



CHIEF EXECUTIVE'S REPORT ON DRAFT JOINT URBAN LOCAL AREA PLAN

PUBLIC CONSULTATION



Laois County Council
Áras an Chontae, Portlaoise, Co. Laois

Table of Contents

Part 1:	Introduction	1
Part 2:	Summary of Submissions by the Regional Assemblies and the Office of the Planning Regulator and the Chief Executive’s Opinion and Recommendations	7
Part 3:	Summary of Submissions and the Chief Executive’s Opinion and Recommendations	47
	Chapter 1: Plan Review and Context	48
	Chapter 2: Carlow-Graiguecullen Strategic Policy and Vision	51
	Chapter 3: Core Strategy and Housing	54
	Chapter 4: Economic Development, Retail and Tourism	58
	Chapter 5: Urban Design, Town Centre and Regeneration	64
	Chapter 6: Sustainable Travel and Transport	68
	Chapter 7: Infrastructure and Environmental Services	96
	Chapter 8: Sustainable Communities	107
	Chapter 9: Built Heritage	113
	Chapter 10: Natural Heritage, Green Infrastructure and Landscape	119
	Chapter 11: Climate Action	126
	Chapter 12: Landuse Zoning, Objectives and Implementation	133
Part 4:	Submissions on Appendices	202
	Submissions to SEA and AA	
	Submissions to SFRA	
	Submissions to Local Transport Plan	
	Appendices to Chief Executive’s Report	228
	(i) List of persons / bodies who made submissions.	
	(ii) Copy of Advert – Notification of Draft Plan	
	(iii) List of Bodies Notified	

Part 1: Introduction

1.1 Introduction

Carlow County Council and Laois County Council are now at an advanced stage in the process of reviewing and preparing a new Carlow – Graiguecullen Joint Urban Local Area Plan for the period 2024-2030. The key stages in the review process are summarised in Figure 1.

The pre-draft stage (stage 2) of the Carlow-Graiguecullen Joint Local Area Plan 2024-2030 review and preparation of a new Joint Local Area Plan formally commenced back in September 2022 with a four (4) week Pre-Draft consultation phase and publication of an Issues Paper.

The second stage of public consultation (stage 3) relating to the publication of the Draft Carlow-Graiguecullen Joint Local Area Plan 2024-2030 is now complete and involved the public display of the Draft JULAP extended over a period of almost eight (8) weeks period from 13th December 2023 to 5th February 2024.

This Chief Executive's Report summarises the 81 submissions received by Carlow County Council and 11 no. submissions received by Laois County Council during the consultation period, which are set out alongside the Chief Executive's opinion and recommendations for the issues raised in same. The report outlines clearly the land use zonings and submissions which relate only to any one individual local authority (i.e. Carlow or Laois as appropriate).

The overall level of engagement was high and included much positive commentary.

1.2 Legislative Context for the Making of the Local Development Plan

A mandatory Local Area Plan is required for Carlow Town having regard to Section 19 of the Planning and Development Act 2000 (as amended), which states that a Local Area Plan is required to be prepared in respect of an area that is:

- designated as a town in the most recent census;
- has a population in excess of 5,000; and,
- is situated in the functional area of the planning authority which is the county council.

Carlow-Graiguecullen is a designated Key Town with a recorded population in excess of 27,000 in 2022.

In accordance with Section 18(2) of the Act, Carlow County Council and Laois County Council are collaborating in the preparation of this Joint Local Area Plan

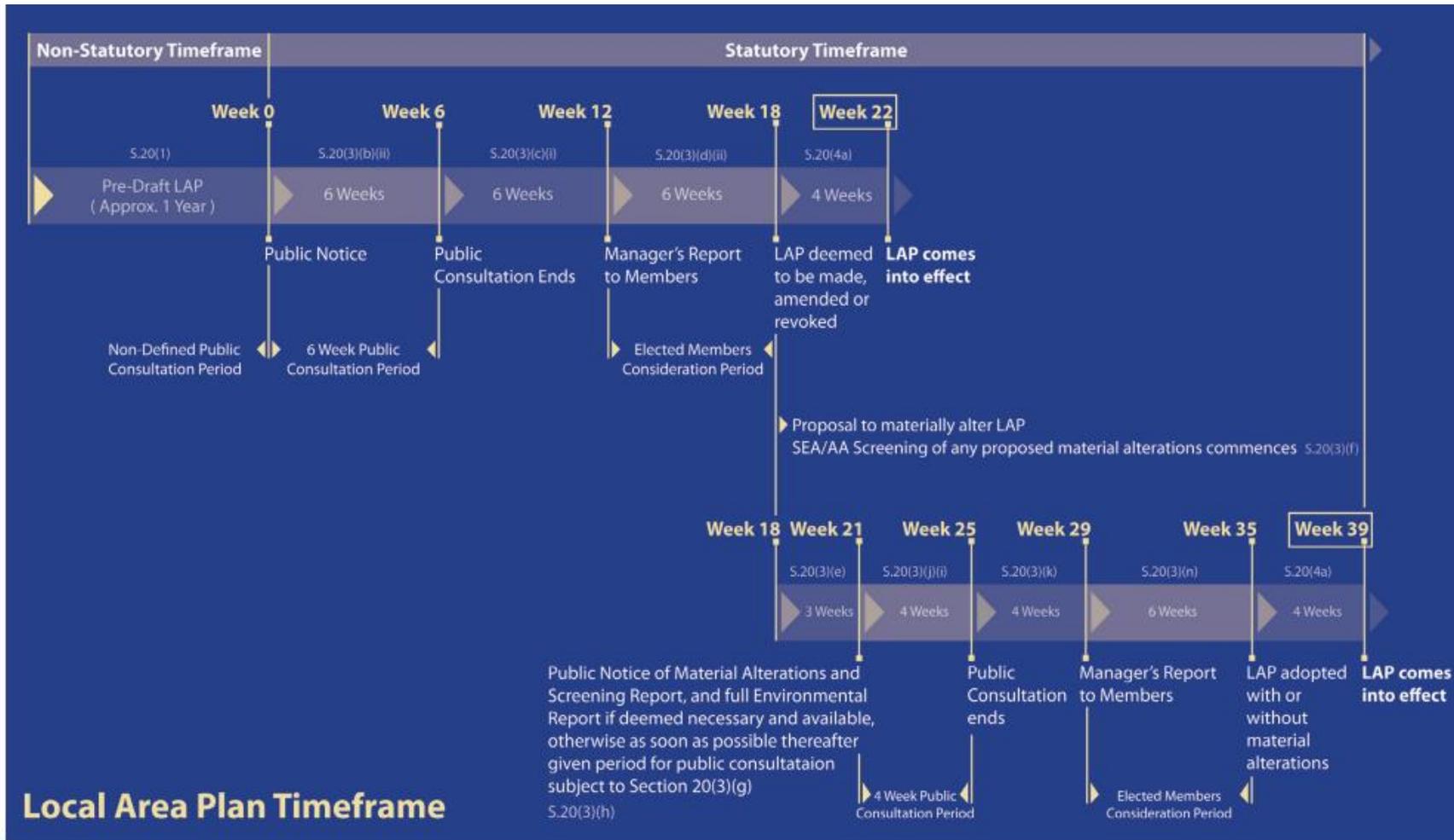


Fig 1 Local Area Plan Poces-Infographic.pdf

1.3 Purpose of Report

The Chief Executive's Report on the Draft Joint Local Area Plan consultation period reports on submissions received during the period and on matters arising out of the consultation. The report:

- Lists the persons or bodies who made submissions or observations, as well as any persons or bodies consulted.
- Provides a summary of the issues raised in the submissions or observations as made by any persons or bodies, including the Office of the Planning Regulator.
- Summarises the issues raised and recommendations made by the relevant Regional Assembly and outlines the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft JULAP.
- Gives the response of the Chief Executive to the issues raised in the submissions or observations, the proper planning and sustainable development of the area, the statutory obligations of any local authority and any relevant policies or objectives of the Government or of any Minister of the Government.

1.4 Overview of Consultation

The process of reviewing the Carlow-Graigucullen Joint Local Area Plan 2024-2030 commenced with the Pre-Draft public consultation stage and publication of an Issues Paper, which took place from 16th September 2022 to 14th October 2022 (inclusive). Thirty-two submissions were received in total during the pre-draft consultation period. A Chief Executive's Report summarising these submissions and outlining recommendations on the content of the Draft JULAP was prepared and issued to the Elected Members of both Local Authorities. Meetings were facilitated with the relevant MD Elected Members to identify any strategic matters for inclusion in the Draft JULAP.

The Draft Carlow – Graigucullen Joint Urban Local Area Plan 2024-2030 was then prepared and presented to the Elected Members of Carlow Municipal District and the Graigucullen-Portarlington Municipal District before being placed formally on public display.

(a) Publicity

The Councils announced that a Draft Carlow-Graigucullen Joint Local Area Plan for the period 2024-2030 had been prepared through publication of a statutory notice in the Irish Independent (13/12/23), the Carlow Nationalist (19/12/23), and the Leinster Express (12/12/23). The notice informed the public that the Draft JULAP was:

- Accompanied by a Strategic Environment Assessment (SEA) Environmental Report, an Appropriate Assessment (AA) Natura Impact Report, and a Strategy Flood Risk Assessment (SFRA).
- Available for inspection on the Councils online consultation portals at <https://consult.carlow.ie> and <https://consult.laois.ie>
- Available to view at the Council's Planning Departments in Carlow and Portlaoise and Carlow Library, Tullow Street.

- Submissions to the Draft JULAP could be made via the Councils' online consultation portals or via email and by post to the relevant local authority.
- The Planning Authorities facilitated two information sessions at Carlow Library on the 11/01/24 and at the Talbot Hotel on the 18/01/24. The Planning Authority also facilitated an in-person briefing of the Carlow PPN members at the Seven Oaks Hotel on the 17/01/24.

(b) Letters and emails

The Councils also wrote to all the prescribed bodies, Elected Members, relevant stakeholders/ infrastructure providers, the Public Participation Network and Members of the Strategic Planning Committee informing them of the preparation and public display of the Draft Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030.

(c) Online

The Draft Plan was available to view and download on both Council's online consultation portals at <https://consult.carlow.ie> and <https://consult.laois.ie>. The Portals also facilitated online submissions. Carlow County Council and Laois County Council wish to express its appreciation to those who made submissions, all those who attending the public information sessions, those who visited the online consultation portal, and all those who viewed the Draft JULAP at the Councils' Planning Departments and in Carlow Library. We also wish to thank all the Elected Members who supported and encouraged participation in the plan making process.

1.5 Interpretation of Chief Executive's Report

Please note in this document, proposed omissions to the text in the Draft Carlow-Graigucullen Joint Urban Local Area Plan are indicated in ~~strikethrough~~ and any amended / additional text is indicated in **green** font.

1.6 Next Steps

Within six weeks of receiving the Chief Executive's Report, the Elected Members of Carlow County Council and Laois County Council must consider the Draft JULAP and the Chief Executive's Report. Following consideration of both, the Elected Members may, as they consider appropriate, by resolution, make, amend, or revoke the Draft JULAP. If the Elected Members decide to materially alter the Draft JULAP, a further period of public consultation will be necessary, and the Planning Authorities must screen the Proposed Material Alterations to determine if a Strategic Environmental Assessment (SEA) or Appropriate Assessment (AA) or both are required for any of the Proposed Material Alterations. This screening, and if deemed necessary, the SEA or AA processes, must be carried out before proceeding to the public consultation period for the Proposed Material Alterations.

The public display period of any Proposed Material Alterations is a minimum of four weeks. Submissions or observations with respect to the Proposed Material Alterations will be taken into account, before the JULAP is made. The Elected Members must consider the Proposed Material Alterations to the Draft JULAP, any environmental reports and the Chief Executive's Report on any

observations or submissions received and decide whether to make the local area plan with or without the Material Alterations.

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

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

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

Part 2: Summary of Submissions by the Regional Assemblies and the Office of the Planning Regulator and the Chief Executive's Opinion and Recommendations

Key Issue	Carlow County Council Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly (CLW-C79-66)	
<p>Role of Carlow-Graiguecullen as a Key Town</p> <p>The Southern Regional Assembly welcomes recognition of the role of Carlow-Graiguecullen as a Key Town throughout the Draft JULAP and references to RSES and key Regional Policy Objectives such as RPO 14 -Carlow. It notes and welcomes the vision set out and endorses the eight strategic objectives identified within the Draft JULAP.</p>	<p>Noted</p> <p>Recommendation</p> <p>No change</p>
<p>Compact Growth and Town Centre Regeneration</p> <p>Having regard to the Draft JULAP Core Strategy, the inclusion of the potential residential unit yield based on the quantum of available brownfield/infill land and from reuse and refurbishment for residential use of underutilised, vacant, and derelict buildings and sites within the built-up area and town centre would be useful. The potential yield (in units) from such buildings/sites could be included in Table 3.2 (Housing Unit Allocation to Carlow Town and Carlow Town Environs) along with the estimated population targets for the Plan area.</p>	<p>A capacity assessment of key intervention areas brownfield/infill town centre sites (no. 3 and no. 4) which were identified as consolidation sites was conducted as part of the Carlow County Development Plan 2022-2028. The potential residential yield was estimated at 370 units. These consolidation sites ref no's CW8 located at Barrow Track and CW9 and CW10 located at Pembroke identified on the Objectives Map 12.2 have been reassessed and allocated higher residential yields of up to c.450 units.</p> <p>The reuse of existing building stock i.e. vacant and derelict properties is supported through policy Ref: VH. P1 and UVD. P1 of the Draft JULAP. Section 5.5.1 of the Draft JULAP notes the level of vacancy in 2023 at c.200 comprising both commercial and residential properties. An updated survey review in February 2024 confirms 171 vacant properties in the JULAP area (comprising 119 residential and 52 commercial units). Carlow County Council Regeneration Team is actively pursuing such properties in addressing vacancy and the efficient use of existing building stock to ensure the continued mixed-use nature of the commercial town centre.</p>

Key Issue	Carlow County Council Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly (CLW-C79-66)	
	<p>Recommendation Include potential units' deliverable on settlement consolidation sites (CW 8 -10) in Table 3.2.</p> <p>Update Section 5.5.1 with updated vacancy / dereliction figures for 2024 (i.e. 119 residential and 52 commercial units).</p> <p>Data on vacancy / reuse of properties will be collated as part of the implementation and monitoring of the plan.</p>
<p>Alignment with Development Plan Core Strategies and RSES Recommends that consideration should be given within the Draft JULAP to higher density targets, particularly for sites within the town centre and close to public transport services. This would reflect the importance of Carlow-Graiguecullen as a Key Town and align with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024, which promotes higher densities for cities and larger towns (including towns with 5,000 or more people).</p> <p>Notes that the compact growth target at RPO 14 (b) (i) is a minimum target of 30% for Carlow Town and therefore the consideration of increased densities to achieve compact growth objectives would align with RSES policy. Recommends that the allocation of housing targets and densities are re-evaluated in order to reflect the</p>	<p>It is noted that National Policy Objective 3c: <i>seeks to 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</i> (i.e. built-up footprints as defined by the CSO). The built-up area as defined by the CSO is illustrated on the land use zoning Map 12.1 which clearly indicates the vast majority of residential units will be delivered within the defined built-up area. The Planning Authority is satisfied that the Draft JULAP complies with both objective NPO 3c and RPO 14(b)(i).</p> <p>The Planning Authority acknowledges the recently published Section 28 Guidelines Sustainable Settlement and Compact Growth Guidelines and in particular residential density considerations associated with Key Towns ranging from 30-50units per ha.</p>

Key Issue	Carlow County Council Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly (CLW-C79-66)	
<p>principles of compact growth set in the RSES, particularly having regard to the designation of Carlow-Graiguecullen as a Key Town.</p>	<p>It is recommended that the density allocation to the former Town Council area for new residential zoned sites is increased from 25units per ha to 30 units per ha which will further support compact growth.</p> <p>Recommendation Increased densities have been allocated to new residential sites at a rate of 30units per ha. See response to Recommendation 1 (i) of the OPR submission.</p>
<p>Economic Development, Retail and Tourism</p> <p>Welcomes the inclusion of policies within the Draft JULAP to promote Carlow-Graiguecullen as an attractive base for employers owing to its resources and strategic location. Notes and welcomes the focus in Chapter 8 on education and learning, including community education and lifelong learning. In RSES, RPOs 186 Lifelong Learning and RPO 190 Lifelong Learning & Healthy Cities and the SRA publication <i>Towards a Learning Region</i> (2022), the Regional Assembly sets out actions developed with Higher Education Institutes (including SETU) and the ETBs to develop a Learning Region using the UNESCO Learning Cities approach. The Learning Region Objective also supports Council policy on social inclusion and skills development, and requests that the Draft JULAP reference the Learning Region objective of the RSES, which will provide active support for education and learning in Carlow as the project is implemented across the Region.</p>	<p>Agreed</p> <p>Recommendation <u>Include additional text in Education and Training Policies:</u> <i>It is the policy of Carlow County Council to:</i></p> <p><i>Support the development of the Southern Region as a Learning Region in support of RPO 186 and RPO 190 190 in the 'Regional Spatial and Economic Strategy for the Southern Region', and the 'SRA publication Towards a Learning Region' (2022) in partnership with the Southern Regional Assembly, Local Authorities and other agencies as appropriate.</i></p>

Key Issue	Carlow County Council Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly (CLW-C79-66)	
<p>Sustainable Transport and Mobility</p> <p>The SRA welcomes the preparation of a Local Transport Plan (LTP) for the Carlow-Graiguecullen JULAP. The LTP achieves RSES Objectives for Carlow (RPO 14) and RPO 157 - Local Transport Plans and has informed the preparation of the Draft JULAP and provides some very useful data considerations for improving conditions for all modes of transport: walking, cycling, roads, parking and public transport with a view to promoting Carlow town centre as the core of activity and to improve the transport system to make the town centre a more attractive place in which to live, work, visit, and recreate. Of note, a walking strategy accompanies the LTP which seeks to improve permeability in particular. A series of new links are shown which look to improve active travellers' connectivity. Included as part of the walking strategy, is a new active travel bridge across the River Barrow, as well as pedestrian wayfinding measures to enhance the attractiveness of the town centre and beyond to SETU for example. This is a welcome inclusion and accords with the intentions of RPO 14 of the RSES. Cycle infrastructure, including off-road segregation and shared foot and roadways have also been explored and form part of the LTP. The enhanced bus services to the town will also contribute toward an attractive public transport network locally and will encourage increased usage. In terms of mixed modal use and provisions, the LTP presents a proposal for a mobility hub (Carlow Coach Park) to enable seamless transfer points for all modes which will further support sustainable transport modes and is a welcome inclusion.</p>	<p>Noted</p> <p>Recommendation</p> <p>No change</p>

Key Issue	Carlow County Council Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly (CLW-C79-66)	
<p>Climate Action</p> <p>Notes that there is an opportunity within this dialogue in Chapter 11 to incorporate reference to the SRA's 'Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region', which would allow for active alignment with regional approaches and enable consistency and a coordinated approach.</p>	<p>Agreed</p> <p>Recommendation</p> <p>Include reference in Section 11.1:1</p> <p><i>The importance of nature-based solutions and green and blue infrastructure is recognised at a regional level through a range of strategies and policies and more recently with the SRA's publication 'Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region'. This Framework provides a resource to guide the implementation of blue and green infrastructure and nature-based solutions to support the implementation of a network of nature-based interventions to solve local challenges in our settlements and the landscapes that they link to.</i></p>
<p>Environmental Assessment</p> <p>The submission notes that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report and that these assessments looked at environmental sensitivities for all parts of the Region and recommends that Carlow and Laois County Councils review these documents to inform the Councils' own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the final JULAP where relevant.</p>	<p>Noted. The RSES documents have been reviewed as part of the SEA, AA and SFRA processes and have informed the environmental assessment documents that have been prepared for the Draft JULAP.</p> <p>Recommendation</p> <p>No change</p>

Key Issue	Laois County Council Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly (LS-L79-3)	
<p>EMRA submission broadly follows the chapter headings of the Draft JULAP and considers that these areas of focus align well with the three key principles [healthy placemaking, climate action and economic opportunity] and the 16 Regional Strategic Outcomes of the RSES.</p> <p>EMRA notes that the Draft JULAP has been informed by the NPF, the RSES' for both regional assemblies and the Laois and Carlow County Development Plans. The preparation of the Draft JULAP is consistent with the Key Town Regional Policy Objective (RPO) 4.75 in the RSES regarding preparation of a cross-boundary Joint Local Area Plan.</p> <p>References that the Draft JULAP identifies Carlow-Graiguecullen as a Key Town with a focus on compact growth. Notes the projected population and associated housing demand figures as set out in Chapter 3 of the Draft JULAP.</p> <p>EMRA welcomes:</p> <ul style="list-style-type: none"> - policies aimed at regeneration and tourism growth. - and supports the continued roll out of measures for opportunities to facilitate co-working and remote-working spaces and a greater mix of daytime and nighttime uses in urban centres. - a 'people first' approach to urban design and planning, the public domain will be returned to the people residing and visiting in the town, while still ensuring high levels of accessibility. - the commitment to promote the integration of land use and transportation and to improve public transport and active travel infrastructure with an increased shift towards sustainable modes of travel and this aligns with RSO 6 Integrated Transport and Land Use and RPOs 8.1-8.4 in the RSES. 	<p>Noted.</p> <p>The Planning Authority acknowledges the content of the EMRA submission together with the statutory obligations of the local authority as set out under Section 19(2) and Section 20(5)(c) of the Planning and Development Act 2000 (as amended) that requires the Local Area Plan to be consistent with inter alia the objectives of the County Development Plan, the National Planning Framework (NPF), the Regional Spatial and Economic Strategies and specific planning policy requirements specified in Section 28 Guidelines.</p> <p>The statutory obligations together with the relevant policies and objectives of the higher tier planning policy framework has informed the preparation of the Draft JULAP.</p> <p>The requirements of the core strategy of the Laois County Development Plan has informed land use zoning requirements over the Plan period.</p> <p>Reference to various RPOs and content of the RSES will be updated where required. Figure 4.1 as contained in Chapter 4 illustrates the combined details from the RSES for the Southern Region and the RSES for the Eastern and Midlands Region. The Economic</p>

Key Issue	Laois County Council Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly (LS-L79-3)	
<ul style="list-style-type: none"> - the County Councils commitment to the provision of high quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner. - the suite of policies and objectives set out in the draft JULAP to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future - the policies and objectives set out in the draft JULAP to support, protect and enhance the County's landscape. - policy supporting urban regeneration and compact growth which can also have a positive role in addressing the challenge of climate change and the policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature-based solutions. - the preparation of the draft JULAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA). <p>Notes that the Graiguecullen-Carlow Key Town RPO 4.76 in the RSES aims to support the sustainable development of environmentally sensitive, low intensity amenity development associated with the Barrow Blueway which aligns with the recommendations contained within the Draft JULAP.</p> <p>EMRA considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect would like to draw attention to RSOs 8 and 9 in relation to building climate resilience and supporting the transition to low carbon and clean energy and Figure 7.4 Climate Strategy of</p>	<p>Development Strategy as contained in Chapter 4 is prepared having due regard to same.</p> <p>It is also considered that the content of the JULAP pertaining to Green Infrastructure, Climate Action and Flood Risk complies with relevant statutory provisions, guidance, and the relevant content of the RSES documents.</p>

Key Issue	Laois County Council Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly (LS-L79-3)	
<p>the RSES. In terms of sustainable transport. The Council's promotion of active travel as part of its ongoing commitment to climate action is welcomed.</p> <p>EMRA advises the Local Authorities to pay particular attention to the following issues in the preparation of the JULAP in order to ensure consistency with the RSES, and makes the following recommendations:</p> <ul style="list-style-type: none"> a) The JULAP should align with Figure 6.3 Economic Strategy of the RSES and RPO 4.27 in the RSES which outlines that Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers. b) Table 6.1 Retail Hierarchy for the Region in the RSES, which shows Graiguecullen under Level 3 of the retail hierarchy entitled 'Town and/or District Centres and Sub-County Town Centres (Key Service Centres)' should be clearly outlined in the JULAP. c) The JULAP should align with the Healthy Placemaking Regional Policy Objectives, RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES. d) The JULAP should align with RPOs 9.1 and 9.2 in the RSES which support a diverse and inclusive region. 	<p>Recommendation: Update sections of plan as identified in green:</p> <ul style="list-style-type: none"> a) No change b) Include reference to the RSES retail hierarchy for Graiguecullen in Section 4.4.1.2 of the Draft JULAP stating Table 6.1. of the RSES (EMRA) outlines the Retail Hierarchy for the Region in which Graiguecullen is designated under Level 3 of the retail hierarchy entitled 'Town and/or District Centres and Sub-County Town Centres (Key Service Centres). c) Include reference in Section 5.1 Urban Design and Placemaking as follows: Healthy Placemaking is supported at a regional level in both the SRA and EMRA RSES (ROs9 10,9.12,9.13 and Fig 9.2 of the EMRA RSES and RPO 31 of the Southern Region RSES). d) Include in Section 8.6 additional text as follows: Diverse and Inclusive Communities is supported at a Regional Level through the relevant RSES (i.e. RPOs 9.1 and 9.2 (EMRA) and RPO 179 of the SRA).

Key Issue	Laois County Council Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly (LS-L79-3)	
<ul style="list-style-type: none"> e) The JULAP should align with the Guiding Principles for the preparation of Green Infrastructure Strategies as set out in Section 7.7 of the RSES. f) The JULAP should align with Figure 7.4 Climate Strategy of the RSES. g) The JULAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management. 	<ul style="list-style-type: none"> e) No change f) No Change g) No change

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
<p><u>Recommendation 1 – New Residential Zoning</u></p> <p>Having regard to:</p> <ul style="list-style-type: none"> • the growth targets for Carlow town and environs under the core strategy of the Carlow County Development Plan 2022-2028; • the growth targets for Graiguecullen under the core strategy of the Laois County Development Plan 2021-2027; • the Development Plans, Guidelines for Planning Authorities (2022), in particular section 4.4.3 Ensuring Sufficient Provision of Housing Lands/Sites; • The following objectives for compact growth: - CS 09 of the Carlow CDP; - CS 05 of the Laois CDP; - RPOs 34 and 35 of the SRA RSES; and - RPO 3.2 of the EMRA RSES; and • Policy CS P4 of the Carlow CDP to support town centre regeneration and the delivery of Project Carlow 2040; the planning authorities are required. <p>(a) to review and amend, as appropriate, the area of land proposed to be zoned New Residential based on the following:</p> <p>i) a revised distribution of post 2028 housing growth target between Carlow Town (TC area) and Carlow Town Environs to apply pro-rata growth separately to both areas, resulting in 300 additional units for Carlow Town</p>	<p>(i) The Planning Authority notes the content of the OPR submission and concerns regarding allocation of unit targets between the former Town Council Area and Carlow Environs. To inform considerations, the Planning Authority has conducted a further review of the core strategy figures and in particular note the availability of an additional provision to the baseline</p>

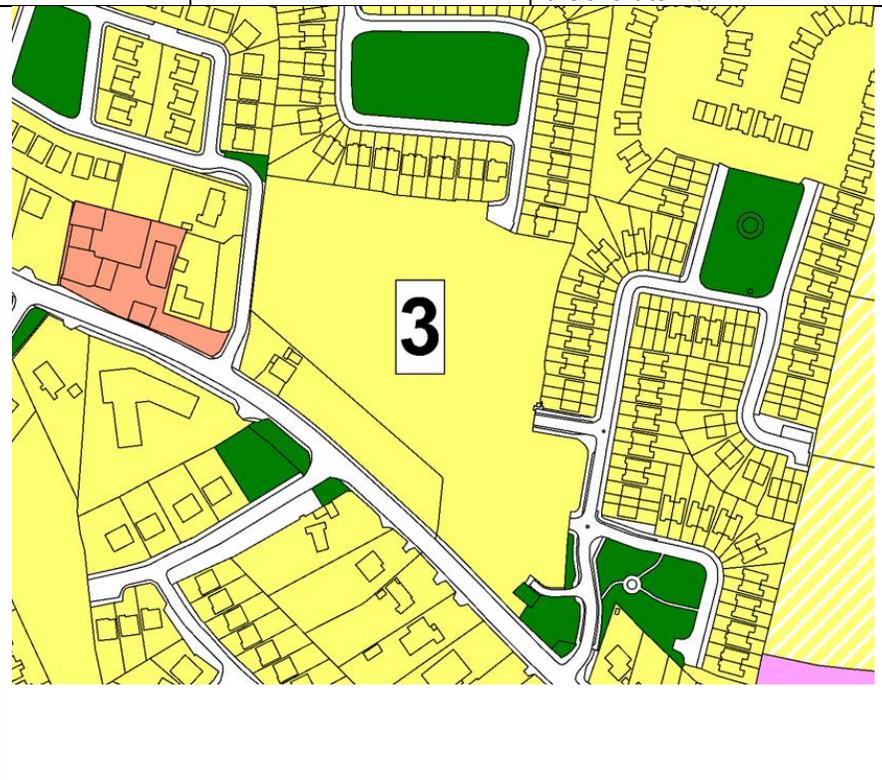
Key Issue	Chief Executive's Opinion & Recommendation														
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)															
<p>and a commensurate reduction from 763 to 463 units for Carlow Town Environs; and</p>	<p>figures of 20-25% as provided for in the Development Plan Guidelines. This additional provision was not included in the Draft JULAP for the areas referenced. Table 2.7 of the Carlow CDP 2022-2028 also provides for this additional 25% to the housing target.</p> <p>Updating the residential unit allocation based on the additional provision results in a revised target for Carlow Town and Carlow Environs as follows:</p> <table border="1" data-bbox="1330 742 1915 1177"> <thead> <tr> <th>Carlow County Council – Functional Area</th> <th>Units</th> </tr> </thead> <tbody> <tr> <td>Core Strategy unit allocation to 2028</td> <td>1,330</td> </tr> <tr> <td>Plus 2-year projected unit allocation to 2030</td> <td>444</td> </tr> <tr> <td>Plus 25% Residual Provision</td> <td>444</td> </tr> <tr> <td>Total</td> <td>2,218</td> </tr> <tr> <td>Less units constructed since 2022</td> <td>111</td> </tr> <tr> <td>Carlow Town and Carlow Town Environs total unit target</td> <td>2,107</td> </tr> </tbody> </table> <p>A capacity assessment of potential yield within the former Town Council area has also been carried out. The estimated potential revised residential yield on regeneration and new residential sites in the town centre based on higher yields on regeneration sites (c.450 units) and 30 units per ha for 18 ha new residential zoned land yields an overall target of 990.</p>	Carlow County Council – Functional Area	Units	Core Strategy unit allocation to 2028	1,330	Plus 2-year projected unit allocation to 2030	444	Plus 25% Residual Provision	444	Total	2,218	Less units constructed since 2022	111	Carlow Town and Carlow Town Environs total unit target	2,107
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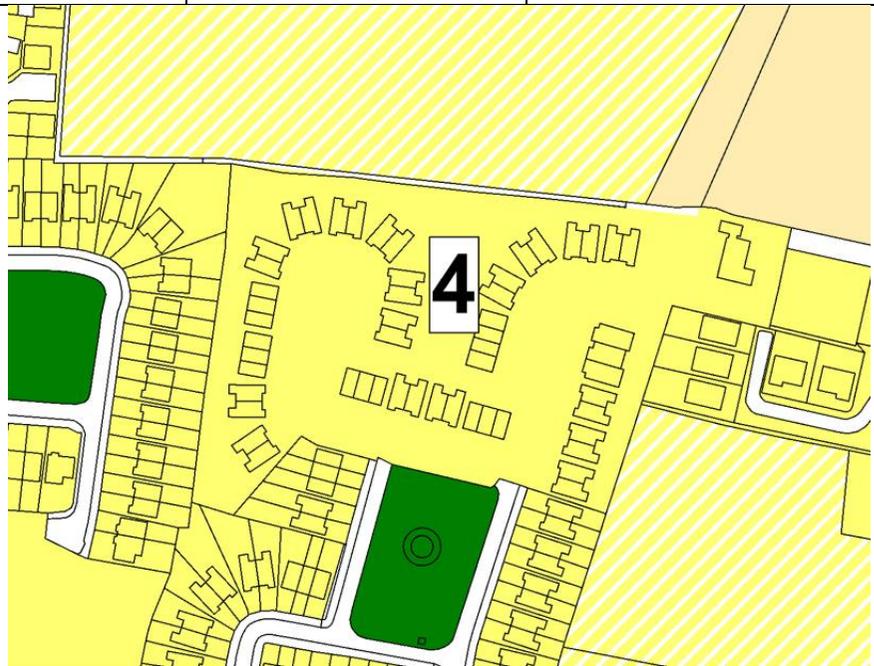
Key Issue	Chief Executive's Opinion & Recommendation																		
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)																			
	<p>It is considered reasonable having regard to policies to support compact growth that an additional allocation of 100 units is provided for in the former Town Council area in recognition of other small-scale schemes which may arise in the former Town Council area e.g. existing residential/infill, town centre sites.</p> <p>It should also be noted that within the former Town Council area c. 111 units have been delivered since the adoption of the CDP 2022-2028.</p> <table border="1" data-bbox="1272 778 1973 1051"> <thead> <tr> <th>Former Town Council Residential Yields</th> <th>CDP</th> <th>JULAP</th> </tr> </thead> <tbody> <tr> <td>Regeneration Sites (CW8, CW9 and CW10)</td> <td>370</td> <td>450</td> </tr> <tr> <td>New Residential Zoned Land (18ha)</td> <td>530</td> <td>540</td> </tr> <tr> <td>Units constructed since 2022</td> <td>N/A</td> <td>111</td> </tr> <tr> <td>Additional allocation under JULAP</td> <td>N/A</td> <td>100</td> </tr> <tr> <td>Total</td> <td>900</td> <td>1201</td> </tr> </tbody> </table> <p>Based on the foregoing an additional 301 units have been allocated to the former town council area since the adoption of the CDP 2022-2028. The Planning Authority is satisfied that significant undeveloped additional lands are not readily available within the former Town Council area to facilitate a greater proportionate allocation as requested in this recommendation. Proposed new residential zoned lands within the environs area are identified having regard to key planning principles including sequential development, availability of services and infrastructure, access to community facilities etc.</p>	Former Town Council Residential Yields	CDP	JULAP	Regeneration Sites (CW8, CW9 and CW10)	370	450	New Residential Zoned Land (18ha)	530	540	Units constructed since 2022	N/A	111	Additional allocation under JULAP	N/A	100	Total	900	1201
Former Town Council Residential Yields	CDP	JULAP																	
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Key Issue	Chief Executive's Opinion & Recommendation						
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)							
ii) a review of the potential housing yield for lands proposed as Existing / Infill Residential.	<table border="1" data-bbox="1330 448 1917 778"> <tr> <td>Carlow Town and Carlow Town Environs total unit target</td> <td>2,107</td> </tr> <tr> <td>Allocation to former Carlow Town Council area (excluding units already constructed since 2022)</td> <td>1,090</td> </tr> <tr> <td>Carlow Town Environs unit target</td> <td>1,017</td> </tr> </table> <p>Having regard to the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authority a density of 30 units per ha would result in a requirement of 34ha (1,017/30 = 34ha) of new residential zoning to meet the core strategy figure in the Carlow Environs Area.</p> <p>Under the Draft JULAP c.26ha of new residential zoned land was identified, an additional 8ha can therefore be facilitated with new residential zoning to accommodate the core strategy figures in Carlow Environs in compliance with the Development Plan Guidelines and the Core Strategy of the Carlow County Development Plan 2022-2028.</p> <p>ii)A review of larger existing residential infill sites within the Carlow Environs area has been conducted. Five no. sites have been reviewed and the following is noted:</p>	Carlow Town and Carlow Town Environs total unit target	2,107	Allocation to former Carlow Town Council area (excluding units already constructed since 2022)	1,090	Carlow Town Environs unit target	1,017
Carlow Town and Carlow Town Environs total unit target	2,107						
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Carlow Town Environs unit target	1,017						

Key Issue	Chief Executive's Opinion & Recommendation		
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)			
	Site	Status of Development	Recommendation
	1. Cluain Bui	The site is occupied by 120 dwellings.	Retain zoning as Existing Residential/ Infill.
			

Key Issue	Chief Executive's Opinion & Recommendation		
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)			
<p>In selecting lands to be retained as New Residential, the planning authority is required to ensure consistency with objectives for compact growth and to have regard to the policy and objective for sequential development under the Development Plans Guidelines for Planning Authorities (2022), and</p>	<p>2. Carrickbrook</p>	<p>The site is occupied by c.80 no. dwellings. A significant portion of the site remains undeveloped primarily to the east of the site (C. 2ha). No current planning permission in place to facilitate completion of the site.</p>	<p>Having regard to the peripheral location of the site, the significant level of residential development at this location already accessing off a single access point from the Tullow Road, the availability of more appropriately zoned land for residential development closer to the town centre, it is recommended that 2ha be rezoned Strategic Reserve.</p>
			

Key Issue	Chief Executive's Opinion & Recommendation		
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)			
	3. Tullow Road (part Cois Dara)	PI ref: 23/79 81 units 2.61ha	Significantly under construction retain as existing residential / infill. Likely to be substantially complete over the short term.
 <p>The map shows a residential development site. A central area is highlighted in yellow and labeled with the number '3'. Surrounding this area are various residential plots, some with green spaces and others with buildings. The layout includes roads and a network of plots.</p>			

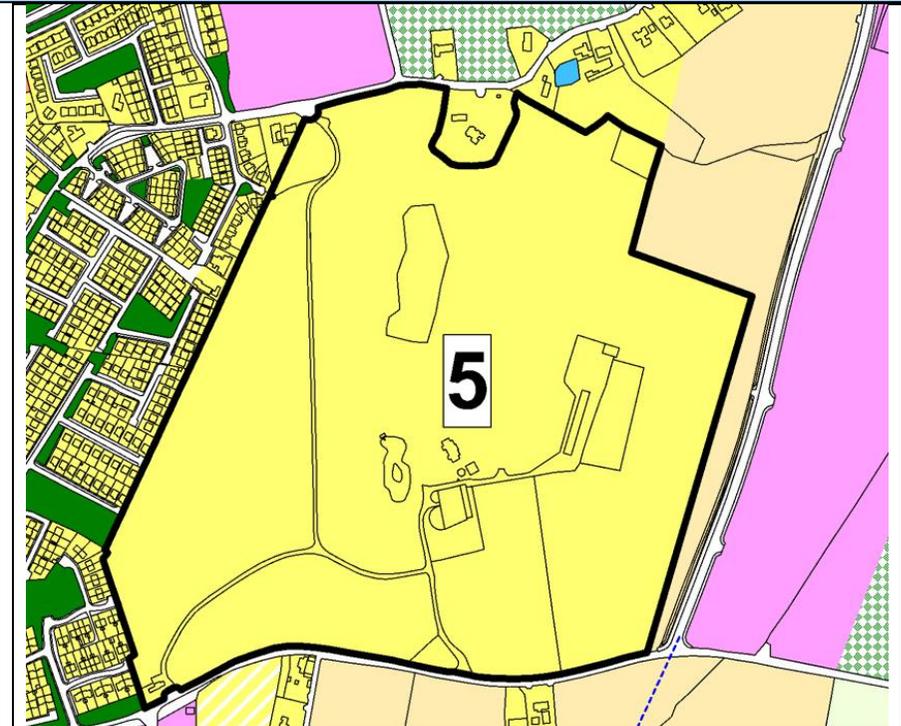
Key Issue	Chief Executive's Opinion & Recommendation		
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)			
	4.Cois Dara	PI 21/524 55 units constructed.	Substantially completed. Retain as Existing/Infill Residential.
 <p>The map shows a residential development layout. A central area is highlighted in yellow and contains a white box with the number '4'. This area is surrounded by numerous small rectangular shapes representing residential units. There are two green rectangular areas, likely representing parks or green spaces, one on the left and one at the bottom center. The surrounding areas are also yellow, with some diagonal hatching in the top right and bottom right corners.</p>			

Key Issue	Chief Executive's Opinion & Recommendation	
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)		
	<p>5.Pollerton Big</p> <p>This site comprises an existing established residential property on substantial grounds and associated agricultural fields. These lands originally formed part of Pollerton Demesne. Remnants of the historic designed landscape which are preserved are evident on maps and aerial photography. Having regard to proper planning principles regarding residential zonings including sequential development, and compliance with core strategy it is considered appropriate to zone the lands as strategic reserve to provide a land reserve for the orderly development and future expansion of Carlow town environs into the future.</p>	<p>Having regard to proper planning principles regarding residential zonings including sequential development, and compliance with the core strategy, it is considered appropriate to zone the lands as Strategic Reserve to provide a land reserve for the orderly development and future expansion of Carlow town environs into the future.</p>

Key Issue

Chief Executive's Opinion & Recommendation

2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)



The Planning Authority of Carlow County Council is satisfied that the sites identified within Carlow Environs for new residential development are sequentially appropriate for development and do not undermine the overall objective of the Council to support compact growth in Carlow Town Centre which is supported by a detailed regeneration strategy and implementation of active land measures. Additional new residential zoning

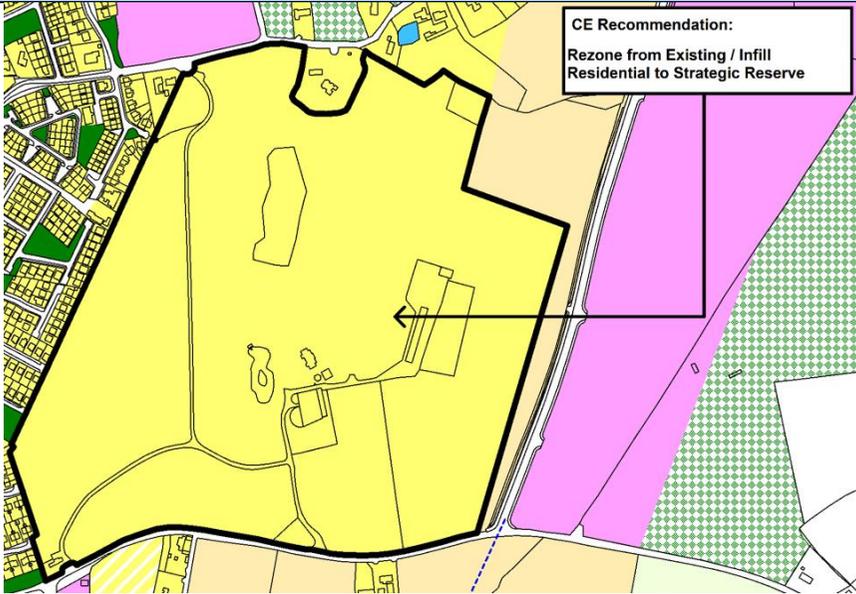
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	<p>to accommodate the additional 8ha has been informed by proper planning considerations including compact growth, sequential development, availability of services, and flood risk considerations. Recommended sites for new residential zoning include extension to Castle Oaks (2.5ha), lands along the Brownhill road (2.5ha) and off Pollerton Manor (3ha). (See section 3.13.1 (subs CLW-C79-22, CLW-C79-51, CLW-C79-45 and CLW-C79-55).</p> <p>(b) See response above, it is proposed to zone the site Strategic Reserve for consideration under future iterations of the JULAP as appropriate.</p> <p>Recommendation</p> <p>(a)</p> <p>(i) Update Table 3.2 with detail in Green</p> <table border="1" data-bbox="1330 962 1912 1390"> <thead> <tr> <th>Carlow County Council – Functional Area</th> <th>Units</th> </tr> </thead> <tbody> <tr> <td>Core Strategy unit allocation to 2028</td> <td>1,330</td> </tr> <tr> <td>Plus 2-year projected unit allocation to 2030</td> <td>444</td> </tr> <tr> <td>Plus 25% Residual Provision</td> <td>444</td> </tr> <tr> <td>Total</td> <td>2,218</td> </tr> <tr> <td>Less units constructed since 2022</td> <td>111</td> </tr> <tr> <td>Carlow Town and Carlow Town Environs total unit target</td> <td>2,107</td> </tr> </tbody> </table>	Carlow County Council – Functional Area	Units	Core Strategy unit allocation to 2028	1,330	Plus 2-year projected unit allocation to 2030	444	Plus 25% Residual Provision	444	Total	2,218	Less units constructed since 2022	111	Carlow Town and Carlow Town Environs total unit target	2,107
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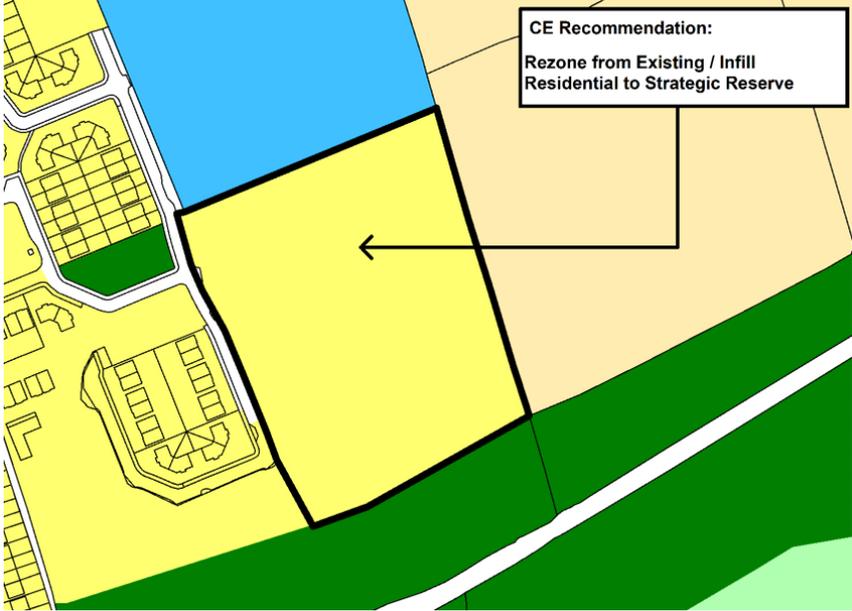
Key Issue	Chief Executive's Opinion & Recommendation				
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)					
<p>(b) to omit or appropriately amend the proposed Existing / Infill Residential zoning objective for Pollerton Big to ensure that it will not be considered for residential development during the period of the JULAP.</p>	<table border="1" data-bbox="1330 448 1915 643"> <tr> <td data-bbox="1330 448 1821 576">Allocation to former Carlow Town Council area (excluding units already constructed since 2022)</td> <td data-bbox="1821 448 1915 576">1,090</td> </tr> <tr> <td data-bbox="1330 576 1821 643">Carlow Town Environs unit target</td> <td data-bbox="1821 576 1915 643">1,017</td> </tr> </table> <p>Rezone additional 8ha to New Residential development having regard to proper planning considerations including sequential development, availability of infrastructure and services and flood risk considerations.</p> <p>(ii) Rezoning two Existing Residential / Infill Sites to strategic reserve. Site no. 2 Carrickbrook (2ha) and Pollerton Big (40ha).</p> <p>(b) Rezone lands at Pollerton Big Strategic Reserve.</p>	Allocation to former Carlow Town Council area (excluding units already constructed since 2022)	1,090	Carlow Town Environs unit target	1,017
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Key Issue

