term 'sustainable development' when used to indicate safeguarding the environment and natural resources.
- A Greenway Strategy (in preparation) should include measures to guide the planning, routing and assessment of future greenways and blueways.

**SEA-Biodiversity, flora and fauna**

- Biodiversity consideration should be developed in a positive, proactive and precautionary way.
- The biodiversity, flora and fauna section of the Environmental Report should be prepared by a suitably qualified ecologist and include information on environmental protection objectives which are established at international or national level.

**Appropriate Assessment**

A Natura Impact Report is required for the Plan. Where the NIR identifies that plan-level mitigation is necessary this must be reflected in the content of the objectives of the final plan. The AA must be carried out by the competent authority for the final iteration of the plan prior to its adoption. The AA must take account of the NIR, including any addenda or revisions.

The submission indicates key legislation together with sources of potential information for the Plan/SEA/AA and advice is given as to the statutory procedures and content of those documents.

The submission in relation to the natural environment includes the need to protect conserve and prevent deterioration of natural habitats, the habitats of protected species and well as significant

disturbances of species in European sites taking cognisance of the objectives of the Habitats Directive.

#### **PD – 8, EIRGRID**

EirGrid describes its role as a state-owned company. It indicates that the submission is made following the publication of Project *Ireland 2040*, National Planning Framework and in parallel to the preparation of the draft Regional Spatial and Economic Strategy for the Northern and Western Regional Assembly. The electricity transmission grid is important in supporting our society and economy.

It requests that the policies and objectives proposed in the NPF and the forthcoming RSES should be transposed into the plan. It names a number of important Government policy documents which should be relied upon for policy formulation and reiterates that the grid is essential to meeting the country's short, medium and long term objectives. Reference should be made in the CDP to support the safe, secure and reliable transmission of electricity which are imperative to national targets for electricity generation, climate change targets and security of energy supplies.

While EirGrid supports and understands measures to protect landscape sensitivities and will always seek to comply, it may not always be possible to avoid landscape sensitive areas because of the nature of generator and demand locations. Eirgrid consider that adopting and implementing the objectives and actions of the National Landscape Strategy for Ireland 2015-2025 should be a key consideration for the plan.

In September 2017 EirGrid announced plans to replace the Grid West project with a smaller-scale development called the North Connacht Project. It states that a reduction in anticipated renewable energy wind generation in North Connacht can be met through development of 110kV electricity infrastructure and not the 220kV or 400kV proposed under GridWest. Connecting renewable energy from the North West to the grid will support Mayo County Council's aim to enhance the attractiveness of the county as a place in which to live work and invest.

The submission concludes that the transmission grid is of critical importance to support the economy and society and meet climate change and energy obligations. EirGrid requires robust policies and objectives and requests that the importance of the grid is acknowledged as a strategic issue in the Plan. They also request that they be further consulted in the development of the policies and objectives relating to the transmission network.

## **PD – 9, TRANSPORT INFRASTRUCTURE IRELAND**

TII made a broad and comprehensive submission. The summary below represents the main points and headings contained within the submission:

### **Managing Exchequer Investment and Statutory Guidance**

The submission presents an overview of the Trans-European Transport Network (TEN-T), which is a planned set of transport networks throughout Europe. The TEN-T regulations define the objective of increasing the benefits for road users by ensuring safe, secure and high-quality standards for road users and freight transport in a co-ordinated fashion to achieve integrated and intermodal long-distance travel routes across Europe.

### **Development and Core Strategy**

TII seeks to ensure that carrying capacity, operational efficiency, safety and national investment made in national roads in Mayo continue to be safeguarded and that the relevant policies/objectives included in the County Development Plan are developed to reflect this.

TII request the Council to consider implications of land use policies on the strategic national road network in the area as a criterion in determining the future land use zoning strategy to be outlined in the draft development plan and the respective Core Strategy.

### **Development at National Road Junctions**

Proposals for development and land use zoning designations at national road interchanges and junctions should be considered and be prepared in the context of the provisions of Section 2.7 of the DoECLG Spatial Planning and National Roads Guidelines.

Whilst the TII recommends that traffic & transport assessments be carried out for individual planning applications, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessments of areas to individual applicant's transport assessments is considered highly inappropriate and would lead to piecemeal and unsustainable approach to development in vicinity of strategic national road network.

### **Transport Planning & National Road Schemes**

The N5 and N17 National Primary Routes through Mayo are identified as part of the TEN-T Comprehensive Network. The N26, N58, N59, N60, N83 & N84 all provide important regional and inter-regional connectivity within and through the region.

County Development Plan policies must therefore allow the network of national roads continue to play their intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness by providing faster, more efficient, safer access to ports, airports and cities.