Chief Executive's Opinion & Recommendation

2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)



Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	
<p><u>Recommendation 2: Enterprise and Employment</u></p> <p>Having regard to:</p> <ul style="list-style-type: none"> the National Climate Objective in the Climate Action and Low Carbon Development Act 2015, as amended; the policies and objectives of the Carlow County Development Plan 2022-2028 - Objective ED O1, ED P8 and ED O5; RPO 62 and RPO 151 of the RSES for the Southern Regional Assembly; and 	<p>The section of land in question forms part of Strategic Employment Land (Site 6) as identified in Chapter 4 of the Draft JULAP. A number of key considerations informed the Enterprise and Employment zoning applying to the land, including:</p> <ul style="list-style-type: none"> The provisions of RPO 14 in the Regional Spatial and Economic Strategy for the Southern Region, which seeks <i>"To strengthen and support the role of Carlow Town as a self-sustaining regional and inter-regional economic driver supporting investment in the strategic employment development potential of the town..."</i>. It is

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
<ul style="list-style-type: none"> the Development Plans Guidelines for Planning Authorities (2022) under section 6.2.5 Zoning for Employment Uses, the planning authorities are required to omit that section (c.30ha) of Strategic Employment site 6 located to the east of the partly constructed Eastern Relief Road in its entirety. 	<p>considered that the unavailability of Strategic Employment Land such as the land in question at Site 6 would undermine the ability of Carlow Town to achieve this RPO.</p> <ul style="list-style-type: none"> Carlow Town is an important regional centre for education and research, reflected most notably in the role of Carlow SETU, Carlow College St. Patricks, and The Teagasc Research Centre at Oak Park. The potential spin-off enterprise and employment sectors from these education and research facilities requires the availability of appropriately located employment lands within the joint urban area. The strategic evidence and rationale from Carlow County Council's Head of Enterprise to support the Enterprise and Employment zoning for the land in question, as follows: <ul style="list-style-type: none"> Demand for enterprise and employment development lands in Carlow Town is currently robust, with a thriving commercial property market, particularly in office and industrial sectors, however this vigour is not matched by an adequate supply. The scarcity of purpose-built office, industrial, or enterprise spaces constructed in the Town over the past 15 years inhibits existing business expansion and the establishment of emerging companies. Globally, trends indicate increasingly interconnected, efficient, and flexible supply chains and production processes, paving the way for mass customisation and virtual production. However, the inherent risk for Carlow Town lies if there is lack of relevant enterprise and employment lands which could have the potential to hinder local enterprises from keeping pace with international developments in the manufacturing sector and also the

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	<p>County's attractiveness as a location of choice for FDI and second site location for companies already located in Ireland.</p> <ul style="list-style-type: none"> - Currently, all industrial/Business parks in Carlow Town are fully developed, necessitating suitably zoned lands elsewhere to allow for the clustered development of companies, particularly in manufacturing. Operationally, locating manufacturing enterprises in and around the core town centre poses significant challenges in terms of logistics and operations. Previous developments in these core town centre areas are now witnessing companies that are landlocked, impeding their overall future development and expansion. - The land in question provides an ideal foundation for the development of a cluster of manufacturing and industrial sites. Spatial clustering offers various advantages, including fostering innovation through knowledge exchange, creating industry-specific talent hubs, optimising supply chain efficiency, and facilitating networking opportunities. This strategic positioning aligns with the global trend of more interconnected and flexible production processes, positioning Carlow Town for sustainable growth in the manufacturing sector. - It has been proven that urban areas with well-planned enterprise and employment zones can position themselves strategically within a region. The land in question will attract investment, development partnerships, and strategically contribute to the urban areas overall influence and competitiveness. <ul style="list-style-type: none"> • The Enterprise and Employment zoning provides for a mix of uses including (inter alia) high-end research and development, science and technology-based

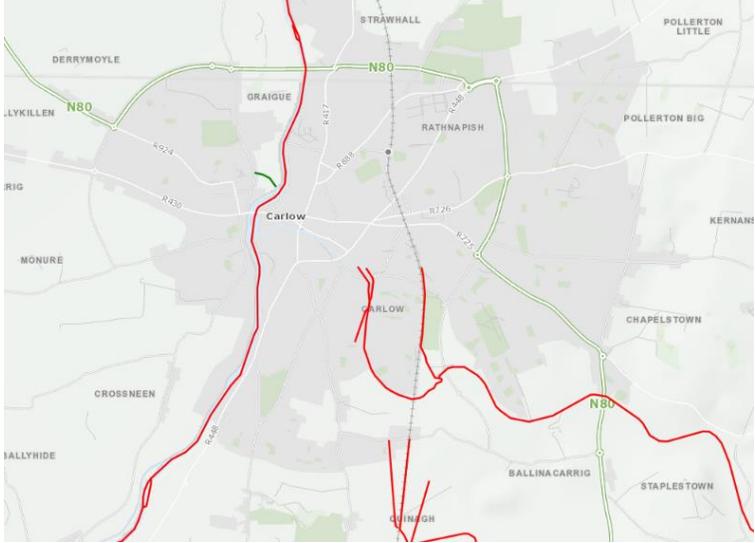
Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	<p>industry, financial services, call centres/telemarketing, software development, enterprise and incubator units, small/medium manufacturing, and corporate offices in high quality campus/park type development. The land and infrastructure requirements to serve these uses and development types are not readily met in central parts of the urban area, with potential constraints around land availability, potential conflicts with and negative impacts on existing adjoining uses, the need to accommodate future expansion etc.</p> <ul style="list-style-type: none"> • The opportunity to consolidate enterprise and employment development at this location, which is proximate to existing key employment lands at MSD Carlow and Deerpark Business Complex, is in an accessible and strategic location near to the primary public road approach (R448) to the joint urban area from the Eastern and Dublin Regions, and which is readily accessible from the N80 and the M9 at Junction 4 via the R448. • The significant investment undertaken to date for the construction of the Eastern Relief Road, including the provision of watermain, sewer and storm water infrastructure in and along the route, as well as entrances to the lands in question, and the installation of telecom ducts, ESB ducts and a public lighting system. Therefore, the land in question would have access to/be able to connect to this existing infrastructure. • The Council's own investment in extending watermain, sewer and surface water infrastructure to this area, including the construction of the interchange with the R448 in conjunction with the IDA as part of advanced works for MSD Carlow. • The availability of public transport in the area. The terminus for the Carlow Town Bus Service is located at the junction of the Eastern Relief Road and the R448, within c. 600m of the land in question.

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	<ul style="list-style-type: none"> • The availability of existing active travel infrastructure (walking and cycling) along the Eastern Relief Road. • The strategic location of the land in question near the R448, N80 and M9 could accommodate enterprise and employment development without negatively impacting on traffic congestion in the urban area. • The unavailability, in the short to medium term, of a large area of enterprise and employment zoned land comprising the former Sugar Factory site, identified in the Draft JULAP as Strategic Employment Land (Site 9). This land is undergoing significant remediation (decontamination) works that are being overseen by the EPA through their licensing process. Further lands have also been occupied in the area including the occupation of a previously vacant opportunity site i.e. the former Braun Brownfield site by NUA Manufacturing. • The inclusion of a requirement in the Draft JULAP for Strategic Employment Land (Site 6), to which the land in question forms part, for the preparation of a masterplan to accompany any development proposal to ensure development does not take place in a piecemeal manner and suitably integrates with existing development and infrastructure. <p>Recommendation No change</p>
<p><u>Recommendation 3: Flood Risk Management</u></p> <p>Having regard to flood risk management, and in particular to:</p>	

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
<ul style="list-style-type: none"> • Policy Objectives FRM 1 and FRM 7 of the Laois County Development Plan 2021-2027; • RPO 7.12 of the RSES for the Eastern and Midlands Regional Assembly; and • the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended; the planning authority is required to: <p>(a) review and revise the SFRA to</p> <ul style="list-style-type: none"> (i) exclude consideration of flood defences in determining the flood risk zones; (ii) take account of the NIFM dataset; (iii) incorporate a pluvial assessment and pluvial mapping for Carlow Graiguecullen, in lieu of the PFRA indicative pluvial maps if pluvial flood risk is considered a flood risk; (iv) consider climate change impact on the 0.1% AEP flood extents, which will impact FRZ B; and (v) consider drainage districts, <p>(b) amend the draft JULAP, including zoning objectives as necessary, having regard to the revisions to the SFRA required under part (a), including zoning lands within Flood Zone A for water compatible uses, only, and zoning lands within Flood Zone B for less vulnerable uses, only, unless the subject zoning and/or infrastructure have each first</p>	<ul style="list-style-type: none"> (i) The JULAP Maps have been updated to reflect content of the SFRA which itself presents the correct undefended mapping and indicates defended areas with a hatched polygon. (ii) The JULAP maps have been updated to reflect the content of the SFRA which includes the NIFM dataset. (iii) There is limited surface water flooding in Carlow, GSI Surface Water mapping is presented in the SFRA and it is not proposed to incorporate a more detailed pluvial assessment at this stage. (iv) The SFRA has been updated with the 0.1% Climate Change mapping and climate change considerations are addressed in the settlement review zoning and justification tests as appropriate. (v) The SFRA will be updated with a section on Drainage Districts. <p>(b) Flood mapping is correctly displayed in the Draft SFRA and justification tests have been applied as appropriate. Under the settlement zoning review and justification test as contained in the SFRA (Section 8) and the justification test (appendices) climate change</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
<p>passed the plan-making Justification Test, including taking full account of future climate change scenarios as identified in the OPW Flood Mapping (floodinfo.ie); and.</p> <p>(c) amend Land Use Zoning Map 12.1 to indicate Flood Risk Zones A and B for Graiguecullen, in addition to that shown for Carlow town and its environs. The planning authorities should consult with the OPW in addressing this recommendation.</p>	<p>considerations are addressed. The zoning of the lands in the Draft JULAP were informed by the SFRA which was carried out as an iterative process in the preparation of the Plan.</p> <p>(c) agreed</p> <p>Recommendation</p> <p>Flood mapping in the Draft JULAP /SFRA updated to reflect points (i), (ii), and (iv). See maps at end of this Section 2.3.</p> <p>Include additional text in Green and map on Drainage Districts in the SFRA</p> <p>Drainage Districts</p> <p>Another form of fluvial regime is seen within the JULAP area is related to rivers that have been subject to works as part of a drainage programme. Drainage Districts were carried out by the Commissioners of Public Works under a number of drainage and navigation acts from 1842 to the 1930s to improve land for agriculture and to mitigate flooding. Channels and lakes were deepened and widened, weirs removed, embankments constructed, bridges replaced or modified, and various other work was carried out.</p> <p>The purpose of the schemes was to improve land for agriculture, by lowering water levels during the growing season to reduce waterlogging on the land beside watercourses known as callows.</p> <p>Drainage Districts cover approximately 10% of the country, typically the flattest areas.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	<p>Local authorities are charged with responsibility to maintain Drainage Districts. The Arterial Drainage Act, 1945 contains a number of provisions for the management of Drainage Districts in Part III and Part VIII of the act. The Act was amended on a number of occasions, e.g. to transpose EU Regulations and Directives such as the EIA, SEA, and Habitats Directives and the Aarhus Convention.</p> <p>Through the implementation of these schemes the hydraulic conveyance efficiency of a catchment is increased, thereby leading to a reduction in overland flood storage. Although it has been found that these schemes generally achieve their main objectives, this increase in discharge-carrying capacity leads to an acceleration of the response to rainfall with flood peaks of increased intensity and more rapid recessions.</p> <p>The Barrow, Quinagh and Burren Drainage Districts are located within the JLAP (see below) and typically ensure that flood waters (of varying magnitude but typically the 3-year flood) are retained in bank by lowering water levels during the growing season thus reducing waterlogging on the adjacent land during wetter periods.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	
<p>Observation 1: Implementation and Monitoring: The Office advises the planning authority to review its implementation and monitoring strategy for the draft JULAP, having regard to section 10.3 of the Development Plans, Guidelines for Planning Authorities (2022) and section 6.2 of the Local Area Plans Guidelines.</p>	<p>The content of this submission is noted and it is recommended that a policy is included and a new Table 12.3 below which sets out the implementation of delivery of relevant policies and objectives in the JULAP. Many policies and objectives will be implemented via the development management process and are therefore not listed. It should also be noted that many policies and objectives will be subject to different funding streams, and for this reason it is difficult to give specific implementation time frames. The implementation set out in Table 12.3 can therefore be subject to change.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator (CLW-C79-42 & LS-L79-6)	
	<p>Recommendation</p> <p>Include policy to support implementation and monitoring and Table 12.3 to facilitate targeted monitoring of the JULAP.</p> <p>IM. P: Monitoring and Evaluation:</p> <p><i>It is policy of Carlow County Council and Laois County Council to:</i></p> <p><i>Implement in conjunction with key stakeholders, the policies and objectives of this Local Area Plan and to review the success or otherwise of the implementation of policies and objectives with reference to Section 10.3 of the Development Plan Guidelines for Planning Authorities (2022), Section 6.5 of Local Area Plans Guidelines for Planning Authorities (2013) and Chapter 16 of the Carlow County Development Plan 2022-2028 and Chapter 14 of the Laois County Development Plan 2021-2027.</i></p>

Table 12.3 Implementation and Monitoring Table

Objective	Implementation
Chapter 3 – Core Strategy and Housing	
<p>Policy HS. P2: Provide for existing unmet housing need as identified by the Carlow County Council and Laois County Council social housing needs assessments through the provision of social and affordable housing using a range of delivery mechanisms.</p>	<p>To be progressed and delivered during the lifetime of the plan subject to available resources and funding, through the use of Part V, direct provision by Carlow County Council and Laois County Council, and through other delivery mechanisms including Approved Housing Bodies, use of vacant properties and properties in need of repair through the Repair and Lease Scheme, Buy and Renew Scheme, and through short and long-term leases by the Councils with private landlords.</p>
<p>Policy HS. P3: Provide social and affordable housing to meet forecasted future housing need over the period of this JULAP as identified in the HNDAs adopted as part of the Carlow County Development Plan and Laois County Development Plan. New units shall be delivered having regard to the aims and policies of the Core Strategies contained in these County Development Plans and the needs of local communities, including the need to deliver sustainable development, compact growth, social integration and an appropriate mix of housing types and tenures. Social and affordable housing shall be delivered through a range of mechanisms including provision directly by Carlow County Council and Laois County Council, by Approved Housing Bodies, Repair and Lease Scheme, Buy and Renew and through short- and long-term leases arranged by the Councils with private landlords.</p>	<p>To be progressed and delivered during the lifetime of the plan and subject to available resources and funding.</p>
<p>Objective HS. O1: Promote the provision of social housing in Carlow-Graiguecullen in accordance with the Housing Strategies/HNDAs and Housing Delivery Action Plans for Carlow County Council and for Laois County Council, and Government Policy as outlined in ‘Housing for All – A New Housing Plan for Ireland’ and any future strategies.</p>	<p>Refer to HS. P2 and HS. P3 above.</p>
<p>Objective CS. O1: Encourage and support urban regeneration in Carlow-Graiguecullen, and in Carlow Town through the implementation and delivery of the objectives of Project Carlow 2040 – A Vision for Regeneration and pursue suitable funding mechanisms as they arise to bring forward the realisation of the Strategy.</p>	<p>Is the subject of ongoing incremental delivery by Carlow County Council, to be progressed during the lifetime of the plan and beyond, and subject to resources and the availability of suitable funding mechanisms.</p>

<p>Objective CS. O2: Monitor the scale, type, tenure, and location of constructed and permitted development in Carlow-Graiguecullen during the lifetime of this JULAP and apply appropriate development management standards to development proposals to ensure compliance with the Core Strategies in the Carlow County Development Plan and Laois County Development Plan, to achieve the delivery of strategic plan-led and coordinated development within the joint urban area.</p>	<p>The monitoring of constructed and permitted residential development will be undertaken during the lifetime of the plan.</p>
<p>Objective CS. O8: Promote and support the role of active land management measures in the redevelopment of buildings and land in Carlow-Graiguecullen in need of regeneration, including the use of statutory powers available through the Derelicts Sites Act, Housing Act, Urban Regeneration and Housing Act, and Residential Zoned Land Tax, together with the role of the Town Centre First Policy, Town Regeneration Officers, Croí Cónaithe (Towns), and Vacant Homes Officer.</p>	<p>To be progressed and delivered during the lifetime of the plan subject to available resources and funding, including through the provisions of the Derelict Sites Act, Housing Act, Urban Regeneration and Housing Act, and Residential Zoned Land Tax, together with the role of the Town Centre First Policy, Town Regeneration Officers, Croí Cónaithe (Towns), and Vacant Homes Officer.</p>
<p>Chapter 4 – Economic Development, Retail and Tourism</p>	
<p>Objective EE. O1: Support the preparation of new Local Economic and Community Plans (LECPs) for County Carlow and County Laois to ensure the local level framework is in place for the joint urban area to support economic growth and community improvements.</p>	<p>The preparation of new LECPs for County Carlow has recently been approved with the Laois LECP due for adoption Q1 of 2024. The LECPs will be progressed and adopted during the lifetime of this plan.</p>
<p>Objective EE. O2: Seek to advance and secure the implementation of Project Carlow 2040 - A Vision for Regeneration through the development of the strategic Intervention Areas in the strategy, to drive the economic development of Carlow Town as an investment location.</p>	<p>Will be subject to ongoing incremental delivery by Carlow County Council, to be progressed during the lifetime of the plan and beyond, and subject to resources and the availability of suitable funding mechanisms.</p>
<p>Objective RT. O12: Support and facilitate further public realm upgrades within Carlow Town Centre, particularly along Dublin Street and Tullow Street, which would benefit from enhanced landscaping and pavement improvements. The provision of street furniture such as benches, and the delivery of the 30km/hr zone will enhance the experience, safety and comfort of pedestrians living in, studying, working, and visiting the Town Centre.</p>	<p>Delivery of enhanced landscaping works and pavement improvements to be progressed during the lifetime of the plan and subject to available resources and funding.</p>
<p>TD. O1: Support, promote and maximise the role of Carlow Town as a designated Ireland’s Ancient East ‘Destination Town’, and to engage with Fáilte Ireland in developing and promoting future tourism initiatives in the town, including enhancement of public space, the development of a way finding project and welcome signage, transport links, accommodation, the night-time economy, and the sustainable development of our natural and built heritage, in order to capitalise on the potential benefit of the funding for the town.</p>	<p>To be progressed during the lifetime of the plan, and subject to resources and the availability of suitable funding mechanisms.</p>

Chapter 5 – Urban Design, Town Centre and Regeneration

<p>Policy UVD. P1: Encourage and facilitate the appropriate regeneration and reuse of underutilised, vacant, and derelict buildings and sites. Both Councils will continue to use their statutory powers, where appropriate, to consider such buildings and sites for inclusion in the Residential Zoned Land Tax or Register of Derelict Sites.</p>	<p>To be progressed during the lifetime of the plan, and subject to resources and the availability of suitable funding mechanisms.</p>
<p>Objective URD. O1: Support and facilitate the implementation of the Project Carlow 2040 – A Vision for Regeneration as set out in its Regeneration Action Plan and Urban Design and Implementation Plan, and actively seek further funding from relevant agencies and Government sources including the Urban Regeneration and Development Fund (URDF) to secure financial support for all regeneration and urban development projects in Carlow Town.</p>	<p>Is the subject of ongoing incremental delivery by Carlow County Council, to be progressed during the lifetime of the plan and beyond, and subject to resources and the availability of suitable funding mechanisms.</p>

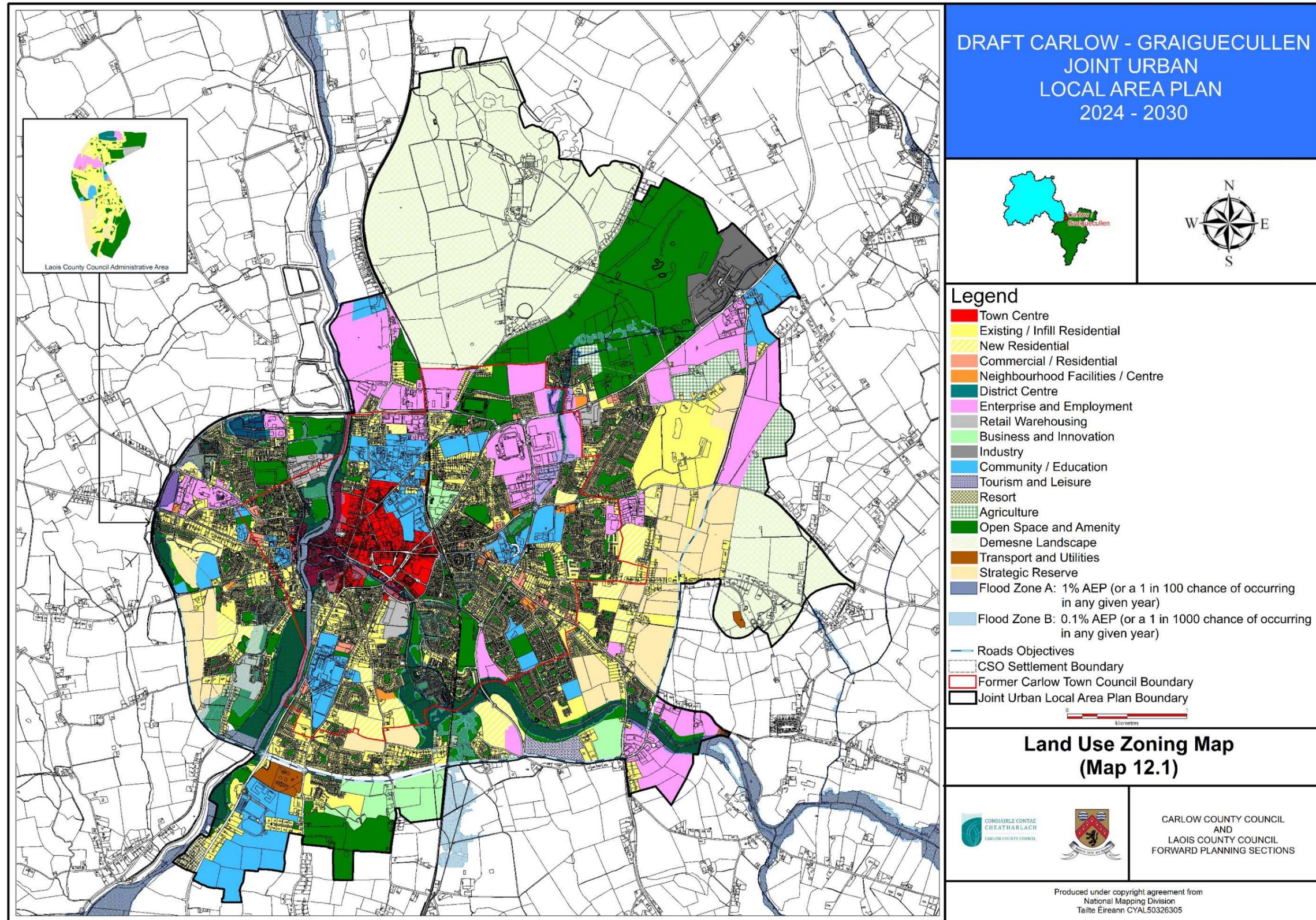
Chapter 6 – Sustainable Travel and Transportation

<p>Objective W. O1: Support and facilitate the delivery of new and improved walking and cycling network in Carlow-Graiguecullen, which delivers permeability enhancements and connections where appropriate as identified in the Local Transport Plan (LTP) and in Figures 6.4 and 6.5, in conjunction with the National Transport Authority, other statutory agencies, and relevant stakeholders. Final design details shall be subject to appropriate environmental assessment and undergo a separate public consultation process where applicable.</p>	<p>To be progressed during the lifetime of the plan, subject to final detailed design for suitably identified locations, separate public consultation where applicable, resources and the availability of suitable funding mechanisms, including NTA funding, and through delivery in tandem with development proposals on suitable privately-owned sites.</p>
<p>Objective PT. O1: Support and facilitate the delivery of the preferred public transport improvements identified in the Local Transport Plan (LTP) to make public transport travel in Carlow-Graiguecullen a more accessible, convenient, attractive, and viable transport option.</p>	<p>To be progressed during the lifetime of the plan, subject to final detailed design for suitably identified locations, separate public consultation where applicable, and resources and the availability of suitable funding mechanisms, including NTA funding.</p>
<p>Objective PT. O2: Seek the delivery of a transport node in the immediate vicinity of Carlow Railway Station, facilitating integration of local bus services and private transport modes with the rail network which will facilitate easy exchange between modes and / or routes.</p>	<p>The delivery of this objective will necessitate continued engagement with Iarnród Éireann, which will be progressed during the lifetime of the plan.</p>
<p>Objective RI. O1: Support and facilitate the delivery of the preferred road infrastructure improvements identified in the Local Transport Plan (LTP) and Figure 6.8, with associated benefits for sustainable travel and transport and multi-modal solutions.</p>	<p>Refer to Objective PT. O1 above.</p>
<p>Objective RI. O2: Support and facilitate the planning, design, and completion of the Carlow Southern Relief Road N80-R448 including a new bridge crossing over the River Barrow, to enhance connectivity between the</p>	<p>The planning and design of the Carlow Southern Relief Road N80-R448 as detailed in this objective will be progressed</p>

South-East and Midlands Regions, and to address and alleviate traffic management considerations thereby making a positive contribution to the local economy and urban environment of Carlow-Graiguecullen.	during the lifetime of the plan. The completion of the relief road is envisioned as a longer-term objective.
Objective PK. O1: Support and facilitate the delivery of the preferred car parking options identified in the Area Based Transport Assessment (ABTA).	Refer to Objective PT. O1 above.
Chapter 8 – Sustainable Communities	
Objective SCF. O1: Deliver the Tullow Road Community Hub subject to the availability of financing and compliance with all planning and environmental criteria.	The Tullow Road Community Hub has been approved through the Part 8 process. The delivery of the Part 8 development is to be progressed during the lifetime of the plan, subject to resources and the availability of funding.
Policy CF. P1: Encourage and support the provision of childcare facilities to support new and existing communities in Carlow-Graiguecullen and as an integral part of proposals for new residential developments in the joint urban area. Carlow and Laois County Councils will have regard to the DEHLG’s Childcare Facilities Guidelines for Planning Authorities (2001) and any future revisions or updates to these Guidelines in relation to the provision of childcare facilities.	Childcare facilities permitted as part of new residential or commercial development shall be constructed in tandem with the overall schemes.
Objective SR. O1: Deliver the River Barrow Water Activity Centre subject to the availability of financing and compliance with all planning and environmental criteria.	The proposed River Barrow Water Activity Centre has been approved through the Part 8 process. The delivery of the Part 8 development is to be progressed during the lifetime of the plan, subject to resources and the availability of funding.
Objective SR. O2: Deliver the redevelopment of Hanover Park, including the provision of accessible and inclusive playground, mountain bike pump track, and mini basketball court, subject to the availability of financing and compliance with all planning and environmental criteria.	The proposed redevelopment of Hanover Park has been approved by An Bord Pleanála under Section 177(AE) of the Planning and Development Act 2000 (as amended). The delivery of the Part 8 development is to be progressed during the lifetime of the plan, subject to resources and the availability of funding.
Objective AC. O1: Support the re-development and extension of Carlow Central Library, subject to the availability of resources and finance, and compliance with proper planning and environmental considerations.	The proposed re-development and extension of Carlow Central Library has been approved through the Part 8 process. The delivery of the Part 8 development is to be progressed during the lifetime of the plan, subject to resources and the availability of funding.

Chapter 9 – Built Heritage	
Objective HR. O1: Support, in conjunction with key stakeholders, the preparation and implementation of a Heritage-Led Regeneration Plan for Carlow Town in accordance with the Historic Towns Initiative and relevant funding sources, and its role in the conservation, enhancement and interpretation of built heritage, and the reuse of vacant historic buildings.	Carlow County Council commenced the preparation of a Historic Towns Initiative Plan for Carlow Town in 2023. The Historic Towns Initiative Plan will be delivered during the lifetime of this plan, subject to resources and the availability of funding.
Chapter 10 – Natural Heritage, Green Infrastructure and Landscape	
Objective GI. O2: Investigate the feasibility of providing a wetland amenity area on lands comprising the former Sugar Factory lagoons, in conjunction with relevant stakeholders and local community groups, taking account of the environmental sensitivities of the land and the need to ensure impacts to biodiversity and nature conservation interests are avoided.	The feasibility of providing a wetland amenity area on lands comprising the former Sugar Factory lagoons will be investigated during the lifetime of the plan. The provision of the wetland amenity area is envisioned as a longer-term objective.
Chapter 11 – Climate Action	
Objective CA. O1: Support, in conjunction with key stakeholders, the preparation and implementation of the Climate Action Plans for County Carlow and County Laois, and to facilitate their role as a driver in the mitigation of greenhouse gas emissions and climate change adaptation in Carlow-Graiguecullen, and the translation of national climate policy to local and community levels in the joint urban area.	Carlow County Council and Laois County Council adopted Climate Action Plans in 2024. The actions contained in these plans will be supported through the implementation of the JULAP.
Objective UR. O1: Leverage all available funding streams which will support and deliver urban regeneration outcomes in Carlow-Graiguecullen which seek to secure climate resilience and a reduction of greenhouse gas emissions in the joint urban area.	Refer to Objective URD. O1
Objective EE. O3: Retrofit all non-LED local authority public lighting in Carlow-Graiguecullen to high efficiency LED lanterns to contribute to meeting statutory energy efficiency targets, and to significantly reduce emissions and achieve cost savings with energy and maintenance efficiencies.	The retrofit of all non-LED local authority public lighting in Carlow-Graiguecullen to high efficiency LED lanterns is ongoing work that will continue to be progressed during the lifetime of the plan, and subject to resources and the availability of suitable funding mechanisms.

Draft Land Use Zoning and objectives Maps Illustrating Flood Zones as per the SFRA



DRAFT CARLOW - GRAIGUECULLEN JOINT URBAN LOCAL AREA PLAN 2024 - 2030



Legend

- Settlement Consolidation Sites
- Regeneration Sites
- Infrastructure Assessment Lands
- Core Retail Area
(See Appendix V Retail Strategy - Carlow County Development Plan 2022 - 2028)
- Opportunity Site
(See Appendix V Retail Strategy - Carlow County Development Plan 2022 - 2028)
- T Traveller Accommodation Site
- Roads Objectives
- Public Right of Ways
- Slí Na Sláinte Walking Routes
- Trails of the Saints
- Flood Zone A: 1% AEP (or a 1 in 100 chance of occurring in any given year)
- Flood Zone B: 0.1% AEP (or a 1 in 1000 chance of occurring in any given year)
- Carlow Town Defended Area
- Former Carlow Town Council Boundary
- Joint Urban Local Area Plan Boundary

Objectives Map (Map 12.2)



CARLOW COUNTY COUNCIL
AND
LAOIS COUNTY COUNCIL
FORWARD PLANNING SECTIONS

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Part 3: Summary of Submissions and the Chief Executive's Opinion and Recommendations

Chapter 1: Plan Review and Context

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.1 Chapter 1: Plan Review and Context		
3.1.1 General Comments		
<p>Notes that the plan seeks to combine the strategic top-down policy framework, but the more detailed bottom-up approach is not sufficiently apparent. Considers that if meaningful public participation and input into decision-making process is to be achieved a number of issues need to be addressed including improved communication methods, plain english and summarised documents.</p>	<p>CLW-C79-52</p>	<p>The Carlow- Graiguecullen Joint Urban Local Area 2024-2030 is a statutory land use plan the content of which is informed by the requirements of Planning and Development Act 2000 (as amended), which requires compliance with higher order plans and Section 28 Guidelines as appropriate. The legislative provision outlines the three stages of consultation:</p> <ol style="list-style-type: none"> 1) Pre-draft 2) Draft Plan 3) Material Amendments <p>The preparation of the Plan commenced in September 2020 with public consultation on the pre-draft plan taking place over a period of 4 weeks with two dedicated information sessions. The outcome of the consultation process was recorded in a Chief Executive's Report presented to the Elected Members as appropriate.</p> <p>The Draft Plan consultation commenced in December 2023 to 5th February for a period of almost 8 weeks with two further dedicated information sessions. Individual members of the public were also facilitated with dedicated meetings as requested. A further briefing / presentation was made to members of the PPN to facilitate consideration of the Draft JULAP.</p> <p>The document was made available on an accessible platform online, in hard copy in the library / public offices in Carlow and Laois was advertised through the Councils' social media platforms.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.1 Chapter 1: Plan Review and Context		
		<p>Recommendation</p> <p>The Councils will continue to facilitate engagement and consultation in the Material Amendment stage of the Plan and will engage with the PPN to further facilitate public participation in statutory land use planning documents as appropriate.</p>
Requests extension to deadline for submissions and expresses dissatisfaction in the public consultation process and time allocated to same.	CLW-C79-60	<p>The Planning and Development Act 2000 (as amended) outlines the minimum statutory timeframe for public consultation (i.e. six weeks). The Council facilitated submissions over a period of almost 8 weeks (to include nine days over Christmas period). Unfortunately, there is no provision to extend the timeline as requested under the statutory provisions.</p> <p>Recommendation</p> <p>No change</p>
The PPN have outlined suggestions for a greater level of engagement / consultation in the process and a willingness to assist in future consultation processes.	CLW-C79-26	<p>The offer of the PPN to assist in future consultations is noted and welcome.</p> <p>Recommendation</p> <p>The Council will liaise with the PPN as appropriate for future consultations.</p>

Chapter 2: Carlow Graiguecullen Strategic Policy and Vision

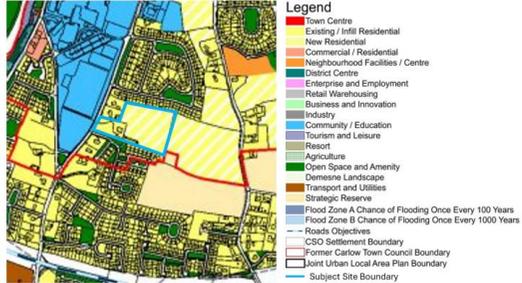
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Carlow – Graiguecullen Strategic Policy and Vision		
3.2.1 Strategic Planning and Vision		
<p>TII requests recognition of official national roads development policy as part of the strategic context of the JULAP, at Chapter 2 <i>Carlow-Graiguecullen Strategic Planning and Vision</i> of the Draft JULAP</p> <p>There is a critical need to manage and protect the national road network and associated junctions, including the N80, in accordance with national and regional policy as outlined in the provisions of <i>Project Ireland 2040, National Investment Framework for Transport in Ireland</i> (NIFTI), and Section 28 <i>Guidelines</i> that apply nationally. TII requests that the Draft JULAP reflects the foregoing provisions of official policy and national objectives in relation to spatial planning and national roads by specific written reference to the DoECLG <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> (2012) at Chapter 2 of the Draft JULAP.</p>	CLW-C35	<p>The Carlow County Development Plan 2022-2028 and the Laois County Development Plan 2021-2027 provide the overarching spatial planning frameworks for both counties. The need to manage and protect the national road network is acknowledged in both County Plans together with the requirements pertaining to the DoECLG Spatial Planning and National Roads Guidelines under the Core Strategy Objectives of both local authorities. (Ref CS O9 and Section 5.8.2 National Road Network of the Carlow CDP 2022-2028 and Ref: CS7 of the Laois County Development Plan 2021-2027). Further reference in Chapter 2 is therefore not considered necessary as the CDPs provide the overarching planning framework and shall be read in tandem with the Draft JULAP.</p> <p>Reference to national objectives in relation to spatial planning and national roads by specific written reference to the DoECLG <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> can be included in Chapter 5.</p> <p>Recommendation Include additional Policy in Road Infrastructure – Policies: Chapter 6 It is the policy of Carlow County Council and Laois County Council to:</p> <p>Co-operate with Transport Infrastructure Ireland to maintain and develop the national road network (N80) through the Carlow-Graiguecullen Joint Urban Area</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Carlow – Graiguecullen Strategic Policy and Vision		
		having due regard to the Spatial Planning and National Roads Guidelines for Planning Authorities DECLG (2012).
3.2.2 Strategic Objectives		
<p>Chapter 2 Section 2.2.1: The Department of Housing, Local Government and Heritage recommends inclusion of archaeological heritage in Strategic Objective SO. 7 as follows (changes in italics):</p> <p>'SO. 7: Protection of Natural, and Built & Archaeological Heritage Manage the development of Carlow-Graiguecullen in a manner that protects, conserves, and enhances the natural, and built <i>and archaeological</i> heritage of the area.'</p>	CLW-C79-65	<p>Noted and Agreed</p> <p>Recommendation Amend Strategic Objective SO 7 as follows:</p> <p>'SO. 7: Protection of Natural, and Built & Archaeological Heritage <i>Manage the development of Carlow-Graiguecullen in a manner that protects, conserves, and enhances the natural, and built and archaeological heritage of the area.'</i></p>

Chapter 3: Core Strategy and Housing

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Core Strategy and Housing		
3.3.1 Housing		
<p>Notes requirement for appropriate mix of housing sizes, types and tenures in new developments (e.g. smaller families, ageing population, accessible homes etc.) and for the incorporation of refuse and community facilities</p> <p>Notes potential to deliver higher densities at appropriate locations in the Town Centre – noting the Barrow track is at risk of becoming a more secluded place in delivering high density developments</p>	CLW-C79-26	<p>Policy HS P1, - HS P6 of the Draft JULAP outlines the policy of the Councils regarding the provision of housing including mix of units, densities etc. Of note are HS P1 and 4 which outline the policy of the Councils to:</p> <p>HS. P1: <i>Ensure that housing is available in Carlow-Graiguecullen to meet the needs of all people through the delivery of an appropriate mix of housing sizes, types, and tenures in suitable locations.</i></p> <p>HS. P4: <i>Require that an appropriate mix of housing type, tenure, density, and size is provided in all new residential areas and in appropriate brownfield/infill areas to meet the needs of the population of Carlow-Graiguecullen, including the needs of older people, people with disabilities, and including social housing, and affordable housing.</i></p> <p>Furthermore, specific housing need policies (HS. P7 – HS. P10) seek to support the provision of housing for older people, people with disabilities, the travelling community, and the homeless/emergency accommodation. The Development Management Standards contained in the Carlow County Development Plan and the Laois County Development also specify requirements for the design of dwellings etc. In addition, higher residential densities have been prescribed to the Town Centre and new residential zoned land (@30units/ha).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Core Strategy and Housing		
		<p>Recommendation See response to OPR Submission Recommendation no. 1 providing increased densities to the former Town Council area.</p>
3.3.2 Student Accommodation		
<p>MKO on behalf of SETU requests that the following site-specific zoning request relate to the lands hereunder with wording to be included alongside, or following, this policy within the JULAP:</p> <p><i>"Work in collaboration with the South East Technological University, particularly in respect of University owned lands, to facilitate the development of purpose-built student accommodation, or uses related to third-level educational facilities for the university, to enhance the offerings of the South East Technological University within Carlow Town, in accordance with the provisions of Policy SA P1 and other related policies within the Plan."</i></p>	CLW-C79-34	<p>Both Council' acknowledge the need for student accommodation within the JULAP area and that the provision of appropriate student accommodation for SETU and Carlow College St. Patrick's will enable Carlow-Graigucullen to continue to develop as a regional centre for education and research.</p> <p>Development management standards for student accommodation for Carlow Town and Carlow Town Environs are established in the Carlow County Development Plan 2022-2028 (Section 16.8.15). Chapter 13 of the Laois County Development Plan 2021-2027 refers (Section 13.2)</p> <p>While a site specific zoning would not be appropriate given the new residential zoning of the lands was attributed to the site in the Calow County Development Plan 2022-2028, it is considered appropriate to include an additional policy to support the third level institutes in the delivery of student accommodation or uses related to third -level education facilities generally as outlined hereunder.</p> <p>See also recommendation Section 3.12.2.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p>3.3 Chapter 3: Core Strategy and Housing</p>		
 <p>Figure 1: Draft Carlow-Graigucullen Joint Local Area Plan 2024-2030 Zoning Maps-Subject Site outlined in Blue</p>		<p>Recommendation Include additional Policy SA. P2 as follows:</p> <p>It is the policy of Carlow County Council and Laois County Council to:</p> <p>“Work in collaboration with the South East Technological University and Carlow College – St. Patrick’s, to support the provision of purpose-built student accommodation, or uses related to third-level educational facilities, to enhance the offerings of the South East Technological University and Carlow College St. Patrick’s within Carlow-Graigucullen, in accordance with the provisions of Policy SA P1 and other related policies within the JULAP Plan and other applicable Development Management standards as outlined in the Carlow County Development Plan 2022-2028 (including Section 16.8.15) and the Laois County Development Plan 2021-2027 (including Section 13.2). as appropriate”</p>
<p>Considers that the shortage of available accommodation for students is not directly addressed in the LAP and queries whether the community / educational zoning owned by third level institutes allows for the development of purpose-built student accommodation to help elevate distress being experienced by many students and their parents.</p>	<p>CLW-C79-80</p>	<p>As per above response.</p>

Chapter 4: Economic Development, Retail and Tourism

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Economic Development, Retail and Tourism		
3.4.1 Economic Development		
<p>The Chamber of Commerce notes the following with respect to Economic Development:</p> <p>1. <u>Economic Development</u>: Need to foster a collaborative approach to economic development by supporting local businesses and entrepreneurs in both Carlow and Graiguecullen. Encourage the establishment of cross-border partnerships and initiatives that stimulate growth and create further employment opportunities.</p> <p><u>Collaborative Economic Strategy</u>: Develop a comprehensive economic strategy that transcends municipal borders, focusing on joint initiatives, partnerships, and incentives to attract investment, support local businesses, and stimulate job creation in both Carlow and Graiguecullen.</p> <p><u>Mixed-Use Development</u>: Encourage mixed-use development projects that integrate residential, commercial, and recreational spaces, fostering vibrant urban environments that cater to the needs of residents and visitors alike.</p>	CLW-C79-36	<p>The comments of the Chamber of Commerce are noted and both Councils will continue to work collaboratively to support the economic development of the overall functional area of Carlow-Graiguecullen. Chapter 4 of the Draft JULAP outlines the framework to support economic development including a focus on:</p> <ul style="list-style-type: none"> • The economic assets of Carlow-Graiguecullen. • The economic development strategy to support economic development. • The identification of strategic employment land. • Economic development policies and objectives. • The importance of promoting the role of the town centre. • Retail policies and objectives, and • The importance of the tourism sector with appropriate policies and objectives to support same. <p>In Chapter 5, the viability and vitality of the town centre is prioritised with an urban regeneration strategy supported by urban design principles. In addition, strategic intervention areas are outlined focusing on place making, creating vibrant places with a strong sense of identity with linkages and legible pedestrian routes.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Economic Development, Retail and Tourism		
<p><u>Entrepreneurship and Innovation:</u> Support entrepreneurship and innovation by providing resources, training, and networking opportunities for aspiring entrepreneurs and startups in Carlow and Graiguecullen.</p> <p><u>Tourism and Cultural Economy:</u> Harness the rich cultural heritage, natural beauty, and recreational assets of Carlow and Graiguecullen to promote tourism and the cultural economy.</p> <p><u>Infrastructure Investment:</u> Prioritize strategic infrastructure investments that support economic development objectives, such as transportation networks, digital infrastructure, and utilities. Ensure that infrastructure planning takes into account the needs of businesses, facilitates connectivity between Carlow and Graiguecullen, and enhances competitiveness in attracting investment and fostering growth.</p>		<p>Chapter 6 Sustainable Travel and Transportation and Chapter 7 Infrastructure and Environmental Services establish the policy framework which will support the future economic development of the Carlow-Graiguecullen Urban Area.</p> <p>Recommendation No change</p>
3.4.2 Engagement with IDA		
<p>Agrees with the analysis that Graiguecullen has significant potential for the growth of business and employment and asks for the IDA to visit and promote the potential for new businesses to be based there</p>	LS-L79-9	<p>Noted.</p> <p>The IDA have recently completed (in 2023) the development of an Advance Factory Building on the Dublin Road at the northeast end of the joint urban area. This building will provide light industrial, office and ancillary support areas, and has been designed to provide the potential for future expansion and flexibility in use.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Economic Development, Retail and Tourism		
		<p>Carlow County Council and Laois County Councils and the IDA will continue to promote the availability of sites and buildings to appropriate industries where available.</p> <p>The draft JULAP has identified 11 no. strategic employment land banks in the plan area.</p> <p>Chapter 4 of the draft JULAP contains numerous policies to promote economic development and jobs growth including engagement with IDA Ireland and the Department of Enterprise Trade and Employment in seeking to develop and attract potential economic opportunities into suitably zoned employment lands in the joint urban area.</p> <p>Recommendation No change</p>
3.4.3 Retail		
<p>The submission outlines the important role of Tesco and the retail sector in the Carlow -Graiguecullen area. It requests that the JULAP includes provision to protect the important function of retail facilities as the urban area continues to expand.</p>	CLW-C79-30	<p>Chapter 4 of the Draft JULAP acknowledges Carlow Town as Level 1 in the retail hierarchy and Graiguecullen as a Level 3 Service Centre and reflects the provisions of the relevant County Development Plans and associated Retail Strategies. It is the policy of the Councils to:</p> <p>RT. P1: <i>Promote the enhancement of retail floorspace, primarily comparison goods and town centre functions in Carlow Town, to sustain its competitiveness and importance as the only Level 1 Centre within the Carlow County Retail Hierarchy.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Economic Development, Retail and Tourism		
		<p>RT. P2: Provide for retail facilities of a scale and type to serve residents living in Graiguecullen within the functional area of County Laois and without undermining the competitiveness and importance of Carlow Town Centre as a Level 1 Centre in the Carlow County Retail Hierarchy.</p> <p>The Councils will continue to support retail development which accords with the provisions of the County Development Plans, Chapter 4 of the JULAP and associated Retail Strategies as contained within the relevant County Development Plan.</p> <p>Recommendation No change</p>
The PPN requests a reduction of rent and rates for local retail businesses (not for huge corporate chains)	CLW-C79-26	<p>The issue of rents and rates is not a function of the Local Area Plan.</p> <p>Recommendation No change</p>
3.4.4 Tourism		
The Carlow Tourism Board welcomes the views expressed within the JULAP which recognise, that collectively and collaboratively Carlow and Graiguecullen can improve its profile as a tourism destination and grow tourism related employment, while also enhancing the tourist visitor experiences. This would benefit all tourism premises both in Carlow and Graiguecullen.	CLW-C79-78	<p>Noted</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Economic Development, Retail and Tourism		
The PPN notes that site 9 marked Strategic Employment Land (former sugar factory site) is a great opportunity for a heritage/tourism opportunity as it is located right at the river.	CLW-C79-26	The site is zoned enterprise and employment wherein tourist related facilities are open for consideration. Recommendation No change
The PPN recommends the provision of more supports for smaller heritage projects	CLW-C79-26	The provision of supports for heritage projects is outside the remit of the JULAP. Recommendation No change