Planned route improvements which were included on the National Development Plan and are requested to be included in the new County Development Plan include:

- N5 Westport to Turlough
- N59 Westport to Mulranny

- N17 Knock to Collooney

Schemes that are currently suspended;

- N5/N25/N26 Turlough to Bohola
- N26/N59 Ballina Bypass
- N59 Ballina
- N59 Ballina-Crossmolina Bypass
- N60 Castlebar to Claremorris
- N84 Ballinrobe Bypass
- N83 Ballyhaunis Bypass
- N5/N59 Westport Southern Relief Road

The location of development should not compromise road planning and route options and should not compromise the functioning of these roads. Schemes and improvements required on national routes as a result of development should be identified in the County Development Plan, however it is outlined the TII may not be responsible for payment of the works.

It is suggested to include the following in the new County Development Plan:

- Objectives for the improvement of any relevant national roads;
- Policy to protect routes of national road schemes free from adverse development that may compromise the development of route options or the construction of preferred routes or add to overall cost of delivery of road schemes;
- Policies to ensure protection of all existing road schemes in Mayo

#### **Other Specific Policies and Objectives**

- Restrict new entrances onto roads where speed limit is higher than 50kph
- Co-ordinate proposed entrances in zoned areas to reduce number of entrances
- Exceptional cases for road accesses must be evidence based
- Design of development must address the functionality & safety of the road
- Refer to compliance with Road Safety Impact Assessment & Road Safety Audit
- Applications for large development should be accompanied with TTA & RSA
- Developments should accord with Traffic & Transport Assessment Guidelines (2014) reference in plan
- TII would welcome the provisions of the TII Service Area Policy (2014) and the DOECLG Guidelines reflected in the Draft County Development Plan
- Developers should be obliged to provide noise mitigation measures plan should refer to S.I No.140 of 2006
- Restrict non-road signage on roads in accordance with DoECLG Spatial Planning and National Road Guidelines and Provision of Tourist & Leisure Signage on National Roads (March 2011)
- Draft development plan should refer to the DoECLG's Spatial Planning and National Roads Guidelines which indicates the importance of evidence-based approach at development plan stage and impact on roads
- Protection of the safety, carrying capacity, efficiency and safety of roads is maintained.

**PD – 10, NORTHERN & WESTERN REGIONAL ASSEMBLY**

This submission informed the council that the new plan must be consistent with the Regional Spatial and Economic Strategy (RSES) which is currently being prepared and the recently published The National Planning Framework (NPF). The assembly advised that the National Strategic Outcomes set out in the NPF should be used to inform the Draft County Development Plan and subsequently the RSES when it is published. The emerging strategic themes in the region concerning a Connected Place, a Vibrant Place, an Inclusive Place and a Low Carbon Place and the information surrounding them published on the NWRA website could be used by the Council to inform the new draft development plan.

**PD – 11, DEPARTMENT OF EDUCATION AND SKILLS**

The Department states that there are currently no sites identified for acquisition in Co. Mayo for the period of 2018 – 2026.

**PD – 12 & 29, HEALTH & SAFETY EXECUTIVE (HSE)**

The Environmental Health Service made its submission under the remit of Healthy Ireland and relevant supporting health strategies. The aim of the submission is to identify to Mayo County Council where the implementation of the objectives of Health Ireland can be incorporated into strategic planning of the spatial and built environment for the county.

Within the HSE submission, reference is made to a multitude of issues, some of which relate to HSE guidelines and strategies which do not have a spatial aspect and would not come within the remit of the County Development Plan. Given the extensive number of points raised, it is considered appropriate to bullet point the issues as follows:

**Housing, Community Development, Disabled & Elderly**

- Support design of age friendly spaces & urban environments
- Set development targets in brownfield sites to consolidate growth
- Promote the development of opportunities for engagement and participation of people of all ages in a range of arts, cultural, spiritual, leisure, learning and physical activities in their local communities
- Incorporate principles set out in 'Design Out Crime' document
- Improve community inclusion for people with disabilities in their local communities and community-based services
- Improve connectivity between community groups & disability specific organisations
- Focus on meeting housing/accommodation needs of disabled through purchasing housing. New-build, rental.
- Re-housing plan should be prepared jointly with HSE & service providers, to include people with disabilities in local communities and should facilitate dispersed housing with personal supports

- Support people with disabilities to access employment, education and mainstream community services.

#### **Energy**

- Promote energy efficient design into projects & implement energy management for public buildings
- Support & promote Better Energy Communities Scheme
- Implement water usage audits in public buildings

#### **Transport**

- School Travel Plans & develop safe cycling/walking routes to schools
- Developments to have travel plans & e-working facilities
- Promote provision of bike parking/changing/showering facilities in workplaces
- Set maximum car parking limits for out of town retail centres which have good transport links
- Create more pedestrian friendly roads, traffic signals, footpaths
- Make state owned lands available for walking etc.
- Establish park & ride facilities near major transport nodes & car club schemes
- Reduce volume of traffic in town centres & in vicinity of schools (especially HGV's)
- Improves junctions for cyclists
- Support provision of signed cycle routes
- Support retrofitting of roads with cycle lanes & road surfaces maintained for cyclists
- Integration of the Rural Transport Programme with other local transport services
- Provision of public transport linkages to major health facilities and personal social services