Chapter 5: Urban Design, Town Centre and Regeneration

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Urban Design, Town Centre and Regeneration		
3.5.1 Development Along the River Barrow and Burren		
<p>The PPN reference Site CW 9 identified as a consolidation site (Pembroke) in the Carlow County Development Plan and the Draft JULAP. The PPN consider it preferable to expand the town out towards the areas which don't border the river - using best practice to develop appropriate multi storey accommodation with green and social spaces and resources. Freeing up land along the river for recreation, outdoor activities, nature, and enjoyment.</p>	CLW-C79-26	<p>The site the subject of this submission has been zoned Town Centre and is identified as a consolidation site within Carlow Town Centre. The zoning of the site given its location within the former Town Council boundary is not subject to review under the provisions of the JULAP and supports compact growth which accords with national and regional policy. The site is included as Intervention Area no. 4 Pembroke District with key urban design principles outlined in Section 5.2 of the Draft JULAP. The development of this area subject to proper planning considerations is considered appropriate and in accordance with the proper planning and sustainable development of the area.</p> <p>Recommendation No change</p>
<p>Development along the River Barrow and Burren River is questioned given the approach to development along the River Barrow having regard to previous development at Haymarket. Of concern is the potential damage to the SAC and flood risk considerations including climate change considerations.</p>	CLW-C79-52 CLW-C79-26	<p>Both the Carlow County Development Plan 2022-2028 (Chapter 12: Urban Design and Placemaking) and the Draft JULAP 2024-2030 (Chapter 5 Urban Design, Town Centre and Regeneration) outline key principles to achieve high quality urban design and placemaking. In addition, the Draft JULAP has been informed by Project Carlow 2040, A Vision for Regeneration, which outlines transformational and aspiring ideas for the economic, social, and environmental benefit of Carlow Town. Policies and objectives contained in the JULAP will inform development management considerations for any planning applications submitted within the functional area.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Urban Design, Town Centre and Regeneration		
		<p>The Draft JULAP has also been informed by the preparation of a Natura Impact Statement which considers impacts on the SAC and a Strategic Flood Risk Assessment which addresses flood risk considerations associated with the JULAP. Appropriate assessment will also be considered at project stage to ensure the protection of the SAC.</p> <p>Recommendation No change</p>
3.5.2 Promoting and Protecting the Role of the Town Centre.		
<p>The PPN acknowledge the role of promoting and protecting the role of the town centre - regeneration of the town centre, revitalising vacant and derelict buildings in the town centre.</p>	CLW-C79-26	<p>Noted and agreed. Chapter 4 Economic Development, Retail and Tourism and Chapter 5 Urban Design, Town Centre and Regeneration include a suite of policies which seek to:</p> <ul style="list-style-type: none"> • Promote the role of the Town Centre. • Revitalise vacant and derelict properties. • Enhance the public realm. • Regenerate the Town Centre. • Establish key Urban Design Principles for future development. <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Urban Design, Town Centre and Regeneration		
3.5.3 Inclusive Public Realm		
Submission notes that development of the public realm must be considered where disability, youth and minority groups are taken into consideration to ensure real inclusion and accessibility.	CLW-C79-26	<p>Chapter 12 of the Carlow County Development Plan 2022-2028 outlines the principles to inform development proposals. Public Realm development proposals must accord with the following:</p> <p><i>"Quality of public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including older people and people with disabilities".</i></p> <p>Recommendation No change</p>

Chapter 6: Sustainable Travel and Transport

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.1 High Level Recommendations		
<p>The NTA recommends that a greater level of cross referencing between the JULAP Volume 1 and the content of the LTP report is included.</p> <p>Although acknowledging the inclusion of Figures 6.4-6.9, Chapter 6 would benefit also from the inclusion of greater detail on the proposed measures, with a particular emphasis on tabulated and graphically presented material, providing a clearer basis for the Policies and Objectives presented in Chapter 6.</p>	<p>CLW-C79-71 LS-L79-8</p>	<p>A greater level of cross referencing will be provided regarding the proposed measures as contained in the LTP. A series of plans will also be incorporated into the LTP and referenced in the JULAP.</p> <p>Recommendation A series of plans will be incorporated into the LTP and cross referenced as appropriate in the JULAP.</p>
3.6.2 Accessible Public Transport		
<p>DoT reference policy which is relevant to accessible, integrated, and sustainable public transport and requests that same be referenced in the Plan.</p> <p>Accessible public transport for All, and especially for Persons with Disabilities, Reduced mobility and Older People</p> <p>National Disability Inclusion Strategy (NDIS) 2017-2022 includes specific actions assigned to local authorities. For example, action 108 relates to the 'dishing' of footpaths and action 109 relates to accessible infrastructure, including bus stops. The Department of Children, Equality,</p>	<p>CLW-C79-4</p>	<p>The Carlow County Development Plan 2022-2028 and the Laois County Development Plan 2021-2027 provide the overarching spatial planning frameworks for both counties. The provisions of the National Disability Inclusion Strategy are referenced in Section 8.8.3 of the Carlow County Development Plan 2022-2028.</p> <p>The Local Transport Plan will be updated to reference the policy documents referred to.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>Disability, Integration and Youth are working with the Disability Inclusion Strategy Steering Group to commence work on the development of a UNCRPD implementation strategy. The DoT welcomes the text 'Ensure that pedestrian and cycling infrastructure is based on principles of Universal Design, and that all footpaths in Carlow-Graigucullen are accessible to all members of the community, including people with disabilities, the elderly, and people with young children,' in Volume I document titled 'Draft Carlow Graigucullen Joint Urban Local Area Plan 2024 – 2030' (page 109, Ref: WC. P4).</p> <p>the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) ratified by Ireland in 2018. The UNCRPD puts obligations on State Parties to ensure access for persons with disabilities to, for example, the physical environment and transportation in both urban and rural areas.</p> <p>the Design Manual for Urban Roads and Streets (DMURS Interim Advice Note – Covid-19 Pandemic Response) published in 2020. References in the draft Plan to the 2019 version of DMURS should be replaced with references to the 2020 DMURS Interim Advice Note – Covid-19 Pandemic Response.</p> <p>Notes that Local Authorities are a key stakeholder by ensuring a universal design approach to the built environment'. This including footpaths, tactile</p>		<p>Noted the text of the Draft JULAP to be amended to include DMURS Interim Advice Note as referenced.</p> <p>Noted and agreed.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>paving, cycle paths, roads, pedestrian crossing points, town greenways and bus stops/shelters.</p> <p>The Connecting Ireland Rural Mobility Plan (2022-2025) is a major national public transport initiative with the aim of increasing public transport connectivity, particularly for people living outside the major cities and towns.</p>		<p>Noted and agreed.</p> <p>Recommendation Include additional text in green and deletions in strikethrough: The Local Transport Plan will be updated to reference the policy documents referred to in this submission:</p> <ul style="list-style-type: none"> • National Disability Inclusion Strategy (NDIS) 2017-2022 • the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) <p>Amend Policies LT. P2 and RI. P3 as follows:</p> <p>LT. P2: <i>Ensure the design of all streets and roads in the joint urban area complies with the principles, approaches and standards in the Design Manual for Urban Roads and Streets (DMURS 2013-Updated 2019 and Supplementary Interim Advice Note Published in 2020) and any subsequent updates to this Design Manual.</i></p> <p>RI. P3: <i>Provide for traffic calming and speed reduction measures throughout the joint urban area, where necessary as funding allows, and ensure that all developments are designed to incorporate appropriate traffic calming measures as set out in the Design Manual for Urban Roads and Streets (DMURS 2013-2017-Updated 2019 and Supplementary Interim Advice Note Published in 2020), and any subsequent updates to this Design Manual.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.3 Integrated Land Use and Transportation		
<p>In terms of integrated land use and transport planning the NTA request the following additions / amendments in red and deletions with strikethrough:</p> <p><i>Overarching Policy</i> LT. P1: Actively support an integrated approach to land use and transport planning in Carlow-Graiguecullen that promotes a shift towards a sustainable, healthy, and low carbon joint urban area with a reduced need for car-based travel, and through the prioritisation of development that facilitates, to the greatest extent possible, trip-making by active travel modes and public transport for commuter and non-commuter journeys between residential, is within reasonable walking and cycling distances from key employment, service, educational, and recreational areas, and key public transport nodes. (p.98).</p> <p>6.3 Local Transport Plan – Overarching Policy LTP. P1: Progress the delivery of the appropriate measures and interventions within the LAP area as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding, in order to support the shift towards sustainable travel and</p>	<p>CLW-C79-71 LS-L79-8</p>	<p>While the content of this submission is noted it is considered that the policy as outlined is in LT. P1 is appropriate in terms of prioritising development that promotes sustainable modes of transport, and that further detail is not warranted.</p> <p>Recommendation No change</p> <p>Recommendation Amend the text of Policy LTP. P1 and Section 6.3.2 as recommended:</p> <p>6.3 Local Transport Plan – Overarching Policy LTP. P1: Progress the delivery of the appropriate measures and interventions within the JULAP area as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.</p> <p>6.3.2 LTP Principles (Table 6.2 – Parking Principles) It is recommended that a new Guiding Principle is added under Parking Principles related to 'blue badge' parking, to 'ensure the needs of Mobility-Impaired and Disabled drivers are considered in the design and implementation of transport schemes'.</p> <p>Figure 6.4 Proposed Walking Permeability Connections In the interests of clarity, it is recommended that this is presented at a larger scale.</p>		<p>6.3.2 LTP Principles (Table 6.2 – Parking Principles) <i>It is recommended that a new Guiding Principle is added under Parking Principles related to 'blue badge' parking, to 'ensure the needs of Mobility-Impaired and Disabled drivers are considered in the design and implementation of transport schemes'.</i></p> <p>Fig 6.4 to be included at a larger scale for clarity.</p>
<p>TII request an update of Overarching Policy LT. P2 to reflect appropriate 'principles, approaches and standards' depending on road classification.</p> <p>Recommended text update of Overarching Policy LT. P2. Suggested text updates in red:-</p> <p>"Ensure the design of all streets and roads in the joint urban area complies with the principles, approaches and standards as appropriate in the Design Manual for Urban Roads and Streets (DMURS 2013-2019) and TII Publications, and any subsequent updates to this Design Manual."</p>	CLW-C79-35	<p>Agreed.</p> <p>Recommendation Include additions / amendments as requested highlighted in green:</p> <p>Overarching Policy LT. P2. <i>"Ensure the design of all streets and roads in the joint urban area complies with the principles, approaches and standards as appropriate in the Design Manual for Urban Roads and Streets (DMURS 2013-2019) and TII Publications, and any subsequent updates to this Design Manual."</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>TII requests an update of Local Transport Plan (LTP) – Overarching Policy LTP. P1 at Section 6.3 of Draft JULAP to ensure appropriate assessment of implementation of transport policy and objectives.</p> <p>Following review and clarification to be undertaken in relation to recommendations 3 to 5 above, TII recommends the following text update of Overarching Policy LTP. P1. Suggested text updates in red:- “Progress the delivery of the appropriate measures and interventions as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding having regard LTP land use transportation and guidance and in consultation with the NTA and TII as appropriate, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.”</p>	CLW-C79-35	<p>Agreed.</p> <p>Recommendation Include additions / amendments as requested highlighted in green:</p> <p>Overarching Policy LTP. P1. <i>“Progress the delivery of the appropriate measures and interventions as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding having regard to the LTP land use transportation and guidance and in consultation with the NTA and TII as appropriate, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.”</i></p>
<p>Submits that the current public transportation provision in Graiguecullen is inadequate to meet the needs of the population. The recent successful launch of the Carlow Town bus has shown that people will use public transport options when available. Unfortunately, under the current bus route there is no public transport available for many residents in Graiguecullen. The current route stops at Barrowvale retail centre. This is inadequate to meet the needs of many living in estates like Fruithill Manor, Spindlewood, Rockford Manor, Highfield Manor, Tommy Murphy Park, Meadows Way or the surrounding area. In addition, it does not serve people shopping in Shamrock business park or travelling to either St Fiacc's</p>	LS-L79-9	<p>Ther provisions of the Draft JULAP incorporate an appropriate policy framework to deliver the provision of new and improved public transport services and routes. Ref: Policy PT.P2: <i>Support transport agencies, including the National Transport Authority (NTA) and public service transport providers in the provision of new and improved public transport services and routes, the enhancement of the quality, frequency and speed of existing train and bus public transport services serving Carlow-Graiguecullen, and with measures incorporated to facilitate access for all.</i></p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
national school, the new Saplings school or the new St Fiaccs soccer pitch. Proposes a significant expansion of the bus service to meet the needs of the growing population in the area.		No change
3.6.4 Active Travel		
3.6.4.1 Carlow Educate Together School – Pedestrian Crossing		
Request the improvement of the pedestrian routes from Carlow Town and Graiguecullen to Carlow Educate Together NS by providing pedestrian crossings at the Athy Road Roundabout on the N80 to provide safer walking routes for children to school and to support a reduction in traffic at peak times facilitating more children to walk/cycle to school.	CLW -C79- 6 CLW -C79-7 CLW-C79-8 CLW-C79-9 CLW-C79-10 CLW-C79-11 CLW-C79-12 CLW-C79-13 CLW-C79-14 CLW-C79-15 CLW-C79-16 CLW-C79-17 CLW-C79-18 CLW-C79-19 CLW-C79-20	<p>The suggestion of improvements to the pedestrian crossing facilities at Athy Road roundabout are noted.</p> <p>In developing the Local Transport Plan, a number of junctions across the Carlow Graiguecullen area have been identified for improvements to facilitate better connectivity for active modes of transport; this includes the Athy Road roundabout.</p> <p>Whilst the detail of the junction improvements have not been specified, this would likely include signalisation and dedicated pedestrian crossing stages.</p> <p>It is noted however that the Athy Road roundabout is on the N80. Any development on the N80 must protect the function of the road. Any proposals to upgrade the junctions on the N80 will therefore be subject to a detailed design and assessment process with Transport Infrastructure Ireland.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
	CLW-C79-23 CLW-C79-58 CLW-C79-69 CLW-C79-72 CLW-C79-73 CLW-C79-76 CLW-C79-77 CLW-C79-79 LS-C79-11	<p>While acknowledging the foregoing, it is considered appropriate that specific reference is made to the school in Policy WC1.</p> <p>Recommendation Include additional text in Policy WC. P1 as indicated in green.</p> <p>WC. P1: <i>Support and promote enhanced connectivity where appropriate for pedestrians and cyclists in Carlow-Graiguecullen in order to improve accessibility throughout the joint urban area and to the town centre, employment areas, residential areas, local schools including the Carlow Educate Together National School on the Athy Road and other educational facilities, recreational facilities, and public transport nodes.</i></p>
<p>Active Travel plans for both areas should and must be integrated with plans to support the development of further infrastructure to ensure safe and easy movement of people by any means. Carlow Educate Together and Knockbeg College are two schools where their routes need to be reviewed and action plans devised towards the delivery of safe walking/cycling routes for children; their current routes do not support this and the development of active travel routes must support areas like this.</p>	CLW-C79-36	<p>The Local Transport Plan has been prepared by Aecom on behalf of both Local Authorities and provides an integrated approach to the functional area of the JULAP. With regard to Schools, Policy WC. P1 <i>to seeks to support and promote enhanced connectivity where appropriate for pedestrians and cyclists in Carlow-Graiguecullen in order to improve accessibility throughout the joint urban area and to the town centre, employment areas, residential areas, local schools and other educational facilities, recreational facilities, and public transport nodes.</i></p> <p>Recommendation See recommendation above to include reference to Carlow Educate Together School. Knockbeg is not located within the functional area of the JULAP.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.4.2 Proposed Link - Parallel to Highfield Estate / at Oak Park		
<p>Expresses concerns regarding public walkway / cycleway that runs parallel with the Highfield Estate on the Dublin Road, Carlow.</p> <p>Concerns expressed relate to:</p> <ul style="list-style-type: none"> - Privacy and security: compromising safety and privacy of homes. - Property values: potential impact on property values - value in route versus the negative impacts outlined above not clear. - Requests that the proposed permeability link at Oak Park is recognised as non-viable for the 0.3 ha of land owned by the resident's association. - Potential impact on the playing pitches. - Creation of a traffic hazard on main road / N80 which is a busy thorough fare. 	<p>CLW-C79-3 CLW-C79-5 CLW-C79-31 CLW-C79-70</p>	<p>This permeability link was identified to provide a more direct connection between Oak Park Drive, the N80 and into Carlow Town. It should be noted that no scheme would be delivered without a detailed design and consultation process. The design process would consider the safety and security of each route.</p> <p>The link has been considered as part of the LTP and it is noted that benefits of this permeability link within the overall strategy are not as significant as other links given only a small percentage of residents would benefit from the proposals. Having regard to same, it is considered reasonable to remove it from the Local Transport Plan at this point.</p> <p>Recommendation The Local Transport Plan and JULAP will be updated to reflect the removal of the Highfield/Oak Park permeability link.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		
3.6.4.3 Proposed Link - - Kearney's Lane		
<p>Objects to the provision of a walkway through Kearney's Lane on the grounds of:</p> <ul style="list-style-type: none"> - Lane is single lane which is extremely narrow and when used by residents is at full capacity. - Due to the narrow nature of the land it is a major public safety concern. - There is no path and no space to provide same. - Negative impact on security for residents 	<p>CLW-C79-44 CLW-C53</p>	<p>The link has been identified to provide more direct connectivity between residential estates and key services and facilities. The link would serve to benefit a number of residential estates to the north, with more direct access provided into town. The link would also provide benefit to residents south of the link seeking to gain access to employment and retail opportunities to the north.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<ul style="list-style-type: none"> - Loss of privacy - Negative effect on quality of life - Negative impact on properties - Risk to public safety and health and well-being of residents on the lane - Health and safety issues - The route to exit onto Kearney's Lane is private. <p>Two no. submissions note that the proposals are not very detailed and difficult to see what is proposed and appears to show a new opening from the Dublin Road through the field behind the Old Lapple factory that stop halfway up Kearney's Lane. It is noted that in the past when access to this field was from Kearney's Lane there was much anti-social behaviour. If the new walkway is fenced correctly and access prohibited to the field, then the submitters would have no issue with the proposal.</p>	<p>CLW-C79-46 CLW-C79-47</p>	<p>The Local Transport Plan is a strategy document. The proposals identified within the strategy will be subject to a detailed design and engagement process, which will give due consideration to the concerns raised in this submission.</p> <p>Given the benefits the link could provide to pedestrians it is recommended that it is retained in the LTP and JULAP. However, it is emphasised that the proposal would be subject to a detailed design process, which would provide further opportunity for engagement with local residents impacted by the proposals and a planning consent process.</p> <p>Recommendation No change</p>

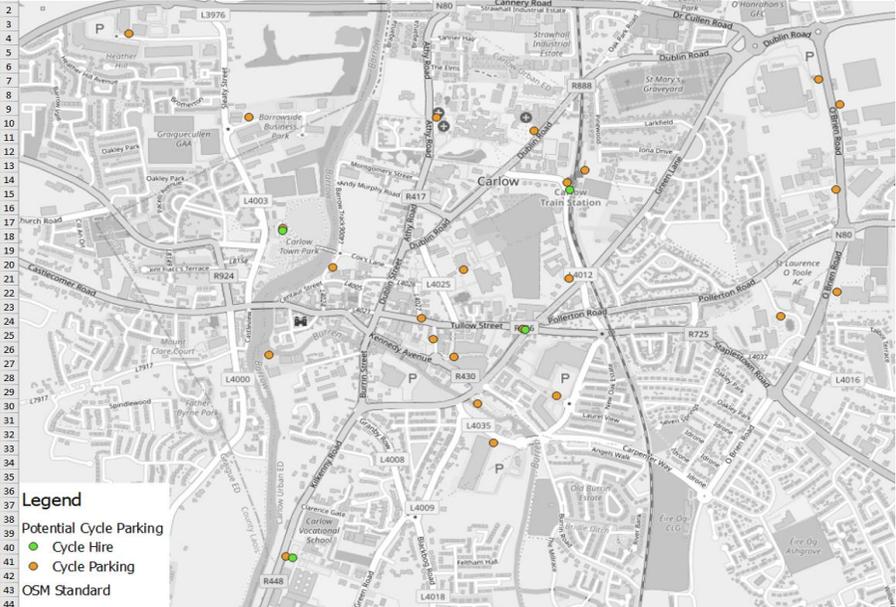
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		
3.6.4.4 Proposed Link – Sandhills and Presentation College		
<p>Objects to the proposed walkway across his landholding which is used for agricultural purposes therefore making it a significant safety and litigation issue. Requests that the proposed walkway be removed from the plan.</p>	<p>CLW-C79-48</p>	<p>The link was identified within the 10-minute towns strategy to provide more direct pedestrian connectivity across Carlow. Given the landowner is not supportive of the proposals given it traverses private lands in agricultural use, it is recommended that the link be removed from the Local Transport Plan and JULAP</p> <p>Recommendation The Local Transport Plan and JULAP will be updated to reflect the removal of the Sandhills permeability link.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		
3.6.4.5 Recommended Proposed Permeability Link at IDA Lands		
<p>Requests that an active travel corridor be established to link Castle Oaks estate to existing active travel infrastructure along the Dublin Road. This is stated as being located along an existing established desire line, within an existing flood zone and would represent a water compatible use.</p>	CLW-C79-33	<p>A permeability link has been identified from the Castle Oaks estate to the Dublin Road. As proposals identified within the strategy are taken forward, they would be subject to a detailed design and public consultation process.</p> <p>As a link has already been identified, no further changes to the Local Transport Plan are proposed.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		<p>Recommendation No change</p>
<p>The PPN considers the provision of a bridge from Hanover Park to Mr Price car park, would be a great addition for access to the town centre.</p>	CLW-C79-26	<p>Additional pedestrian links have been identified where they will offer the greatest benefit to accessibility and will likely deliver value for money when taking account of the cost of these improvements. Whilst the benefits that an additional bridge from Hanover Park are acknowledged, there is an existing crossing to the west, and therefore an additional bridge is unlikely to deliver the benefits that would be needed to demonstrate value for money.</p> <p>Recommendation No change</p>
3.6.4.6 Pedestrianisation		
<p>Tullow Street: Recommends that Tullow Street (the one-way street) should be pedestrianised with deliveries at appropriate times similar to Grafton Street, providing increased safety and economic growth.</p>	CLW-C-79-40	<p>The Local Transport Plan identifies a section of Tullow Street for pedestrianisation. Proposals to pedestrianise this street would be subject to a detailed consultation exercise with those businesses impacted by the proposals.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		<p>Recommendation No change</p>
<p>Tullow Street: Notes that given the huge car parks that surround the town, Dublin Street and Tullow Street would benefit from having on-street parking removed except for loading bays and mobility impaired parking with Lower Tullow Street trialled for pedestrianisation.</p>	<p>CLW-C-79-57</p>	<p>The Local Transport Plan identifies the removal of on-street parking where it is necessary to facilitate improvements to walking and cycling infrastructure. To take any proposals forward, a detailed design, assessment and engagement process would be required, which will impact on timescales in which measures can be delivered. The timescales for delivery of measures identified within the LTP will be dependent on availability of funding and the engagement processes that take place.</p> <p>Recommendation No change</p>
<p>Cox's Lane: With regard to the pedestrianisation of Cox's Lane, it is stated that significant design and planning conflicts are present in the plans and particulars submitted with Planning Application Reference 23188 for development comprising: construction of a new 3 storey hostel accommodation, with 31 bedrooms, associated signage and associated site works and the proposal to pedestrianise Cox's Lane which is detailed as short time frame (1-2 yrs.).</p>	<p>CLW-C79-75</p>	<p>The Planning Authority will have due regard to relevant statutory Plans in the assessment of development proposals along Cox's Lane.</p> <p>As the planning application is currently the subject of a further information request, it would be inappropriate to comment on the content of same in this separate statutory planning process.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.5 Cycling Strategy		
<p>The NTA whilst noting the inclusion of Objective WC. P5 (to provide adequate and secure bicycle parking facilities subject to demand analysis at appropriate locations), there would merit in further explanation regarding the determination of location and quantum, with a clear distinction between the provision of public cycle parking at destination and the application in any case, of appropriate cycle parking standards for new developments.</p>	<p>CLW-C79-71 LS-L79-8</p>	<p>Noted and agreed.</p> <p>Cycle parking will be provided in the form of lockers to ensure parking is secure and protected from the elements. Alongside cycle parking, the benefits of installing maintenance stands in key locations will also be considered</p> <p>Recommendations Include a draft plan for the location of cycle parking and maintenance stands as shown in the figure below. The use of cycle parking will be monitored through the use of occupancy surveys and the strategy for installation of additional parking updated accordingly.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<h3>3.6 Sustainable Travel and Transport</h3>		
<p>The NTA further recommend an addition to the following policy: <i>Walking and Cycling Policies</i> WC. P2: Ensure that all development where appropriate within Carlow-Graiguecullen provides for connectivity (pedestrian and cyclist and vehicular) to adjacent lands in accordance with the National Transport</p>		 <p>Include addition as requested highlighted in green:</p> <p><i>Walking and Cycling Policies</i> WC. P2: Ensure that all development where appropriate within Carlow-Graiguecullen provides for connectivity (pedestrian and cyclist and vehicular) to adjacent</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
Authority's Permeability Best Practice Guide (2015) and any subsequent update to this Guide.		<i>lands in accordance with the National Transport Authority's Permeability Best Practice Guide (2015) and any subsequent update to this Guide.</i>
Recommends a cycling lane on Sleaty Street instead of the suggested shared roadway. If this is not possible traffic calming measures are suggested such as speed bump.	CLW-C-79-40	<p>It is not considered feasible to deliver a segregated cycle lane on Sleaty Street given constraints along the route. A quiet route has been suggested, which would include traffic calming measures. This would be subject to a detailed design and consultation process prior to any changes being made.</p> <p>Recommendation No change</p>
<p>Welcomes the proposed cycle routes in the plan. Feels this could be further expanded to encourage cycling to school safely with cycle routes to St Fiacc's national school being a priority. Also, encourages better traffic management in the area and safer cycle routes to the school.</p> <p>Given the poor state of public transport and cycling infrastructure it is noted that it is surprise that there are traffic issues in the area. This is important to address now before new housing developments are finished. Areas of concern include Leighlin Road, Ballickmoyler Road, the N80 at the access from Heather Hill and the N80 roundabout for people travelling to Knockbeg College. Notes that road safety needs to be improved.</p>	LS-L79-9	<p>Noted.</p> <p>Carlow, and Laois County Councils both acknowledge the importance of the fundamental link between land use and transport planning to reduce car-based travel and promote more sustainable and active modes travel.</p> <p>The importance of integrated land use and transport planning for the urban area is addressed in the Local Transport Plan (LTP) which accompanies this Draft JULAP and is also reflected in the findings of the 10-Minute Town Study commissioned by the Southern Regional Assembly in 2020 for Carlow Town.</p> <p>Policies and objectives in the draft JULAP actively support an integrated approach to land use and transport planning in Carlow-Graigucullen that promotes a shift towards a sustainable, healthy, and low carbon joint urban area with a reduced need</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
		<p>for car-based travel, and through the prioritisation of development that is within reasonable walking and cycling distances from key employment, service, educational, and recreational areas, and key public transport nodes.</p> <p>Policy LTP.P1 of Chapter 6 is to progress the delivery of the appropriate measures and interventions as outlined in the Carlow-Graiguecullen Local Transport Plan (LTP) on a phased basis and subject to the availability of funding, in order to support the shift towards sustainable travel and transport throughout the joint urban area and to accommodate anticipated transport demand due to planned population growth.</p> <p>The provisions of the County Development Plans (Section 16.10.4 Carlow County Development Plan, Section 10.1.4.2 Laois County Development Plan) outline the requirements for Road Safety Audits and / Road Safety Impact Assessments as maybe required by the planning authority for development proposals.</p> <p>Recommendation No change</p>
3.6.6 Rail Strategy		
The NTA Recommends additional text to Policy PT. P4 as outlined in red:	CLW-C79-71 LS-L79-8	Noted and agreed. Recommendations Include addition as requested highlighted in green:

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>PT. P4: Ensure that public transport infrastructure, and accessibility to public transport services as required and appropriate, is considered as part of any significant residential or commercial development proposals ...</p>		<p>PT. P4: Ensure that public transport infrastructure, and accessibility to public transport services as required and appropriate, is considered as part of any significant residential or commercial development proposals ...</p>
3.6.7 Road Infrastructure Strategy		
<p>The NTA notes the Draft JULAP's objective to provide for the Southern Relief Road. NTA would emphasise the need for investment in any additional road capacity to be justified through a clear demonstration of the benefits arising, in terms of reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making. This approach would be consistent with the National Investment Framework for Transport in Ireland Intervention Hierarchy of <i>1. Maintain, 2. Optimise, 3. Improve and 4. New.</i></p> <p>Recommends that greater alignment is established between the roads proposals set out in the Draft JULAP and the goal of managing general vehicular capacity elsewhere, such that there is, at a minimum, no increase in general vehicular car capacity in the JULAP area.</p> <p>The NTA also recommends that the LAP should include a policy stating that the implementation of active travel measures is not contingent on the completion of new roads schemes, and that the development of</p>	<p>CLW-C79-71 LS-L79-8</p>	<p>The Councils will comply with relevant guidelines and frameworks as appropriate.</p> <p>While the recommendation that any road improvements should result in no increase in general vehicular car capacity within the JULAP area is noted. This is not considered realistic or achievable and would be difficult to measure and monitor. The Councils however do acknowledge the importance of active travel measures in addition to road infrastructure and that the implementation of active travel measures is not contingent on the completion of new road schemes. This will be reflected in amendments to the relevant policies as outlined hereunder.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>new/improved roads and delivery of active travel measures should happen in parallel. In the absence of such safeguards, there is a risk that roads proposals may proceed to construction without the commensurate (or greater) reduction in traffic capacity in the town centre, which could impact on the achievement of, <i>inter alia</i>, the NPF NSOs.</p> <p>(i) Carlow Southern Relief Road <i>Road Infrastructure- Policies</i></p> <p>RI. P1: Maintain, improve, and extend the public road network in and around Carlow-Graiguecullen to ensure a high standard of connectivity and safety for all road users, based on a clear demonstration that there is, at a minimum, no increase in general vehicular car capacity in the JULAP area and of the benefits arising, in terms of reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making.</p> <p>RI. P2: Co-operate and liaise with the Department of Transport, the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to securing appropriate improvements/extensions as appropriate to the public road network within Carlow -Graiguecullen. Any such improvements / extensions will only be considered, based on a clear demonstration that there is, at a minimum, no increase in general vehicular car capacity in the JULAP area and of the benefits arising, in terms of</p>		<p>Recommendation</p> <p>(i) Carlow Southern Relief Road Include additional text in green.</p> <p>RI. P1: Maintain, improve, and extend the public road network in and around Carlow-Graiguecullen to ensure a high standard of connectivity and safety for all road users, while also supporting active travel modes in the joint urban area thereby seeking to facilitate the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making. The implementation of active travel measures in the Joint Urban Area will not be contingent on the completion of new roads schemes.</p> <p>RI. P2: Co-operate and liaise with the Department of Transport, the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII) in relation to securing appropriate improvements/extensions as appropriate to the public road network, including active travel measures, where deemed appropriate within Carlow -Graiguecullen.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making.</p> <p>RI. P4: That all medium to large scale and complex planning applications (30+ residential units, commercial development over 1,000sq.m., or other development proposals as required by Carlow County Council and Laois County Council shall be accompanied by a Traffic and Transport Assessment (TTA) Traffic Impact Assessment (TIA) carried out in accordance with Transport Infrastructure Ireland's (TII) Traffic and Transport Assessment Guidelines (2014).</p> <p>(ii) Road Infrastructure Objectives</p> <p>RI. 01, RI. 02: It is recommended that these policies are amended, so that they are consistent with the NTA's recommendations above, under section 6.3.6 and policies RI. P1 and RI. P2.</p> <p>In the case of RI. 02, this would include the following additional text:</p> <p>This will be based on a clear demonstration that there is, at a minimum, no increase in general vehicular car capacity in the JULAP area and of the benefits arising, in terms of reducing dependency on the private car, facilitating the effective operation of and access to public transport services into and through the town and facilitating the use of walking and cycling modes for local trip making.</p>		<p>RI. P4: That all medium to large scale and complex planning applications (30+ residential units, commercial development over 1,000sq.m., or other development proposals as required by Carlow County Council and Laois County Council shall be accompanied by a Traffic and Transport Assessment (TTA) Traffic Impact Assessment (TIA) carried out in accordance with Transport Infrastructure Ireland's (TII) Traffic and Transport Assessment Guidelines (2014).</p> <p>(ii) Road Infrastructure Objectives</p> <p>It is considered on the basis of the above recommendation and with reference to LTP. P1 that further amendments to RI. O1 and RI. O2 are not required.</p> <p>Recommendation</p> <p>No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.8 Parking Strategy		
<p>6.3.7 Parking Strategy and the role of Parking and the Management of Transport Demand</p> <p>The NTA would recommend that the JULAP includes a commitment to the development of a town centre Parking Strategy, which would consider the potential for the migration of on-street car parking to sites on the town centre edge. Where feasible, parking facilities would be located on active travel routes to facilitate onward journeys by active modes, and should consider the provision of e-charging facilities. The removal or reduction of on-street car parking would present an opportunity to reallocate road space to alternative uses, including public realm enhancements. Such reallocation would be of particular benefit on routes identified as part of the cycle and walking networks. Where such reduction is proposed, care is required to ensure that provision is made for mobility impaired & disabled motorists and loading/delivery requirements.</p> <p><i>Parking – Policies</i></p> <p>PK. P1: Support the provision of appropriate levels of parking in Carlow-Graigucullen to provide for the needs of residents, business, and visitors to the joint urban area.</p>		<p>Noted and agreed.</p> <p>Recommendations</p> <p>Include additional Parking Objective</p> <p>PK. O2 It is an objective of Carlow County Council to:</p> <p>Prepare a town centre parking strategy which would consider the potential for the migration of on-street car parking to more appropriate off-street sites / locations where feasible, thereby facilitating more active travel modes within the town centre, including public realm enhancements.</p> <p>Include amendments/additions as follows:</p> <p>PK. P1: Support the provision of appropriate levels of parking in Carlow-Graigucullen to provide for the needs of residents, business, and visitors to the joint urban area.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>PK. P4: Treat the County Development Plans' parking standards as maxima, with the objective of determining and applying reduced car parking levels</p> <p>Apply flexibility in relation to car parking requirements where appropriate, in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in Carlow-Graigucullen, and subject to the availability of connections to active travel and public transport infrastructure and provided public safety is not compromised and the environment is suitably protected.</p> <p><i>Proposed Additional Parking Policy</i></p> <p>With reference to the NTA's recommendation above on 'blue badge' parking, under Table 6.2 – Parking Principles, a specific Policy in this regard should be considered, for example:</p> <p>PK. P6: Support the provision of dedicated parking at appropriate locations for mobility-impaired and disabled drivers and monitor this provision to ensure it remains fit for purpose.</p> <p>Table 6.3: LTP Parking Strategy Options</p> <p><i>Option: New Railway Station Car Park – New car park east of the railway line access from Glendale Avenue</i></p> <p><i>Option: Current Railway Station Car Park – Convert the current railway station car park, etc.</i></p> <p>Consistent with Public Transport Objective PT. 02, it is recommended that the quantum, location, configuration of and access arrangements to car</p>		<p>PK. P4: Treat the County Development Plans' parking standards as maxima, with the objective of determining and applying reduced car parking levels</p> <p>Apply flexibility in relation to car parking requirements where appropriate, in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in Carlow-Graigucullen, and subject to the availability of connections to active travel and public transport infrastructure and provided public safety is not compromised and the environment is suitably protected.</p> <p>PK. P6: Support the provision of dedicated parking at appropriate locations for mobility-impaired and disabled drivers and monitor this provision to ensure it remains fit for purpose.</p> <p>Table 6.3: LTP Parking Strategy Options</p> <p>Changes to the provision of car parking at the railway station has been identified as a real opportunity to create a multi-modal transport interchange. The quantum, location, configuration of and access arrangements to car parking at the railway station will be informed by an overall plan for development at the station and its environs, taking all modes of transport into consideration.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>parking at the railway station should be informed by an overall plan for development at the station and its environs, taking all modes of transport into consideration.</p> <p>This is supported by in Chapter 4 of the Draft JULAP (Economic Development, Retail and Tourism) which states that 'the strategy to support economic development will be achieved by' ... 'Supporting the development of an economic quarter and transport interchange on underutilised lands around Carlow Railway Station subject to compliance with proper planning and environmental considerations.</p> <p><i>Option: Carlow Retail Park – Make use of some of the spaces ... to provide parking for SETU students and workers Option: SETU – Provide a new car park near to SETU.</i></p> <p>It is recommended that any options relating to the provision of parking for SETU in terms of location(s), access arrangements and quantum, need to be considered and informed on the basis of a parking strategy, as part of a mobility management plan for the campus as a whole, taking all modes of transport into consideration, with clearly defined mode split targets. Furthermore, the merit of attracting car based trips associated with SETU into the relatively central location of Carlow Retail Park, is questionable and may not be consistent with the reallocation of road space in favour of sustainable transport modes.</p>		<p>Carlow County Council will continue to engage with SETU to ensure a mobility management plan for the campus is developed.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
3.6.8.1 Car – Parking		
<p>An Post, notes that facilities may require greater levels of car parking, including electric vehicle charging points for delivery vehicles. Car parking spaces are also required for staff and customers.</p> <p>Requests that any relevant parking standards in the JULAP should only apply to visitor and staff parking while the storage of all other vehicles used for the operation should not be included within the parking standard.</p> <p>Given the change in postal trends a greater quantum of car parking may be required and in this regard, it is imperative that facilities are future proofed to ensure the long-term viability of An Post's operations.</p>	CLW-C79-24	<p>The Draft JULAP does not prescribe car parking standards. These standards are governed under the relevant development management standards of the respective County Development Plan as appropriate.</p> <p>Recommendation No change</p>
<p>The PPN notes that as most new cars are now roughly 1.8 m wide, it is now absolutely necessary to re-mark all parking spaces to a minimum of 2.5m wide or more as the present widths are no longer fit for purpose which could lead to claims for accidents and injuries which happen in these car parks. Also, older people find it very difficult to get in and out of their cars as many spaces are very narrow.</p>	CLW-C79-26	<p>Both Carlow County Council and Laois County Council will comply with relevant best practice standards pertaining to the design and layout of car parking, loading bays etc.</p> <p>Recommendation No change</p>
3.6.8.2 New Railway Station Car Park		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Sustainable Travel and Transport		
<p>In respect of the new car park to the east of the railway line, accessed from Glendale Avenue, neither the Draft Carlow-Graiguecullen Local Transport Plan (AECOM, November 2023) (LTP), nor the LTP Baseline Assessment documents assess the impacts that development of a new train station car park adjacent to, and with direct pedestrian access from, areas zoned as Existing / Infill Residential, namely Springfield Drive, Pinewood Avenue, Larkfield and Glendale Avenue. No details have been provided on how the local authority plans to protect the residences of the above referenced areas from motorists parking in these areas and walking through the proposed carpark to the train station. This scenario would result in loss of amenity value for the residents of the above areas, and loss of revenue for the local authority.</p>	CLW-C79-75	<p>The Local Transport Plan is a strategy document. As schemes identified within the plan are taken forward, they will be subjected to a detailed design, assessment, consultation, stakeholder engagement and a planning process. Stakeholder engagement will enable consideration of the matters outlined in this submission which is outside the remit of the Draft JULAP.</p> <p>Recommendation No change</p>
3.6.9 Section 50 Arterial Drainage Act		
<p>The OPW advise of requirements of Section 50 where a new active travel bridge is proposed crossing the River Barrow. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts.</p>	CLW-C79-21	<p>Noted. The Councils will comply with all statutory requirements including the Arterial Drainage Act regarding the construction of an active travel bridge/ crossing of the River Barrow.</p> <p>Recommendation No change</p>