#### **Health & Wellbeing**

- Facilitate more locally produced high quality food
- Ensure protection of ground water
- Support radon measures in county and remediation works
- Consider noise in context of new development
- Support policies to reduce air pollution
- Promote local biodiversity plans
- Implement National Physical Activity Plan
- Implement tobacco free playgrounds
- Facilitate community gardens
- Provide alcohol free spaces for youths
- Have policies to promote areas of recreational activity in all developments
- Developments for nursing/residential care homes should include gardens for recreational activities

This summary also incorporates the main issues raised from the Dept. of Public Health section of the HSE, which was submitted both as an Appendix to the HSE's submission and as a separate submission.

#### **PD – 13, BALLYHAUNIS CHAMBER**

The submission makes a number of observations relating to a range of topic such as town centre improvements, smarter travel, enterprise and community facilities.

Regarding town centre improvements, the chamber seeks to improve the attractiveness of town centre with an emphasis on shared surfaces and improved traffic control, they suggest extending the square to Bank of Ireland to accommodate a larger pedestrian area. Restoring vacant derelict premises (e.g. Old National School) for other uses such as community amenity centre for multi-cultural population, library or housing should be explored and demolition of council owned properties to create pedestrian link from the square to public park should also be explored.

The development of walking trails and the promotion of smarter travel is also sought and promotion of Ballyhaunis as a tourist destination is also within their submission

Promote Ballyhaunis's strategic location to Knock and Ireland West Airport and encourage enterprise and employment for the town and support organisations in the area.

#### **PD – 14, IRISH WATER**

Irish Water welcomes the opportunity to make a submission. It includes a high-level assessment of water services supply in Mayo for the top three tiers of the current settlement hierarchy, linked hubs, key towns, other towns and villages. They indicate that the Draft NPF population projections have been used as an initial estimate in the assessment, i.e 40% population increase by 2040 in towns over 10,000 and 15% for all settlements with a population less than 10,000. Irish Water are developing water and wastewater treatment capacity registers for settlements with a population greater than 500 which is expected to be available in Q4 2018.

Non-domestic growth will be facilitated through Irish Water's new connections process. The submission summarises the projects for Mayo included in their 2017-2021 Investment Plan. The submission suggests policies/objectives for inclusion in the development plan and include a menu of general policies in relation to water services, water supply and wastewater services. Irish Water considers that the policies will protect its assets and the environment for the benefit of current and future population served by public water services.

#### **PD – 15, DECLAN BRASSIL & COMPANY LTD ON BEHALF OF INISHOO MANAGEMENT LTD & HOTEL WESTPORT LTD**

The submission indicates that Inishoo purchased Westport House and Demesne in 2017 and are committed to preserving and protecting the elements of the Demesne that contribute to its historic and cultural importance, and to making an international visitor and tourist attraction.

The submission proposes that appropriate policies are included in the County Development Plan to provide a policy framework that is consistent with the principles of the Architectural Heritage Protection Guidelines (DAHG), which supports Inishoo's objectives, and that will in due course inform the preparation of the Westport LAP. The suggested policies propose:

- That a Conservation Masterplan will be prepared to guide;
  - the protection and development of the Demesne
  - Landscape conservation



- Building conservation, adaption/extension and new and viable uses for existing buildings
  - location, scale and use of new building/features
  - Access strategy which maximises accessibility
- That policies of the new plan and the agreed Masterplan will take precedence over the existing Westport & Environs plan, pending the making of a new Westport Local Area Plan.

An overview of the planning, development and conservation basis for the inclusion of the above policies is provided in terms of (i) the cultural, recreational and economic importance of Westport Demesne (of national and international significance) and consistency with the Architectural Heritage Guidelines which support the sympathetic maintenance, adaptation and re-use of architectural heritage, and empower planning authorities to protect architectural heritage.

#### **PD – 16, NEWPORT & DISTRICT DEVELOPMENT COMPANY**

This submission is broken down into two main headings — Infrastructure and Town Boundary:

##### **Infrastructure**

A new Public Sewerage Scheme is suggested at lands at Calicaun as well as new sewer & water pipe lines to be extended to the many entrance roads to Newport, particularly along Glenhest road to incorporate the Newport sports & educational hub. Improvement of inlet pipe to Newport Water Scheme and possible connection to Lough Mask scheme needs to be looked at. The provision of parking in backstreets should be aggressively targeted by the Council as seen in Ballina, Westport & Castlebar. Improved access to Railway Viaduct for wheelchair users and a new road crossing/traffic calming measures at Newport national school. Road widening is requested along Newport church to allow access to Western Care and residential properties particularly during church occasions.