Chapter 7: Infrastructure and Environmental Services

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
3.7.1 EC (Drinking Water) Regulations 2023.		
Request that the following update be included under heading 10 Water, The EC (Drinking Water) Regulations 2014 needs to be updated to the EC (Drinking Water) Regulations 2023.	CLW-C79-1	<p>The updated regulations are noted and both Carlow County Council and Laois County Council will support Uisce Éireann in delivering key water services projects to meet the future needs of the Joint Urban Area subject to compliance with all relevant EU and national legislation and normal environmental and planning criteria.</p> <p>Recommendation No change</p>
3.7.2 Public Water and Wastewater Infrastructure – Policy/ Plan Updates		
<p><i>Text of Draft Plan</i> Uisce Éireann has reviewed the text of the JULAP and welcome the inclusion of objectives and policies in relation to water and wastewater which are included in Sections 7.1 and 7.2. Some suggestions/additional information is highlighted in red below for consideration.</p> <p>- Section/Chapter Number Comment 7.2 – Public Wastewater Collection and Treatment include additional text regarding Mortarstown WWTP. UE update:</p>	CLW-C79-41	<p>Noted and agreed.</p> <p>Recommendations Include amendments / deletions as highlighted hereunder:</p> <p><i>The Mortarstown Wastewater Treatment Plant (WWTP) provides treatment for the sewerage effluent generated by the Carlow-Graiguecullen joint urban area. The WWTP has a current treatment capacity of 36,000 population equivalent (pe). The Uisce Éireann wastewater capacity register indicates that the WWTP</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
<p>Completion date forecasted for 2027, subject to statutory and regulatory approvals processes.</p> <p>Section 7.2 Public Wastewater collection and treatment. Text in Draft JULAP: include after paragraph on growth. <i>UE update: the 5 drivers identified for the DAP above are standard drivers for all DAPs and not specific to the Carlow DAP. In addition, the text included in the Growth Driver does not correlate with the DAP growth driver, (the text is more relevant to new connections data) and we suggest it should be removed. It should be noted that the DAP process will take a number of years to complete, during which data collation, surveys, modelling of the existing network, creation of a future model, analysis of growth etc will all take place. UE will be in a position to update Carlow CC and Laois CC on the progress of the DAP as the JULAP process progresses. In this regard we would suggest that the text outlining the drivers for the DAP which is input into Section 7.2 of the Draft LAP is not needed.</i></p>		<p><i>has spare capacity available. However, improvement and upgrade works are planned by Uisce Éireann for the WWTP to increase its treatment capacity to 58,000pe, with a forecasted completion data for this upgrade is Q2-2029. date of 2027, subject to statutory and regulatory approvals processes.</i></p> <p>Section 7.2 Delete drivers as identified under the Drainage Area Plan as requested:</p> <p><i>The following key drivers were identified from this DAP by Uisce Éireann:</i></p> <ul style="list-style-type: none"> <i>• Environmental – There are a number of pumping station and combined network overflows in the network, which can discharge either directly or indirectly (via storm water infrastructure) to watercourses such as the River Barrow and Burrin.</i> <i>• Hydraulic – It is believed that some sections of the network are operating at or close to capacity which is restricting future development upstream of these areas.</i> <i>• Structural – Given the age of some of the sewers within the agglomeration, there is some concern regarding structural integrity of sections of the network. Excessive infiltration has been reported as a significant issue in some areas of the network.</i> <i>• Operational – There are instances of blockages and operational issues across the network. Fats, Oils, and Grease (FOGs) are an issue in a number of areas. Odour and septicity have also been reported as an issue.</i> <i>• Growth – Carlow Graiguecullen is identified as a Key Town with a targeted 30% population growth to 2040. UE has received a large</i>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
		number of pre-connection enquiries and applications regarding new residential and commercial developments in the area.
3.7.2 Public Water and Wastewater Infrastructure		
<p>A high-level review of the land-use zoning maps has been carried out by Uisce Eireann who advise as follows:</p> <p>Available network information indicates network extensions may be required to service some zoned sites. In particular this may be the case for Site CW18 (i.e. Lands in Graiguecullen Co. Laois) plus the Regeneration site on the Athy Road (i.e. Kelvin Grove).</p> <p>Depending on the extent of development realised, localised network upgrades may also be required. In particular this may be the case for Sites CW 16 (i.e. lands either side of the link road at Eire Og) and CW 4 (i.e Lands at Monacurragh).</p> <p>In order to maximise the use of existing water services, phased sequential development is encouraged in areas with existing water services infrastructure and spare capacity.</p>	CLW-C79-41	<p>The content of this submission from Uisce Eireann regarding potential infrastructural constraints on individual sites together with standard operating procedures for connections to public water infrastructure etc are noted and welcomed.</p> <p>In particular, the Council notes:</p> <ul style="list-style-type: none"> - Requirements for connection agreements - Requirement for third party agreement where a proposed development is to be serviced through private property. - Requirement for the protection / diversion of Uisce Eireann assets. - Support for phased sequential development of land. - The need to maximise existing collection systems. - The need to support connections to public infrastructure as opposed to private systems in serviced areas. - Potential concerns regarding proximity of residential uses to wastewater treatment plants.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
<p>Similarly, to maximise the capacity of existing collection systems for foul water, the discharge of additional surface water to combined (foul and surface water) sewers is not permitted.</p> <p>Where network reinforcements such as upgrades or extensions are required, these shall be developer driven unless there are committed Uisce Éireann projects in place to progress such works.</p> <p>All new residential and commercial/ industrial developments wishing to connect to an Uisce Éireann network are to be assessed on a case-by-case basis through the New Connections process, which will determine the exact requirements in relation to network and treatment capacity.</p> <p>Third-party agreement will be required where it is proposed to service a new development via private property or private water services infrastructure e.g., on some 'backland' sites and/or housing and industrial/commercial estates with private water services networks. This may apply to a number of sites within the JULAP area, in particular Site CW3 (i.e. lands at Monacurragh).</p> <p>Where Uisce Éireann assets are within a proposed development site these assets must be protected and / or diverted. For example, existing gravity sewers run through Site CW8 (Strategic Employment Land site no. 2 (i.e. lands to rear of Council County Building), and Strategic Employment Land Site No. 4. (i.e. lands to west of Four Lakes Retail Park) Further, existing watermains run</p>		<ul style="list-style-type: none"> - That Uisce Eireann will not retrospectively take over responsibility for developer provided treatment facilities or associated networks unless agreed in advance. <p>The Planning Authority will continue to engage with Uisce Eireann through the pre-planning and / or the development management process on proposals within the JULAP area to obtain relevant advice and input as the relevant prescribed body with responsibility for the provision of public water services. The advice received will inform the Planning Authorities considerations in the assessment of relevant planning applications / development proposals as appropriate.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
<p>through Strategic Employment Site 10 (i.e. Business and Innovation Land to the South of the proposed Southern Relief Road).</p> <p>Uisce Éireann wish to draw attention to the proximity of several existing/infill residential sites to the Mortarstown WWTP. There is potential for future residential development within these infill sites to be impacted by odour and noise nuisance that may be generated from the WWTP and/or the upgraded WWTP.</p> <p>Regarding zoning and development in lands with no public water services infrastructure, as outlined in Draft Water Services Guidelines for Planning Authorities (January 2018), Section 5.3: "It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance".</p>		
3.7.3 Masterplans / Planned Road and Public Realm Projects		
<p><u>Masterplans</u> The Draft JULAP identifies the need for a masterplan for three of the strategic employment sites, (i) Strategic Employment site no. 2 (land adjoining the Barrow Track), (ii) Strategic Employment site no. 6 (Land</p>		<p>Noted and agreed. The Councils will seek to encourage early engagement with Uisce Eireann regarding masterplans / planned road and public realm projects. The Planning Authority acknowledges that development in the</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
<p>adjoining Dublin Road and Eastern Relief Road), (iii) Strategic Employment site no. 9 Former Sugar Factory land). Uisce Éireann supports the preparation of Masterplans for proposed developments. As part of the master-planning process, consideration should be given to how sites will be serviced as well as the potential impacts on Uisce Éireann infrastructure and projects e.g., building over of assets, tree planting, synergies with planned Uisce Éireann projects, opportunities for surface water removal. A Pre-Connection Enquiry can be submitted to our Connections and Developer Services Team to assist with this.</p> <p><i>Planned Road and Public Realm Projects</i> Planned public realm and road projects, as described in Strategic Objective 3 have the potential to impact on Uisce Éireann assets and projects e.g. tree planting, building over of assets, new connections, stormwater separation, requirement to programme upgrade works in advance of road project. These include the details shown in Figures 10, 13 and 18 of the Local Transport Plan and in the masterplans for Intervention Areas.</p>		<p>vicinity of Uisce Éireann assets should be in accordance with Standard Details and Codes of Practise, and Diversion Agreements as appropriate.</p> <p>Recommendation No change</p>
3.7.4 Water Quality		
<p>Laois and Carlow County Councils have important statutory roles to play in protecting water quality through their powers under the Planning and Development Acts, the Local Government (Water Pollution) Acts and the Good Agricultural Practices Regulations.</p> <p>Article 5 of the Surface Water Regulations (SI 272 of 2009) requires that a public authority shall not knowingly cause or allow deterioration in the</p>	LS-L79-1	<p>Both Carlow County Council and Laois County Council acknowledge statutory responsibilities as outlined in this submission. With respect to the Draft JULAP, <i>Objective SG. O2 states that it is an objective to require applicants, where necessary to demonstrate that development proposals will not negatively impact on any surface water or groundwater body, individually as a result of the proposed development, or cumulatively, in combination with other</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
<p>chemical or ecological status of a body of surface water. Article 28(2) states that a surface water body whose status is determined to be less than Good shall be restored to at least good status. IFI request that the plan include a commitment to flood protection methods that facilitate the achievement of Good ecological status for these sections of the Barrow and Burren Rivers..</p>		<p><i>developments, and be compliant with the requirements of the Water Framework Directive and measures to protect and improve our water bodies set down in the River Basin Management Plan for Ireland 2018-2021 and any subsequent amendments or revisions to the Plan.</i></p> <p>The foregoing Objective addresses the content of the submission.</p> <p>Recommendation No change</p>
3.7.5 Sustainable Drainage Systems		
<p><u>Sustainable Drainage, Green-Blue Infrastructure and the Circular Economy</u> Uisce Éireann welcomes policies SG.P1, SG.P2, SG.P3 and SW.P1 regarding sustainable drainage systems and NB.P1 with regard to nature based solutions and green infrastructure. Uisce Éireann would indicate their willingness to engage with both Carlow County Council and Laois County Council to discuss stormwater removal opportunities, in particular to progress nature-based rainwater management initiatives in line with the recently issued Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Best Practice Interim Guidance Document.</p>	CLW-C79-41	<p>The Councils welcome the offer of engagement with Uisce Éireann to address stormwater removal opportunities to facilitate compliance with Policy SG. P2 as follows:</p> <p>SG. P2. <i>Require the use of Sustainable Urban Drainage Systems (SuDS) within development proposals and infrastructure projects, in accordance with the DHLGH Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022' (and any subsequent amendments or revisions to the document), Carlow County Council's SuDS Policy, and Laois County Council's Storm Water Management Policy as appropriate, in order to reduce flood risk, improve water quality and enhance biodiversity and amenity in the joint urban area.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
		<p>Recommendation No change</p>
<p>The Department of Housing Local Government and Heritage reiterates the importance of a coordinated “whole of settlement” approach to the implementation of SuDS and strongly advises the Local Authorities to include a Rainwater Management Plan. This is in accordance with the Department’s guidance document ‘<i>Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022</i>’.</p>	CLW-C-79-65	<p>The protection and management of the status of waters and European sites, including the use of SuDS, is provided for by the existing planning framework, including existing legislation, the RSES, the County Development Plans, and the Draft JULAP, which include various focused provisions, policies, and objectives in this regard.</p> <p>Recommendation No change</p>
3.7.6 Circular Economy		
<p>Uisce Éireann are eager to collaborate with others in leveraging circularity opportunities to support the development of a sustainable bioeconomy model and reduce greenhouse gas emissions.</p>	CLW-C79-41	<p>Section 7.5.1 of the Draft JULAP acknowledges that Carlow County Council and Laois County Council will continue to support the circular economy principles in addressing all aspects of waste in Carlow-Graiguecullen in order to prioritise waste prevention, reuse, recycling and recovery over waste disposal. Waste management policies (WM. P1 – P4) and waste management objectives (WM. O1-3) seek to support same.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
No change		
3.7.7 Flood Risk		
Consideration of flood risk is referenced and the potential for unprecedented flooding due to climate change.	CLW-C79-52	<p>Appendix III of the Draft JULAP contains the Strategic Flood Risk Assessment for the Carlow-Graiguecullen Urban Area. The SFRA has been prepared in accordance with the requirements of the DoEHLG and OPW Planning Guidelines, The Planning System and Flood Risk Management. Climate change considerations have been further updated and incorporated into the Plan.</p> <p>Recommendation See response to OPR submission CLW-C79-42, OPW Submission LW-C79-21 and amendments to the SFRA (Appendix III).</p>
IFI request that this plan includes a proposal to investigate the restoration of flood plain connection on all lands formerly subject to flooding on the Sugar Factory Site and that modelling to determine the scale of flood storage that could be achieved be included. IFI believe that such a proposal could represent a significant win-win, with the potential for significant flood storage/mitigation, carbon storage and the development of important riparian habitat as part of the River Barrow SAC	LS-L79-1	<p>The content of this submission is noted and it is considered that reference to flood risk considerations can be incorporated into Table 4.2 Strategic Employment Lands 9-Former Sugar Factory Land</p> <p>Recommendation Include additional text in green: The preparation of a masterplan should accompany any development proposal on this land, to include a vision for the overall land parcel to ensure development does not take place in a piecemeal manner, to ensure that flood risk considerations including flood storage/mitigation as</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Infrastructure and Environmental Services		
		<p>appropriate informs any future development proposals and that the future development of the site suitably integrates with existing development and infrastructure.</p>

Chapter 8: Sustainable Communities

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Sustainable Communities		
3.8.1 Shared Services		
<p>The Chamber of Commerce note the importance of Shared Services and the need to explore opportunities for sharing public services and amenities to eliminate duplication and improve efficiency. This could include joint-use facilities for recreation, healthcare, education, and cultural activities that serve residents from both communities.</p>	CLW-C79-36	<p>The content of the submission is noted, however same is outside the remit of the Local Area Plan.</p> <p>Recommendation No change</p>
3.8.2 Education		
<p>The Department of Education has considered potential impacts on school place requirements in the context of future population trends and anticipates:</p> <p>Primary School Provision: If the growth anticipated in the JULAP materialises, it will put pressure on existing primary school facilities. However, if expansion of existing schools is not a practical or viable option, the possibility of establishing a new primary school in the Carlow/Graigucullen area may need to be considered. The Department cannot state that there is a definitive requirement for a new future primary school. Requests that both councils consider the</p>	CLW-C79-67 LS-L79-7	<p>The content of the submission is noted. Under the provisions of the JULAP significant lands have been zoned community / education within which the provision of an educational facility would be acceptable in principle. Furthermore, education uses are acceptable in principle in the town centre land use zoning category.</p> <p>Both Carlow and Laois County Council welcome engagement with the Department of Education where demand arises for extensions to existing facilities or where a requirement for a new educational facility is required within the JULAP area.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Sustainable Communities		
<p>option of zoning one suitable and appropriate site on the understanding that such a zoning can be revisited at a future date.</p> <p>Secondary School Provision: It is anticipated that extra requirement in post-primary school place demand arising from the potential population growth outlined, is expected to be accommodated by the planned expansion of existing facilities.</p> <p>The Department welcomes policy ET P1, ET P2, ET P4, SCF P1, SCF P3,. The Department further notes Policy ET. P3, ET O2, SP P4 and Table 6.3 LTP Parking Strategy Options to remove set down or drop off zones immediately outside schools.</p> <p>The Department finally notes the potential for unforeseen circumstances (e.g. Ukrainian Crisis) which have the ability to impact school space provision and could necessitate reassessment of school space provision from time and time.</p> <p>The Department will consult with the Councils if and when additional SEN accommodation is required within specific locations.</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Sustainable Communities		
3.8.3 Carlow Town Scout Group		
<p>Submission on behalf of Carlow Town Scout Group outlines constraints in the facility currently available to the group, the unlikely probability of extending same and the requirement to meet in the Bishop Foley School for bigger events. An appropriate site or premises would cater for growing membership, and to accommodate other groups coming to stay and use it as an adult Training Hub which requires travelling to Dublin.</p>	CLW-C79-61	<p>The content of this submission is noted and as outlined above significant undeveloped community / educational lands are available throughout the JULAP area. Furthermore, community facilities are acceptable in principle in numerous land use zonings including town centre, existing residential / infill, new residential, district centre etc. It is considered that Policy SCF. P1 and SCF. P4 would seek to support the community group in the event of a planning application to expand / relocate subject to all planning and environmental considerations being addressed.</p> <p>Recommendation No change</p>
3.8.4 Community and Youth Hub Graiguecullen		
<p>Mentions that Graiguecullen has its own distinct history and community apart from Carlow Town. Proposes the development of a community and youth hub in a central location which would be accessible for all. For example, close to the town park, possibly in the new development in the park, or in other accessible areas. The youth service recent trial in the park proved to be very successful. Also proposes a public library for Graiguecullen and a remote</p>	LS-L79-9	<p>Noted.</p> <p>Prioritising the development of inclusive and sustainable communities in Carlow-Graiguecullen is central to safeguarding and improving the quality of life of all residents in the joint urban area. This aim is reflected in the strategic objectives of the draft JULAP.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Sustainable Communities		
<p>working hub. This would further develop the distinct characteristics of the area.</p>		<p>Both Councils are committed over the lifetime of this JULAP and subject to resources, to supporting and providing a range of shared, inclusive, and accessible social and community facilities that respond to the various needs and expectations of the current and future population of the joint urban area. At the same time, this JULAP acknowledges that there are challenges facing Carlow-Graigucullen in meeting these needs and expectations.</p> <p>The delivery of new and improved social and community facilities will not be through policy alone but will require sustained measures and targeted investment over the long term. Public intervention must also foster pride of place and it calls for imaginative solutions such as support for repurposing existing underutilised urban spaces and buildings where appropriate.</p> <p>Chapter 8 of the draft JULAP contains numerous policies to promote sustainable communities through, for example, facilitating and securing the provision of new and enhanced social and community facilities to support existing and new communities in Carlow-Graigucullen, and in a manner which provides flexibility to respond to varied and changing needs and deficiencies, and through funding for their development where available and appropriate.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Sustainable Communities		
3.8.5 Postal Services		
<p>An Post request inclusion of the following policies that could assist An Post as they invest over the next decade:</p> <ul style="list-style-type: none"> - <i>To support An Post in the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, in the town.</i> - <i>To facilitate the provision of postal infrastructure at suitable locations in the town.</i> - <i>To promote the integration of appropriate postal facilities, including both post offices and processing, sortation, and distribution facilities, within new and existing communities that are appropriate to the size and scale of each settlement.</i> 	CLW-C79-24	<p>Post Offices are prescribed as a shop under the provisions of the Planning and Development Regulations 2001 (as amended). The Draft JULAP and the associated County Development Plans for Carlow and Laois contain various policy provisions which support the provision of retail and the enhancement of retail floorspace etc. It is considered that any proposals to facilitate enhancement of existing facilities, provision of new facilities and associated processing can be assessed under the current policy framework and specific reference to any individual form of retail would be inappropriate.</p> <p>Recommendation No change</p>

Chapter 9: Built Heritage

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Built Heritage		
3.9.1 Archaeology		
<p>Requests that specific reference is made in Chapter 9 of the JULAP to <i>Framework and Principles for the Protection of the Archaeological Heritage</i> (Government of Ireland 1999) which sets out national policy for the protection of the archaeological heritage in the course of development.</p> <p>Chapter 9 Title: 'Built Heritage' The Department recommends the inclusion of 'Archaeological Heritage' in the chapter title – i.e. <i>'Built and Archaeological Heritage'</i>.</p> <p>Chapter 9 Section 9.3: The Department recommends amendment of the below statement as follows (changes in italics): '...Urban areas may contain important sub-surface <i>and upstanding</i> archaeological deposits <i>remains</i> and apparently modern, or relatively modern structures may contain much earlier fabric.</p> <p>Chapter 9 Section 9.3.1: Zone of Archaeological Potential The Department recommends amendment of the below statement as follows (changes in italics): 'Carlow County Council and Laois County Council will <i>have regard to national policy as set out in Framework and Principles for the Protection</i></p>	<p>CLW-C79-65</p>	<p>Noted and agreed.</p> <p>Recommendation Include additional text / edits as requested and outlined hereunder in green:</p> <p>Chapter 9 Title: 'Built Heritage' The Department recommends the inclusion of 'Archaeological Heritage' in the chapter title – i.e. <i>'Built and Archaeological Heritage'</i>.</p> <p>Chapter 9 Section 9.3: The Department recommends amendment of the below statement as follows (changes in green italics): '...Urban areas may contain important sub-surface <i>and upstanding</i> archaeological deposits <i>remains</i> and apparently modern, or relatively modern structures may contain much earlier fabric.</p> <p>Chapter 9 Section 9.3.1: Zone of Archaeological Potential The Department recommends amendment of the below statement as follows (changes in green italics): 'Carlow County Council and Laois County Council will <i>have regard to national policy as set out in Framework and Principles for the Protection of the Archaeological</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Built Heritage		
<p><i>of the Archaeological Heritage (Government of Ireland 1999) and will consult with the Department of Housing Local Government and Heritage and other statutory consultees when considering planning applications in their respective administrative areas that relate to development proposals on or in the vicinity of recorded archaeological monuments/sites.</i></p> <p>Chapter 9 Section 9.3.2: Medieval Town Wall/Defences The Department recommends amendment of the below statement as follows (changes in italics):</p> <p>The significance of Carlow Town in the medieval period is attested to by <i>the grant of a charter in the 13th century and</i> construction of town defences, which were built in the latter part of the 14th century. The town defences consisted of a wall, <i>external ditch</i> and a number of town gates (<i>Dublin Gate, Tullow Gate and Castle Gate</i>). All upstanding traces of the town wall were gone by the early 18th century, and therefore its exact course or route is unknown <i>remains unclear</i>. However, there have been consistent <i>research</i> suggestions <i>suggests</i> that the defences formed an irregular-shaped triangle as indicated on Map 9.6, along with three main town gates at Tullow Street, the northern end of Dublin Street, and Castle Street. The postulated line of the wall is also shown in the OPWs Urban Archaeological Survey for County Carlow (1990). The Carlow Town wall/defences are recorded on the Record of Monuments and Places (and the Sites and Monuments Record) under reference CW007-</p>		<p><i>Heritage (Government of Ireland 1999) and will consult with the Department of Housing Local Government and Heritage and other statutory consultees when considering planning applications in their respective administrative areas that relate to development proposals on or in the vicinity of recorded archaeological monuments/sites.</i></p> <p>Chapter 9 Section 9.3.2: Medieval Town Wall/Defences The Department recommends amendment of the below statement as follows (changes in green italics):</p> <p>The significance of Carlow Town in the medieval period is attested to by <i>the grant of a charter in the 13th century and</i> construction of town defences, which were built in the latter part of the 14th century. The town defences consisted of a wall, <i>external ditch</i> and a number of town gates (<i>Dublin Gate, Tullow Gate and Castle Gate</i>). All upstanding traces of the town wall were gone by the early 18th century, and therefore its exact course or route is unknown <i>remains unclear</i>. However, there have been consistent <i>research</i> suggestions <i>suggests</i> that the defences formed an irregular-shaped triangle as indicated on Map 9.6, along with three main town gates at Tullow Street, the northern end of Dublin Street, and Castle Street. The postulated line of the wall is also shown in the OPWs Urban Archaeological Survey for County Carlow (1990). The Carlow Town wall/defences are recorded on the Record of Monuments and Places (and the Sites and Monuments Record) under reference CW007018006. <i>Town defences, whether above or below ground remains, are considered to be National Monuments in the ownership of the Local Authority.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Built Heritage		
<p>018006. <i>Town defences, whether above or below ground remains, are considered to be National Monuments in the ownership of the Local Authority.</i></p> <p>Chapter 9 Archaeological Heritage – Policies</p> <p>The Department recommends amendment of the wording of the below heritage policies as follows (changes in italics):</p> <p>'AH. P3: Ensure that any development proposal in the joint urban area that may, by reason of location, scale, nature, layout, or design, have potential implications for archaeological heritage (including areas and sites of archaeological potential), shall be subject to an archaeological impact assessment. <i>The In line with national policy, archaeological impact assessment will seek to ensure that the development proposal can be sited and designed to avoid impacting mitigate impacts of development on archaeological heritage. Any archaeological works, including testing, monitoring and excavation, shall be licensed under the National Monuments Act 1930-2014 and carried out in accordance with best practice outlined by the NMS, the National Museum of Ireland, and the Institute of Archaeologists of Ireland. In all such cases the relevant local authority shall consult with the National Monuments Service in the Department of Housing, Local Government and Heritage.'</i></p> <p>'AH. P4: Have regard to the Record of Monuments (RMP) and Places, the OPWs Urban Archaeological Survey for County Carlow (1990), and</p>		<p>Chapter 9 Archaeological Heritage – Policies</p> <p>The Department recommends amendment of the wording of the below heritage policies as follows (changes in deletions in red additions in green italics):</p> <p>AH. P3: <i>Ensure that any development proposal in the joint urban area that may, by reason of location, scale, nature, layout, or design, have potential implications for archaeological heritage (including areas and sites of archaeological potential), shall be subject to an archaeological impact assessment. The In line with national policy, archaeological impact assessment will seek to ensure that the development proposal can be sited and designed to avoid impacting mitigate impacts of development on archaeological heritage. Any archaeological works, including testing, monitoring and excavation, shall be licensed under the National Monuments Act 1930-2014 and carried out in accordance with best practice outlined by the NMS, the National Museum of Ireland, and the Institute of Archaeologists of Ireland. In all such cases the relevant local authority shall consult with the National Monuments Service in the Department of Housing, Local Government and Heritage.'</i></p> <p>AH. P4: <i>Have regard to the Record of Monuments (RMP) and Places, the OPWs Urban Archaeological Survey for County Carlow (1990), and archaeological sites identified subsequent to the publication of the RMP when assessing planning applications for development. No development shall be permitted in the vicinity of a recorded archaeological monument/site/feature, where such</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Built Heritage		
<p>archaeological sites identified subsequent to the publication of the RMP when assessing planning applications for development. No development shall be permitted in the vicinity of a recorded <i>archaeological monument/site</i>/feature, where <i>such development would detracts from the its setting and/or amenity of the feature</i> or which is <i>would be injurious to its cultural or educational value.</i></p> <p>Chapter 9 Section 9.4: Climate Change & Built Heritage The Departments recommends amendment of the title of this section to 'Climate Change & Built and Archaeological Heritage' and amendment of the following statement and policy (changes in italics):</p> <p>'The impacts of climate change as discussed in Chapter 11 of this JULAP will have implications for built <i>and archaeological</i> heritage in Carlow-Graigucullen.'</p> <p>'CCH. P1: Increase public awareness of the impacts of climate change on built <i>and archaeological</i> heritage,....'</p>		<p><i>development would detracts from the its setting and/or amenity of the feature or which is would be injurious to its cultural or educational value.'</i></p> <p>Chapter 9 Section 9.4: Climate Change & Built Heritage The Departments recommends amendment of the title of this section to 'Climate Change & Built and Archaeological Heritage' and amendment of the following statement and policy (changes in green italics):</p> <p><i>'The impacts of climate change as discussed in Chapter 11 of this JULAP will have implications for built and archaeological heritage in Carlow-Graigucullen.'</i></p> <p><i>'CCH. P1: Increase public awareness of the impacts of climate change on built and archaeological heritage,....'</i></p>
<p>States that Graigucullen is an area of significant historical importance. As part of a community hub for the area, proposes a permanent space for people to learn the history of the area, with a particular focus on the 1798 rebellion which resulted in the in the mass grave located in the Croppy graveyard. This is an important period of Irish history and it is crucial that future generations have a place to learn about it.</p>	LS-L79-9	<p>Noted.</p> <p>The Laois County Development Plan 2021-2027 and the Carlow County Development Plan 2022-2028 acknowledge the importance of built and cultural heritage throughout the County and contain policies and objectives to protect, conserve and manage heritage so as to ensure its survival and maintenance for future generations.</p>

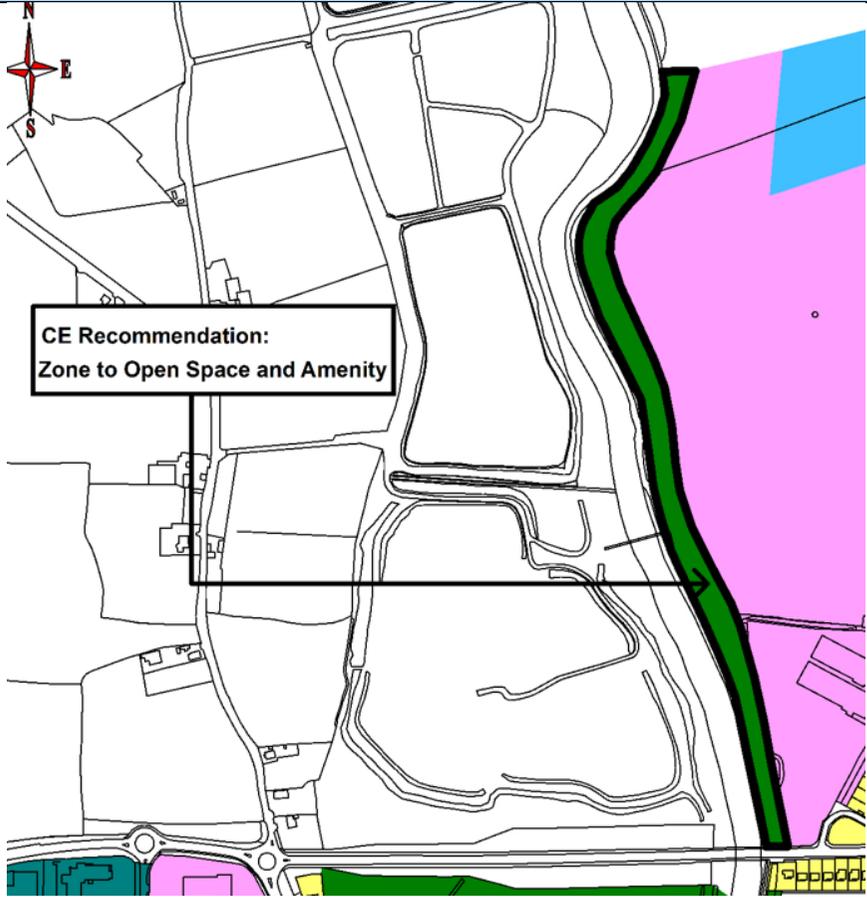
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Built Heritage		
		<p>The provision of a public space to educate people on the history of the Croppies Grave is outside the remit of the Joint Urban Local Area Plan.</p> <p>Recommendation No change</p>

Chapter 10: Natural Heritage, Landscape and Green Infrastructure

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural, Landscape and Green Infrastructure		
3.10.1 Biodiversity		
<p>The Department recommends integration of the recently published National Biodiversity Action Plan 2023 – 2030 (https://www.npws.ie/legislation/national-biodiversity-action-plan) into the JULAP. The Wildlife (Amendment) Act 2023 introduced a new public sector duty on biodiversity. The legislation provides that every public body, as listed in the Act, is obliged to have regard to the objectives and targets in the National Biodiversity Action Plan. See: https://www.npws.ie/legislation for further details.</p>	CLW-C79-65	<p>Noted and agreed.</p> <p>Recommendation Include additional Policy on Biodiversity: <i>It is the policy of Carlow County Council and Laois County Council:</i></p> <p><i>To have regard to the objectives and targets in the National Biodiversity Action Plan as appropriate in the future development of the Carlow-Graigucullen Joint Urban Area.</i></p>
<p>Notes that the policy on biodiversity enhancement should include aquatic and riparian biodiversity. Every attempt should be made to restore connectivity in river systems.</p>	LS-L79-1	<p>Policy GI P1 of the Draft JULAP seeks to protect and enhance the biodiversity and ecological function of the green infrastructure network in Carlow -Graigucullen. Both the River Barrow and the River Burren comprise part of the green infrastructure of the Carlow-Graigucullen area. Furthermore, as outlined above an additional policy is proposed to have regard to objectives and targets in the National Biodiversity Action Plan as appropriate. Policy GI P12 also outlines the policy of the Councils to take account of Inland Fisheries Guidance as appropriate.</p> <p>It is considered that an additional recommendation can be included in 10.4 Landscape 3. River Corridors.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural, Landscape and Green Infrastructure		
		<p>Recommendation Include an additional recommendation in 10.4 Landscape 3. River Corridors as follows: Developments along the river corridor should seek to support biodiversity enhancement along the river system including aquatic and riparian biodiversity.</p>
3.10.2 Green Infrastructure		
<p>The Department of Housing Local Government and Heritage welcomes Green Infrastructure objective GI. O2 <i>'Investigate the feasibility of providing a wetland amenity area on lands comprising the former Sugar Factory lagoons, in conjunction with relevant stakeholders and local community groups, taking account of the environmental sensitivities of the land and the need to ensure impacts to biodiversity and nature conservation interests are avoided'</i> The Department recommends that the feasibility study includes recommendations for the ecological and hydrological management of the site.</p>	CLW-C79-65	<p>Noted and agreed.</p> <p>Recommendation</p> <p>(i) Amend text of GI. O2 as follows:</p> <p>GI. O2 <i>'Investigate the feasibility of providing a wetland amenity area on lands comprising the former Sugar Factory lagoons, in conjunction with relevant stakeholders and local community groups, taking account of the environmental sensitivities of the land and the need to ensure impacts to biodiversity and nature conservation interests are avoided</i> while detailing recommendations for the ecological and hydrological management of the site.'</p>
<p>In relation to Green Infrastructure the Department recommends that further work is needed (including habitat mapping) to identify key environmental values with the aim of mapping an interconnected ecological network of Green Infrastructure within the JULAP area with a view to protecting and</p>	CLW-C79-65	<p>While the content of this submission is noted it is considered that the requirement for habitat mapping is outside the remit of the JULAP but can be considered separately as part of any review of the Carlow Town Biodiversity Strategy and Action Plan 2021-2025. The protection and management of the status of waters and</p>

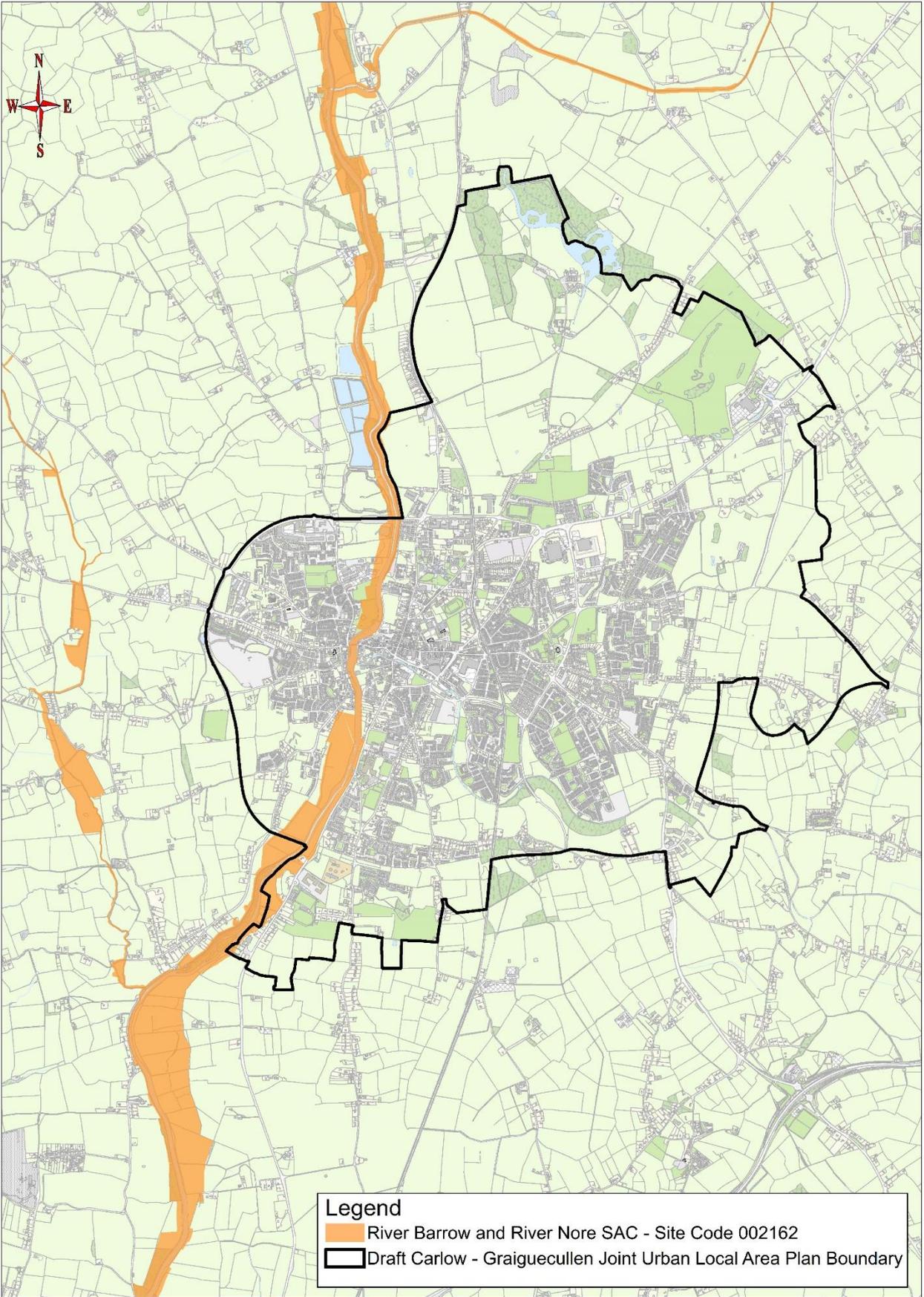
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural, Landscape and Green Infrastructure		
<p>enhancing this network. In this regard, the Department recommends investigation of the Sugar Factory land on the Carlow side of the River Barrow as potential GI. It is noted that part of this land, which appears to be currently unzoned is within the River Barrow and River Nore SAC.</p>		<p>biodiversity and flora and fauna is provided by the existing planning framework, including existing legislation, the RSES and the Draft Plan, which includes various focused provisions in this regard.</p> <p>Additional work, such as habitat/interconnected ecological network mapping, could contribute towards the protection and enhancement of this network, however such work is not necessary for the SEA or AA of the Draft JULAP.</p> <p>It is considered appropriate that lands along the tow path of the River Barrow to the west of the Sugar Factory Site be zoned open space and amenity and incorporated into the land use zoning map and the Green Infrastructure Map.</p> <p>Recommendation Amend Land Use Zoning Map 12.1 to zone lands along the tow path of the River Barrow to the west of the Sugar Factory Site as Open Space and Amenity and that same be reflected in the Network of Green Infrastructure Map 10.3.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural, Landscape and Green Infrastructure		
		 <p>The map displays a plan view of a watercourse and surrounding land parcels. A thick green line highlights a section of the watercourse on the right side of the map. A callout box with a black border and white background points to this green area, containing the text: "CE Recommendation: Zone to Open Space and Amenity". A north arrow is located in the top left corner of the map area. The map uses various colors to delineate different zones or parcels: pink, blue, yellow, and green.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural, Landscape and Green Infrastructure		
The PPN notes that there is a need to protect designated sites of importance such as the River Burren and Barrow and oak Park.	CLW-C79-26	<p>Noted and agreed. A Natura Impact Report (NIR) has been prepared in support of the Appropriate Assessment (AA) of the Draft Carlow-Graigecullen Joint Urban Local Area Plan 2024-2030 in accordance with the requirements of Article 6(3) of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (as amended). The NIS is part of the ongoing AA process that is being undertaken alongside the preparation of the Plan. It will be considered, alongside other documentation prepared as part of this process, at adoption of the Plan. Furthermore, the policy framework to support the protection of PNHAs and SACs is contained in Chapter 10 of the Draft JULAP.</p> <p>Recommendation No change</p>

Chief Executive Recommendation

Map 10.1 Update of Map River Barrow and River Nore SAC	
Update Map to illustrate full extent of the SAC within and adjoining the JULAP boundary	The full extent of the SAC within and adjoining the boundary to be updated to reflect the boundary as contained in the Natura Impact Report.



Chapter 11: Climate Action

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Climate Action		
3.11.1 Climate Action		
<p>The submission on behalf of the Department of the Environment, Climate and Communications outlines a number of recommendations for consideration / inclusion in the JULAP:</p> <p><u>Recommendation 1:</u> Consistent with climate action policies and objectives of the CCDP and LCDP, the JULAP should support the implementation of the national Climate Action Plan and the Carlow/Laois Council Climate Action Plan through the preparation of effective objectives and actions for climate action in the JULAP area.</p> <p><u>Recommendation 2:</u> The Local Authorities are requested to include specific reference to the NAF and any subsequent variations in the finalised JULAP, by incorporating policy which is consistent with the updated NAF and policies in the CCDP 2022-2028 and LCDP 2021-2027.</p> <p><u>Recommendation 3:</u> Encourages the inclusion of an objective of the Councils in the JULAP to promote the development of appropriately scaled renewable energy installations (rooftop solar, geothermal energy and other types of installations appropriate to urban environments), and to support the development of additional supporting grid</p>	<p>CLW-C79-62</p>	<p><u>Recommendation 1 and 2:</u> While the Carlow County Development Plan 2022-2028 and the Laois County Development Plan 2021-2027 provide the overarching spatial planning frameworks for both counties and address Climate Action in detail with supporting policies to support the implementation of Climate Action Policy, It is considered that an additional overarching policy can be included to support the implementation of the National Climate Action Plan, the National Adaptation Framework, the Carlow Climate Action Plan, the Laois Climate Action Plan and any amendments thereto.</p> <p><u>Recommendation 3:</u> The relevant provisions to support energy efficiency and conservation and associated Energy Infrastructure are contained within the relevant County Development Plan. The CDPs are to be read in tandem with the JULAP and this provides the appropriate policy framework to achieve the requirements of this recommendation.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Climate Action		
<p>infrastructure in line with the CAP24 and policy in the CCDP 2022-2028 and LCDP 2021-2027.</p> <p><u>Recommendation 4:</u> Encourages the Local Authority to not include policy which protects road infrastructure over grid infrastructure in the final JULAP.</p> <p><u>Recommendation 5:</u> Notes the Local Authorities' promotion of the retrofitting of existing buildings (11.9 Energy Efficiency). Encourages further consideration with regard to the energy efficiency of existing residential buildings. The Local Authorities are requested to consider the development of the electrification of heating to further their objective during the preparation of the Local Area Plan and adopt a target-based approach in line with RH.02 of the CCDP 2022-2028, while having regard to the CAP24. As such, explicit policies in support of retrofitting and the electrification of heat are encouraged in the finalised JULAP.</p> <p><u>Recommendation 6:</u> Encourages the Local Authorities to consider implementing a policy at JULAP level, which promotes the use of geothermal heat pumps, having regard to the Policy Statement on Geothermal Energy for a Circular Economy and the National Heat Study.</p> <p><u>Recommendation 7:</u> Encourages the Local Authorities to examine the potential of district heating in both existing and new developments,</p>		<p><u>Recommendation 4:</u> This provision is not included in the Draft JULAP.</p> <p><u>Recommendation 5, 6 and 7:</u> The relevant provisions to support energy efficiency and conservation, Geothermal Energy, and District Heating are contained within the relevant County Development Plan. The CDPs are to be read in tandem with the JULAP and this provides the appropriate policy framework to achieve the requirements of this recommendation.</p> <p>Recommendation Include additional Policy in Chapter 11 as follows:</p> <p><i>It is the policy of Carlow County Council and Laois County Council to:</i></p> <p><i>Support the implementation of National, Regional and Local Climate Policy including support for the implementation of the National Climate Action Plan, the National Adaptation Framework, the Carlow Climate Action Plan, the Laois Climate Action Plan and any amendments thereto over the period of this Plan.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Climate Action		
including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. The National Heat Study provides a comprehensive assessment of the options available to decarbonise Ireland's energy used for heating and cooling homes, businesses, and industry.		
Climate Action should be highlighted in each chapter of the JULAP consultation in recognition of the SDG's indicating that it is not a standalone issue.	CLW-C79-26	Climate Action is a theme which is addressed in all Chapters of the Draft JULAP. Refer to Table 11.2 which illustrates how climate action mitigation and adaptation are addressed in policies, objectives, and related provisions of the Draft JULAP. Recommendation No change
The Chamber of Commerce notes the importance of Environmental Sustainability and that both County Council councils are currently in the process of completing their respective Climate Action Plans and it is imperative that they are connected, and show joined up thinking in the approach to the Carlow Graiguecullen area.	CLW-C79-36	Both Carlow County Council and Laois County Council will work collaboratively to implement the respective Climate Action Plans including facilitating the role of Carlow Town Decarbonisation Zone in the delivery of effective climate action at local level facilitating the transition to a low carbon and climate resilient urban area. Recommendation No change
The JULAP should consider the climate resilience co-benefits of measures to protect surface water quality and habitat. These include	LS-C79-1	Table 11.2 of the Draft JULAP outlines how the Plan incorporates policies, objectives and related provision of the Plan which seek to contribute to climate change

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.11 Climate Action						
<p>increased biodiversity, carbon sequestration, improved flood resilience, access to nature, and the contribution to general wellbeing.</p>		<p>mitigation and adaptation. Of particular note regarding this submission are those provided in Chapter 7 and Chapter 10 as follows:</p> <table border="1" data-bbox="1182 544 2087 1331"> <tbody> <tr> <td data-bbox="1182 544 1415 1074"> <p>Chapter 7</p> <p>Infrastructure and Environmental Services</p> </td> <td data-bbox="1415 544 2087 1074"> <ul style="list-style-type: none"> ▪ Require the use of nature-based solutions and sustainable urban drainage systems (SuDS) in the management of surface water drainage, including an allowance for climate change. ▪ Require flood risk management, including site-specific flood risk assessment, to take account of climate change impacts. ▪ Supports best practice water conservation measures, including the use of rainwater harvesting systems and roof water collection. ▪ Supports protection of existing and potential water resources and their use by humans and wildlife, including rivers, streams, groundwater, and associated habitats and species. </td> </tr> <tr> <td data-bbox="1182 1074 1415 1331"> <p>Chapter 10</p> <p>Natural Heritage, Green Infrastructure and Landscape</p> </td> <td data-bbox="1415 1074 2087 1331"> <ul style="list-style-type: none"> ▪ Seeks to protect, conserve, and manage natural heritage in Carlow-Graiguecullen to ensure it contributes to the future sustainable development of the joint urban area. ▪ Recognises and supports the role of natural heritage, biodiversity and landscape as a non-renewable resource and eco-system services asset that can </td> </tr> </tbody> </table>	<p>Chapter 7</p> <p>Infrastructure and Environmental Services</p>	<ul style="list-style-type: none"> ▪ Require the use of nature-based solutions and sustainable urban drainage systems (SuDS) in the management of surface water drainage, including an allowance for climate change. ▪ Require flood risk management, including site-specific flood risk assessment, to take account of climate change impacts. ▪ Supports best practice water conservation measures, including the use of rainwater harvesting systems and roof water collection. ▪ Supports protection of existing and potential water resources and their use by humans and wildlife, including rivers, streams, groundwater, and associated habitats and species. 	<p>Chapter 10</p> <p>Natural Heritage, Green Infrastructure and Landscape</p>	<ul style="list-style-type: none"> ▪ Seeks to protect, conserve, and manage natural heritage in Carlow-Graiguecullen to ensure it contributes to the future sustainable development of the joint urban area. ▪ Recognises and supports the role of natural heritage, biodiversity and landscape as a non-renewable resource and eco-system services asset that can
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Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation	
3.11 Climate Action			
			<p>contribute towards sustainable urban drainage, flood management, and climate action.</p> <ul style="list-style-type: none"> ▪ Supports the conservation and enhancement of the River Barrow and River Nore SAC. ▪ Seeks to protect wildlife habitats and species not otherwise protected by legislation, including woodland, river, wetlands, and grassland areas. ▪ Recognises and supports the role of green infrastructure as a natural asset capable of strengthening climate resilience in Carlow-Graigecullen. <p>Recommendation No change</p>
3.11.2 Climate Change			
<p><u>Climate Change</u>. The impacts of climate change are taken into account in Uisce Eireann plans and projects e.g. the National Water Resources Plan. Uisce Eireann is preparing a strategy which will respond to global and national climate change legislative and policy frameworks for climate change action and fulfils the requirements of UE's Water Services Strategic Plan 2015, The Water Services Policy Statement 2018</p>	CLW-C79-41	<p>The content of this submission is noted and welcome.</p> <p>Recommendation No change</p>	

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Climate Action		
– 2025 and most recently the Climate Change Sectoral Adaptation Plan for Water Quality and Water Services Infrastructure 2019.		
3.11.3 Renewable Energy		
Notes that it would be useful to have information on the role of other statutory bodies regarding renewable energy.	CLW-C79-52	<p>While the content is noted, this is outside the remit of the Draft JULAP.</p> <p>Recommendation No change</p>

Chapter 12: Land Use Zoning Objectives and Implementation

(i) Land Use Zoning – Carlow County Council and Laois County Council

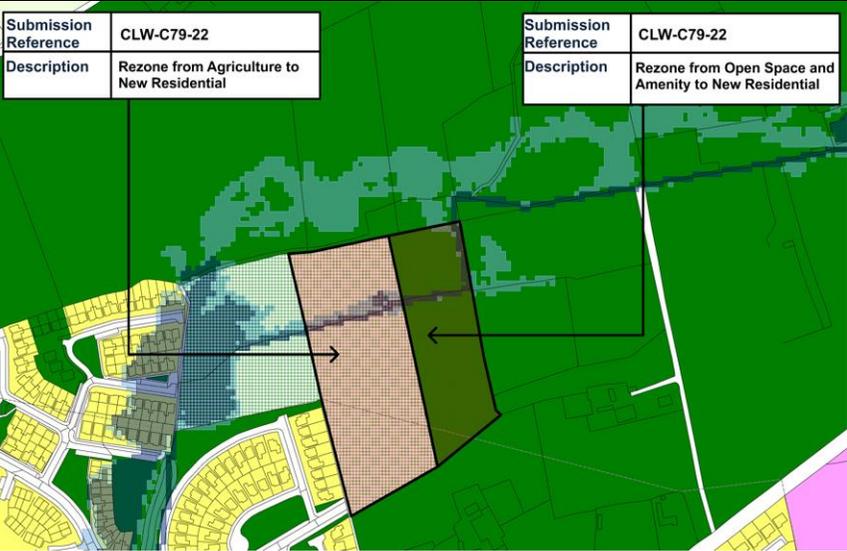
Key Issue	Sub. No.	Chief Executive’s Opinion & Recommendation
<p>3.12 Land Use Zoning Objectives and Implementation Carlow County Council and Laois County Council</p>		
<p>3.12.1 General Recommendation</p>		
<p>Land Use Zoning Map (Map 12.1) and Objectives Map (Map 12.2)</p> <p>(i) The OPW Requests revision to the descriptions for the Flood Zones provided in the legends - “<i>Flood Zone A Chance of Flooding Once Every 100 Years</i>” and “<i>Flood Zone B Chance of Flooding Once Every 1000 Years</i>”. If the descriptions are to be provided, then the terminology used should be 1% AEP or a 1 in 100 chance of occurring in any given year for Flood Zone A and 0.1% AEP or a 1 in 1000 chance of occurring in any given year for Flood Zone B.</p> <p>(ii) Notes that the Flood Zones on these maps appear to show defended extents. Flood Zones are defined ignoring the presence of flood defences (Section 2.25 of the Guidelines). These maps have also not included the Flood Zones which were established using the National Indicative Fluvial dataset. Therefore, the Flood Zones on these maps are underestimated and should be updated as per the Flood Zone map that is provided in the SFRA.</p>	<p>CLW-C79-21</p>	<p>Noted and agreed.</p> <p>Recommendation See response to Recommendation no. 3 OPR submission CLW-C79-42 and LS-L79-6)</p>
<p>3.12.2 Land Use Zoning Objectives Flexibility</p>		
<p>(a) Flexible Zoning Objectives An Post requests flexibility under strategic land use zonings and objectives to allow enhancement of existing facilities and the development of new postal infrastructure. Requests that the Plan include provision for An Post postal</p>	<p>CLW-C79-24</p>	<p>Section 12.1 in Chapter 12 sets out the land use zoning categories and objectives for the JULAP. The permitted in principle and open for consideration uses for each land use zone as listed category in Table 12.1 are intended as general guidance only and are therefore not</p>