##### **Town Boundary**

The submission requests that the existing Area Plan boundary be extended to the south along the Westport road to include housing estate in Kilbride (N59), to the east along the Glenhest road to include Newport community playing pitch and to the North-West along the Mulranny road to include housing at Acres Grove (N59). In addition to the boundary extension requests, speed limits should align with these requests.

#### **PD – 17, FAILTE IRELAND**

Fáilte Ireland welcomes the Council's acknowledgement of tourism in the current plan and its Economic Development Strategy and recommends this approach is carried forward to the new plan. Given the impact that tourism can have on economic development, Fáilte Ireland suggest that tourism should have a standalone chapter within the County Development Plan.

The coverage of tourism in other sectors, such as Marine Resources, of the current plan is welcomed. The tourism sector does not control all elements which underpin or assist in enabling the tourism sector or development thereof in order to ensure a successful tourism environment. For example, transport enables visitors to access the county, but the tourism sector does not have control over the provision and maintenance of transport links. Additional such cross-sectoral

alignment and acknowledgement between tourism and other sectors would therefore be further welcomed in the new 2020 – 2026 development plan.

It is suggested that the new plan provides a spatial dimension to tourism development by building tourism considerations into the settlement hierarchy. Following the Settlement Hierarchy set out within the current County Development Plan, it is suggested to follow the Fáilte Ireland 3 tier approach 'Always On' (HUB), 'Seasonal' (Service Centre) and 'Attraction'. Westport and Ballina would be 'Hubs' as both have the greatest potential offering to tourism. Westport offers a variety of attractions such as Westport House, the Great Western Greenway and the Clew Bay Archaeological Trail. Ballina can also be classified as a 'Hub' due to its accommodation capacity and tourist attractions adjacent to the settlement in the north Mayo area (e.g. the Ceide Fields and Downpatrick Head). In terms of 'Service Centres', it is recommended that these would include settlements such as Newport and Belmullet. The submission also promotes the incorporation of sustainable tourism within the tourism policy section of the County Development Plan to ensure developments achieve a balance between appropriate tourism development and economic, environmental and social sustainability.

Fáilte Ireland encourage inclusion of a policy/objective to support the delivery of Visitor Experience Development Plans (VEDPs) in the new plan, the VEDP approach involves identifying 'hero' products for the area and provides a framework to present the experiences and stories of that area in a way that tourists can readily and easily understand. It clearly identifies tangible actions and a process for businesses to shape their respective tourist experience(s) in line with the overall experience brand proposition and the key motivating themes for their area.

The submission acknowledges emerging tourism assets in Mayo which include the Ballycroy National Park and the Western Way, the Park is now the 2<sup>nd</sup> largest national park (it is also a wilderness area and a dark sky park) in the country. There are plans to develop the Western Way as an off-road mountain bike route, such developments would further attract visitors to the region.

Since the publication of the current County Development Plan, Fáilte Ireland has further developed the **Wild Atlantic Way (WAW)**– the longest defined coastal touring route in the world stretching 2,500km from the Inishowen Peninsula in Donegal, to Kinsale in West Cork.

County Mayo is home to a significant and important wealth of natural and cultural heritage and attractions which form an integral part of the Wild Atlantic Way. Mayo is therefore in a significantly advantageous position to attract further visitor numbers to the county and should be fully incorporated into the County Development Plan. Fáilte Ireland would encourage the Council to incorporate the detail of strategies such as the Wild Atlantic Way, into the zoning maps for the County and implement the policies set out therein as policies of the County Development Plan. It is recommended that the locations of key nodes such as 'Signature Points' and 'Discovery Points' are also included.

It is acknowledged that Mayo is developing its own brand to attract visitors and increase investment into the county (MAYO.IE). Further opportunities to maximise market exposure exist through co-operation and themed 'branding bundles' including linking the Wild Atlantic Way Brand and the Mayo County brand – MAYO.IE. This will encourage the capturing of greater international interest by promoting strategic attractions of scale and signature visitor attractions.

#### **Other issues**

Coastal Towns & Villages: Physical appearance of some coastal towns/villages is poor and requires investment in public realm and appearance & condition of streetscapes & key buildings

Activities: Land and Sea solutions must be available to our visitors. The development of coastal walks is key to communities and all activities support local businesses.

Beach Management: There are nearly 90 Blue Flag and Green Coast beaches along the full extent of the Wild Atlantic Way. Existing beaches have been developed in piecemeal fashion and has led to some becoming poor and visually intrusive (i.e. car parks, signage, toilet blocks etc)

Boat Touring: Boat touring along our coastline and to the islands is a key part of this, and the WAW provides the opportunity now to increase the availability & quality of passenger boats tours.

Renewable Energy: Fáilte Ireland commend the existing Renewable Energy Strategy and the map-based approach and encourage the Council to update the existing strategy.