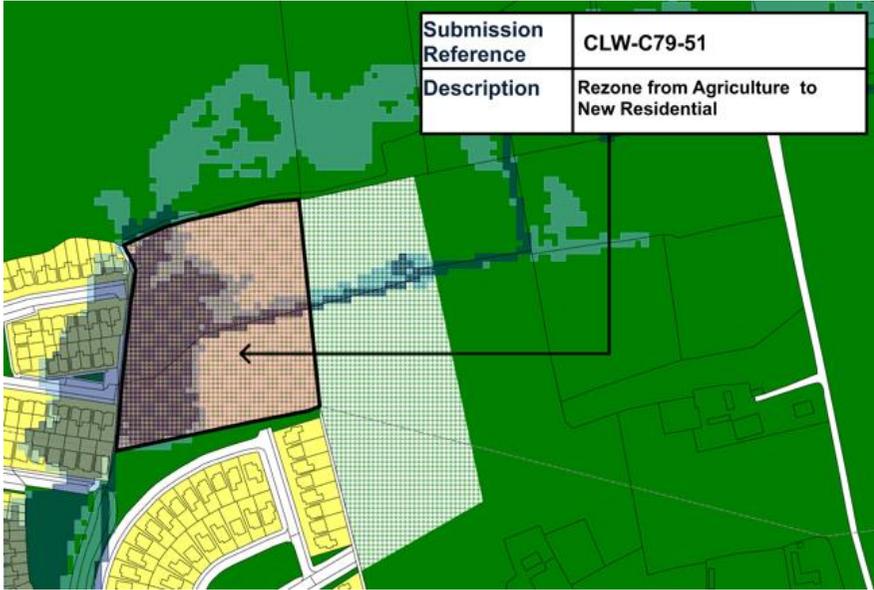
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.12 Land Use Zoning Objectives and Implementation Carlow County Council and Laois County Council		
<p>facilities as "permissible in principle" or "open for consideration" across all land use zoning objectives.</p> <p>It is also requested that the plan include a specific land use classification for postal facilities in the LAP:</p> <p>Postal Facilities: <i>A building which facilitates mail services that can include the processing, sortation and distribution of mail</i>** <i>*this use can be assessed on a case by case basis appropriate to site context and all other relevant policies, objectives and standards in the plan</i>".</p>		<p>exhaustive. This is further clarified in section 12.1.1 which states in this regard that <i>"Whilst an extensive list of potential land uses in the 'Permitted in Principle' and 'Open for Consideration' categories has been provided for each of the land use zones, it is recognised that there may be scenarios where there are proposals for uses that are not listed. Where this arises such proposals will be considered on their individual merits, with reference to the most appropriate use of a similar nature that is listed, and taking account of surrounding land uses, the compatibility of the use/development in the area in which it is proposed to locate, compliance with the relevant policy, objectives, standards and requirements as set out in this JULAP, and the proper planning and sustainable development of the area"</i>.</p> <p>In view of the foregoing, it is considered that a new use classification for postal facilities as requested in the submission is not required. The land use zoning provisions in the Draft JULAP are sufficiently comprehensive, robust, and flexible such that the development of existing and proposed postal services and facilities can be provided for subject to compliance with proper planning and sustainable development.</p> <p>Recommendation No change</p>
<p>MKO on behalf of SETU, respectfully requests that Student Accommodation is explicitly referenced as 'Permitted in Principle' under New Residential, Existing / Infill Residential, and Community / Education land use zoning objectives within the Draft Carlow Graiguecullen Joint Urban LAP 2024-2030 in order to facilitate the development of Purpose-Built Student Accommodation. Noting that this</p>	<p>CLW-C79-34</p>	<p>While the Councils acknowledge the request of SETU, it is considered that student accommodation is a form of residential use that can be considered as appropriate under the relevant land use zoning classification. Student accommodation as a form of residential accommodation would be permitted in principle under new residential, existing residential/ infill</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.12 Land Use Zoning Objectives and Implementation Carlow County Council and Laois County Council		
<p>request will work towards delivering high-quality and sustainable development that will enhance Carlow town and its communities.</p>		<p>subject to compliance with development management standards for student accommodation for Carlow Town and Carlow Town Environs in the Carlow County Development Plan 2022-2028 (Section 16.8.15). Chapter 13 of the Laois County Development Plan 2021-2027 (Section 13.2 refers).</p> <p>See previous recommendation to CLW-C79-34 to include additional Policy to support delivery of student accommodation <i>Work in collaboration with the South East Technological University and Carlow College – St. Patrick's, to support the provision of purpose-built student accommodation, or uses related to third-level educational facilities, to enhance the offerings of the South East Technological University and Carlow College St. Patrick's within Carlow-Graigecullen, in accordance with the provisions of Policy SA P1 and other related policies within the JULAP Plan and other applicable Development Management standards as outlined in the Carlow County Development Plan 2022-2028 (including Section 16.8.15) and the Laois County Development Plan 2021-2027 (including Section 13.2). as appropriate</i>".</p> <p>In support of implementation of the above it is recommended that student accommodation is permitted in principle on third level owned campus locations within the community/education zone.</p> <p>Recommendation: Include in Table 12.1 purpose built and managed student accommodation as a use permitted in principle on third level owned campus locations within the community / educational zone.</p>

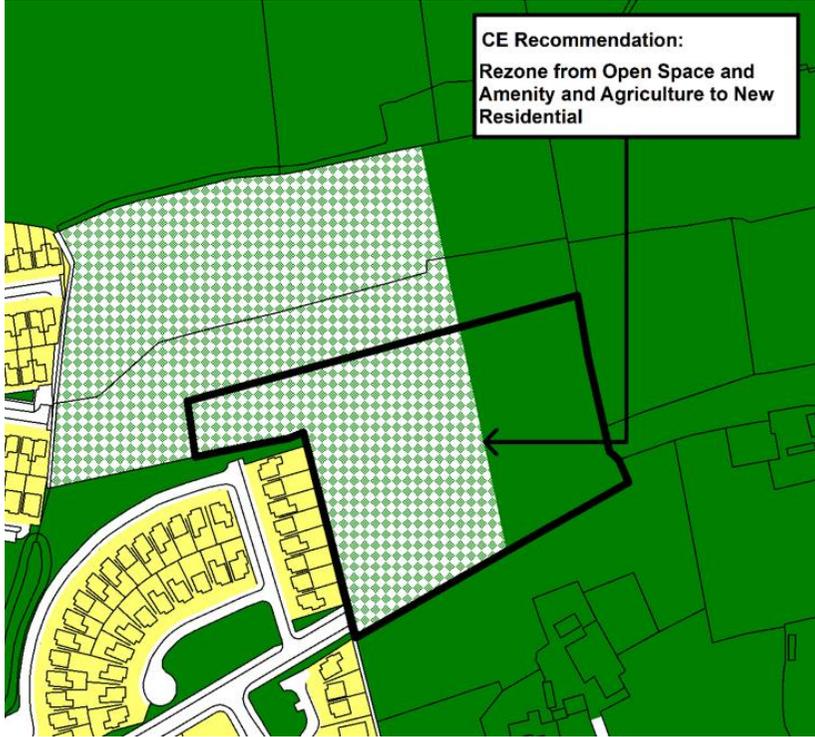
(iii) Land Use Zoning – Carlow County Council

Key Issue	Sub. No.	Chief Executive’s Opinion & Recommendation
<p>3.13 Land Use Zoning Objectives - Carlow County Council</p>		
<p>3.13.1 Land Use Zoning Requests - Residential</p>		
<p>3.13.1.1 Lands adjoining / proximate to Castle Oaks</p>		
<p>Submission by JC Brenco relates to two separate Folios at Pollerton Little and requests that the land use proposed change from the JSP – Residential to Agriculture be reinstated as New Residential. Reference is made to confirmation of feasibility obtained from Uisce Eireann for the site. Acknowledges that there may be concern regarding flood risk but notes the site is not severely affected by flood risk and refers to a FRA carried out under 16/93 and willingness to implement recommendations.</p> <p>Requests zoning of additional land (not previously zoned in JSP) in lieu of land use zoning change for IDA land as outlined hereunder noting its ideal location for commuting, close proximity to the town centre and ease of entering the M9. References the willingness of the agricultural landowner to make the lands available for residential purposes.</p>	<p>CLW-C79-22</p>	<p>Three number submissions have been received regarding proposed rezoning of lands from proposed agriculture to new residential adjoining Castleoaks Estate (Ref: Sub CLW-C79-22, CLW-C79-51 and CLW-C-39).</p> <p>Under the provisions of the JSP an area of 2.3ha and 2.03 ha were zoned New Residential.</p> <p>These areas were proposed for rezoning due to flood risk considerations associated with the lands.</p> <p>In summary;</p> <p>Submission CLW-C79-22 seeks:</p> <ul style="list-style-type: none"> - the reinstatement of 2.03 ha as new residential and the rezoning of a further 1.76ha as new residential from open space and amenity. <p>Submission CLW-C79-51 seeks:</p> <ul style="list-style-type: none"> - The reinstatement of a stated area of 2.6ha as new residential.

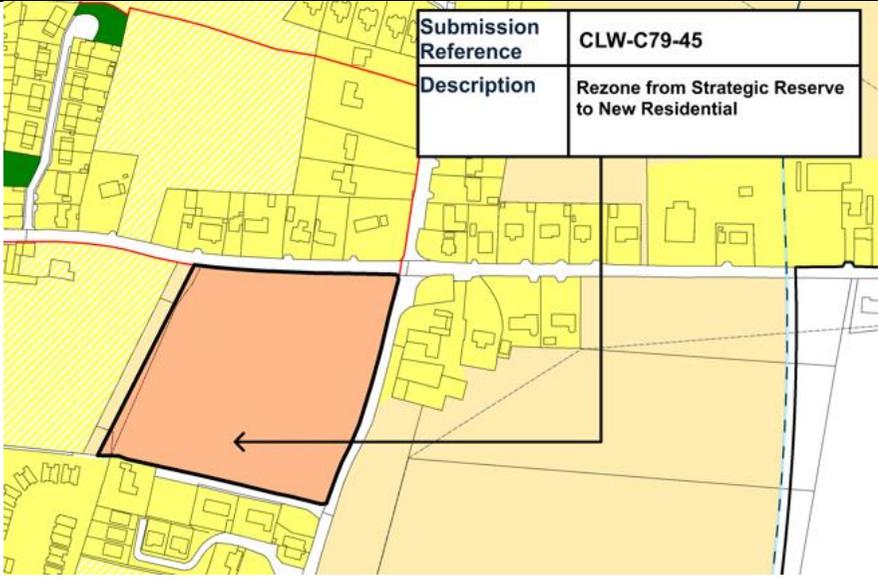
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation								
3.13 Land Use Zoning Objectives - Carlow County Council										
<table border="1" data-bbox="210 379 528 469"> <tr> <td>Submission Reference</td> <td>CLW-C79-22</td> </tr> <tr> <td>Description</td> <td>Rezone from Agriculture to New Residential</td> </tr> </table>  <p data-bbox="210 1187 1088 1362">Submission by Dermot Kehoe on behalf of Pat Kehoe requesting that 2.6ha site be zoned New Residential as opposed to Agriculture, reverting to previous zoning of the site under the JSP. Notes that the site is serviced in terms of road access, foul and storm drainage together with utility services. An initial assessment regarding flood risk accompanies the submission prepared by IE Consulting. Submits that the</p>	Submission Reference	CLW-C79-22	Description	Rezone from Agriculture to New Residential	<table border="1" data-bbox="734 379 1052 469"> <tr> <td>Submission Reference</td> <td>CLW-C79-22</td> </tr> <tr> <td>Description</td> <td>Rezone from Open Space and Amenity to New Residential</td> </tr> </table> <p data-bbox="1115 1187 1234 1251">CLW-C79-51</p>	Submission Reference	CLW-C79-22	Description	Rezone from Open Space and Amenity to New Residential	<p data-bbox="1265 411 2051 475">Submission CLW-C79-39 seeks:</p> <ul data-bbox="1312 451 2051 480" style="list-style-type: none"> - Reinstatement of lands formerly zoned new residential in the JSP. <p data-bbox="1265 523 2018 660">While the location of these lands immediately adjoining the Castleoaks Estate with the availability of services, the flood risk considerations associated with the landholding impact significantly on the zoning and development potential of the entirety of the lands.</p> <p data-bbox="1265 708 2078 1066">Regarding submission no. 22, JBA Consulting, who prepared the SFRA for the Draft JULAP, note that: - <i>given the location of the site on the very periphery of the settlement it is not possible to pass the Justification Test within Flood Zone A/B. It is therefore not possible to zone land that is at risk of flooding in this location. Some lands remain in Flood Zone C and these would generally be considered appropriate for zoning on flood risk grounds. When considering the extent of zoning then regard should be given to climate change extents, access requirements and appropriate provision for green infrastructure and the riparian zone, as per CDP Policy. This approach would preferentially lead to zoning of land only in the southern portion of the lands.</i></p> <p data-bbox="1265 1187 2069 1324">JBA Consulting note that:- <i>given the location of the site on the very periphery of the settlement it is not possible to pass the Justification Test within Flood Zone A/B. It is therefore not possible to zone land that is at risk of flooding in this location. Some lands in the south east corner remain in Flood Zone C</i></p>
Submission Reference	CLW-C79-22									
Description	Rezone from Agriculture to New Residential									
Submission Reference	CLW-C79-22									
Description	Rezone from Open Space and Amenity to New Residential									

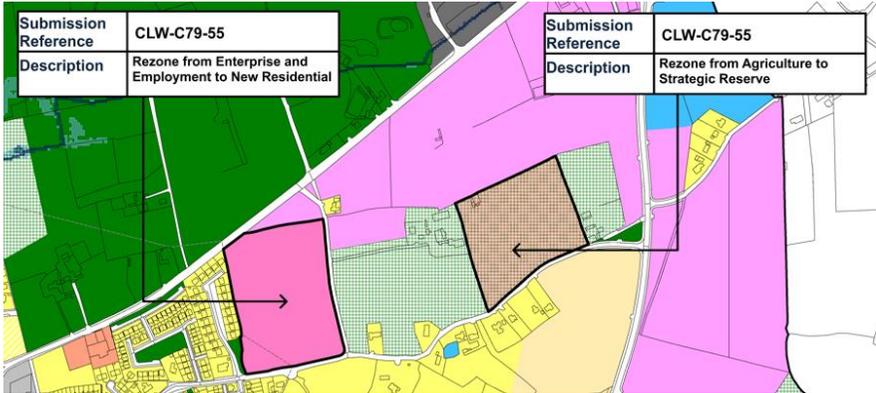
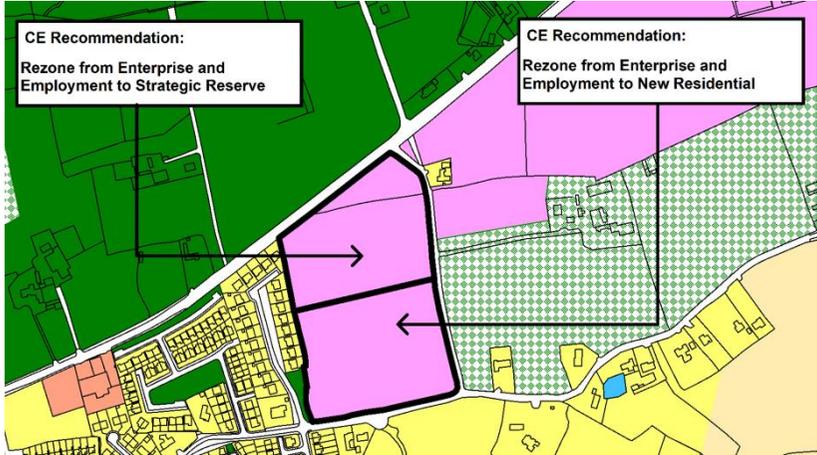
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
<p>site would deliver high quality development, comply with unit allocation for the JULAP area and that the applicants are in the final stages of preparing an application for the site.</p>  <table border="1" data-bbox="622 528 1068 651"> <tr> <td>Submission Reference</td> <td>CLW-C79-51</td> </tr> <tr> <td>Description</td> <td>Rezone from Agriculture to New Residential</td> </tr> </table> <p>Submission by Jimmy Walsh requests that land previously zoned residential at Pollerton Little adjacent to Castleoaks development be reinstated from Agriculture to New Residential having regard to the following points:</p> <ul style="list-style-type: none"> - Land is not a flood risk and has been farmed for 50 years 	Submission Reference	CLW-C79-51	Description	Rezone from Agriculture to New Residential	<p>CLW-C79-39</p>	<p><i>and these would generally be considered appropriate for zoning on flood risk grounds. When considering the extent of zoning then regard should be given to climate change extents, access requirements and appropriate provision for green infrastructure and the riparian zone, as per CDP Policy. The argument regarding zoning the land on the assumption that the risk will be mitigated by a future flood relief scheme is premature and not a reasonable justification. Any flood relief scheme would only be bound to protect existing property and a simple increase in conveyance at this point may exacerbate downstream flooding. It would be prudent to retain the upstream floodplain for storage purposes.</i></p> <p>This submission appears to relate to the lands referenced in previous submissions above. No map has been submitted with the submission.</p> <p>Conclusion: The climate change flood extents have been reassessed for the relevant sites and are illustrated in the image below. Zoning of the lands</p>
Submission Reference	CLW-C79-51					
Description	Rezone from Agriculture to New Residential					

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<ul style="list-style-type: none"> - Land appropriately sited serviced by water and sewerage lines with access on to the main intersection for Castleoaks. - It would be a missed opportunity to provide housing. - It would complement the 10-minute town concept. - Provision of sewer line to MSD through the lands was regarded as being a notable investment for future development. <p>The provision of housing in the immediate vicinity of MSD and IDA would represent good planning.</p>		<p>within Flood Zone A/B would not be able to apply/pass the justification test for any lands which is required in order to comply with Flood Risk Management Guidelines for Planning Authorities, County Development Plan Policy, and Draft JULAP policy (FR P1).</p> <div data-bbox="1429 555 1921 1040" data-label="Image"> </div> <p>Excluding the areas directly affected by flood risk zones A and B and climate change considerations an area of 2.5ha of land previously zoned new residential and open space could be accommodated on the site.</p> <p>Recommendation</p>

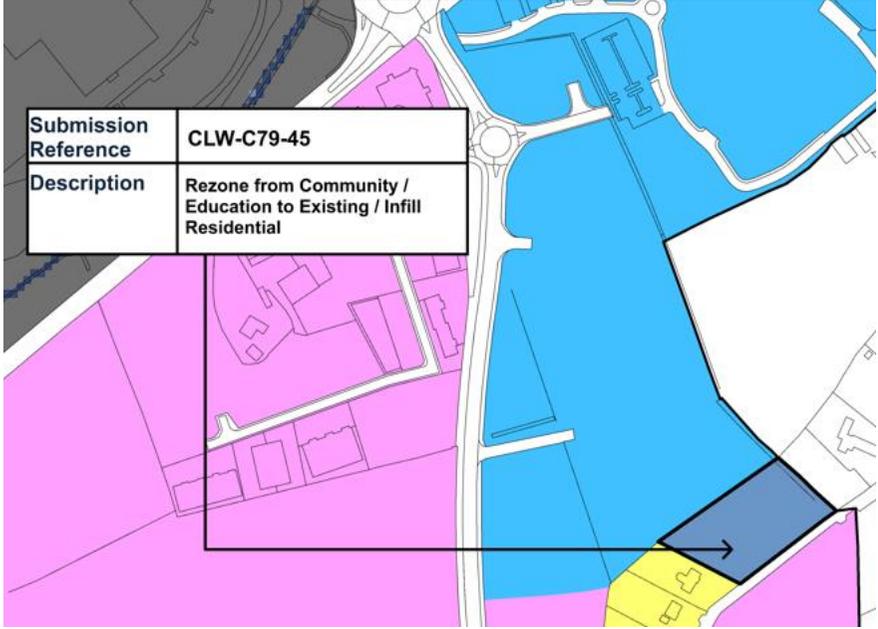
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p>Given the location of the site, which is sequentially appropriate for development adjoining the Castleoaks Estate with services available it is recommended that:</p> <ul style="list-style-type: none"> - 2.5ha. be rezoned New Residential.  <p>CE Recommendation: Rezone from Open Space and Amenity and Agriculture to New Residential</p>

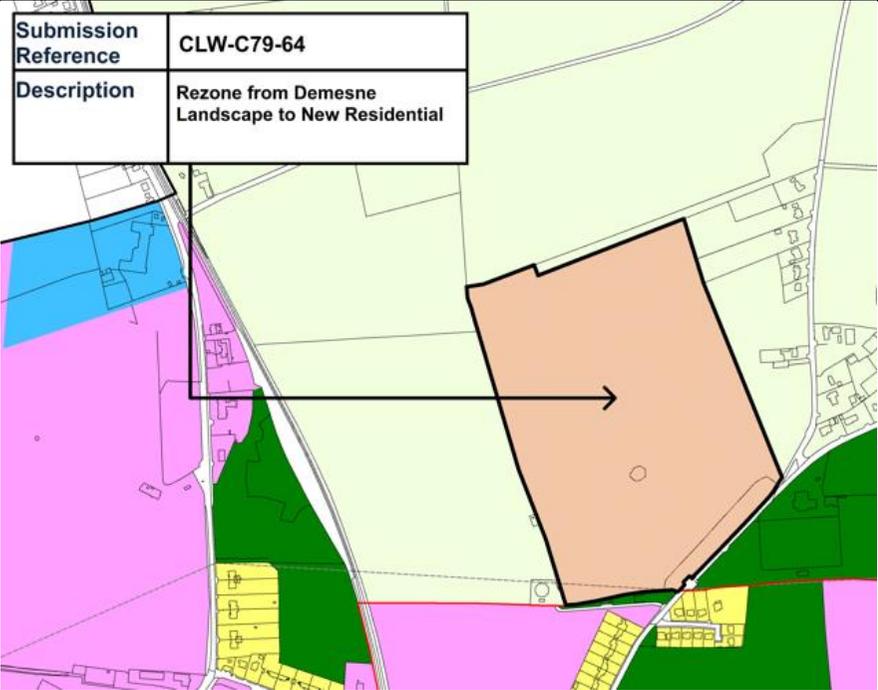
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.1.2 Lands on Brownhill Road		
<p>Tom Phillips and Associates on behalf of Nesselside requests that Carlow County Council amend the land use zoning objective relating to the subject site from 'Strategic Reserve' to 'New Residential' use; having regard to, inter alia, the strategic location of this serviced site. Moreover, it references that there is an extensive history of permitted residential development, to the southwest of the site (most recently for 55 No. units and 81 No. units, granted in 2022 and 2023 respectively, reflecting the proven track record of our client in delivering well-designed residential development. (CCC Reg. Ref. 21524 and 2379 refer).</p> <p>In support of the proposed request the following is stated:</p> <ul style="list-style-type: none"> - Proximity to Carlow town centre and the wider environs and mix of uses available. - Represent a logical, sequential location for new residential development. - Access to services with foul water, potable water and road infrastructure. - Serviced by the CW2 Bus Route 550m from the site - Supports the continued delivery of dwellings in this part of the town. 	<p>CLW-C79-45</p>	<p>Having regard to available capacity to accommodate additional growth in the Carlow Environs area (Refer response to OPR Recommendation 1 Sub CLW-C79-42, Section 2.3) it is considered that the rezoning of the site from strategic reserve to new residential is appropriate for the following reasons:</p> <ul style="list-style-type: none"> - The zoning can be accommodated with reference to the core strategy figures for Carlow Environs. - The site is sequentially appropriate for further residential development. - Site is appropriately serviced by water / wastewater and other service infrastructure. - Site is not located within an area subject to flooding. - It comprises part of a larger landholding in the immediate area which has successfully been developed for housing. <p>Recommendation It is recommended that the 2.5ha site be rezoned from Strategic Reserve to New Residential as requested.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="622 379 1064 528"> <tr> <td>Submission Reference</td> <td>CLW-C79-45</td> </tr> <tr> <td>Description</td> <td>Rezone from Strategic Reserve to New Residential</td> </tr> </table>	Submission Reference	CLW-C79-45	Description	Rezone from Strategic Reserve to New Residential		
Submission Reference	CLW-C79-45					
Description	Rezone from Strategic Reserve to New Residential					
3.13.1.3 Lands at Pollerton Little						
<p>Submission by Declan Kehoe on behalf of Peter Kelly.</p> <p>Requests rezoning of Plot A from Enterprise and Employment to New Residential In support of the submission the following is outlined:</p> <ul style="list-style-type: none"> - Site is a natural progression to adjacent residential developments and conveniently located. - Reference is made to the RSES, NPF, the NDP - Submits that the lands are already serviced and have water services, surface water drainage, roads infrastructure and bus service. 	CLW-C79-55	<p><u>Plot A</u></p> <p>Further to a re-assessment of residential capacity within the Carlow Environs area (See OPR Submission CLW-C42 Section 2.3), the planning authority is satisfied that the site is sequentially appropriate for residential development, immediately adjoins existing established residential uses, and is located outside any flood risk zones. Having regard to the availability of additional lands (3ha) to meet the core strategy figures it is recommended that 3ha of the site is zoned new residential with the remaining site area zoned strategic reserve.</p>				

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation												
3.13 Land Use Zoning Objectives - Carlow County Council														
<p>- Sufficient capacity existing in residential allocation to Carlow indicating some landowners are reluctant to develop, referencing RZLT submission, legal issues and economic viability.</p>  <table border="1" data-bbox="215 528 539 612"> <tr> <td>Submission Reference</td> <td>CLW-C79-55</td> </tr> <tr> <td>Description</td> <td>Rezone from Enterprise and Employment to New Residential</td> </tr> </table> <table border="1" data-bbox="745 528 1070 612"> <tr> <td>Submission Reference</td> <td>CLW-C79-55</td> </tr> <tr> <td>Description</td> <td>Rezone from Agriculture to Strategic Reserve</td> </tr> </table>	Submission Reference	CLW-C79-55	Description	Rezone from Enterprise and Employment to New Residential	Submission Reference	CLW-C79-55	Description	Rezone from Agriculture to Strategic Reserve		<p>Recommendation</p> <p>Plot A: Rezone 3ha new residential to the south of the site and 3ha strategic reserve.</p>  <table border="1" data-bbox="1274 580 1563 665"> <tr> <td>CE Recommendation:</td> </tr> <tr> <td>Rezone from Enterprise and Employment to Strategic Reserve</td> </tr> </table> <table border="1" data-bbox="1783 580 2072 665"> <tr> <td>CE Recommendation:</td> </tr> <tr> <td>Rezone from Enterprise and Employment to New Residential</td> </tr> </table>	CE Recommendation:	Rezone from Enterprise and Employment to Strategic Reserve	CE Recommendation:	Rezone from Enterprise and Employment to New Residential
Submission Reference	CLW-C79-55													
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CE Recommendation:														
Rezone from Enterprise and Employment to New Residential														
<p>Submission by Declan Kehoe on behalf of Peter Kelly. Requests rezoning of Plot B from Agriculture to Strategic Reserve In support of the submission the following is outlined:</p> <ul style="list-style-type: none"> - Site is a natural progression to adjacent residential developments and conveniently located. 	<p>CLW-C79-55</p>	<p><u>Plot B</u></p> <p>While it is acknowledged that the designation of Strategic Reserve provides a land reserve for future expansion it is considered that sufficient strategic reserve lands are proposed within the Carlow Environs including lands now proposed as strategic reserve at Pollerton Big (40ha). Furthermore, the</p>												

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation								
3.13 Land Use Zoning Objectives - Carlow County Council										
<ul style="list-style-type: none"> - Reference is made to the RSES, NPF, the NDP - Submits that the lands are already serviced and have water services, surface water drainage, roads infrastructure and bus service. - Sufficient capacity existing in residential allocation to Carlow indicating some landowners are reluctant to develop, referencing RZLT submission, legal issues and economic viability. <div data-bbox="203 628 1079 1023" style="border: 1px solid black; padding: 5px;"> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Submission Reference</td> <td>CLW-C79-55</td> <td style="width: 30%;">Submission Reference</td> <td>CLW-C79-55</td> </tr> <tr> <td>Description</td> <td>Rezone from Enterprise and Employment to New Residential</td> <td>Description</td> <td>Rezone from Agriculture to Strategic Reserve</td> </tr> </table> </div>	Submission Reference	CLW-C79-55	Submission Reference	CLW-C79-55	Description	Rezone from Enterprise and Employment to New Residential	Description	Rezone from Agriculture to Strategic Reserve		<p>planning history associated with the landholding and the immediate area indicates that the site is not fully serviced.</p> <p>Recommendation No change</p>
Submission Reference	CLW-C79-55	Submission Reference	CLW-C79-55							
Description	Rezone from Enterprise and Employment to New Residential	Description	Rezone from Agriculture to Strategic Reserve							
<p>Tom Phillips and Associates on behalf of Nesselside requests that Carlow County Council amend the zoning objective relating to the southern section of the site to Infill/Existing Residential Use, to support the appropriate use of the subject lands for residential use.</p> <p>In respect of proposed zoning on southern portion of site, reference is made to the prevailing residential uses fronting Pollerton Manor Road.</p>	<p>CLW-C79-45</p>	<p>The proposed rezoning of this peripherally located site on the edge of the development boundary for residential use would be contrary to national, regional, and county level policy, which is focused on ensuring more sustainable compact growth through the provision of housing within strategic and existing built-up areas and the development of land in a sequential manner, rather than more sprawl of urban development. National Policy Objectives 3(a), 3(b) and 3(c) in the NPF refer, along with Regional</p>								

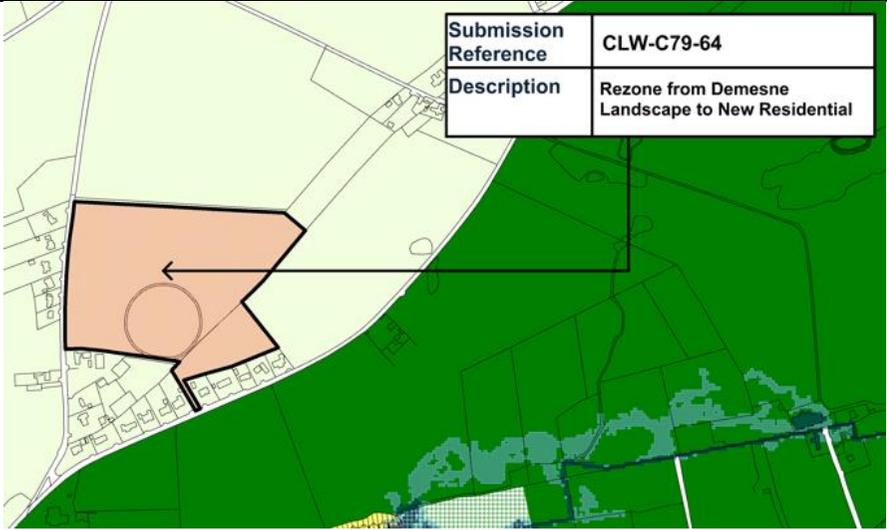
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="230 480 669 627"> <tr> <td>Submission Reference</td> <td>CLW-C79-45</td> </tr> <tr> <td>Description</td> <td>Rezone from Community / Education to Existing / Infill Residential</td> </tr> </table>	Submission Reference	CLW-C79-45	Description	Rezone from Community / Education to Existing / Infill Residential		<p>Policy Objective 14 in the RSES for the Southern Region, and Objective CS.09 in the Carlow County Development Plan 2022-2028.</p> <p>Rezoning of the site for residential purposes would be contrary to the proper planning and sustainable development of the area.</p> <p>Recommendation No change</p>
Submission Reference	CLW-C79-45					
Description	Rezone from Community / Education to Existing / Infill Residential					

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
3.13.1.4 Lands at Oak Park						
<table border="1" data-bbox="219 491 674 646"> <tr> <td>Submission Reference</td> <td>CLW-C79-64</td> </tr> <tr> <td>Description</td> <td>Rezone from Demesne Landscape to New Residential</td> </tr> </table>  <p data-bbox="206 1182 1084 1209">Plot A: c. 48 acres (bounded by Oak Park Estate Road on its southeastern boundary)</p> <p data-bbox="206 1257 837 1284"><u>Plot A Proposed Demesne Landscape to New Residential</u></p> <p data-bbox="206 1294 1032 1396">Plot A: Summary of Site Suitability as submitted: The proposed site by reason of its location and close to the urban edge is well suited to plan a mixed-use, residential emphasis development.</p>	Submission Reference	CLW-C79-64	Description	Rezone from Demesne Landscape to New Residential	<p data-bbox="1115 491 1243 550">CLW-C79-64</p>	<p data-bbox="1265 491 2038 550">It is considered that the proposed rezoning of Plot A to 'New Residential' would not be appropriate, by reason of the following considerations:</p> <ul data-bbox="1317 603 2078 1369" style="list-style-type: none"> <li data-bbox="1317 603 2078 1214">• The public road frontage of Plot A commences beside the historic entrance gateway (Classical style triumphal arch) to Oak Park Demesne, which is a protected structure (RPS Ref. CW070), and which is recorded by the National Inventory of Architectural Hertiage with a 'Regional' Rating (Reg. No. 10300209). The arch is a significant and unique built heritage feature in the area, which marks the main historic approach road and entrance to the demesne, as well as the historic extent of the demesne lands i.e. being on the perimeter wall and boundary of the demesne at this location. The historic character and visual setting of the arch on approach through same from the south, benefits from an existing open landscape character afforded by the agricultural lands to the west and north, and by the Carlow Rugby Club grounds to the east. The proposed rezoning of Plot A to facilitate residential development would negatively impact and disrupt the historic character and visual setting of the arch, including key views to and from same. <li data-bbox="1317 1230 2078 1369">• The landscape character of the northern fringe area is significantly influenced by the Oak Park Demesne. Key natural features of the demesne include a relatively regular shaped field pattern of large plots divided by a series of access routes to Oak Park House
Submission Reference	CLW-C79-64					
Description	Rezone from Demesne Landscape to New Residential					

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>Submits that the rezoning of the subject lands for residential use creates a greater viability for the development of the site.</p> <p><u>Rational for rezoning as submitted:</u></p> <p>a. The zoning of these lands in their entirety as Agricultural white zoned / Demesne landscape is excessive in terms of its scale, reduction of the development potential of lands located a close proximity to established urban areas, with available services and access options.</p> <p>b. The intent of the zoning to protect the Oakpark estate is acknowledged, the following is highlighted with respect to these lands:</p> <ul style="list-style-type: none"> ○ At the extremity of the original Oakpark estate- located circa 700m from Oakpark house. ○ Clearly separated both physically and visually from the estate by the mature stand of trees on the plot's northern boundary-referenced above. ● The Oakpark estate lands to the north of the site are currently presented, subdivided into intense agriculture test plots with various mobile and semi- permanent crop support and protection structures. The activities of Oakpark as one of the country's principle agricultural research stations are renowned and expected to continue. Submits that in this context the demesne status imposed on adjoining lands seems onerous. ● Bounded by 7 No. private dwellings on the site's eastern boundary to the Oakpark Road the demesne setting is further diminished. ● Respectfully submits that the demise of the original demesne lands have long since been blurred and intruded by ribbon development at this location and many others. 		<p>(Teagasc Headquarters). Many of these fields contain mature stands of deciduous trees, which in conjunction with more recently cultivated Teagasc tree plantations, provide a sense of enclosure within the Oak Park Demesne. Plot A as submitted is located within the historic demesne landscape of Oak Park, contributes to the regular shaped field pattern referred to, contains a stand of mature trees along its public road boundary, and has a flat open topography that affords unobstructed and long-distance view-lines looking northwards from the public road across farmland in the northern fringe area. The landscape features referred to are what underpin the historic landscape attributes of the area as associated with Oak Park Demesne. They also contribute to the present-day value of the area as a high-quality amenity environment with large sections of open space, which although are not all accessible to the public, do contain important recreation routes along roads which exhibit lower levels of vehicular traffic, and which traverse open farmland and wooded areas that are within easy walking and cycling distance of the more central and built-up parts of the joint urban area. The proposed rezoning of Plot A to facilitate residential development would contribute to the incremental erosion of the historic demesne landscape and would negatively impact on its important amenity and recreation value as a large and accessible area of open space in a more natural setting that is proximate to the built-up environment of the joint urban area. The proposed rezoning of Plot A for residential use would also lead to a visually unsympathetic and disruptive transition between the urban area and the demesne landscape.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<ul style="list-style-type: none"> • The main landholding of the Agricultural Research centre should serve to ensure that the demesne setting surrounding the main Oak Park house is retained into the future. • The extension of this demesne zoning onto adjoining privately owned lands is onerous on the landowners interests and removes significant opportunities for Carlow Town to develop at this location- and meaningfully contribute to both the improvement of Urban areas defined edge - thereby contributing to the presentation of the intact Demesne. <p>c. Any development proposals for these lands would be contingent on the protection and preservation of the extant mature tree stands, with further supplemental tree planting imposed within any proposal - designed to reinstate and reinforce a demesne parkland setting.</p> <p>d. It is submitted that the zoning of the significant portion of these lands as residential would be an appropriate use and show due regard to its surroundings, particularly in the context of establishing a long-term sustainable use of the lands.</p>		<ul style="list-style-type: none"> • The proposed rezoning of Plot A for residential use would be contrary to national, regional, and county level policy, which is focused on ensuring more sustainable compact growth through the provision of housing within strategic and existing built-up areas and the development of land in a sequential manner, rather than more sprawl of urban development. National Policy Objectives 3(a), 3(b) and 3(c) in the NPF refer, along with Regional Policy Objective 14 in the RSES for the Southern Region, and Objective CS. 09 in the Carlow County Development Plan 2022-2028. The following is noted in this regard: <ul style="list-style-type: none"> - Plot A comprises an extensive area of greenfield land located in the northern environs of the joint urban area, and outside of the edge of the urban area as may be indicated by the small scale established residential development to the south along Oak Park Road. Plot A is also located in an historic demesne landscape, which exhibits a predominantly rural, agricultural, and open landscape character. Residential development on Plot A would therefore represent undesirable urban sprawl out into this more peripheral landscape setting, and at the expense of a focus on providing residential development within the existing built-up footprint of the joint urban area in accordance with national, regional, and local level policy. - The requirement for additional zoned residential land over the plan period as proposed for Plot A is not warranted, and by reference to its non-compliance with the Core Strategy in the Carlow County Development Plan 2022-2028, the quantum of land that has been

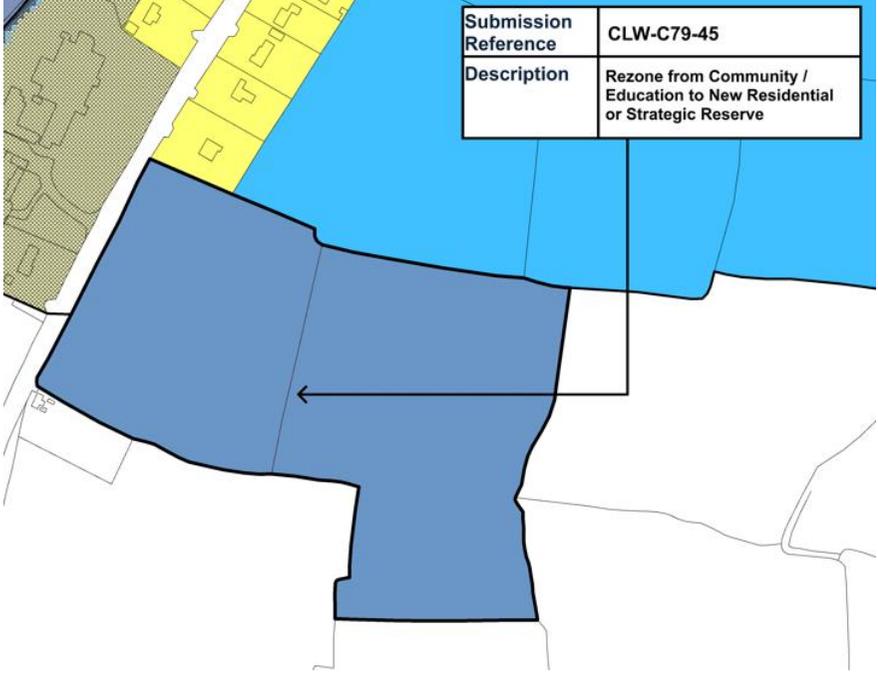
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p>zoned 'New Residential' in the Draft JULAP for Carlow Town and Carlow Town Environs and the potential capacity of this land to deliver new residential units (582 units @30/ha).</p> <ul style="list-style-type: none"> - Access to the land via the Oak Park Road would not be sustainable. The road is inadequate in width, and further restricted in width and in height by the historic entrance gateway. The Oak Park Road junction with the N80 is also restricted, and improvement works to same would require the incorporation of third-party lands. Any improvement works at the junction to provide traffic lights would also raise serious concerns in terms of potential negative impacts to vehicular capacity on the N80. <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="647 384 1075 507"> <tr> <td>Submission Reference</td> <td>CLW-C79-64</td> </tr> <tr> <td>Description</td> <td>Rezone from Demesne Landscape to New Residential</td> </tr> </table> <p data-bbox="203 906 766 935">Plot B: c.21 acres (bounded by Oak Park Estate Road)</p> <p data-bbox="203 979 837 1008"><u>Plot B Proposed Demesne Landscape to New Residential</u></p> <p data-bbox="203 1018 714 1046">Plot B: Summary of Site Suitability as submitted:</p> <p data-bbox="203 1054 1032 1120">The proposed site by reason of its location and close to the urban edge is well suited to plan a low-density residential emphasis development.</p> <p data-bbox="203 1166 580 1195"><u>Rational for rezoning as submitted:</u></p> <p data-bbox="203 1203 1090 1342">a. The zoning of these lands in their entirety as Agricultural white zoned / Demesne landscape is excessive in terms of its scale, reduction of the development potential of lands located a close proximity to established urban areas, with available services and access options.</p>	Submission Reference	CLW-C79-64	Description	Rezone from Demesne Landscape to New Residential	<p data-bbox="1113 376 1234 442">CLW-C79-64</p>	<p data-bbox="1265 376 2038 442">It is considered that the proposed rezoning of Plot B to 'New Residential' would not be appropriate, by reason of the following considerations:</p> <ul data-bbox="1312 488 2083 1364" style="list-style-type: none"> <li data-bbox="1312 488 2083 1364">• The landscape character of the northern fringe area is significantly influenced by the Oak Park Demesne. Key natural features of the demesne include a relatively regular shaped field pattern of large plots divided by a series of access routes to Oak Park House (Teagasc Headquarters). Many of these fields contain mature stands of deciduous trees, which in conjunction with more recently cultivated Teagasc tree plantations, provide a sense of enclosure within the Oak Park Demesne. Plot B as submitted is located within the historic demesne landscape of Oak Park, contributes to the regular shaped field pattern referred to, and has a flat open topography that affords unobstructed and long-distance view-lines from the public roads to its immediate east and west. The landscape features referred to are what underpin the historic landscape attributes of the area as associated with Oak Park Demesne. They also contribute to the present-day value of the area as a high-quality amenity environment with large sections of open space, which although are not all accessible to the public, do contain important recreation routes along roads which exhibit lower levels of vehicular traffic, and which traverse open farmland and wooded areas that are within easy walking and cycling distance of the more central and built-up parts of the joint urban area. The proposed rezoning of Plot b to facilitate residential development would contribute to the incremental erosion of the historic demesne landscape and would negatively impact on its important
Submission Reference	CLW-C79-64					
Description	Rezone from Demesne Landscape to New Residential					

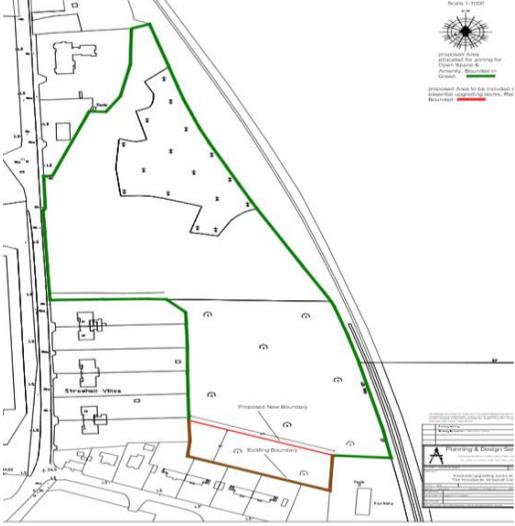
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>b. The intent of the zoning to protect the Oakpark estate is acknowledged, the following is highlighted with respect to these lands:</p> <ul style="list-style-type: none"> • At the extremity of the original Oakpark estate- located circa 900m from Oakpark house. • Clearly separated both physically and visually from the estate by the mature hedgerow on the plot's northern boundary-referenced above. • The Oakpark estate lands to the north of the site are currently presented, subdivided into intense agriculture test plots with various mobile and semi permanent crop support and protection structures. The activities of Oakpark as one of the country's principle agricultural research stations are renowned and expected to continue. Submits that in this context the demesne status imposed on adjoining lands seems onerous. • Bounded by circa 14 private dwellings on the site's southern boundary – the demesne setting is further diminished. <p>c. While there are no surviving mature trees on the site, extensive boundary buffer and supplemental tree planting imposed within any proposal - could be designed to reinstate and reinforce a more appropriate demesne parkland setting.</p> <p>d. The zoning of a significant portion of these lands as low-density residential would be an appropriate use and show due regard to its surroundings, particularly in the context of establishing a long-term sustainable use of the lands.</p>		<p>amenity and recreation value as a large and accessible area of open space in a more natural setting that is proximate to the built-up environment of the joint urban area.</p> <ul style="list-style-type: none"> • The proposed rezoning of Plot B for residential use would lead to a visually unsympathetic and disruptive transition between the urban area and the demesne landscape. • The proposed rezoning of Plot B for residential use would be contrary to national, regional, and county level policy, which is focused on ensuring more sustainable compact growth through the provision of housing within strategic and existing built-up areas and the development of land in a sequential manner, rather than more sprawl of urban development. National Policy Objectives 3(a), 3(b) and 3(c) in the NPF refer, along with Regional Policy Objective 14 in the RSES for the Southern Region, and Objective CS. 09 in the Carlow County Development Plan 2022-2028. The following is noted in this regard: <ul style="list-style-type: none"> - Plot B comprises an extensive area of greenfield land located in the northern environs of the joint urban area, and well outside of the edge of the urban area as may be indicated by the small scale residential development to the south along Oak Park Road. Plot B is also located in an historic demesne landscape, which exhibits a predominantly rural, agricultural, and open landscape character. Residential development on Plot B would therefore represent undesirable urban sprawl out into this more peripheral landscape setting, and at the expense of a focus on providing residential development within the existing built-up footprint of the joint

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p>urban area in accordance with national, regional, and local level policy.</p> <ul style="list-style-type: none"> - The requirement for additional zoned residential land over the plan period as proposed for Plot B is not warranted, and by reference to its non-compliance with the Core Strategy in the Carlow County Development Plan 2022-2028, the quantum of land that has been zoned 'New Residential' in the Draft JULAP for Carlow Town and Carlow Town Environs and the potential capacity of this land to deliver new residential units (c.250 units @30units/ha units). - Access to the land via the Oak Park Road would not be sustainable. The road is inadequate in width, and further restricted in width and in height by the historic entrance gateway. The Oak Park Road junction with the N80 is also restricted, and improvement works to same would require the incorporation of third-party lands. Any improvement works at the junction to provide traffic light would also raise concerns with TII in terms of potential negative impacts to vehicular capacity on the N80. <p>Recommendation No change</p>
3.13.1.5 Lands off Kilkenny Road		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>Tom Phillips and Associates on behalf of Nesselside requests that Carlow County Council amend the zoning objective as it applies to the subject site from 'Community/Education' to 'New Residential' use to more accurately reflect the suitability of the site to accommodate new residential development, including potentially, Student Accommodation. Planning permission has previously been granted (and commenced) for residential development (Reg. Ref.: 09167), supporting the proposal to amend the land use zoning objective to 'New Residential' use. Notes that the site is serviced (by roads, potable water, stormwater – notes significant infrastructure required i.e. pumping station, rising main and new gravity sewer)) and is strategically located within 500 metres of the SETU, and within 2.5km of Carlow Town Centre. In the event that the Council do not consider it appropriate to apply the 'New Residential' zoning objective to this site, it is requested that the site forms part of the 'Strategic Reserve'</p>	<p>CLW-C79-45</p>	<p>Further to a re-assessment of residential capacity (See OPR Submission CLW-C42, Section 2.3), the planning authority is satisfied that the requirement for further additional zoned residential land and strategic reserve land in the Carlow Environs area over the plan period at this location is not warranted. In addition, it is considered that residential development on the site, which is located at the southernmost edge of the environs area, with wastewater infrastructural constraints would be contrary to national, regional, and county level policy, which is focused on ensuring more sustainable compact growth through the provision of housing within strategic and existing built-up areas and the development of land in a sequential manner, rather than more sprawl of urban development. National Policy Objectives 3(a), 3(b) and 3(c) in the NPF refer, along with Regional Policy Objective 14 in the RSES for the Southern Region, and Objective CS.09 in the Carlow County Development Plan 2022-2028.</p> <p>Recommendation No Change</p>

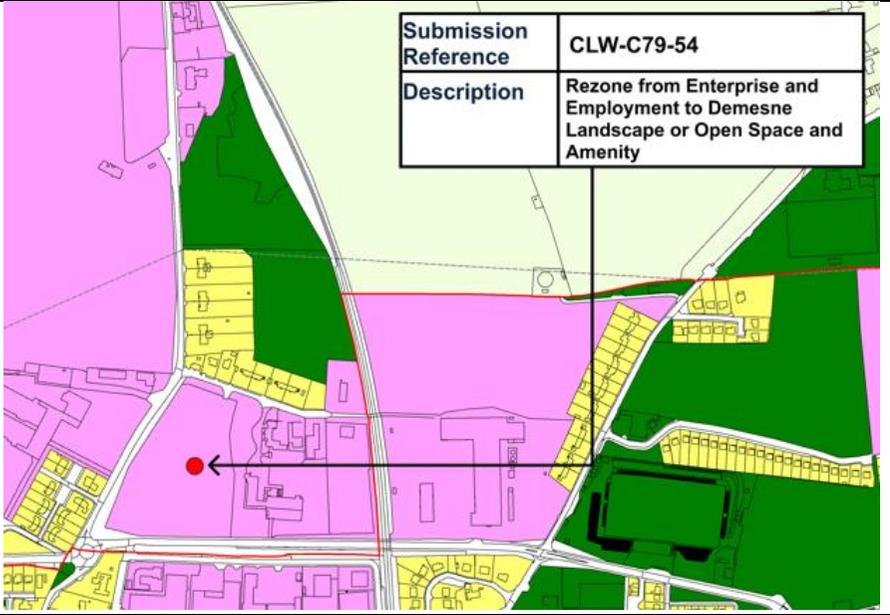
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="667 384 1064 515"> <tr> <td>Submission Reference</td> <td>CLW-C79-45</td> </tr> <tr> <td>Description</td> <td>Rezone from Community / Education to New Residential or Strategic Reserve</td> </tr> </table>	Submission Reference	CLW-C79-45	Description	Rezone from Community / Education to New Residential or Strategic Reserve		
Submission Reference	CLW-C79-45					
Description	Rezone from Community / Education to New Residential or Strategic Reserve					

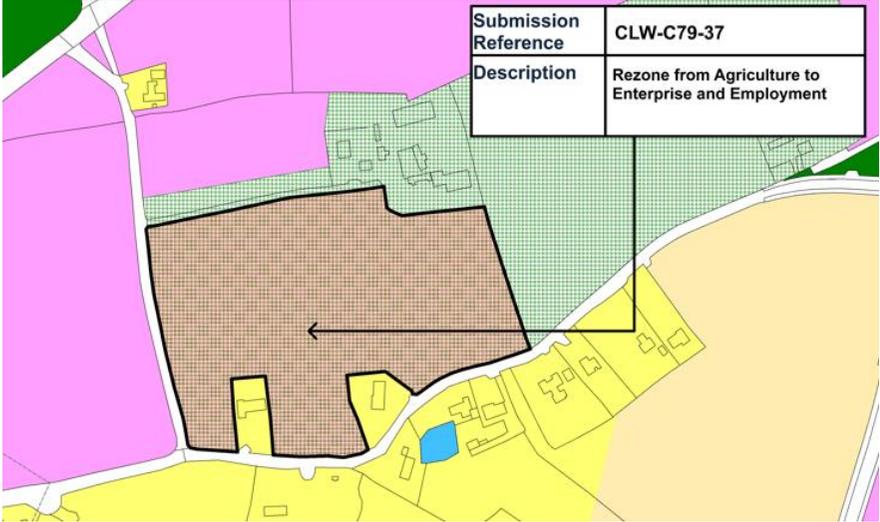
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.2 Land Use Zoning Requests Open Space and / or Demesne Landscape		
3.13.2.1 Lands at Strawhall		
<p>Submission by James Kealy on behalf of Greencore which notes that the current zoning on these lands is that of Community, Educational and Institutional use, the proposed zoning is for use as Open Space and Amenity.</p> <p>Greencore do not wish to make a submission to keep the existing zoning or to change the proposed zoning, but they do however wish to carry out essential upgrading works to an area of land at the southern boundary, and these works will incur a change to the position of this existing boundary.</p> <p>Greencore Ireland wish to be in a position to carry out these works in the near future and would like to clarify with the local authority that it would be possible for these works to be carried out under the proposed new zoning.</p>	<p>CLW-C79-27</p>	<p>The content of this submission is noted. Any upgrading works relating to existing utility structures/infrastructure within the open space area will be considered on its merits as uses which are open for consideration in this land use zoning. Please note in this regard relevant wording from Chapter 12 of the Draft JULAP:</p> <p><i>Uses that are listed as 'Open for Consideration' are uses that are not considered acceptable in principle in all parts of the relevant use zone. However, such uses may be acceptable in circumstances where Carlow County Council or Laois County Council is satisfied that a proposed use would not conflict with the general objectives for a land use zone in their administrative areas and permitted or existing uses as well as being in the interests of the proper planning and sustainable development of the area.</i></p> <p>Recommendation No change</p>

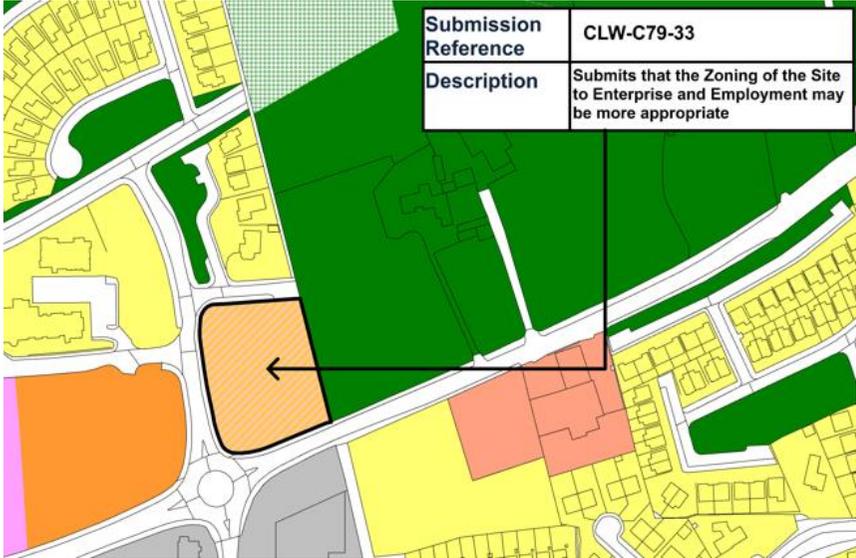
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		
<p>Carlow PPN and Mary Ryan welcomes the rezoning of the Strawhall Woodland to open space and amenity and would make a wonderful natural amenity.</p>	<p>CLW-C79-59 CLW-C79-26</p>	<p>Noted</p> <p>Recommendation No change</p>
<p>(i) Submission on behalf of Save the Strawhall Woodland Campaign Steering Group welcomes the zoning of the woodland at Strawhall as Open Space and Amenity. Reference is made to submission CLW-C79-27 which seeks clarification to “essential upgrade works” to the southern boundary of the woodland. Concern is expressed regarding the upgrade works and specifically impact on the woodland, Badger Sett. An ecological baseline survey has been submitted. Requests that</p>	<p>CLW-C79-81</p>	<p>(i) Existing utility services area located within the area referenced. Refer to response to CWL-C79-27 above.</p> <p>(ii) The lands associated with the former Sugar Factory site i.e. brownfield industrial lands and lands associated with the Gateway Business Park are long established industrial and employment related sites and do not have the same landscape</p>

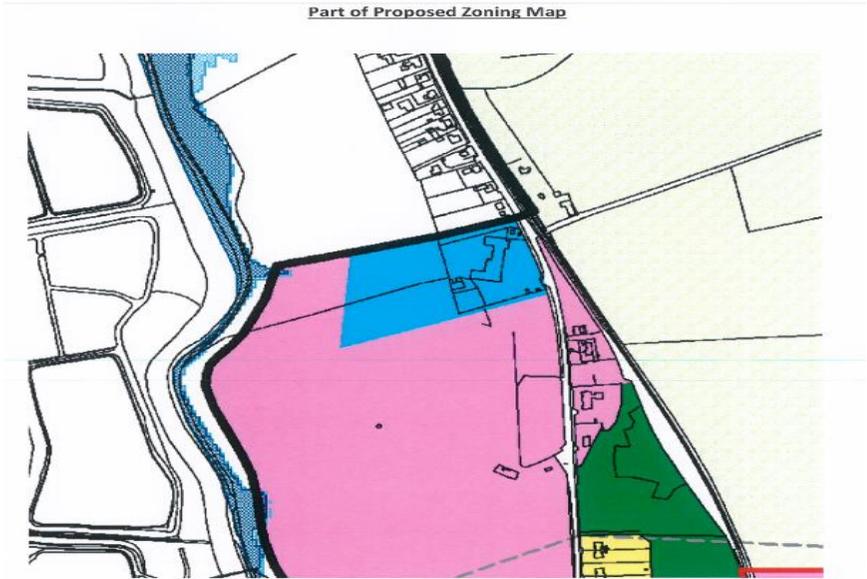
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>protect this woodland from any interference by Greencore and is rezoned to preserve and protect the woodland and all the flora and fauna living there.</p> <p>(ii) States that it is their understanding that this woodland, as well as Strawhall House, the site of Carlow Gateway Business Park, the adjoining lands and the former sugar factory lands would have all originally been part of the Oak Park Demesne. Considers that the woodland, all adjoining lands currently managed by Greencore including the former Sugar Factory lands should be afforded the same protection as if they were still part of Oak Park Demesne.</p>		<p>heritage characteristics as the designated Demesne Landscape associated with Oak Park. The areas are also further fragmented / segregated from the historic demesne landscape by the rail line and Athy Road. Having regard to the foregoing it is not considered appropriate to designate the areas as part of Oak Park Demesne.</p> <p>Recommendation No change</p>
<p>Submission on behalf of Save the Strawhall Woodland Campaign Steering Group requests rezoning of the former Sugar Factory from Enterprise and Employment to Open Space and Amenity, considering same is ideal to develop as a tourist attraction and is already landmark and place of interest due to the Lime Kiln – a protected structure. Reference is made to various sections of the Plan in support of the concept of <u>tourism</u> at this location.</p> <p>Considers the former Sugar Factory Site adjoining the SAC should be considered for <u>recreational</u> facilities.</p>	CLW-C79-81	<p>The lands associated with the former Sugar Factory site are brownfield industrial lands which are currently subject to remediation under licence by the EPA. Given the historic use of the site, the proximity to the town centre and subject to preparation of a masterplan for the overall site it is considered that the retention of the site for employment related uses is appropriate and in accordance with the proper planning and sustainable development of the area.</p> <p>It should also be noted that tourist related uses and recreational facilities are open for consideration within the Enterprise and Employment zoning.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>Rezoning Submission on behalf of Residents of Strawhall requesting the Proposed rezoning from Enterprise and Employment to Demesne Landscape or Open Space and Amenity.</p> <p>Requests that consideration be given to the land to the front of Strawhall House be rezoned from Enterprise and Employment to Demesne Landscape or Open Space and Amenity based on the following points:</p> <ul style="list-style-type: none"> - Strawhall House is a Protected Structure and part of the Oak Park Demesne - Zoning for Enterprise and Employment will result in increased traffic movements on the narrow Strawhall Avenue. Potential access maybe onto the N80 which is already onto an extremely busy road or onto a bend on the Athy road. - Mature oak and beech trees are a characteristic of the parkland area and contribute to the biodiversity of the area. 	CLW-C79-54	<p>See response above in relation to designation of area as part of Oak Park Demesne CLW-C79-81.</p> <p>While it is acknowledged that the area to the front of Strawhall House contains many mature trees which contribute to the amenity and biodiversity of the local area and Strawhall House which is a protected structure, it is considered that various policy provisions exist within the Draft JULAP to seek their protection and to guide any further development in this area to ensure compliance with proper planning and environmental considerations. Of particular note with reference to the trees and protected structure are the following policies in the Draft JULAP:</p> <p><i>Seek to protect trees and hedgerows in the joint urban area with a particular local amenity or conservation value and encourage the planting of native tree and hedgerow species (GI P14).</i></p> <p><i>Ensure the protection and conservation of the character, setting and special interest of all buildings and structures (or parts of structures) and sites, listed as protected structures in the Records of Protected Structures for Carlow-Graigecullen, including their curtilage, attendant grounds, and fixtures and fittings. (BH.P1).</i></p> <p><i>Ensure that development proposals do not obscure views, principal elevations and the character and setting of protected structures. (BH.P6).</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="600 384 1066 536"> <tr> <td>Submission Reference</td> <td>CLW-C79-54</td> </tr> <tr> <td>Description</td> <td>Rezone from Enterprise and Employment to Demesne Landscape or Open Space and Amenity</td> </tr> </table>	Submission Reference	CLW-C79-54	Description	Rezone from Enterprise and Employment to Demesne Landscape or Open Space and Amenity		<p>Any traffic related impacts arising from any development proposal will be assessed in accordance with Development Management criteria and following engagement with TII where required.</p> <p>Recommendation No change</p>
Submission Reference	CLW-C79-54					
Description	Rezone from Enterprise and Employment to Demesne Landscape or Open Space and Amenity					
3.13.3 Land Use Zoning Enterprise and Employment						
3.13.3.1 Lands at Pollerton Little						
<p>Submission by Kevin Murphy requests that the area proposed for Agricultural zoning highlighted red at Pollerton Little be rezoned Enterprise and Employment to consolidate land in this area as a single entity.</p>	CLW-C79-37	<p>The lands the subject of this submission were previously zoned New Residential under the former JSP. Arising from the RZLT submission process in 2023 the landowner requested that the lands be dezoned having regard to the following:</p>				

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p><i>Lands not serviced: no mains water, sewerage services, gas services or public lighting. Narrow road with no footpaths or public lighting. Potential for traffic hazard due to bends on road. Other issues identified include power line crossing site, topography of land and more sequentially appropriate land for zoning.</i></p> <p>On the basis of the foregoing the Planning Authority reassessed the lands under the RZLT process and determined:</p> <p><i>It is reasonable to consider that the land does not have an ease of access or direct connection to public infrastructure and facilities necessary for dwellings to be developed, due to the distance of the public mains water and public sewer from the land and taking account of the requirement for significant works to facilitate such a connection(s).</i></p> <p>Having regard to infrastructural constraints and the level of lands zoned for employment purposes which are appropriately serviced it is considered that further lands for such purposes would not be required over the period of the JULAP.</p> <p>Recommendation No change</p>
3.13.3.2 Lands Opposite Four Lakes Retail Park		
(i) Indicates that land proposed for New Residential would be unsuitable due to proximity of the main road and impacts arising from noise with consequential impacts on the potential layout and design. Submits	CLW-C79-33	(i) Having regard to the pattern of development in the immediate vicinity of the site including established residential uses and proposed neighbourhood facilities / centre the Planning

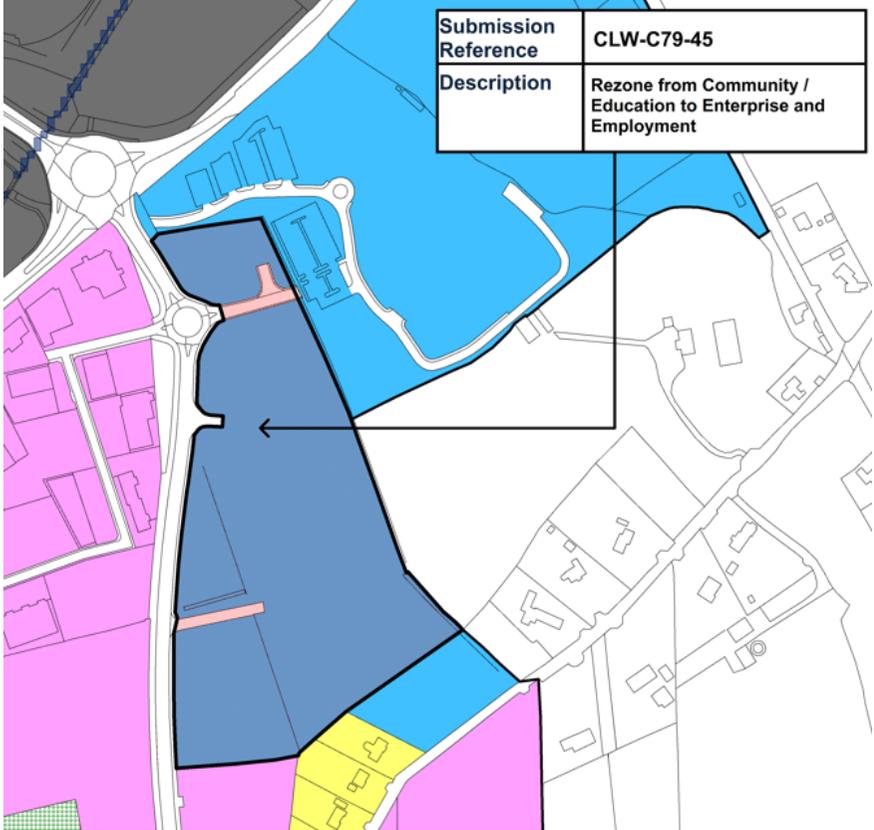
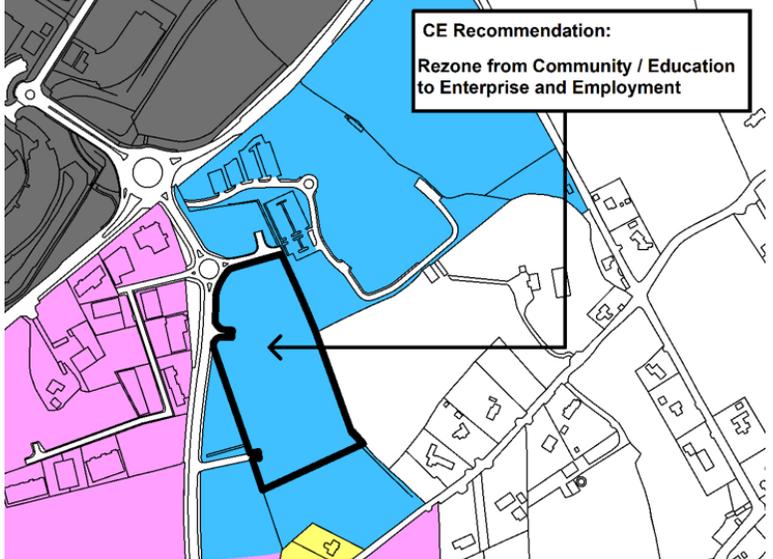
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>that the zoning of the site for Enterprise and Employment maybe more suitable allowing for a wide range of community and employment opportunities and complimenting the future neighbourhood centre and the existing business park.</p> <p>(ii) Requests that the Council retain the neighbourhood centre zoning as proposed in the Draft LAP to protect the land as part of the commercial node forming around the Four Lakes Business Park.</p> 		<p>Authority is satisfied that an appropriately designed residential scheme providing a built edge to the roundabout would be an appropriate land use in this serviced area which is sequentially appropriate for development. Having regard to the level of enterprise and employment undeveloped land zoned in the immediate area, further zoning for enterprise and employment is not warranted in this case.</p> <p>(ii) Noted</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.3.3 Lands in ownership of Greencore		
<p>Submission by James Kealy on behalf of Greencore which requests that no change of zoning at the Sugar Factory Site and that the current zoning would remain for the entirety of the site.</p>  <p style="text-align: center;"><small>This submission relates to Area shaded in Blue proposed for rezoning</small></p>	<p>CLW-C79-25</p>	<p>The zoning of the site as represented in the map submitted to the west of the Athy Road remains as per the former Joint Spatial Plan. No change has been proposed to the Community and Education zoning as published in the Draft JULAP.</p> <p>Recommendation No change</p>

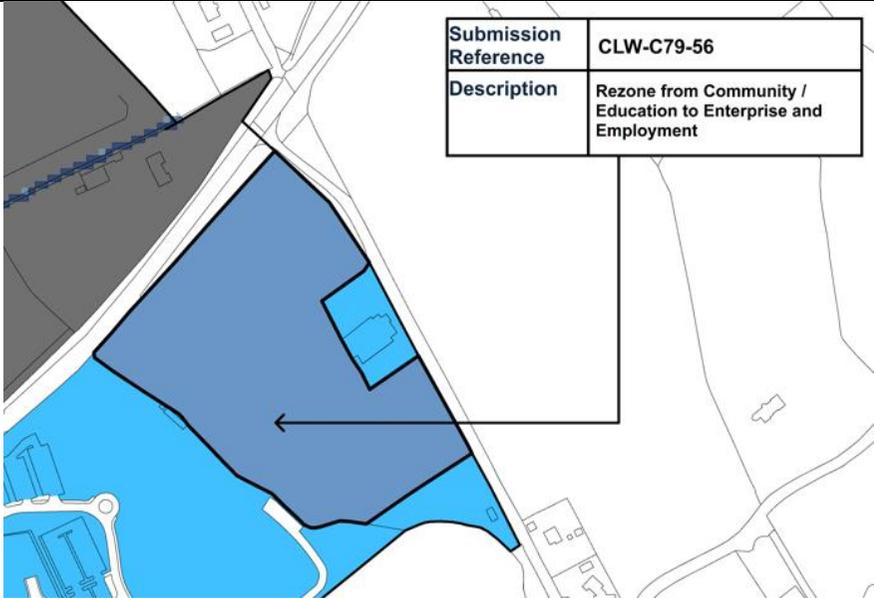
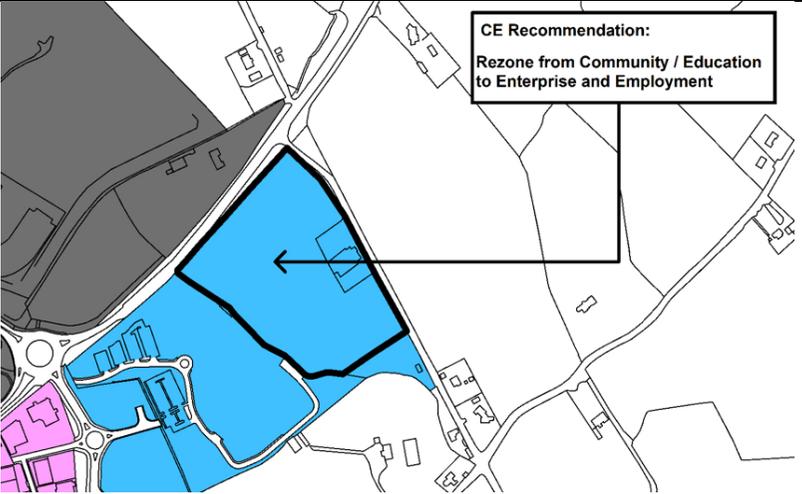
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.3.4 Lands located to the East of the Relief Road South of Pollerton Manor Road		
<p>Tom Phillips and Associates on behalf of Nesselside requests that Carlow County Council retain the 'Enterprise and Employment' zoning designation for the western portion of the subject lands and extend this 'Enterprise and Employment' to replace the 'Agriculture' zoning designation currently proposed for the eastern portion of the site.</p> <p>In support of the proposed zoning request the following is stated:</p> <ul style="list-style-type: none"> - strategic location. - located within 2.5km of Carlow town centre. - site is of scale to accommodate a significant additional employment hub. - agricultural zoning effectively sterilises eastern portion of site and contrary to employment strategy. - site is readily serviceable. - site is serviced by the CW1 Bus Route which provides access to Pollerton Manor Road or MSD. <p>Request reinstatement of development boundary to the east as per the JSP to facilitate future growth at the north-eastern section of Carlow Town and to facilitate the orderly use of this field as part of the emerging employment / enterprise hub.</p>	<p>CLW-C79-45</p>	<p>See response to Recommendation no. 2 of the OPR Submission (CLW-C79) which outlines a detailed rationale for the retention of the proposed enterprise and employment zoning as contained in the Draft JULAP.</p> <p>Having regard to the level of lands zoned for enterprise and employment, the need for appropriate sequential development extending from the eastern relief road, the location of the lands to the east of undeveloped enterprise and employment lands extending the requirement for additional employment land and / or extending the development boundary is not warranted over this plan period. The requirement for any extension to the Enterprise and Employment zoning would be more appropriately considered in any subsequent review of the JULAP in light of circumstances then prevailing, the agreement of a masterplan for the landholding and having regard to the level of development which may be undertaken over the plan period 2024-2030.</p> <p>Recommendation No change</p>

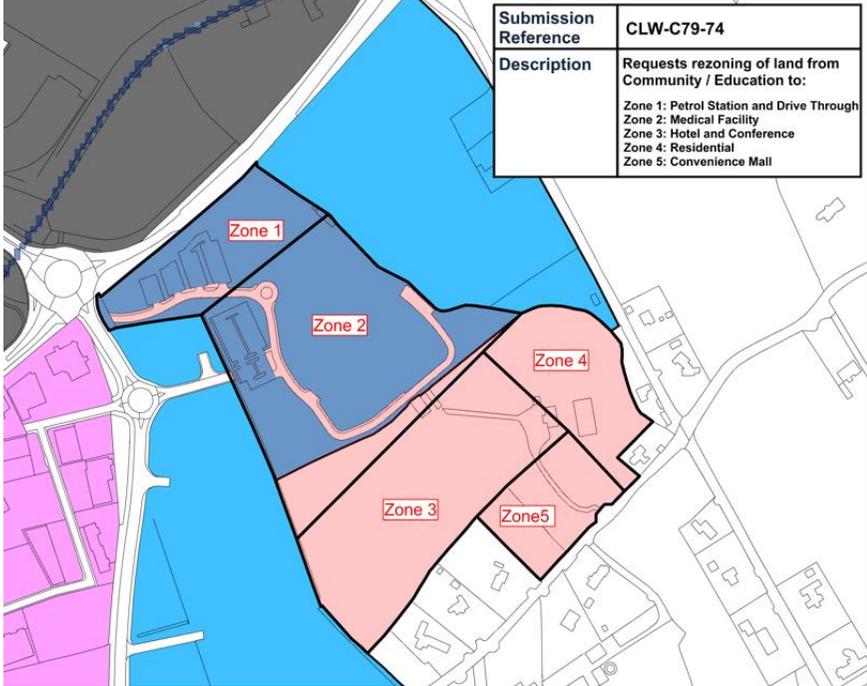
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>Submission Reference CLW-C79-45 Description Requests that Enterprise and Employment Zoning be retained</p> <p>Submission Reference CLW-C79-45 Description Rezone from Agriculture to Enterprise and Employment</p> <p>Submission Reference CLW-C79-45 Description Requests Reinstatement of Plan Boundary as per Joint Spatial Plan 2012 - 2018 (as extended)</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.3.5 Lands located to the East of the Relief Road North of Pollerton Manor Road		
<p>Tom Phillips and Associates on behalf of Nesselside requests that Carlow County Council amend the zoning objective relating to the subject site from 'Community/Education' to 'Enterprise and Employment' to more accurately reflect the sites suitability to accommodate new enterprise and employment uses.</p> <p>In support of the proposed zoning amendments in summary the following is outlined regarding northern portion of site for enterprise and employment:</p> <ul style="list-style-type: none"> - planning and development policy context - location of site 3.5km northeast of town centre - two access points off the eastern relief road and within 5minute drive of the M9. - Historical land use community / education and Enterprise and Employment. - Established enterprise and employment and industrial uses in the immediate vicinity. - Site is fully serviced with respect to foul, potable water, storm water infrastructure. - Serviced by CW1 Bus Route. 	CLW-C79-45	<p>Having regard to the established pattern of development in the immediate vicinity it is considered that additional lands extending to 2.5ha from Community / Education to Enterprise and Employment is considered appropriate. A proportion of the overall site c.3ha shall be retained for community / educational purposes to facilitate the co-ordinated development of other community related uses and to ensure the protection of the residential amenities of established residential properties along Pollerton Manor Road.</p> <p>Recommendation Rezone 2.5 ha from community/. Education to Enterprise and Employment.</p>

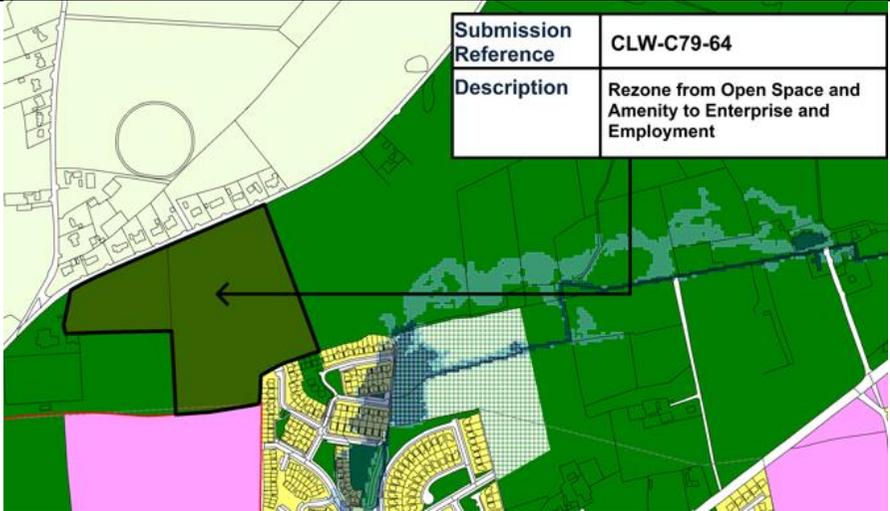
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation						
3.13 Land Use Zoning Objectives - Carlow County Council								
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Submission Reference	CLW-C79-45							
Description	Rezone from Community / Education to Enterprise and Employment							
CE Recommendation:								
Rezone from Community / Education to Enterprise and Employment								

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<p>Submission by Purser on behalf of Michael Quinn requests the rezoning of lands from proposed community and education to enterprise and employment or industry. In support of the proposal the following is stated:</p> <ul style="list-style-type: none"> - strategic location of lands on the Dublin Road, 4km from the town centre and proximate to the M9. Considers that the Community/education zoning is an anomaly and alternative sites are available for community / education in proximity to residential areas. - reference is made to other proposed and existing employment in the vicinity. - it would support existing business and facilitate expansion. - supports local, regional and national policy. - accords with relevant guidelines. - assist Carlow to support existing businesses and promote sustainable growth. 	<p>CLW-C79-56</p>	<p>Having regard to the proposed rezoning of lands from enterprise and employment to residential (ref: CLWE-C79 – 55) it is considered that given the strategic location of the site opposite MSD and the position as outlined by the Planning Authority in response to Recommendation no. 2 of the OPR submission that the zoning of the land would be appropriate given its strategic location opposite MSD. Future proofing of additional lands proximate to MSD lands at this location would be appropriate and in accordance with the proper planning and sustainable development of the area. The existing auto mechanics operational within the landholding is also proposed for inclusion as any future community/educational use may be incompatible within any new proposed employment related zoning. Any additional lands to facilitate community related uses would be open for consideration under the enterprise and employment land use zoning matrix e.g. School, Community Facility, Childcare, Recreational facilities, Health Centre/Health Care. Accordingly, it is considered that the change in proposed zoning would not prejudice the delivery of other community related uses where deemed required.</p> <p>Recommendation Rezone 4.5ha from community / education to enterprise and employment</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
 <p>Submission Reference CLW-C79-56</p> <p>Description Rezone from Community / Education to Enterprise and Employment</p>		 <p>CE Recommendation: Rezone from Community / Education to Enterprise and Employment</p>
<p>Requests rezoning of lands at Pollerton from proposed community / education and unzoned land to facilitate various individual uses::</p> <p>Zone 1: Petrol Station and Drive Through Zone 2: Medical Facility Zone 3: Hotel and Conference Zone 4: Residential Zone 5: Convenience Mall</p>	<p>CLW-C79-74 LS-L79-10</p>	<p>There are no specific land use zonings outlined in the submission received and accordingly the nature of the uses requested are assessed hereunder:</p> <p><u>Zone 1:</u> There is no specific land use zoning for petrol station and drive through and such a use is neither permitted in principle or open for consideration in the proposed community/education zoning. Petrol stations are however open for consideration in enterprise and employment zones and could be considered in the adjoining enterprise and employment land uses as appropriate. Any proposed change in land use zoning to facilitate</p>

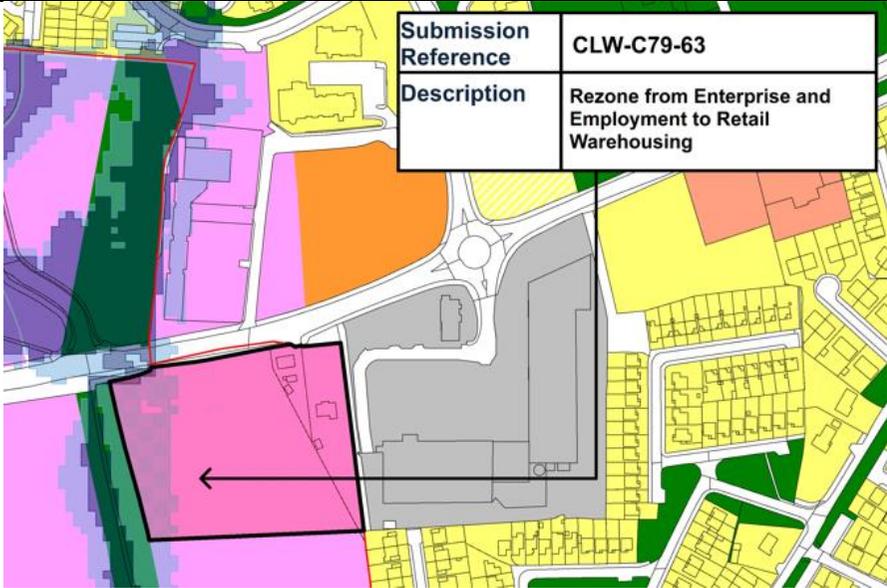
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
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Submission Reference	CLW-C79-74					
Description	Requests rezoning of land from Community / Education to: Zone 1: Petrol Station and Drive Through Zone 2: Medical Facility Zone 3: Hotel and Conference Zone 4: Residential Zone 5: Convenience Mall					

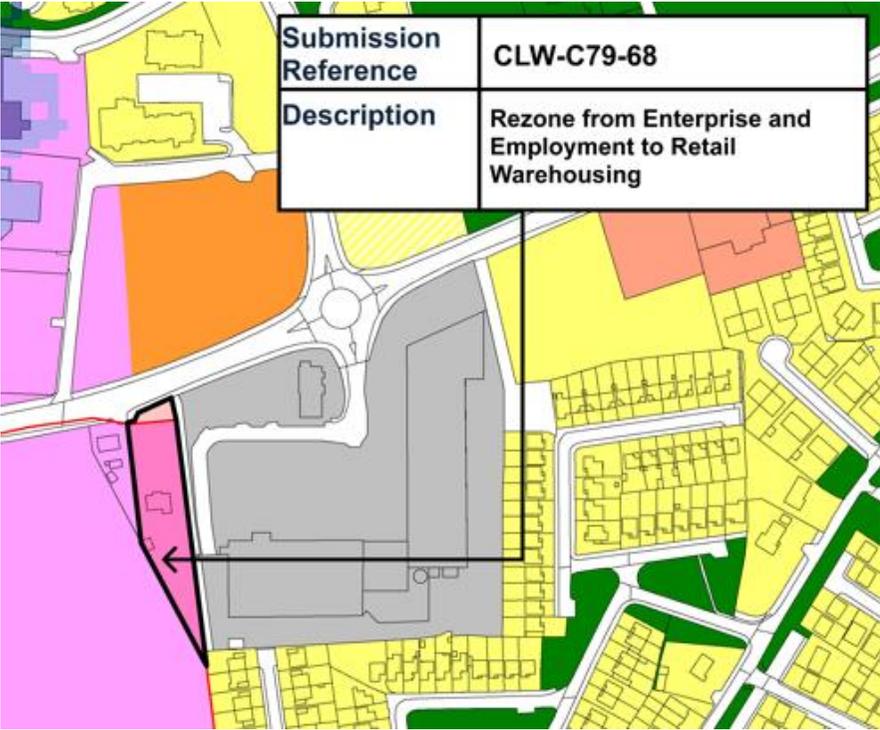
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p>refer, along with Regional Policy Objective 14 in the RSES for the Southern Region, and Objective CS. 09 in the Carlow County Development Plan 2022-2028.</p> <p><u>Zone 5:</u> Commercial mall: This site is located outside the development boundary associated with Carlow Environs and comprises part of the grounds of a private residential dwelling. Given the remote location of the site, the absence of any established significant employment / community uses immediately adjoining to justify such a use it is considered that the proposed development would constitute an unsustainable land use at this peripheral location.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
3.13.3. 6 Lands at Oak Park		
 <p>Plot C: c. 20 acres (adjoining Carlow Rugby Club)</p> <p><u>Plot C Open Space to Enterprise and Employment</u> Plot C Summary of Site Suitability as submitted: The proposed site by reason of its location and close proximity to the urban edge and existing enterprise targeted development and transport infrastructure is well suited to enhance the towns commercial potential and the immediate areas visual presentation. (with a particular designation as a strategic logistics hub).</p> <p><u>Rational for rezoning as submitted:</u></p>	CLW-C79-64	<p>It is considered that the proposed rezoning of Plot C to 'Enterprise and Employment' to facilitate the development of a strategic logistics hub would not be appropriate, and by reason of the following considerations:</p> <ul style="list-style-type: none"> The landscape character of the northern fringe area is significantly influenced by the Oak Park Demesne. Key natural features of the demesne include a relatively regular shaped field pattern of large plots divided by a series of access routes to Oak Park House (Teagasc Headquarters). Many of these fields contain mature stands of deciduous trees, which in conjunction with more recently cultivated Teagasc tree plantations, provide a sense of enclosure within the Oak Park Demesne. Plot c as submitted is located within the historic demesne landscape of Oak Park, contributes to the regular shaped field pattern referred to, and has a flat open topography that affords unobstructed and long-distance view-lines from the public road adjoining its northern boundary. The landscape features referred to are what underpin the historic landscape attributes of the area as associated with Oak Park Demesne. They also contribute to the present-day value of the area as a high-quality amenity environment with large sections of open space, which although are not all accessible to the public, do contain important recreation routes along roads which exhibit lower levels of vehicular traffic, and which traverse open farmland and wooded areas that are within easy walking and cycling distance of

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
<ul style="list-style-type: none"> • The de-zoning of these lands in their entirety is excessive in terms of its scale, reduction of the development potential of lands located a close proximity to established urban areas, with available services and access options. • The development of these lands as summarised offers considerable opportunity to Carlow to offer a world class logistics facility, which would serve the needs of current and future FDI companies in the area and is seen by the IDA and all industry bodies as critical infrastructure for supply chain management in the modern industrial context. • The Nolan Transport group of companies have identified this site as ideally positioned to serve this need, and as one of the most respected logistic management companies in the British Isles, would bring their industry knowledge to establish and enhance Carlow's industrial support infrastructure. • Any development of the site would incorporate new parkland setting integrated into proposed development plans – and as such could be designed to reinstate and reinforce a more appropriate at the boundary of the demesne parkland setting. • The zoning of the significant portion of these lands as enterprise and employment would be an appropriate use and show due regard to its surroundings. 		<p>the more central and built-up parts of the joint urban area. The proposed rezoning of Plot C to facilitate enterprise and employment development would contribute to the incremental erosion of the historic demesne landscape and would negatively impact on its important amenity and recreation value as a large and accessible area of open space in a more natural setting that is proximate to the built-up environment of the joint urban area.</p> <ul style="list-style-type: none"> • The proposed rezoning of Plot C to facilitate a logistic park would lead to a visually unsympathetic and disruptive transition between the urban area and the demesne landscape. • In addition to its location within a designated demesne landscape, Plot C adjoins the grounds of Carlow Rugby Club to the west, residential development at Castleoaks to the south, and is to the immediate south of a row of residential properties which front the other side of the adjoining public road. It is therefore considered that a logistic facility on the land would be a non-compatible use at this location which would be injurious to the established amenities of area, including residential, sports and recreational amenities. • The requirement for additional zoned enterprise and employment land over the plan period as proposed for Plot C is not warranted, having regard to the quantum of undeveloped land already zoned enterprise and employment in the Draft JULAP. • Access to the land via the Oak Park Road would not be sustainable. The road is inadequate in width, and further restricted in width and in height by the historic entrance gateway. The Oak Park Road junction with the N80 is also restricted, and improvement works to same would require the incorporation of third-party

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
		<p>lands. Any improvement works at the junction to provide traffic lights would also raise concerns with TII in terms of negative impacts to vehicular capacity on the N80. In addition, it is considered that the zoning of Plot C on the basis of a potential access through the new IDA advance factory development to the south off the R448, would be premature at this time pending the requirement for detailed examination of the feasibility of such an access, including the future delivery of a new roundabout on the R448 and the requirement for third-party landowner consents.</p> <p>Recommendation No change</p>
3.13.4 Rezoning Requests within Former Town Council Boundary		
<p>Requests the rezoning of 2.03 ha at Pollerton Little from Enterprise and Employment to Retail Warehousing to enable expansion of the Retail Park. It is indicated that no discussions have taken place to date with the relevant landowners.</p>	<p>CLW-C79-63</p>	<p>The land use zonings for Carlow Town (i.e., former Carlow Town Council area), were adopted in May 2022 and are not subject to review under this Draft Joint Urban Local Area Plan.</p> <p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
 <table border="1" data-bbox="600 384 1077 539"> <tr> <td>Submission Reference</td> <td>CLW-C79-63</td> </tr> <tr> <td>Description</td> <td>Rezone from Enterprise and Employment to Retail Warehousing</td> </tr> </table>	Submission Reference	CLW-C79-63	Description	Rezone from Enterprise and Employment to Retail Warehousing		
Submission Reference	CLW-C79-63					
Description	Rezone from Enterprise and Employment to Retail Warehousing					

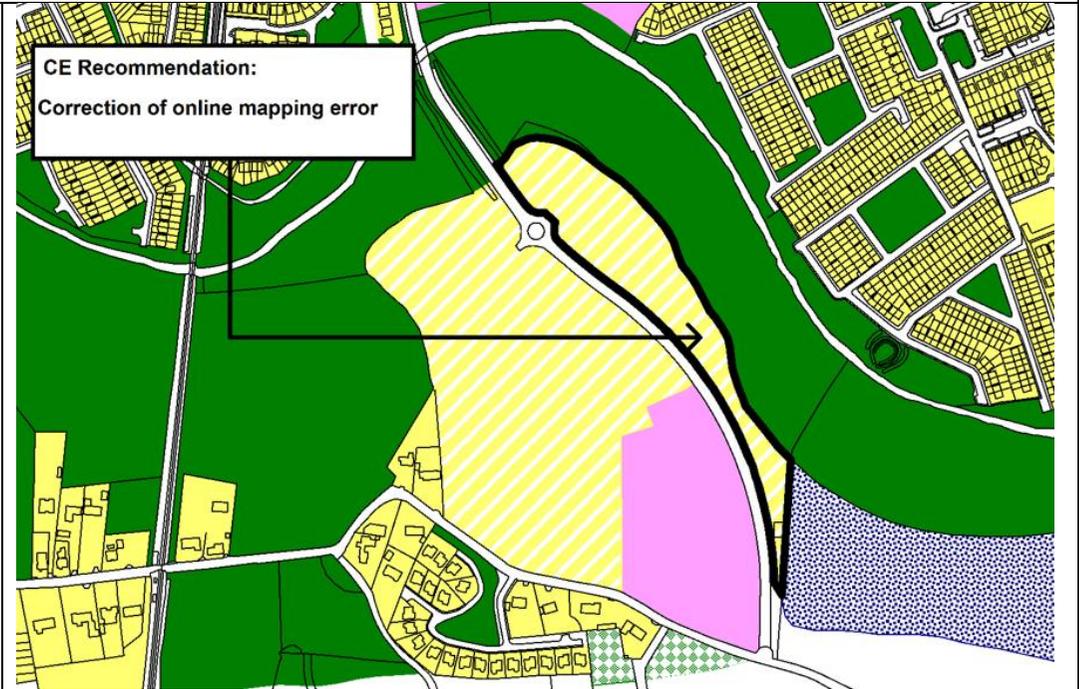
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.13 Land Use Zoning Objectives - Carlow County Council						
<p>References their site adjoining four lakes retail park and request change in zoning from Enterprise and Employment to Retail Warehousing to facilitate an extension of the four lakes retail park.</p>  <table border="1" data-bbox="483 533 1070 727"> <tr> <td>Submission Reference</td> <td>CLW-C79-68</td> </tr> <tr> <td>Description</td> <td>Rezone from Enterprise and Employment to Retail Warehousing</td> </tr> </table>	Submission Reference	CLW-C79-68	Description	Rezone from Enterprise and Employment to Retail Warehousing	CLW-C79-68	As per response above to CLW-C79-63.
Submission Reference	CLW-C79-68					
Description	Rezone from Enterprise and Employment to Retail Warehousing					

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Land Use Zoning Objectives - Carlow County Council		
It is suggested that Kelvin Grove would be appropriate for recreational facilities to increase natural heritage and green infrastructure.	CLW-C79-26	Kelvin Grove is zoned Community and Education wherein recreational facilities are permitted in principle. Recommendation No change

Chief Executive Recommendation – Mapping Clarification

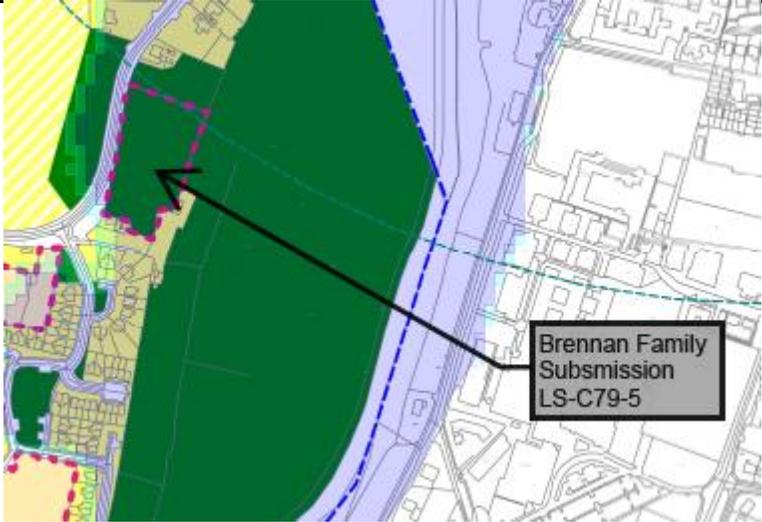
Site CW 16 – North East portion of site

This amendment is proposed to rectify an online mapping error in the land use zoning map for a proportion of Site no. CW16 (2.54ha). Site no. CW16 was considered in its entirety as proposed new residential in the core strategy and the Infrastructure Assessment. The printed hard copy of map 12.1 correctly illustrated the site as new residential. Having regard to the error on the online mapping it is recommended that the site be clearly illustrated as new residential zoning.