#### **PD – 18, FRIENDS OF DARK SKIES**

The submission highlights that Co. Mayo is home to the only International Dark Sky Park in Ireland and received an international gold tier award for the quality of its night skies, an important asset of natural night sky heritage. It states that without preserving such dark sky places there is a real risk of losing our natural night skies. It indicates that planning policies should limit the impact of light pollution from artificial light. It highlights that light pollution is an environmental issue and needs to be presented to the same extent as waste, noise pollution, air and water quality. It indicates that the introduction worldwide of blue-rich LED lighting occurred without almost no environmental assessments. It recommends that policies for responsible lighting in planning, maintenance and for environmental protection should be included in Development Plan and concludes with the following 7 recommendations for the CDP;

- that the plan has a light pollution policy in line with the NPF
- street lighting policy to include strict requirements in identified dark skies
- public buildings/car parks should lead by example
- part-night light or dimmer schemes
- there is careful consideration for LED lighting already in use
- Include lighting impacts in Strategic Environmental Assessment
- Preserve dark sky areas.

#### **PD – 19, MOUNTAINEERING IRELAND**

This submission sets out key points which Mountaineering Ireland believes should be taken into account in the drafting of Mayo County Development Plan. These points are presented under the issues headings as set out in the Consultation and Issues document prepared by Mayo County Council. Reference is made to the recognition and protection of Mayo's Upland and Mountainous environments, mapping of undeveloped and semi-developed landscapes, offshore renewable energy, rural transport investment. Other suggestions include stronger mechanisms to ensure effective development control and enforcement to deal with unauthorised developments. Adoption of an ecosystems services approach to help with flood mitigation, drinking water etc. Improved habitat conditions by incentivising landowners through projects such as peatland restoration, native woodland planting (birch, willow, alder, etc).

Mountaineering Ireland's primary concern is that appropriate measures for the protection of Mayo's mountains, upland area and upland communities should be part of the County Development Plan, and that the plan should recognise the importance of investing in the planning and management of outdoor recreation to ensure these activities continue to deliver benefit to County Mayo in the years and decades ahead.

**PD – 20, SLR CONSULTING IRELAND ON BEHALF OF ROADSTONE IRELAND**

The submission states that Roadstone has several landholdings in the county with only the Castlebar quarry operational at present. The basis of the submission is the importance of the extractive industries to the wider economy and the need to protect operations of working quarries. As aggregate extraction can only take place where suitable aggregate resources exist, it is submitted that planning policies should be carefully constructed to avoid adverse effects on aggregate resources and the related extractive industries and added-value production that are essential for our built environment, infrastructure and future economic development. It considers economic and social benefits of aggregate extraction should be balanced against the potential for environmental and other effects. The forthcoming draft County Development Plan should ensure that the extraction of aggregates can take place in suitable locations where resources exist without undue environmental effects.

It acknowledges that the current plan provides a relatively balanced approach to extractive industries.

In order to ensure that existing and any future proposed extractive industry schemes are feasible under the MCDP 2020 - 2026, Roadstone Ltd recommend that the Draft Plan refers to; —

- The important role of the extractive industry
- Avoiding the sterilisation of aggregate resources
- The potential for quarries to deliver environmental benefits in the form of habitat creation and biodiversity
- Securing long term future of aggregates and added value products

It also recommends indicative policies for inclusion:

- To support the necessary and important role of the extractive industries in the delivery of building materials for infrastructural and other development and to recognise the need to develop extractive industries for the benefit of society and the economy.
- To secure the long-term supply of value-added products (such as concrete products and asphalt) within the county, which are often, but not always, produced in conjunction with aggregate extraction.

**PD – 21, KEEP IRELAND OPEN (KIO)**

A wide range of suggestions are made regarding formatting of the plan. This submission was accompanied by a number of appendices relating to access to the countryside issues. Recommendations are made relating to several objectives of the plan which are relevant to the objectives of Keep Ireland Open (KIO) with a view to expanding on those objectives so that access to the countryside is enhanced. These include listing of existing RoWs, mapping, marking, maintenance and creation of rights of way, as well as improving/enhancing quality of access. Also,

recommendations to protect/enhance amenities of the countryside with reference to infrastructure, forestry, agriculture, telecommunications, tourism, renewable energy, extractive industries, environment, heritage and conservation and other rural based objectives.

The submission critiques the existing plan and considered it fails to comply with/ have regard to/take into account:

- Planning & Development Acts
- Plans in adjoining counties
- Development Plan Guidelines
- Heritage Act 1995

Recommendations are also made in relation to Development Control Guidelines in the plan for rural based developments.

#### **PD – 22, INLAND FISHERIES IRELAND**

The submission, under several headings, gives an overview of the responsibility of the IFI. It highlights that the river Moy is one of the most productive salmon fisheries in Western Europe. In addition, a number of river and lake systems support valuable salmonid fisheries in the county. There is also a major fisheries research centre at Burrishoole operated by the Marine Institute. It is vital to protect water quality, and fishery habitats should be a major consideration in respect of all new development. The submission states that water based recreational and tourism activities should not be developed at the expense of others. The Development Plan should address the need to regulate activities such as power boats and jet skis interfering with angling and identify and designate specific locations where these activities will not interfere with established angling activities. Other headings in the summary are as follows;

##### **Riparian and Aquatic Habitat**

A policy in relation to aquatic and riparian habitat protection should be included in the plan to ensure that impacts from development or change in land use does not interfere with the aquatic environment. Riparian zones along salmonid rivers, spawning and nursery habitat should be given the highest protection to maintain and improve fishery stocks. Policies on zoning of lands along watercourses as open space wildlife corridors or linear parks should be included in the plan.

##### **River Crossing Structures**

The plan should include a policy on the use of clear span structures on fisheries waters and IFI should be consulted on any such proposed developments.

##### **Marine Strategy**

The marine strategy must prioritise the protection of the existing natural resources i.e. marine and shell fish as well as migratory species from and to freshwater.

##### **Invasive species**

An invasive species policy should be developed to prohibit their spread.

##### **Flood alleviation**

Flood alleviation and drainage works must be carried out in a fisheries sensitive manner and in consultation with the IFI.

### **Waste Water Treatment**

The IFI has significant concerns regarding long term management and maintenance of privately operated communal proprietary effluent treatment systems and requests that a policy preventing such effluent treatment systems be included in the plan.

### **Rural Housing**

Effluent from rural housing can have a significant impact on surface and groundwaters and deleterious impacts on aquatic life especially in areas where there is a high density of private systems, and Section 20.2 of the current plan should be retained. It should be a condition of planning that a long-term maintenance contract is taken out on any proprietary treatment system. IFI would be in favour of identifying areas which are unsuitable for development based on soil profile and correlation with catchments identified in the River Basis Management Plan as being 'at risk' of not meeting the Water Framework Directive due to impact of domestic waste water. Integrated wetland systems should be designed and installed by qualified persons.

### **Forestry**

The impact of forestry on sensitive fishery catchments where planting is carried out on deep soils is a major concern of the IFI. They indicate an increase in the number of applications of Aerial Fertilisation Applications for 2018. Two of the sites are in fisheries sensitive catchments and are unsuitable for commercial forestry. Forestry production should not be encouraged in these areas. The indicative Forestry Statement (December 2008) indicates that large areas in the north and west of the county as 'suitable, where appropriate, for nature conservation and/or amenity forests' however these are not suitable for commercial forestry production.

### **Agriculture**

The submission highlights that agriculture is the largest land use type in the county and has potential to have a significant impact on the environment and water quality. Mayo County Council must remain committed to exercising its powers under the Water Pollution Act, this should continue along with cross compliance inspections and the issuing of Section 12 notices.

### **SUDS**

SUDS should be considered in all development projects, including roads. The plan should also take account of the IFI guidance document planning for watercourses in the urban environment.

### **Public Right of Way**

IFI use many access roads to ports/harbours and piers. They consider all these roads to be public areas and public rights of way. Many of the roads are not in common use or no longer used, some have gates placed across them, but it is important that their status as public is retained, also roads which lead to lake shore piers, jetties, or river fiords. The IFI includes a list of suggested specific areas considered public rights of way. Consideration should also be given to parking areas at key location where new roads or road improvements are being planned.

### **Strategic Environmental Assessment**

Regard should be given to the sustainable development of the inland and marine fishery resource, and in determining likely significant impacts, consideration should be given to potential significant impacts of the plan on;

- Water quality
- Aquatic and associated riparian habitats
- Fish spawning and nursery areas
- Surface water hydrology

- Passage of migratory fish
- Sport and commercial fishing and angling.

**PD – 23, FAMILY RESOURCE CENTRE (FRC) PROGRAMME - MAYO**

The submission states that the network of Family and Community Resource Centres, as part of the National Family Resource Centre (FRC) Programme, wish to be included & recognised in the Mayo County Development Plan 2020-2026 as a key programme of community development being delivered across communities in County Mayo.

The Mayo projects (Ballina, Ballyhaunis, Claremorris, Kilmovee, Castlebar, Ballinrobe, Westport) make up 7 of 120 Family Resource Centres nationally. The programme is funded by *Tusla the Child and Family Agency* under the *Department of Children & Youth Affairs*. Through the provision of universal and targeted services they work to tackle disadvantage, marginalisation and social exclusion and to improve the functioning of the family unit so that families & communities can achieve the 5 National Outcomes, under the Better Outcomes, Brighter Futures policy framework.

FRCs operate under a combined model of community development and family support, supporting families and communities through a prevention and early intervention approach. Through this model they strive to effectively bring about social inclusion, empowerment and to facilitate and support participation, community leadership and self-determination. FRCs are community led and locally informed; the projects, programmes and services provided are determined by the needs of the local communities which they operate in. Services & programmes commonly delivered by FRC's include provision of information & support to target groups/families, delivering education and training courses, establishment of new community groups to meet local needs and delivery of services (e.g. childcare facilities, men's groups, after-school clubs etc), policy work.