(iii) Land Use Zoning –Laois County Council

Key Issue	Sub. No.	Chief Executive’s Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
3.14.1 Land Use Zoning Requests		
<p>This submission made by SCA on behalf of the Brennan Family relates to a landholding of 0.94 hectares [2.32 acres] located at Crossneen in the south-western outskirts of Graiguecullen, Carlow.</p> <p>The lands access onto County Primary Road L-3920 due west and are zoned <i>Amenity & Open Space</i> in the draft JULAP.</p>	LS-C79-5	<p>Noted.</p> <p>The Draft Local Area Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, Core Strategy and housing targets as contained in the Laois County Development Plan and the draft JULAP, the sequential approach to development, flood risk assessment, infrastructure capacity, natural habitats and Section 28 Guidance.</p> <p>The Draft Local Area Plan will recognize the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations proximate to public transport services where feasible and with appropriate densities of development.</p> <p>There are ample lands already zoned to accommodate projected population growth and housing demand.</p> <p>If the Planning Authority decides to approve this zoning request, the forthcoming JULAP would be at variance with the Core Strategy and</p>

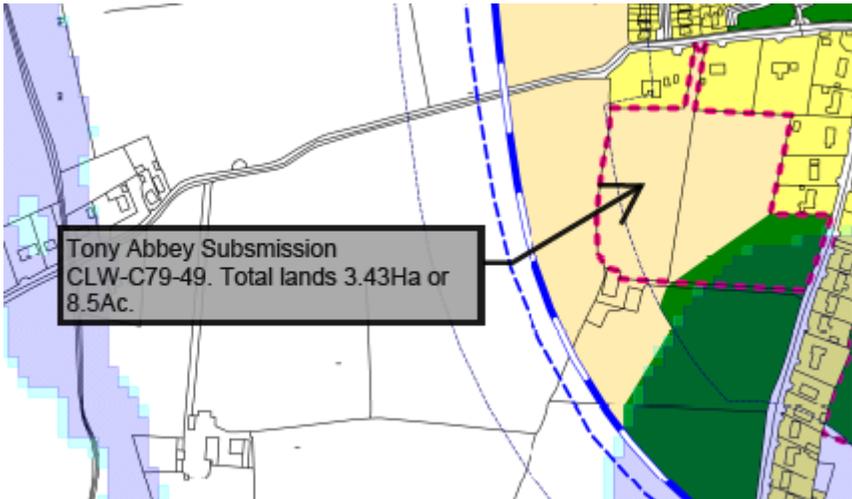
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
 <p>They were similarly zoned in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p> <p>Agent requests that the lands be zoned for residential development.</p> <p>In support of this zoning request the following is stated.</p>		<p>housing target of 276 no. units by 2030 as established in Chapter 3 of the draft JULAP.</p> <p>In its submission, The Office of Planning Regulator advises inter alia as follows:</p> <p><i>“In relation to Graiguecullen, the extent of zoning for residential development exceeds the requirement for zoned land and, while the Office is satisfied that the subject lands are located such as to be consistent with compact and sequential growth, there is no requirement for additional New Residential zoning objectives [my emphasis].”</i></p> <p>Save for a very minor overlap, the lands are clear of the at-risk flood zone as indicated in the Draft SFRA. They are adjacent to said zone however.</p> <p><i>Lands within Flood Zone C would be appropriate for consideration in terms of a highly vulnerable residential use, however Flood Zone B is predicted to impact the road access and could prove to be a significant constraint.</i></p> <p>They are outside the River Barrow and River Nore SAC [code 2162].</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<ul style="list-style-type: none"> - "The subject lands were in a designated flood risk zone in the last plan. That is no longer the case; they are now clear of such designation. - The subject lands lie between areas of land zoned Existing Residential. They are close to Carlow town and sequentially are suitable for residential development in the context of strategically developing a compact urban area of scale as envisaged in the JULAP. While there may be a justification for a riparian corridor alongside the river, there is adequate parkland and riverside public open space elsewhere in the vicinity. - The subject lands are not required for open space or green network purposes. - The subject lands were zoned residential before the zoning was changed to Open Space due to categorisation as undeveloped land at risk of flooding. This is now, demonstrably not the case. <p>Taking into account the Development Management guidance contained in the JBA SFRA, a considerable amount of land around Carlow will not be available for compact development and may lie fallow or be redeveloped at existing density. Submits that rezoning the land to New Residential will not materially affect the carefully prepared Core Strategy as there is considerable uncertainty as to the capacity of lands at risk of flooding and speedy delivery of other redevelopment aspects of the JULAP including Town Centre Regeneration, which inevitably takes time and is subject to a programme set out in the Town Centre Masterplan 2020-2040."</p>		<p>Recommendation No change</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>This submission by Martha Roche on behalf of James Millar refers to a landholding of c. 5 hectares [12.4 acres] located at Crossneen in the south-western outskirts of Graiguecullen, Carlow.</p> <p>More specifically the lands are part of the Crossneen Manor estate residential development originally approved by the Planning Authority under PI Ref 04/294 with access onto County Primary Road L-3920 due west.</p> <p>Under PI Ref 04/294, Laois County Council granted permission to the present applicant for a residential development comprising 187 no. dwellings, a creche and associated works on a 7.8 hectares [19.26 acres] site at this place.</p> <p>Construction commenced but was never completed. A total of 87 no. dwellings and the creche were built before the recession. The permission which was extended courtesy of PI Ref 10/18 expired in 2017.</p> <p>The lands are zoned <i>Strategic Reserve</i> in the draft JULAP.</p> <p>They were similarly zoned in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p>	<p>LS-C79-4</p>	<p>Noted.</p> <p>The Draft Local Area Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, Core Strategy and housing targets as contained in the Laois County Development Plan, the sequential approach to development, flood risk assessment, infrastructure capacity, natural habitats and Section 28 Guidance.</p> <p>The Draft Local Area Plan will recognise the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations proximate to public transport services where feasible and with appropriate densities of development.</p> <p>There are ample lands already zoned to accommodate projected population growth and housing demand.</p> <p>If the Planning Authority decides to approve this zoning request, the forthcoming JULAP would be at variance with the Core Strategy and</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
 <p data-bbox="203 1289 1077 1353">Agent requests that the land holding be zoned for residential development noting residential development is not allowed on lands zoned Strategic Reserve.</p>		<p data-bbox="1352 424 2096 483">housing target of 276 no. units by 2030 as established in Chapter 3 of the draft JULAP.</p> <p data-bbox="1352 517 2069 576">In its submission, The Office of Planning Regulator advises inter alia as follows:</p> <p data-bbox="1352 609 2096 823"><i>"In relation to Graiguecullen, the extent of zoning for residential development exceeds the requirement for zoned land and while the Office is satisfied that the subject lands are located such as to be consistent with compact and sequential growth, there is no requirement for additional New Residential zoning objectives [my emphasis]."</i></p> <p data-bbox="1352 857 2069 916">The majority of the lands are in the at-risk flood zone as indicated in the Draft SFRA.</p> <p data-bbox="1352 949 2096 1094"><i>JBA would note that given the location of the site on the very periphery of the settlement it is not possible to pass the Justification Test within Flood Zone B. It is therefore not possible to zone land that is at risk of flooding in this location given the current assessment.</i></p> <p data-bbox="1352 1182 2069 1209">They are outside the River Barrow and River Nore SAC [code 2162].</p> <p data-bbox="1352 1243 1563 1302">Recommendation: No change</p>

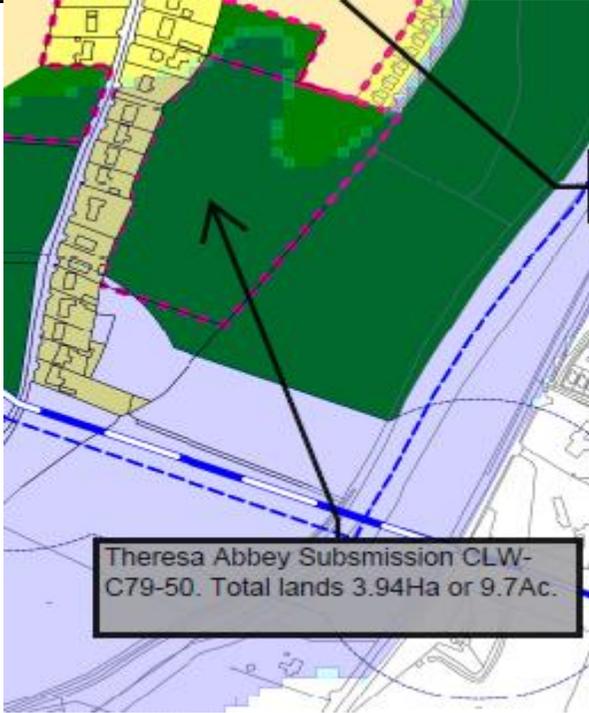
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>Applicant makes the following points in support of this zoning request.</p> <ul style="list-style-type: none"> - The subject lands are already serviced with foul and surface water drainage, water, and electricity infrastructure to accommodate the full extent of the originally approved development. - Developer could not complete the original development because of fluctuations in the construction sector. <p>However, now that the economic climate is improving, the plan is to lodge a new planning application for completion of the scheme (comprising c. 110 no. 3-4 bed family units of which c. 22 would be for Part V accommodation).</p> <p>Points out that in the draft plan “some of the open spaces have been increased to the rear of existing bungalows while on the previous layout, previously small bungalows had been identified in this area to accommodate older people.” Asks to revert to that situation.</p> <p>Claims that the “subject lands have the infrastructure, roads, sewers and social facilities, schools, shops and community facilities for a residential development” and that there would be no outlay required from either local authority as all services are available on site.</p>		
<p>This submission made by Declan Kehoe on behalf of Tony Abbey refers to a landholding of 3.43 hectares [8.5 acres] located at Crossneen in the south-western outskirts of Graiguecullen, Carlow.</p>	<p>CLW-C79-50</p>	<p>Noted.</p> <p>The Draft Local Area Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, Core Strategy and housing</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>The lands access onto County Primary Road L-3920 due east and County Secondary Road L-7919 due north. The majority of the lands are zoned <i>Strategic Reserve</i> in the draft JULAP with a minority portion zoned <i>Open Space & Amenity</i>.</p> 		<p>targets as contained in the Laois County Development Plan, the sequential approach to development, flood risk assessment, infrastructure capacity, natural habitats and Section 28 Guidance.</p> <p>The Draft Local Area Plan will recognise the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations proximate to public transport services where feasible and with appropriate densities of development.</p> <p>There are ample lands already zoned to accommodate projected population growth and housing demand.</p> <p>If the Planning Authority decides to approve this zoning request, the forthcoming JULAP would be at variance with the Core Strategy and housing target of 276 no. units by 2030 as established in Chapter 3 of the draft JULAP.</p> <p>In its submission, The Office of Planning Regulator advises inter alia as follows:</p> <p><i>"In relation to Graiguecullen, the extent of zoning for residential development exceeds the requirement for zoned land and while the Office is satisfied that the subject lands are located such as to be consistent with compact and sequential growth, there is no</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>They were similarly zoned in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p> <p>Agent requests that the land holding be zoned for residential development. Noting residential development is not allowed on lands zoned Strategic Reserve or Open Space and Amenity.</p> <p>Agent makes the following points in support of this zoning request.</p> <ul style="list-style-type: none"> - Makes reference to growth targets in the Regional Spatial and Economic Strategy [RSES], National Development Plan 2021-2030 and various National Policy Objectives in the National Planning Framework. - Advances reasons as to why lands that are zoned for residential development may not be brought forward for actual development. For example, farmers may simply wish to continue farming. - States that the subject lands are clear of the flood risk zone and have access to public water and foul drainage services via adjacent residential developments. - "The subject lands are appropriate for residential zoning. 		<p>requirement for additional New Residential zoning objectives <i>[my emphasis]."</i></p> <p>A significant portion of the lands are in the at-risk flood zone as indicated in the Draft SFRA.</p> <p><i>JBA would note that given the location of the site on the very periphery of the settlement it is not possible to pass the Justification Test within Flood Zone B. It is therefore not possible to zone land that is at risk of flooding in this location given the current assessment.</i></p> <p><i>Some lands remain in Flood Zone C and these would generally be considered appropriate for zoning on flood risk grounds. When considering the extent of zoning then regard should be given to climate change extents, access requirements and appropriate provision for green infrastructure as per LCC Policy</i></p> <p>They are outside the River Barrow and River Nore SAC [code 2162].</p> <p>Recommendation No change to proposed zoning as indicated in draft JULAP.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<ul style="list-style-type: none"> - The subject lands are serviced by existing Pathways via adjacent residential development and can be extended easily. - All related services for the subject lands are next to adjacent residential developments. The subject lands are a 25-minute walk (2kms) to Carlow town Centre. - The subject lands are in Close proximity to the following: Church (St. Clare's Catholic Church), School, Community Centres. <p>The subject lands were zoned for residential development previously, in the Graiguecullen LAP 2007-2013. The adjacent lands have been deemed acceptable for Residential in the past and were granted planning permission. [Under PI Ref 04/784. Submits that rezoning of subject lands can only assist in developing the Crossneen area, improving the supply of residential units for Crossneen in a sustainable manner, regenerating the Crossneen area which is a contributory residential area to Carlow town. A designated Key Towns in the RSES.</p> <p>Notes:</p> <p>-ESRI report “underestimated targets needed” to deal with challenges around housing, health and climate change.</p>		

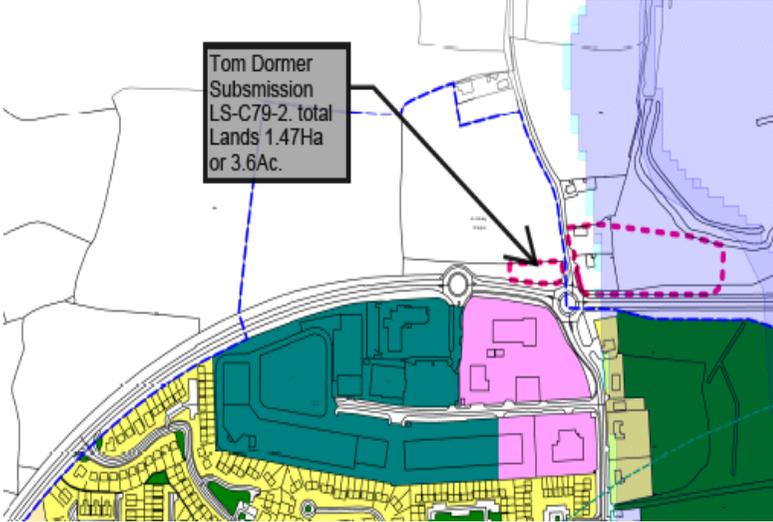
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>-Some Farmers just simply want to remain farming and lands dezoned as requested, allowing other lands to be zoned.</p>		
<p>This submission by Declan Kehoe on behalf of Theresa Abbey refers to a landholding of 3.94 hectares [9.7 acres] located at Crossneen in the south-western outskirts of Graiguecullen, Carlow. The lands access onto County Primary Road L-3920 due west.</p> <p>Under PI Ref 07/2409, and PI Ref 08/758, Laois County Council refused permission for residential development.</p> <p>The lands are zoned <i>Open Space & Amenity</i> in the draft JULAP.</p>	<p>CLW-C79-49</p>	<p>Noted.</p> <p>The Draft Local Area Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, Core Strategy and housing targets as contained in the Laois County Development Plan, the sequential approach to development, flood risk assessment, infrastructure capacity, natural habitats and Section 28 Guidance.</p> <p>The Draft Local Area Plan will recognise the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations proximate to public transport services where feasible and with appropriate densities of development.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
 <p data-bbox="203 1217 1149 1281">They were similarly zoned in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p>		<p data-bbox="1352 424 2040 488">There are ample lands already zoned to accommodate projected population growth and housing demand.</p> <p data-bbox="1352 576 2092 711">If the Planning Authority decides to approve this zoning request, the forthcoming JULAP would be at variance with the Core Strategy and housing target of 276 no. units by 2030 as established in Chapter 3 of the draft JULAP.</p> <p data-bbox="1352 799 2069 863">In its submission, The Office of Planning Regulator advises inter alia as follows:</p> <p data-bbox="1352 951 2096 1166">"In relation to Graiguecullen, the extent of zoning for residential development exceeds the requirement for zoned land and while the Office is satisfied that the subject lands are located such as to be consistent with compact and sequential growth, there is no requirement for additional New Residential zoning objectives [my emphasis]."</p> <p data-bbox="1352 1254 2029 1318">A significant portion of the lands are in the at-risk flood zone as indicated in the Draft SFRA.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>Agent requests that the land holding be zoned for residential development, noting residential development is not allowed on lands zoned Open Space and Amenity.</p> <p>Agent makes the following points in support of this zoning request.</p> <ul style="list-style-type: none"> - Makes reference to growth targets in the Regional Spatial and Economic Strategy [RSES], National Development Plan 2021-2030 and various National Policy Objectives in the National Planning Framework. - Advances reasons as to why lands that are zoned for residential development in the draft JULAP may not actually be brought forward for development. For example, farmers may simply wish to continue farming. - States that the subject lands are clear of the flood risk zone and have access to public water and foul drainage services via adjacent residential developments. <p>Submits that the subject lands are appropriate for residential zoning.</p> <ul style="list-style-type: none"> - The site has its own access point or it can be accessed via adjacent residential development at Crossneen Manor, Leighlin Road. 		<p><i>JBA note that given the location of the site on the very periphery of the settlement it is not possible to pass the Justification Test within Flood Zone B. It is therefore not possible to zone land that is at risk of flooding in this location given the current assessment. Some lands remain in Flood Zone C and these would generally be considered appropriate for zoning on flood risk grounds. When considering the extent of zoning then regard should be given to climate change extents, access requirements and appropriate provision for green infrastructure as per LCC Policy.</i></p> <p>They are adjacent to the River Barrow and River Nore SAC [code 2162].</p> <p>Recommendation</p> <p>No change to proposed zoning as indicated in draft JULAP.</p>

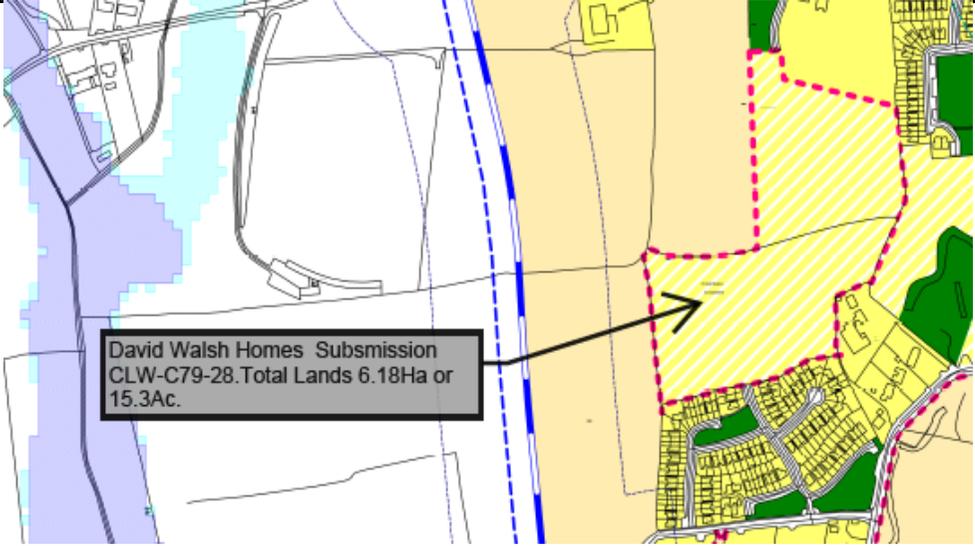
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<ul style="list-style-type: none"> - The subject lands are serviced by existing Pathways via adjacent residential development at Crossneen Manor, Leighlin Road and can be extended easily. - All related services and public lighting for the subject lands are next to adjacent residential developments. - The lands meet the criteria as set out in JULAP 2024-2030 Appendix V Infrastructure Assessment. - The subject lands are a 25-minute walk (2kms) to Carlow town Centre. - The subject lands are in Close proximity to the following: Church (St. Clare's Catholic Church), School, Community Centres. - The subject lands were zoned for residential development previously, in the Graiguecullen LAP 2007-2013. - The adjacent lands have been deemed acceptable for Residential in the past and were granted planning permission. [Under PI Ref 04/294]. <p>Notes:</p> <ul style="list-style-type: none"> - that rezoning of subject lands can only assist in developing the Crossneen area in a sustainable manner, regenerating the Crossneen area as a contributory residential area to Carlow town. Carlow has been Identified as Key Towns in RSES. - ESRI report "underestimated targets needed" to deal with challenges around housing, health and climate change. - Some Farmers just simply want to remain farming and lands dezoned as requested, allowing other lands to be zoned. 		

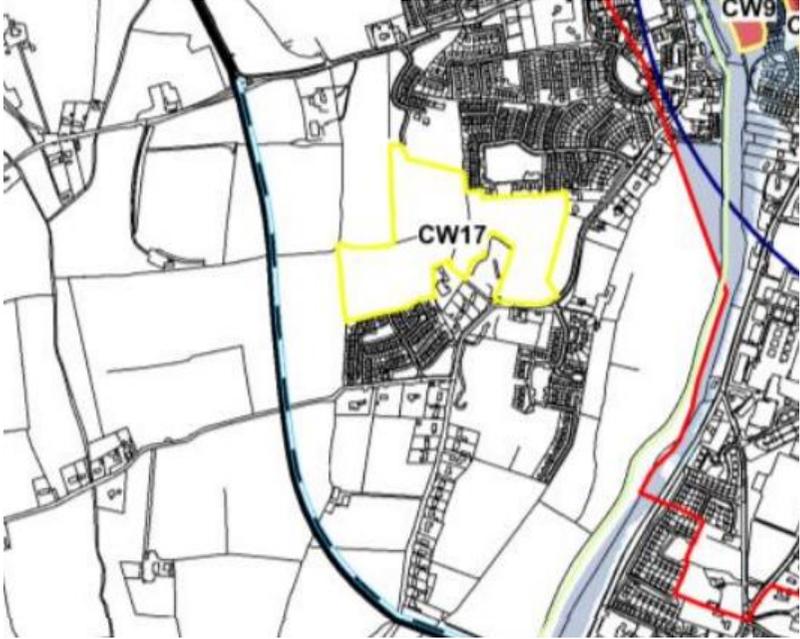
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
In relation to adjacent residential development, known as Crossneen Manor, Leighlin Road, see submission CLW-C79-29, author: James Millar Developments Limited.		
<p>This submission by Tom Dormer refers to a landholding of 1.47 hectares [3.6 acres] in two plots located in Graigue at the northern approach to Graiguecullen, Carlow. More specifically the lands are on the county side of the N80 National Secondary Road. They front onto that road as well as County Primary Road L-3976.</p> <p>The lands are split into two plots: Plot A is the westernmost portion and is 0.202 hectares [0.5 acres] in size. Plot B is the easternmost portion and is 1.268 [3.1 acres] in size.</p> <p>The lands are not zoned in the draft JULAP. Neither were they zoned in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p>	LS-C79-2	<p>Noted.</p> <p>The Draft Local Area Plan will adopt an evidence-based approach to land-use zoning and settlement planning including demonstrating a rational assessment of zoned land requirements based on such criteria as, inter alia, Core Strategy and housing targets as contained in the Laois County Development Plan, the sequential approach to development, flood risk assessment, infrastructure capacity, natural habitats and Section 28 Guidance.</p> <p>The Draft Local Area Plan will recognise the need to concentrate growth in settlement cores, on brownfield sites, and at appropriate infill locations proximate to public transport services where feasible and with appropriate densities of development.</p> <p>There are ample lands already zoned to accommodate projected population growth and housing demand.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
 <p>Tom Dorner Submission LS-C79-2. total Lands 1.47Ha or 3.6Ac.</p> <p>Applicant requests that Plot A be zoned for enterprise and employment development and Plot B for residential development.</p> <p>Applicant makes the following points in support of this zoning request.</p>		<p>If the Planning Authority decides to approve this zoning request, the forthcoming JULAP would be at variance with the Core Strategy and housing target of 276 no. units by 2030 as established in Chapter 3 of the draft JULAP.</p> <p>In its submission, The Office of Planning Regulator advises inter alia as follows:</p> <p><i>“In relation to Graiguecullen, the extent of zoning for residential development exceeds the requirement for zoned land and while the Office is satisfied that the subject lands are located such as to be consistent with compact and sequential growth, there is no requirement for additional New Residential zoning objectives [my emphasis].”</i></p> <p>The lands in Plot A are clear of the at-risk flood zone as indicated in the Draft SFRA.</p> <p>Save for a very minor overlap, the lands in Plot B are also clear of the at-risk flood zone. They are adjacent to said zone however.</p> <p>They are also outside the River Barrow and River Nore SAC [code 2162].</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>- Refers to the strategic location of lands including roundabout access to the National Secondary Road N80 and the Sleaty Road, County Primary Road L-3976.</p> <p>In relation to Plot B, applicant states that the lands are already drained to the Barrow back drain by Carlow County Council and are not subject to flooding. All contours in Plot B are above the ordnance levels of all maximum predicted flood events formally published for the area.</p> <p>References lands given by agreement in 1993 to Laois County Council to facilitate the N80 relief road works.</p>		<p>Both portions are on the rural side of the N 80 National Secondary Road.</p> <p><i>JBA note that lands within Flood Zone C would be appropriate for consideration in terms of a highly or less vulnerable use. When considering the extent of zoning then regard should be given to climate change extents, access requirements and appropriate provision for green infrastructure and the riparian zone, as per LCC Policy.</i></p> <p>Recommendation No change to proposed zoning as indicated in draft JULAP.</p>
<p>This submission made by BPS Planning and Development Consultants on behalf of David Walsh Homes refers to a landholding of 6.1 hectares [15.3 acres] at Crossneen in the south-western outskirts of Graiguecullen, Carlow. More specifically the lands lie between Meadows Way estate due north and Highfield Manor estate due south.</p> <p>Meadows Way, originally approved under PI Ref 04/890, is currently being developed under PI Ref 23/60329. The lands are zoned <i>New Residential</i> in the draft JULAP.</p>	CLW-C79-28	Noted.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests- Laois County Council		
<p>They were zoned <i>Strategic Reserve</i> [predominantly] and <i>Residential 2</i> in the most recent local area plan, the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018.</p> <p>Agent welcomes the zoning as indicated in the draft JULAP.</p> <p>The intention is to deliver housing on these lands at the earliest opportunity. There are no infrastructural constraints pertaining to this site.</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests- Laois County Council		
 <p data-bbox="304 746 685 836">David Walsh Homes Submission CLW-C79-28. Total Lands 6.18Ha or 15.3Ac.</p> <p data-bbox="203 1107 1066 1169">Essentially, the submission relates to Objective CW17 in Appendix 5 Infrastructure Assessment of the draft JULAP.</p> <p data-bbox="203 1262 1133 1324">Agent wants this to be either amended or removed insofar as it relates to the applicants lands.</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
 <p>Objective CW17 includes lands under applicants control as well as unrelated lands to the east which are controlled by a separate party. Linking the two areas of lands under one</p>		<p><u>Re Objective CW17</u></p> <p>The applicant's landholding has its own independent access point[s].</p> <p>The Planning Authority does not accept that Objective CW17 will slow down or prevent development or formally require developers with separate land holdings to work in unison.</p> <p>Recommendation:</p> <p>No change to Objective CW17 in draft JULAP.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>objective gives the unrealistic impression that the area can be developed under a single umbrella site/master plan and/or planning application with each part dependent on the other. This objective could, in its present format, delay the development of applicants and which are deemed 'Tier 1' and which are fully serviced.</p> <p>Objectives like CW17 tend to slow and/or prevent development because:</p> <p>a. There is more than one party involved. Sometimes the issue can be a disagreement as to how to proceed, but it can also simply be the case that one landowner has different plans or even no plans to develop. Timelines can vary between different landowners and/or developers.</p> <p>b. Local authority planners see a single area on a County Development Plan or Local Area Pan map and begin to think of action area plans, framework plans, masterplans, etc. and/or consider that a single phased planning application for the entire area should be submitted.</p> <p>Agent argues that not required in this instance as both areas of land can be and/or are being individually developed 'and' both will achieve the policy aims of the JULAP without adding another hurdle for those involved including the</p> <p>Objective CW17 cannot reasonably be applied in this instance as it is unclear how the owners of the adjoining lands to the east could be required to make any agreement with our client to facilitate a planning application. The lands to the east of our client's lands have been the subject of several recent planning applications including PI Ref 23/3 under which</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>permission for Phase 1 [87 no. dwellings] of an overall residential development of 136 no. dwellings, creche/work hub was granted by Laois County Council to applicant Whitehorse Developments Limited.</p> <p>That planning permission does not specifically provide for any road connection into applicants lands nor was this requested by the Laois County Council Roads Design or Planning Departments. This being the case, it is difficult to envisage how applicant can reasonably be required to address Objective CW17 when it could only possibly be retrospectively applied to the adjoining lands which now maintain a full 5 year planning permission which can be extended.</p> <p>Agent asks for alteration to Map 10.4: 'Carlow-Graiguecullen Landscape Character Assessment' such that the subject lands are changed from being defined as 'Lowland Agricultural Areas' to being defined as part of the 'Urban Fringe Area'. In their un-zoned state, they are agricultural in appearance but not wholly in context terms. There is a need to show a clear differentiation in Map 10.4 regarding those areas of land deemed to now form part of the urban area.</p> <p>In their present appearance in Map 10.4, the lands maintain the same landscape character designation as lands not proposed to be re-zoned residential, while other lands which are, as yet, undeveloped within the 'Urban Fringe Area' retain their urban designation.</p> <p>The reason for this request arises because the 'General Recommendations' set out in the Draft JULAP for 'Lowland Agricultural Areas' and 'Urban Fringe Areas' are very different.</p> <p>A review of the subject lands shows how they now meet the definition of 'Urban Fringe Area' which the JULAP outlines as follows:</p>		<p><u>Re Landscape Character Assessment</u></p> <p>The function of the general recommendations for the assigned landscape types, as outlined in Section 10.4 of the Draft JULAP, is to inform the policy framework for the Plan as well as the development management assessment and decision-making process. The general recommendations should therefore be read in conjunction with relevant policies and objectives of the Draft JULAP, including the land use zoning objectives. The lands in question are zoned <i>New Residential</i> in the Draft JULAP, the objective of which is: - <i>to provide for new residential development, supporting community facilities and other facilities and services incidental to residential development.</i> The Planning</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
<p>The defining characteristics of this LCT include radial and orbital roads with a mixture of ribbon-style housing, some in rural idiom and others more suburban in character. These houses are often encircled with established suburban housing estates or with newer estates contiguous to agricultural lands.</p> <p>The subject lands adjoin housing estates to the north and south and permission has recently been granted for a large residential development on adjoining lands to the east under PI Ref 23/3. The context for these lands is now a suburban one with them increasingly being encircled by suburban housing estates and emerging housing estates.</p>		<p>Authority also acknowledges that development has occurred and is occurring on the lands. In this regard, the general recommendations for the assigned landscape types do not preclude the development of lands in accordance with applicable land use zonings, and in compliance with proper planning and environmental considerations. Notwithstanding, it is considered that the content of Section 10.4 in the Draft JULAP would benefit from additional wording to clarify the purpose of the general recommendations for the assigned landscape types.</p> <p>Recommendation:</p> <p>Include additional text in green in Section 10.4:</p> <p>The general recommendations for each of the assigned landscape types do not preclude the development of lands in accordance with applicable land use zoning objectives, and compliance with proper planning and environmental considerations.</p>
3.14.2 Extension of Boundary		
<p>The Department of Housing Local Government and Heritage welcomes Green Infrastructure objective GI. O2 ' and further recommends that consideration should be given to revising the JULAP boundary to include the Sugar Factory Lagoon to the west of the River Barrow,</p>	CLW-C79-65	<p>While the Council acknowledges the benefits of extending the boundary to facilitate future management of the green infrastructure of the area, the zoning and or extension of the JULAP boundary is</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Land Use Zoning Requests– Laois County Council		
thereby facilitating their future management as part of the Carlow – Graiguecullen Green Infrastructure network.		<p>considered premature pending completion of a feasibility study of providing a wetland amenity area on lands in conjunction with relevant stakeholders. Considerations regard the rezoning of the lands and or extension of the boundary maybe more appropriate following completion of same.</p> <p>Recommendation</p> <p>No change</p>

Part 4: Submissions on Appendices to Draft JULAP

Appendix I and II Strategic Environmental Assessment and Appropriate Assessment

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Strategic Environmental Assessment and Appropriate Assessment		
3.15.1 Strategic Environmental Assessment and Appropriate Assessment		
<p>EPA submission focuses on promoting the full and transparent integration of the findings of the Environmental Assessment (SEA) into the plan and advocating that the key environmental challenges for Ireland be addressed. Key recommendations for integrating environmental considerations into land use plans has been submitted entitled "SEA of Local Authority Land-Use Plans- EPA Recommendations and Resources" published and continually updated by the EPA. Submission notes the requirement to comply with higher order plans i.e. NPF and RSES.</p> <p>Reference is made to:</p> <ul style="list-style-type: none"> - The content of the Environmental Report (i.e. assessment of alternatives, assessment of environmental effects, mitigation measures, and monitoring). - Taking into account State of the Environment Report – Irelands Environment 2020. - Future amendments screened for likely significant effects. - Requirement for SEA Statement – Information on the Decision - Indication of environmental authorities for the purposes of SEA. 	CLW-C79-2	<p>Noted.</p> <p>The 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' document has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process.</p> <p>The Councils have ensured that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategies for the for the Eastern and Midland Region and the Southern Region.</p> <p>The SEA Environmental Report that was placed on public display alongside the Draft Plan contains the information required, including that identified by the Regulations.</p> <p>The recommendations, key issues and challenges described in the EPA's State of the Environment Report – Ireland's Environment have been taken into account during the preparation of the Plan and undertaking of the SEA.</p> <p>An SEA Statement will be prepared including the required information and taking into account the EPA guidance on SEA Statements.</p>

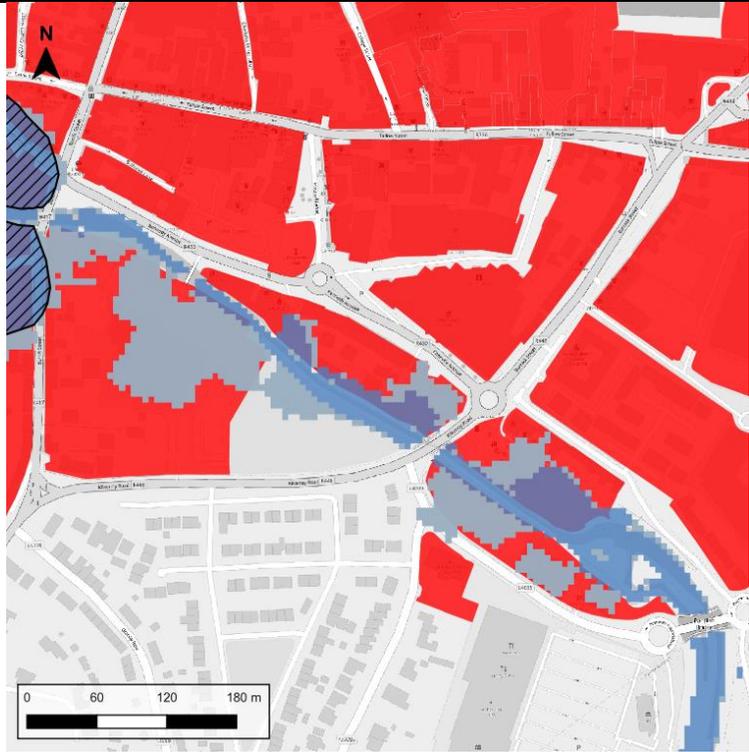
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Strategic Environmental Assessment and Appropriate Assessment		
		<p>The relevant environmental authorities have been consulted with as part of the Plan preparation/SEA process.</p> <p>Recommendation No Change</p>
<p>The Department of Housing Local Government and Heritage notes that one of the Monitoring targets is 'Condition of European sites'. Detailed site-specific conservation objective (SSCO) have also been published for all SACs in the country. These objectives define favourable conservation condition, at site-level of the Annex I habitats and Annex II species for which the sites have been selected. The documents are available for download from the National Parks and Wildlife Service website (www.npws.ie). The associated spatial data is also available for download.</p> <p>In terms of monitoring the conservation condition of the River Barrow and River Nore SAC, the ER must commit to reviewing the SSCO's for this SAC. Article 17 and 12 reporting on habitat / species status is at a national scale and does not assess the conservation condition of individual sites. Assessment of the conservation condition of Qualifying Interest finfish species with the SAC, should be carried out in consultation with Inland Fisheries Ireland.</p> <p>Recommends that the evidence base for SEA should include all available biodiversity data sources such as the following:</p> <p>Flora Protection Order - Vascular Plants, Charophytes and Lichens:</p>	CLW-C79-65	<p>Noted. Monitoring measures detailed in the SEA Environmental Report provide for compliance with the SEA Directive, transposing Regulations and Ministerial Guidelines for Regional Assemblies and Planning Authorities on SEA. The sources for the mentioned indicator will be updated in the SEA Environmental Report to take account of the issue raised.</p> <p>Noted. The SEA Environmental Report will be updated to take account of the issue raised.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Strategic Environmental Assessment and Appropriate Assessment		
<p>The National Parks and Wildlife Service Flora (Protection) Order 2022 Map Viewer web application on the National Parks and Wildlife Service website shows records for Vascular Plants, Charophytes and Lichens listed in and legally protected under the Flora (Protection) Order 2022.</p> <p>Flora Protection Order – Bryophytes: The Flora (Protection) Order, 2022 (S.I. No. 235 of 2022) gives legal protection to 65 species of bryophytes in the Republic of Ireland (25 liverworts and 40 mosses). Information packs are now available for each of the known FPO bryophyte populations, downloadable as PDF documents from www.NPWS.ie. A bryophyte map viewer is also available.</p> <p>Other Data Sources: Data and information on ecological interests and features in or near the LAP area are or may be available from other sources, including:</p> <ul style="list-style-type: none"> • The National Biodiversity Data Centre (www.biodiversity ireland.ie). • Non-governmental organisations such as Birdwatch Ireland, Bat Conservation Ireland etc. • Local Authority (e.g. county or sub-county habitat maps, wetland surveys, hedgerow surveys, etc). • Carlow Swift Survey Report 		<p>Recommendation</p> <p>To add the following sources for this SEA indicator to Table 10.1 of the SEA Environmental Report (text to be added in bold):</p> <p>“ - Available information on the conservation condition of individual sites.</p> <p>- Consultations with Inland Fisheries Ireland with respect to the conservation condition of Qualifying Interest finfish species.”</p> <p>To insert the following text into Section 4.6 “Biodiversity and Flora and Fauna” of the SEA Environmental Report:</p> <p>“Other sources considered by the SEA which will be of use to project-level assessments include:</p> <ul style="list-style-type: none"> • Flora Protection Orders; • Carlow Swift Survey Report; • National Landcover Map; • Botanical Society of the Britain and Ireland; and <p>Other data sources of the National Biodiversity Data Centre, Non-governmental organisations, local authorities and the Environmental Protection Agency.”</p>
<p>The Department of Housing Local Government and Heritage recommends integration of the recently published National Biodiversity Action Plan 2023 – 2030 (https://www.npws.ie/legislation/national-biodiversity-action-plan) into the JULAP, NIR and SEA. The Wildlife (Amendment) Act 2023 introduced a new public sector duty on biodiversity. The legislation provides that every public body, as listed in the Act, is obliged to have regard to the objectives and targets</p>	CLW-C79-65	<p>Noted.</p> <p>Recommendation</p> <p>The SEA Environmental Report will be updated to take account of the issue raised.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Strategic Environmental Assessment and Appropriate Assessment		
in the National Biodiversity Action Plan. See: https://www.npws.ie/legislation for further details.		
The NTA notes with particular regard to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes that accompanied the preparation of the Draft JULAP, the NTA recommends that, as applicable, the final LAP should explicitly distinguish between the LTP measures that are located wholly within the LAP area, and those that fall outside its boundaries and thus outside the scope of the SEA and AA.	CLW-C79-71 LS-L79-8	<p>Noted. Various transport infrastructure and services may extend beyond the Local Area Plan boundary; however, the geographical scope of LTP provisions adopted as part of the Local Area Plan will be limited to the proper planning and sustainable development of the area to which the Development Plan or Local Area Plan area applies.</p> <p>Recommendation Include text at end of first paragraph of Section 6.3 Local Transport Plan Various transport infrastructure and services may extend beyond the Local Area Plan boundary; however, the geographical scope of LTP provisions adopted as part of the Local Area Plan will be limited to the proper planning and sustainable development of the area to which the Local Area Plan area applies.</p>
The Southern Regional Assembly references that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report. These assessments looked at environmental sensitivities for all parts of the Region and recommends that Carlow and Laois County Councils review these documents to inform the Councils' own environmental assessments and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the final JULAP where relevant.	CLW-C79-66	<p>Noted. The RSES documents have been reviewed as part of the SEA, AA and SFRA processes and have informed the environmental assessment documents that have been prepared for the Draft Plan.</p> <p>Recommendation No Change</p>

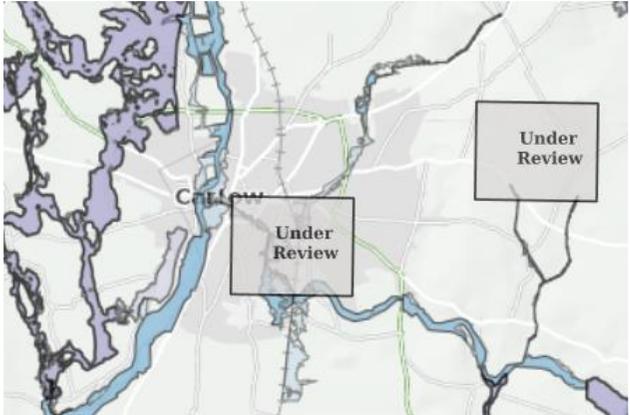
Appendix III Strategic Flood Risk Assessment

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
3.16.1 Justification Tests		
<p>Regarding the Justification Tests the OPW note: Town Centre Plan-making Justification Tests have been supplied for <i>Town Centre</i> zonings which are within the 1% Annual Exceedance Probability Standard of Protection defended areas associated with the existing flood defence scheme, however no Justification Tests have been supplied for areas zoned <i>Town Centre</i> that are located in Flood Zones outside of the defended areas.</p> <p>A.2.2 Neighbourhood Facilities / Centre A Justification Test has been included for a <i>Neighbourhood Facilities / Centre</i> zoning, however text in Criteria 3 there is reference to a school and playing pitches. There is another area with a <i>Neighbourhood Facilities / Centre</i> zoning with a <i>Community / Education</i> zoning adjacent that are both overlapping with Flood Zone B and no Plan-making Justification Test has been supplied for either. Carlow and Laois County Council might review to ensure required Justification Tests are supplied.</p>	<p>CLW-C79-21</p>	<p>JBA can update the report to include the undefended Town Centre JT. This was addressed as part of the zoning of the lands in the former Town Council area in the Carlow CDP 2022-2028.</p> <p>For the Burrin Road Neighbourhood Centre the JT text can be amended to remove the school reference.</p> <p>For the other area referred to then this is not within or adjacent to the core of the town and the JT cannot be applied here. This area is discussed in Section 8.4 and appropriate restrictions to development are applied.</p> <p>Recommendation Include additional Justification Test – Undefended Town Centre – Burrin River</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
		 <p data-bbox="1025 1129 1585 1321">1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p> <p data-bbox="1615 1129 2175 1385">Carlow Town is designated as a Key Town in the RSES and in the Settlement Hierarchy in the Carlow County Development Plan 2022-2028. The strategic vision for Carlow Town is to support and promote the role of Carlow Town as a regional and inter-regional economic growth driver and to fulfil its role as a key town, focused on regeneration, sustainable development, quality of life and economic investment. As a</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation	
3.16 Strategic Flood Risk Assessment			
			designated Key Town, Carlow Town is to play a critical role in underpinning the RSES and ensuring a consolidated spread of growth beyond cities at a sub-regional level.
		2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:	Lands zoned for existing residential / infill and largely developed.
		i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement	Existing development
		ii. Comprises significant previously developed and/or underutilised lands,	Yes, comprises significant previously developed lands
		iii. Is within or adjoining the core of an established or designated urban settlement,	Yes, is within the established designated urban settlement
		iv. Will be essential in achieving compact and sustainable urban growth, and	Lands already developed
		v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	Lands already developed
		3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and	The Burren River overtops its banks and undefended Flood Zone A/B extends into existing developed lands. For the most part Flood Zone A extends into lands that are subject to open space (e.g. Hanover Park) but some areas of existing Town Centre are at risk. Flood Zone B extends into lands that are under existing commercial/retail use and the key site is the Penneys redevelopment which has extant planning permission for redevelopment and was subject to an appropriately detailed FRA.