**PD – 24, BROOKFIELD RENEWABLES (BR)**

Brookfield Renewable is part of Brookfield Renewable, one of the largest publicly-traded renewable power platforms operating across North America, South America and Europe. Employing close to 100 people in its Irish headquarters in Cork City, its Irish base in Cork forms an important part of Brookfield's global growth plans in Europe. The company welcomes the opportunity to submit their observations and considerations in relation to infrastructure and climate change, specifically windfarm development.

BR owns and operates one of the largest RE portfolios on the island of Ireland. The Irish portfolio consists of 368 MW of operating wind capacity across 20 wind projects in 9 counties.

Brookfield notes that the majority of land currently zoned for renewable energy within the current CDP (2014-2020), lie within areas which would not be acceptable to wind development, figures 1 and 2 are appended in this regard. It is stated that the Landscape Appraisal of County Mayo is over a decade old and that there is inconsistency between the current Renewable Energy Strategy (RES) and the current landscape appraisal policy. It is noted that only land within Policy Area 4 would currently be considered for wind development and that of the 16 Landscape Character Units described within the County, 1 unit (6%) is considered positive towards wind energy development.

Reference is made to the granted Oweninny wind farm (ABP Ref: PA0029) and refused Cluddaun wind farm (PC0133) as specific examples to illustrate the contradiction between the RES and the Landscape Character Appraisal. Both wind farms are located within a Tier 1 Preferred for large windfarms (Cluddaun) areas for wind farm development under the RES. However, under the Landscape Appraisal, these developments would be considered unacceptable to wind energy development. This demonstrates that the landscape appraisal is not robust enough to consider specific sites or smaller areas when assessing potential wind development projects at inception. It also demonstrates that the Landscape Appraisal for the County is not robust enough to consider specific sites or smaller areas and is an inadequate tool to use when assessing potential wind development projects at inception. Additionally, after taking account of the current areas zoned for wind farm development under the RES, and considering the Landscape Character Appraisal, as well as current and predicted minimum set back distances of turbines from dwellings under the National Wind Energy Guidelines, the available land space left for potential development is insignificant.

The Council is urged to draft a new Landscape Appraisal Report which is in line with the RES.

#### **PD – 25, MULRANNY COMMUNITY FUTURES**

The submission makes a number of observation relating to Town & Village Renewal/Regeneration, Establishing a Vision, Climate Change and Social Infrastructure/Community Development, which issues were highlighted in the Consultation Guidelines and Issues document.

**Re Town & Village Renewal/Regeneration**, the main goals should be: provision of social/affordable housing by buying property which has been on the market over a long period, building social housing, revisiting RLS (Repair & Leasing scheme).

Priority should be given to social housing in rural areas such as Mulranny, where there are ample employment opportunities in the area, but due to the shortage of affordable housing, workers live elsewhere which has negative impacts on the village community.

As tourism is the mainstay of many coastal villages, consideration should be given to transport infrastructure to enable access to all the attractions available in the area, i.e. providing safer walking and cycling route and loop walks which can accommodate all abilities.

Re Climate Change, it is suggested that the new plan should look at alternative energy sources, explore means of reducing light pollution and pursue a green plan agenda, coastal management and coastline habitats, light pollution and CO2 emissions.

#### **PD – 26, TOCHAR VALLEY RURAL COMMUNITY NETWORK**

The Tochar Valley Rural Community Network is an established network of 18 rural communities over the past 20 years. The submission supports policy that promotes a more clustered and centralised population around key services such as Community Centres, Childcare Facilities, Schools, Playground Facilities, Social Housing, Landscaped Public Amenities and Sports Facilities. The basis of this submission is to support the policy of the County Development Plan, in terms of growing a more clustered or centralised population around these services in the respective communities. It is stated that existing rural housing is not helping with this trend and desired village



clustering is not taking place as a result. Clustering would be more cost effective for the provision of improved broadband and other key services to more people. This in turn could be a factor in retaining more young families, attracting technology jobs, reducing travel and improved quality of life. Houses in a built-up area, adjacent to services, would retain a better market value.

In conclusion, the submission invites the County Planning Authorities to give serious consideration to exploring how existing successful village/parish communities might get involved in supporting and implementing 'cluster focused' housing developments. Incentives to roll out such an approach would also help address our present housing crisis. The TVRCN strongly request that provision be included to develop pilot models.

**PD – 27, DUBLIN AIRPORT AUTHORITY (DAA)**

DAA had no observations to make.

**PD – 28, DEPARTMENT OF CULTURE, HERITAGE AND THE GAELTACHT**

The submission is made in the context of the Department's role in relation to nature conservation and as an environmental authority under SEA legislation. The submission includes observations to the proposed CDP on Appropriate Assessment /Natura Impact Report and the Strategic Environmental Assessment.

**Duties of authorities in relation to Nature Conservation and matters relating to the Plan**

The submission highlights the duties of authorities in relation to nature conservation and the key legislative framework and requirements in relation to Biodiversity. The Department welcomes the Council's commitment to the short and long-term protection of the natural environment, the European sites and Natura 2000 network in particular. It recommends that the plan should have a section with information and maps on key elements of the natural heritage and biodiversity of the plan area and objectives for their conservation.

Key recommendations /advises are set out as follows; —

- Natural heritage and biodiversity to be reflected in the Plan/AA mitigation and SEA measures to safeguard European sites biodiversity and the environment
- On the importance of green infrastructure, there should be a clear distinction between nature conservation obligations and other land uses. Changes to land uses or increased pressures can lead to or perpetuate habitat loss. Good land-use planning should seek to anticipate and manage such competing requirements
- Clarify the term 'sustainable development' when used to indicate safeguarding the environment and natural resources.
- A Greenway Strategy (in preparation) should include measure to guide the planning, routing and assessment of future greenways and blueways.

**SEA-Biodiversity, flora and fauna**

- Biodiversity consideration should be developed in a positive, proactive and precautionary way

- The biodiversity, flora and fauna section of the Environmental Report should be prepared by a suitably qualified ecologist and include information on environmental protection objectives which are established at international or national level.

#### **Appropriate Assessment**

A Natura Impact Report is required for the Plan. Where the NIR identifies that plan-level mitigation is necessary this must be reflected in the content of the objectives of the final plan. The AA must be carried out by the competent authority for the final iteration of the plan prior to its adoption. The AA must take account of the NIR, including any addenda or revisions.

The submission indicates key legislation together with sources of potential information for the Plan/SEA/AA.

#### **PD-30, ENTERPRISE IRELAND (EI)**

Enterprise Ireland's submission outlines the agency's strategy and its strategic targets which focus on;

- Assisting client to create 60,000 jobs by 2020 while sustaining the existing record level of jobs
- Growing the annual exports of client companies by €5bn to €26bn per annum
- Increasing the level of spend by client companies by €4bn to €27bn per annum by 2020, and
- Inspiring more Irish owned companies to have global ambition.

The submission also outlines Enterprise Ireland's role in sourcing and maintaining jobs whilst also supporting start-up companies nationally. It supported companies which have over 375,000 direct and indirect jobs nationwide and provide investment to companies (e.g. €50,000 Enterprise Ireland's Competitive Start Fund and €30.5 million the Regional Enterprise Development Fund)

There was a 5% increase in employment within Mayo between 2016 – 2017, in 2017, 4118 people were employed in supported companies in Mayo.

Numerous clients such as CBE, Portwest, Sportlomo and Irish Pet Foods announced jobs for Mayo in 2017. In addition to this, in 2018 another Westport based client 'Payslip' announced a €1m investment and also received investment from Enterprise Ireland as part of the Fintech Competitive Start Fund in 2016.

In May 2018, the Leeson Enterprise Centre in Westport was opened providing space for a number of start-up businesses both in private units and hot-desk areas. Approximately 30 people work in the centre and support and mentoring is provided for start ups by Enterprise Ireland, the Local Enterprise Office and liBC.

EI also includes a table of the number of plants in Mayo it supported during 2014 – 2017.

#### **Emerging trends with respect to enterprise development**

Enterprise Ireland clients are growing employment strongly in Mayo. A number of emerging trends with respect to enterprise development in the county have been identified over the last five years.

1. Companies are facing new market conditions, including but not limited to challenges and opportunities as a result of Brexit. Building further capability in innovation and competitiveness is essential to build resilience to a changing marketplace.

2. The availability of talent and skills, as well as retention of key staff, is an area of concern for companies.

3. Indigenous exporters have performed strongly in recent years and when expanding, they are likely to expand close to their existing premises. The ability to quickly undertake an expansion will be a competitive advantage for Mayo exporters.

Enterprise Ireland would promote an enterprise specific Goal within the Draft County Development Plan for:

- sustaining and growing indigenous enterprise across the county and
- entrepreneurship and innovation at the heart of future development policy in the county

## Appendix 2

### Issues raised at public information/consultation events

| Location             | Matters raised   |
|----------------------|--|
| Ballina 24/04/18     | Community Facilities, Accessibility (e.g. Pedestrian/wheelchair),                                  |
| Westport 26/04/18    | Marine Technology, Renewable Technology, Tourism   |
| Castlebar 30/04/18   | Dark Skies   |
| Belmullet 01/05/18   | Pedestrian Accessibility around Belmullet (too much furniture, kerb heights, unauthorised parking) |
| Claremorris 03/05/18 | Footpaths/Pedestrian Safety - Accessibility  |

In addition to the matters listed above, a small number of individuals raised queries relating specifically to zoning of lands at the consultation events in Ballina, Westport, Castlebar and Claremorris. These were advised that requests relating to zoning could not be dealt with at this stage in the process.