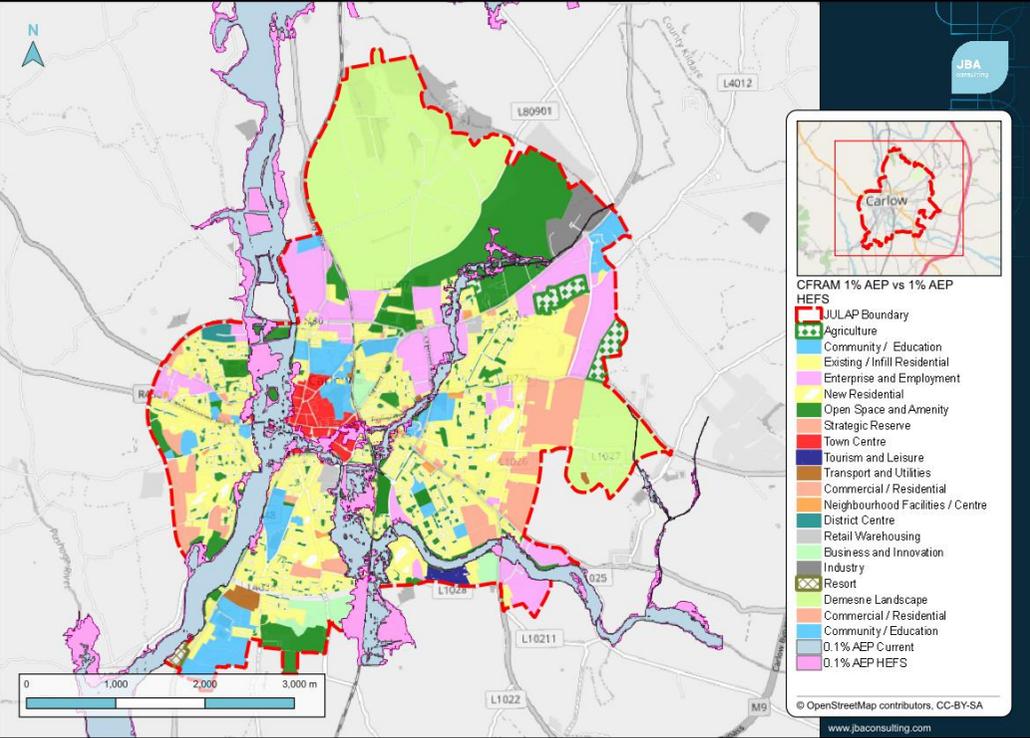
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation	
3.16 Strategic Flood Risk Assessment			
		<p>should be described in the relevant flood risk assessment</p>	<p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that within areas not benefitting from the FRS (undefended) development is;</p> <ul style="list-style-type: none"> Limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction can only take place in Flood Zone C. <p>Any future development should be subject to an FRA which should follow the general guidance provided in Section x of the SFRA and must specifically address the following:</p> <ul style="list-style-type: none"> FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Residential FFLs should be above the 1% AEP level plus climate change and freeboard; Bedrooms should be located in the upstairs of two-story buildings when extending existing property; Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events. Any development shall also be required to be built in accordance with CCC SuDS Policy including consideration of nature based surface water

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
		management in line with the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.
3.16.2 Map Review Programme		
<p>The OPW notes that the Flood Mapping produced under the National CFRAM Programme is currently under review at two locations in Carlow Town. The OPW requests that Carlow County Council note that the mapping in this area may change as part of the review process.</p> 	CLW-C79-21	<p>Noted</p> <p>Recommendation</p> <p>Include additional text in green in Table 4.1</p> <p>Detailed 1D/2D CFRAM HPW model and is useful. Site verified by walkover and consultation with local authority. In general, CFRAM provides all information needed to apply the Justification Test (JT) for Plan Making under the SFRA. Area is listed for update under the OPW map review programme, and this will be updated in the County Flood Zones when available.</p>
3.16.3 National Indicative Flood Mapping		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
<p>The OPW references updated indicative flood mapping provide only an indication of areas that may be prone to flooding and are therefore not necessarily locally accurate. As such, while the indicative maps may be used for strategic-level assessments, they should not be used:</p> <ul style="list-style-type: none"> - to assess the flood hazard and risk associated with individual properties or point locations, or to replace a detailed flood risk assessment, or, - as the sole basis for defining the Flood Zones, or for making planning policy and development management decisions. <p>It is stated in the SFRA that the dataset <i>"Has been used as an initial screening tool for flood extents and should be reviewed as part of site specific FRAs"</i>. Site specific flood risk assessments should not use National Indicative Flood Mapping as a data source and should instead be producing a detailed flood risk assessment for the area. For Planning Authorities, where there is evidentially robust additional sources of information, such as site-specific flood risk assessments, where physical changes have occurred or where local, more recent surveys have been undertaken, this information can and should also be included in the making of spatial planning decisions. This is particularly the case for sites at the edge of a Flood Zone (i.e., just inside, on or just outside the Flood Zone</p>	<p>CLW-C79-21</p>	<p>There is not sufficient time under the statutory process to undertake the level of study outlined by the OPW. In the meantime the SFRA places an appropriate restriction on development has been put in place. This approach is robust and conservative.</p> <p>Recommendation No change</p>

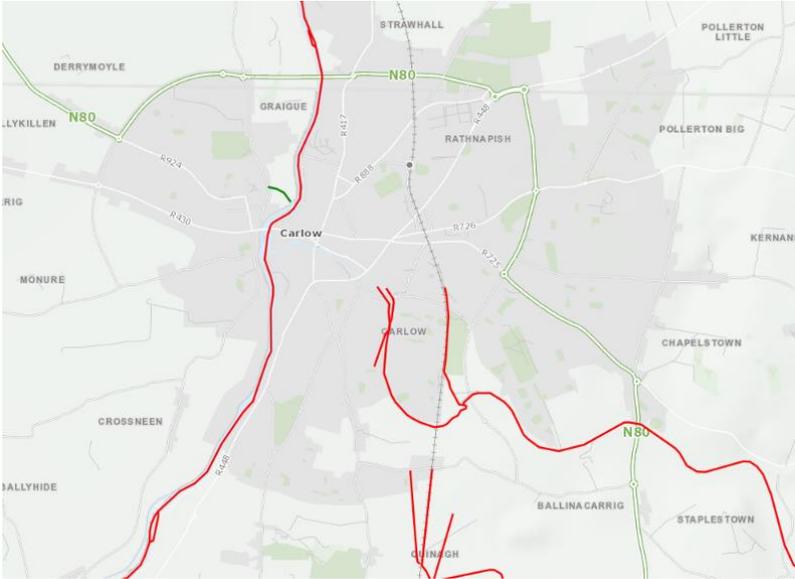
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
boundary) where the Flood Zone definition may be sensitive to uncertainties in the mapping process.		
3.16.4 Pluvial Flooding		
<p>The SFRA states that the PFRA pluvial dataset “was reviewed and used to identify development areas at particular risk of surface water and pluvial flooding” and that “areas vulnerable to ponding are indicated on the OPW’s PFRA mapping”. It is not intended to update the indicative pluvial maps, as it is not appropriate to map flooding from this source through a national-scale assessment, and maps would be more robust if produced at the community / local scale. The PFRA indicative pluvial maps are not considered to be reliable for the purposes of zoning or decision-making. If pluvial flooding is considered to be a flood risk then Carlow & Laois County Councils will need to carry out their own pluvial assessment and mapping for Carlow-Graiguecullen</p>	CLW-C79-21	<p>Noted.</p> <p>Recommendation No change</p>
3.16.5 Defended Areas		
<p>The OPW In the SFRA there is a Section 7.7.1 Development in Defended Areas, under Section 7.7 Requirements for a Flood Risk Assessment, however there is no text included for the section.</p>	CLW-C79-21	<p>Noted.</p> <p>Recommendation Include text in Section 7.7.1 as follows:</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
		<p>Development in Defended Areas</p> <p>Carlow is partially defended and in this case it should be noted that where a site or area is referred to as being defended for the purposes of determining flood mitigation it is assumed that the defences provide a minimum of the 1% AEP (fluvial) or 0.5% AEP (tidal) standard of protection, and have been through a formal detailed design process and approved by OPW or Carlow County Council. Informal defences, which may only be at an agricultural standard, or those developed under the minor works scheme which may provide a lesser standard of protection, are not considered to provide a robust enough standard of protection to allow a moderation in the flood risk mitigation required at a site. The understanding of risks of developing behind defences needs to be explored in the site-specific FRA and this has been discussed in detail under the Justification tests presented in the Appendix.</p>
3.16.6 Consideration of Climate Change Impacts		
<p>The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future and providing space for future flood defences.</p> <p>The OPW welcomes that climate change was also considered and the inclusion of Figure 4-4 CFRAM 1% AEP</p>	<p>CLW-C79-21</p>	<p>Noted and agreed.</p> <p>Recommendation Include additional figure 4.5 CFRAM 1% vs 0.1%AEP HEFS</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
<p>vs 1% AEP HEFS. It would be beneficial to detail the impact that Climate Change may have on the 0.1% AEP flood extents, as this will impact Flood Zone B.</p> <p>In addition, it would be useful if these maps could be overlaid with the land use zoning map.</p>		 <p>The map displays the Carlow area with various land use zones color-coded according to the legend. The legend includes categories such as Agriculture (green), Residential (yellow, orange, red), Commercial (blue, purple), and Industrial (brown). It also shows flood risk zones for 0.1% AEP Current (light blue) and 0.1% AEP HEFS (pink). A scale bar indicates distances up to 3,000 meters, and a north arrow is located in the top left corner. An inset map shows the location of Carlow within a larger regional context.</p>
		Noted

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation																					
3.16 Strategic Flood Risk Assessment																							
<p>In Table 7-1: Allowances for Future Scenarios (100-year Time Horizon), which has been taken from the Climate Change Sectoral Adaptation Plan, some text appears as random characters.</p> <p>The settlement is described in the SFRA as “<i>low impact of climate change across the settlement</i>”. However the Flood Risk Management Plan produced as part of the National CFRAM programme noted that the Carlow AFA would be considered to be at high vulnerability from the mid-range and high end future scenarios.</p>		<p>Recommendation Include Revised Table 7-1 Allowances for Future Scenarios (100-year Time Horizon)</p> <table border="1" data-bbox="1032 459 2199 839"> <thead> <tr> <th>Parameter</th> <th>MRFS</th> <th>HEFS</th> </tr> </thead> <tbody> <tr> <td>Extreme Rainfall Depths</td> <td>+20%</td> <td>+30%</td> </tr> <tr> <td>Flood Flows</td> <td>+20%</td> <td>+30%</td> </tr> <tr> <td>Mean Sea Level Rise</td> <td>+500mm</td> <td>+1000mm</td> </tr> <tr> <td>Land Movement</td> <td>-0.5mm / year*</td> <td>-0.5mm / year*</td> </tr> <tr> <td>Urbanisation</td> <td>No General Allowance - Review on Case by Case Basis</td> <td>No General Allowance - Review on Case by Case Basis</td> </tr> <tr> <td>Forestation</td> <td>-1/6 Tp**</td> <td>-1/3 Tp**+10% SPR***</td> </tr> </tbody> </table> <p>Notes: * Applicable to the southern part of the country only (Dublin - Galway and south of this) ** Reduce the time to peak (Tp) by a third; this allows for potential accelerated runoff that may arise as a result of drainage of afforested land. *** Add 10% to the Standard Percentage Runoff (SPR) rate; this allows for increased runoff rates that may arise following felling of forestry</p> <p>Noted</p> <p>Recommendation Update Section 4.5 CFRAM Results confirm a generally low high impact of climate change across the settlement with the HEFS mapping aligning with the 0.1% current flood extent.</p>	Parameter	MRFS	HEFS	Extreme Rainfall Depths	+20%	+30%	Flood Flows	+20%	+30%	Mean Sea Level Rise	+500mm	+1000mm	Land Movement	-0.5mm / year*	-0.5mm / year*	Urbanisation	No General Allowance - Review on Case by Case Basis	No General Allowance - Review on Case by Case Basis	Forestation	-1/6 Tp**	-1/3 Tp**+10% SPR***
Parameter	MRFS	HEFS																					
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Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
3.16.7 Drainage Districts		
<p>There is no discussion on the Drainage District in the Plan area in the SFRA or the Draft Plan. Local authorities are responsible for maintaining Drainage Districts, while Arterial Drainage Schemes are the responsibility of the OPW. Carlow and Laois County Councils should have regard in zoning land for development to ensure that access requirements are preserved for the maintenance of Drainage Districts. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Drainage Districts may be viewed on www.floodinfo.ie.</p>	<p>CLW-C79-21</p>	<p>Noted</p> <p>Recommendation Include Section 5.1.5</p> <p>Drainage Districts</p> <p>Another form of fluvial regime is seen within the JLAP area is related to rivers that have been subject to works as part of a drainage programme. Drainage Districts were carried out by the Commissioners of Public Works under a number of drainage and navigation acts from 1842 to the 1930s to improve land for agriculture and to mitigate flooding. Channels and lakes were deepened and widened, weirs removed, embankments constructed, bridges replaced or modified and various other work was carried out.</p> <p>The purpose of the schemes was to improve land for agriculture, by lowering water levels during the growing season to reduce waterlogging on the land beside watercourses known as callows.</p> <p>Drainage Districts cover approximately 10% of the country, typically the flattest areas.</p> <p>Local authorities are charged with responsibility to maintain Drainage Districts. The Arterial Drainage Act, 1945 contains a number of provisions for the management of Drainage Districts in Part III and Part VIII of the act. The Act was amended on a number of occasions, e.g. to transpose EU Regulations and Directives such as the EIA, SEA, and Habitats Directives and the Aarhus Convention.</p> <p>Through the implementation of these schemes the hydraulic conveyance efficiency of a catchment is increased, thereby leading to a reduction in overland flood storage. Although it has been found that these schemes generally achieve their main objectives, this increase in discharge-carrying capacity leads to an acceleration of the response to rainfall with flood peaks of increased intensity and more rapid recessions.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
		<p>The Barrow, Quinagh and Burren Drainage Districts are located within the JULAP (see below) and typically ensure that flood waters (of varying magnitude but typically the 3-year flood) are retained in bank by lowering water levels during the growing season thus reducing waterlogging on the adjacent land during wetter periods.</p> 
3.16.8 Nature Based Solutions and SuDS		
The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key	CLW-C79-21	Noted and agreed. Recommendation

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
<p>development sites, and also identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.</p>		<p>Include additional text in green in Section 8.2. Town Centre</p> <p>The town centre area is subject to regeneration plans which are formalised under the Carlow 2040 masterplan and allow consolidation of development, the Justification Test has been applied and passed. These areas include the former Celtic Linen Site and the Pembroke District. For both sites it is a suitable opportunity to apply nature based surface water management in line with SG P2 and the DHLGH Best Practice Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.</p> <p>Both sites are protected by the Carlow FRS and future development in these areas can develop within the defended Flood Zone A and Flood Zone B. Due to the presence of the defences ground levels can be raised appropriately to achieve the design FFL for the type of development proposed, without the need for compensatory storage. All development should be subject to an FRA which should follow the general guidance provided in the SFRA and within the appendix, development must specifically address the following:</p> <ul style="list-style-type: none"> • The Masterplan should be subject to an appropriately detailed FRA that finalises the design flood levels and mitigation approach; • The FRA should address climate change scenarios in relation to FFLs; • Basement levels are permitted, but no highly vulnerable development would be permitted on this level and the access point to the basement and any vents/opes should be above the design flood level including freeboard; • Any development shall also be required to be built in accordance with CCC SuDS Policy including consideration of nature based surface water management in line with the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas. <p>Other defended areas of the Town Centre are managed in a similar way and this is set out in the appendix</p> <p>Elsewhere in the Town Centre there are existing developed lands (principally residential), some of which do not benefit from the flood defences, where this is the case there are restrictions placed on new development in order to apply and pass the Justification Test. This is defined further under the Appendix and is on the basis that within</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.16 Strategic Flood Risk Assessment		
		<p>areas not benefitting from the FRS (undefended) development is;</p> <ul style="list-style-type: none"> • Limited to extensions, renovations and change of use. • Infill residential development and demolition and reconstruction can only take place in Flood Zone C. • Any future development should be subject to an FRA which should follow the general guidance provided in a Section of the SFRA and the further measures outlined under the Appendix Where there is also some undefended residential zoned land (Barrowville) a similar approach has been applied and this is detailed under the appendix. <p>The Retail Warehousing lands adjacent to the Burrin River are also at potential risk and are undefended but are a lower vulnerability class. Any future planning applications for extensions/refits/change of use should be subject to an FRA which should follow the general guidance provided in a section of the SFRA and the guidance provided under the appendix.</p> <p>Include additional text in Green in Section A.1 Town Centre, A1.2 Town Centre Redevelopment – Pembroke District, A1.3 Other Town Centre (Defended), A1.4 Existing/ Infill Residential. A1.5 Retail Warehousing, A2.1 Existing Residential, A2.2 Neighbourhood Facilities / Centre</p> <p>Any development shall also be required to be built in accordance with CCC SuDS Policy including consideration of nature-based surface water management in line with the DHLGH Best Practise Interim Guidance Document; Nature-Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas.</p>

Appendix IV Local Transport Plan

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.17 Local Transport Plan		
3.17.1 General Comments		
<ul style="list-style-type: none"> Update of Section 2 Policy Context of the LTP Baseline Assessment to reflect national road policy and TII Publications (technical and standards) "Section 2.1 National Policy" shall include national planning and development policy: <i>Guidelines Spatial Planning and National Roads Guidelines for Planning Authorities</i> (2012). Suggested position is at 2.1.3 ahead of 2.1.4 NIFTI in view of the directly scheduled nature of TII projects in the NDP. Recommended text update of "<i>Relevance to Carlow Graiguecullen ABTA</i>" at <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i> in order to correctly reflect statutorily prescribed planning and development policy. Suggested text updates in red:- <p>"Relevance to Carlow Graiguecullen ABTA The N80 is a key route through the study area. Any development, or changes to the transport network, must protect maintain the safety, carrying capacity and efficiency of the N80 and future national roads network function of the N80 and ensure a reasonable level of service is maintained in accordance with the <i>Spatial Planning and National Roads Guidelines for Planning Authorities</i>."</p> <ol style="list-style-type: none"> "Section 2.2 National Guidance" shall include TII Publications as item 2.2.2. Current item 2.2.3 will have moved to section 2.1 and therefore shall be deleted from this position. 	CLW-C79-35	<p>The Local Transport Plan will be updated to include Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and TII Publications as appropriate. Figures referencing policy documents will also be updated.</p> <p>The LTP document already states that the function of the N80 must be protected. The alternative form of wording fails to acknowledge other measures proposed within the Local Transport Plan which does not necessarily mean the function of the N80 will not be protected. The Local Transport Plan also recognises that any measures which impact on the N80 will need to be subject to a detailed design and assessment process in collaboration with TII. All measures which impact on the N80 will be highlighted.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.17 Local Transport Plan		
		<p>Recommendation</p> <p>Include additional referring in document to: The Spatial Planning and National Roads Guidelines set out planning considerations relating to development which would affect national roads outside the 50/60 kmh speed limit zones for cities towns and villages. Key principles within the guidance document include:</p> <ul style="list-style-type: none"> • Land-use and transportation policies are highly interdependent and integrated development and implementation of planning and land-use policies is vital in minimising the need for travel; • Proper planning is central to ensuring road safety; • Development must be plan-led; • Planning Authorities, the National Roads Authority and other public transport bodies must work closely together. <p>The guidelines recognise the function that national roads play in terms of Ireland's overall transport system and in the country's economic, social and physical development. The guidance emphasises the need to deliver development in a manner in which a satisfactory level of service is achieved for road users and to protect and maintain that level of service with any future development.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation		
3.17 Local Transport Plan				
<p>TII requests update of Figure 4 National, Regional, and Local Policy of the LTP to reflect national road policy and TII Publications (technical and standards)</p> <ul style="list-style-type: none"> Official national planning and development policy for the national road network <i>Spatial Planning and National Roads Guidelines</i> is depicted in <i>Figure 4 National, Regional, and Local Policy</i> under "Guidance Documents". These Guidelines for Planning Authorities should be under "National Policy". TII Publications should be recorded under "Guidance Documents" having regard to the presence of the N80 within the JULAP and having regard to their applicability for all public roads outside the urban speed limits. 	CLW-C79-35	<p>As above - The LTP will be updated as appropriate to reference appropriate policy documents.</p> <p>Recommendation LTP to be updated to reference national guidelines and TII publications as appropriate.</p>		
<p>TII requests a review Table 5.2 Sense Check of Proposals Based on ABTA Guidance of the LTP to reflect TII Publications</p> <p>Review and potentially amend Table 5.2 "Sense Check of Proposals Based on ABTA Guidance" of the LTP at Appendix IV of the Draft JULAP to ensure that proposed transport measures demonstrate that the measures have been assessed against TII Publications where measures may interact with the national road network.</p>	CLW-C79-35	<p>Noted</p> <p>Recommendation Include additional text</p> <table border="1" data-bbox="1279 1066 2078 1391"> <tr> <td data-bbox="1279 1066 1682 1391">Where applicable, the strategic national road network will be protected from local car trip generation.</td> <td data-bbox="1682 1066 2078 1391">There is recognition that the N80 serves a dual function of catering for both strategic and local traffic. Measures have been proposed, which will promote a modal shift, thus reducing the level of local traffic using the N80. Prior to implementation of any option which impacts on the national road network, a detailed option assessment exercise will be undertaken. Options will be</td> </tr> </table>	Where applicable, the strategic national road network will be protected from local car trip generation.	There is recognition that the N80 serves a dual function of catering for both strategic and local traffic. Measures have been proposed, which will promote a modal shift, thus reducing the level of local traffic using the N80. Prior to implementation of any option which impacts on the national road network, a detailed option assessment exercise will be undertaken. Options will be
Where applicable, the strategic national road network will be protected from local car trip generation.	There is recognition that the N80 serves a dual function of catering for both strategic and local traffic. Measures have been proposed, which will promote a modal shift, thus reducing the level of local traffic using the N80. Prior to implementation of any option which impacts on the national road network, a detailed option assessment exercise will be undertaken. Options will be			

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation	
3.17 Local Transport Plan			
			developed with due consideration to Spatial Planning and National Roads Guidelines for Planning Authorities (2012) and other relevant TII publications.
<p>Chapter 12 – Land Use Zoning Objectives and Implementation <i>Relationship between zoned development lands and the indicative alignment of the Southern Relief Road</i> In relation to the serviceability of zoned development lands located adjacent to the indicative alignment of the South Relief Road, the extent to which these lands can be sustainably developed on the basis of the existing transport infrastructure and without the Southern Relief Road, should be considered, taking into consideration the transport measures presented in the LTP.</p> <p><i>Lands in the vicinity of the Rail Station</i> In relation to lands in the vicinity of the rail station, opportunities for Transport Oriented Development (TOD) could be investigated and considered. Information on TOD can be found in the following document: https://www.gov.ie/en/publication/0b532-opportunities-for-transport-orientated-development-tod-in-major-urban-centres-dublin-study/#transport-orientated-development</p> <p><i>Community and Education</i> In relation to the serviceability of lands zoned for community and education located on the southern periphery and north eastern periphery of the JULAP area, it should be demonstrated how accessibility to these lands from their</p>	CLW-C79-71	<p>Both the JULAP and the LTP have been prepared having regard to National and Regional Policy and long standing local policy. In particular the Carlow Southern Relief Road is listed under strategic investment priorities of the National Development Plan 2021–2030 and is supported in the RSES for the Southern Region RPO 14.</p> <p>Furthermore, the provision of a Southern Relief Road of Carlow Town has long been an objective of both Carlow and Laois County Council's, contained in the Joint Spatial Plan (JSP) for the Greater Carlow Graiguecullen Urban Area 2012–2018, Land Use and Objective Maps indicate the relief road and associated link roads as an objective. Currently, the Carlow Southern Relief Road is an objective of the Carlow County Development Plan 2022–2028, and included as a 'project currently subject to appraisal' under National Strategic Outcome 3 of "Project Ireland 2040 – National Development Plan 2018–2027", supported by the key principles as outlined in the "Investing In Our Transport Future Strategic Investment Framework for Land Transport", "Smarter Travel – A Sustainable Transport Future 2009–2020" and the "Southern Regional Assembly Regional Spatial and Economic Strategy 2020"</p> <p>The Department of Transport has outlined its recognition and commitment towards this scheme, highlighting the necessary steps to be taken while committing to fund assessments necessary to advance the project to a</p>	

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.17 Local Transport Plan		
<p>intended catchment at the local level and from within the JULAP area as a whole would be achieved by public transport, walking and cycling modes.</p> <p>Related to this, the NTA would highlight the need to provide for permeability in new development areas and between existing and new development areas, providing, for example, for walking and cycling connectivity between new and existing residential areas.</p> <p>Enterprise and Employment Lands</p> <p>In relation to the lands zoned for Enterprise and Employment located on the eastern periphery of the JULAP area, clarity is required on the level of employment growth which is anticipated for these areas relative to more centrally located employment zoned sites and the town centre, where a greater level of employment growth consolidation, based on more employment intensive uses would be expected.</p> <p>Furthermore, the large extent of these lands, combined with the current lack of specificity on the phasing or overall quantum of employment envisaged and associated trip demand/demand patterns, presents a significant degree of uncertainty on how the transport measures presented in the LTP would provide the basis for the sustainable development of these areas.</p>		<p>successful conclusion. It is the view of the Planning Authority that relevant policy documents accordance with higher level policy.</p> <p>Any proposed developments on lands proposed for development will be assessed having regard to all proper planning considerations including phasing of development, accessibility, mobility and active travel considerations.</p> <p>Recommendation</p> <p>No change</p>
<p>Specific reference is made to the LTP noting that the Draft LTP envisions several road and junction changes over the plan period. Of specific importance to Tesco is the R19- Fairgreen Retail Access which states "Access to Fairgreen Retail Park from Barrack Street is closed to make the space for pedestrians and cyclists". It is stated that it is unclear if a full road closure is proposed or if access from Barrack Street is to be restricted with the existing exit route onto Barrack Street. Tesco</p>	CLW-C79-30	<p>Under these proposals, access to the Fairgreen Retail Park from Barrack Road would be closed in both directions, with access to be maintained from Bridge Street.</p> <p>The scheme is being developed with funding available from the Urban Regeneration and Development Fund. In taking forward any proposal, a comprehensive engagement and consultation process will take place and a</p>

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<p>requests clarity on the proposed works to take place together with clarity on the envisaged construction timeline.</p> <p>It is further requested that regard is had for customer, HGV movements and all other operational requirements of the centre throughout both construction and the operational phase.</p>		<p>statutory planning process. As timescales for the project become clearer, these will be communicated with stakeholders.</p> <p>Recommendation No change</p>

Appendices to Chief Executive's Report

Appendix I – List of Persons / Bodies who made Submissions

Submissions to Carlow County Council	
CLW-C79-1 Health Service Executive	CLW-C79-30 RMLA on behalf of Tesco
CLW-C79-2 Environmental Protection Agency	CLW-C79-31 Highfield Residents Association
CLW-C79-3 Kieran Lillis	CLW-C79-32 Meath County Council
CLW-C79-4 Department of Transport	CLW-C79-33 Anne O'Reilly
CLW-C79-5 Anne Ahern	CLW-C79-34 MKO on behalf of South East Technological University
CLW-C79-6 Chris Madden	CLW-C79-35 Transport Infrastructure Ireland
CLW-C79-7 Siobhan Moore	CLW-C79-36 County Carlow Chamber of Commerce, Industry and Tourism CLG
CLW-C79-8 Mike Aslan	CLW-C79-37 Kevin Murphy
CLW-C79-9 Sara Timmons	CLW-C79-38 Submission withdrawn
CLW-C79-10 Adriana Ballayayova	CLW-C79-39 Jimmy Walsh
CLW-C79-11 Lia de Lancey	CLW-C79-40 Mariusz Dziewonski
CLW-C79-12 Sinead Dowling	CLW-C79-41 Uisce Eireann
CLW-C79-13 Viktor Sudicky	CLW-C79-42 Office of the Planning Regulator (duplicate LS-C79-6)
CLW-C79-14 Davd Purcell	CLW-C79-43 Derek Oman
CLW-C79-15 Marcella Kelly	CLW-C79-44 David McCarthy
CLW-C79-16 Goran Majhen	CLW-C79-45 Tom Phillips on behalf of Nessleside BuildersUC
CLW-C79-17 Naomi Keating	CLW-C79-46 Frank Bolger
CLW-C79-18 Jason Tomkins	CLW-C79-47 Catherine Bolger
CLW-C79-19 Tricia Hutton	CLW-C79-48 Karl Broderick
CLW-C79-20 Betty Kelly	CLW-C79-49 Declan Kehoe on behalf of Theresa Abbey (Laois Functional Area)
CLW-C79-21 Office of Public Works	CLW-C79-50 Declan Kehoe on behalf of Tony Abbey (Laois Functional Area)
CLW-C79-22 Seamus Brennan	CLW-C79-51 Declan Kehoe
CLW-C79-23 Radu Patrascu	CLW-C79-52 Mary Ryan
CLW-C79-24 RMLA on behalf of An Post	CLW-C79-53 Mary Walker
CLW-C79-25 James Keely on behalf Greencore	CLW-C79-54 Margaret Barron on behalf of Residents of Strawhall
CLW-C79-26 Carlow Public Participation Network	CLW-C79-55 Declan Kehoe on behalf of Peter and Mary Kelly
CLW-C79-27 James Keely on behalf of Greencore	CLW-C79-56 Purser on behalf of Michael Quinn
CLW-C79-28 BPS Planning with support of Dooley Cummins on behalf of David Walsh Homes Ltd (Laois Functional Area)	CLW-C79-57 Mark O'Brien
CLW-C79-29 James Millar Developments Ltd (duplicate LS-C79-4) (Laois Functional Area)	CLW-C79-58 Mark O'Brien on behalf of staff, children and school community of Carlow Educate Together NS

Submissions to Carlow County Council

CLW-C79-59 Mary Ryan	CLW-C79-71 National Transport Authority (duplicate LS-C79-8)
CLW-C79-60 Sinead Tynan	CLW-C79-72 Cherish Kinsella
CLW-C79-61 Fiona Yule on behalf of the Trustees of 5 th Carlow Town Scouts Group	CLW-C79-73 Adrian Kelly
CLW-C79-62 Department of the Environment, Climate and Communications	CLW-C79-74 Jim Madden Eurocare (duplicate LS-C79-10)
CLW-C79-63 Monaco Properties	CLW-C79-75 John Fennell
CLW-C79-64 Gittens Murray on behalf of Oakpark Lands and Oakpark Sote Ltd (i.e. part of Nolan Transport Group).	CLW-C79-76 Simon Lewis Principal Carlow Educate Together NS (duplicate LS-C79-11)
CLW-C79-65 Department of Housing Local Government and heritage	CLW-C79-77 Shay Kirwan
CLW-C79-66 Southern Regional Assembly	CLW-C79-78 Eileen O'Rourke on behalf of the Board of Carlow Tourism
CLW-C79-67 Department of Education (duplicate LS-C79-7)	CLW-C79-79 Sinead Kirwan
CLW-C79-68 Patrick and Helen Whelan	CLW-C79-80 Sinead Tynan
CLW-C79-69 Regina Tieken	CLW-C79-81 Sinead Tynan on behalf of Strawhall Woodland Campaign Steering Group
CLW-C79-70 Terry Delaney	

Submissions to Laois County Council	
LS-C79-1 Inland Fisheries Ireland	LS-C79-7 Department of Education (duplicate CLW-C79-67)
LS-C79-2 Tom Dormer	LS-C79-8 National Transport Authority (duplicate CLW-C79-71)
LS-C79-3 Eastern Midlands Regional Assembly	LS-C79-9 Cllr. Eoin Barry
LS-C79-4 James Millar (duplicate CLW-C79-29)	LS-C79-10 Jim Madden Eurocare (duplicate CLW-C79-74) (Carlow Functional Area)
LS-C79-5 Brennan Family	LS-C79-11 Simon Lewis Carlow Educate Together NS (duplicate CLW-C79-76)
LS-C79-6 Office of Planning Regulator (duplicate CLW-C79-42)	

Appendix II – Advertisement

CARLOW COUNTY COUNCIL AND LAOIS COUNTY COUNCIL

COMHAIRLE CONTAE CHEATHARLACH AGUS COMHAIRLE CONTAE LAOISE DRAFT CARLOW-GRAIGUECULLEN JOINT URBAN LOCAL AREA PLAN 2024- 2030

Pursuant to Section 20(3) of the Planning and Development Act 2000 (as amended), notice is hereby given that jointly Carlow County Council and Laois County Council, being the Planning Authorities for the Carlow-Graiguecullen Joint Urban Area, have prepared a Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 (Draft JULAP).

The Draft JULAP comprises a Written Statement and maps and is accompanied by:

- a Strategic Environmental Assessment (SEA) Environmental Report, prepared in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I No. 436 of 2004) (as amended);
- an Appropriate Assessment (AA) Natura Impact Report pursuant to the Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (as amended);
- a Strategic Flood Risk Assessment pursuant to The Planning System and Flood Risk Management Guidelines (2009); and,
- a Local Transport Plan pursuant to Area Based Transport Assessment (ABTA) Guidance Notes (2018) and ABTA How to Guide (2021)

The land use zonings for Carlow Town (former Town Council Area) were adopted as part of the Carlow County Development Plan 2022-2028 and have been incorporated into the Draft JULAP.

DISPLAY OF DRAFT JULAP

The Draft JULAP (Written Statement, including Appendices), SEA Environmental Report, AA Natura Impact Report, Strategic Flood Risk Assessment, Local Transport Plan and Maps, may be inspected online from **13th December 2023 to 5th February 2024** inclusive at <https://consult.carlow.ie> and <http://consult.laois.ie>

The Draft JULAP (Written Statement, including Appendices), SEA Environmental Report, AA Natura Impact Report, Strategic Flood Risk Assessment, Local Transport Plan and Maps, will be on display from **13th December 2023 to 5th February 2024** and available to view during opening hours at the following locations:

- Carlow County Council Planning Department, County Buildings, Athy Road, Carlow
- Carlow Library, Tullow Street, Carlow
- Laois County Council, Planning Department, Áras an Chontae, JFL Avenue, Portlaoise, Co. Laois

PUBLIC INFORMATION SESSIONS

Two information sessions for members of the public will be held on the following dates:

Carlow	Shaw Room at Carlow Central Library, Tullow Street, Carlow	Thursday 11 th January	14.30-18.00
Graiguecullen	Talbot Hotel, Graigue, Portlaoise Road, Carlow	Thursday 18 th January	14.30-18.00

Should any member of the public wish to make a specific appointment during either of these two information sessions, please arrange to do so by phone **059 9170310** or by email to: **JointLAP@carlowcoco.ie**

MAKING A SUBMISSION

Submissions or observations regarding the Draft JULAP and the associated environmental reports and Local Transport Plan are hereby invited from the public and interested bodies between **13th December 2023 to 5th February 2024** inclusive. Children, or groups or associations representing the interests of children, are entitled to make submissions or observations. All written submissions or observations will be duly considered and taken into consideration before the making of the JULAP.

Submissions and observations can be made as follows:

- (i) Via the relevant consultation portal(s): <http://consult.carlow.ie> or <http://consult.laois.ie>
- (ii) By email to: JointLAP@carlowcoco.ie or jointlap@laoiscoco.ie
- (iii) In writing marked “Draft Carlow-Graiguecullen Joint Urban Local Area Plan” and sent to the following relevant address:

Carlow County Council, Senior Executive Officer, County Buildings, Athy Road, Carlow, Co. Carlow.

Laois County Council, Senior Planner, Áras an Chontae, JFL Avenue, Portlaoise, Co. Laois.

- Submissions/observations made within this period will be taken into consideration by the Elected Members of Carlow County Council and / or Laois County Council as appropriate before the making of the Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030.
- All submissions should be in one medium only i.e. hard copy or via the consultation portal online **or** by email. This will avoid the duplication of submission reference numbers and will streamline the process.
- Include your name and address and, where relevant, details of any organisation, community group or company you represent on a separate page to the content of your submission, in order to assist in complying with the provisions of the Data Protection Act.

- The Planning process is an open and public one. In that context, all submissions / observations will be taken into consideration, are a matter of public record and will be placed on the County Councils websites. Please be advised that the name of the person(s)/group(s) who make submissions will be published, but personal data will be redacted. This processing of your personal data is lawful under Article 6(1)(e) of the GDPR Regulations.

The Councils' Data Protection Policy is available at:

<https://www.carlow.ie/wp-content/documents/uploads/Data%20Protection%20Policy%20GDPR%20Carlow%20Co%20Co%2013th%20June%202018.pdf>

<https://laois.ie/wp-content/uploads/Agreed-Laois-County-Council-revised-Data-Protection-policy-1.pdf>

YOU ARE STRONGLY ADVISED TO MAKE YOUR SUBMISSION AS EARLY AS POSSIBLE, LATE SUBMISSIONS WILL NOT BE ACCEPTED. LATEST TIME FOR RECEIPT OF SUBMISSION (BY POST/ONLINE/EMAIL) IS 5.00PM 5th FEBRUARY 2024.

Michael Rainey
Director of Services
Carlow County Council
Council

Angela McEvoy
Director of Services
Laois County

Appendix III – List of Bodies Notified

Name	Organisation
Chief Executive	Laois County Council
Forward Planning	Laois County Council
Chief Executive	Kilkenny County Council
Senior Planner	Kilkenny County Council
Chief Executive	Wicklow County Council
Senior Planner, Forward Planning	Wicklow County Council
Chief Executive	Wexford County Council
Senior Executive Planner	Wexford County Council
Chief Executive	Kildare County Council
Forward Planning	Kildare County Council
Chief Executive	Offaly County Council
Chief Executive	Tipperary County Council
Chief Executive	Galway County Council
Chief Executive	Roscommon County Council
Chief Executive	Westmeath County Council
Chief Executive	Meath County Council
Minister Darragh O'Brien	Department of Housing, Local Government and Heritage
The Manager, Development Applications Unit	Department of Housing, Local Government and Heritage
Corporate Support Unit	Department of the Environment, Climate and Communications
Environmental Co-ordination unit	Climate Change and Bio Energy Division, Department of Agriculture, Food and the Marine
Minister McConalogue	Department of Agriculture, Food, and the Marine
Minister Simon Coveney	Department of Defence
Alan Hanlon, Higher Executive Officer, Site Acquisitions and Property Management	Department of Education
Minister Norma Foley	Department of Education
Minister Heather Humphreys	Department of Rural and Community Development
Minister Leo Varadkar	Department of Enterprise, Trade and Employment
Minister Eamon Ryan	Department of Transport
Regional Planning Officer	Regional Planning Officer, Southern Regional Assembly
Jim Conway, Director	Eastern & Midland Regional Authority
Dr Ciaran Byrne, CEO	Inland Fisheries Ireland
Tadhg O'Mahoney, Senior Scientific Officer	Environmental Protection Agency
John Curtin, Director of Flood Risk Management	OPW
Jana Goold, Regional Forward Planning Specialist	Uisce Eireann / Irish Water
John McDonagh, CEO	Waterways Ireland

Seán Woods, Executive Officer	Office of the Planning Regulator
Mary Tucker, Executive Officer	An Bórd Pleanála
Prof. Kevin Rafter	An Comhairle Ealaíon
Minister Catherine Martin	Deot. Tourism, Culture, Arts, Gaeltacht, Sport and Media
Paul Kelly, Chief Executive	Fáilte Ireland
Virginia Teehan, CEO	Heritage Council
Dalton Philips, CEO	Dublin Airport Authority
Mark Foley, CEO	Eirgrid
Pat O'Doherty	ESB (Electric Ireland)
Ann Marie Part	Health Service Executive
Dr. Sharon McGuinness, CEO	The Health and Safety Authority
Ms Phoebe Duvall, Planning and Environmental Policy Officer	An Taisce
Michael McCormack, Senior Land Use Planner	Transport Infrastructure Ireland
To Whom It May Concern	National Transport Authority
Margaret Moore, Development Officer	LCDC
To Whom It May Concern	Commission for the Regulation of Utilities
To Whom It May Concern	Carlow County Development Partnership
Jennifer Murnane O'Connor	TD
Mr. Fergal Browne	Member Carlow County Council
Mr. John Cassin	Member Carlow County Council
Ms. Andrea Dalton	Member Carlow County Council
Mr. Michael Doran	Member Carlow County Council
Mr. Andy Gladney	Member Carlow County Council
Mr. Thomas Kinsella	Member Carlow County Council
Mr Arthur McDonald	Member Carlow County Council
Mr. John McDonald	Member Carlow County Council
Mr. Ken Murnane	Member Carlow County Council
Mr. Charlie Murphy	Member Carlow County Council
Mr. John Murphy	Member Carlow County Council
Mr. Brian O'Donoghue	Member Carlow County Council
Mr. Tom O'Neill	Member Carlow County Council
Mr. William Paton	Member Carlow County Council
Mr. John Pender	Member Carlow County Council
Mr. Fintan Phelan	Member Carlow County Council
Mr. William Quinn	Member Carlow County Council
Ms. Adrienne Wallace	Member Carlow County Council

Fiona Broadbery	Public Participation Network
IDA Ireland	Three Park Place
Julia Sinnamon, Chief Executive	Enterprise Ireland
Mr. Ian Sewell	SPC
Mr. Eamonn Moore	SPC
Mr. George Collier	SPC
Mr. Willie Murphy	SPC
Mr. Brian O'Farrell	Carlow Chamber of Commerce
Mr. William Aird	Member of Laois County Council
Mr. Conor Bergin	Member of Laois County Council
Mr. Patrick Bracken	Member of Laois County Council
Mr. Ben Brennan	Member of Laois County Council
Mr. Ollie Clooney	Member of Laois County Council
Ms. Thomasina Connell	Member of Laois County Council
Ms. Caroline Dwane Stanley	Member of Laois County Council
Mr. John Joe Fennelly	Member of Laois County Council
Ms. Catherine Fitzgerald	Member of Laois County Council
Mr. Pdraig Fleming	Member of Laois County Council
Mr. James Kelly	Member of Laois County Council
Mr. PJ Kelly	Member of Laois County Council
Mr. John King	Member of Laois County Council
Mr. Seamus McDonald	Member of Laois County Council
Mr. Pascal McEvoy	Member of Laois County Council
Ms. Aisling Moran	Member of Laois County Council
Mr. Aidan Mullins	Member of Laois County Council
Ms. Marie Tuohy	Member of Laois County Council
Mr. Barry Walsh	Member of Laois County Council