

**CUNNANE STRATTON REYNOLDS**

Presentation Building Regeneration  
—  
Library, Cultural, Civic and Learning Space

## **Planning Statement**

To accompany  
A development proposal application made  
under Part 8 of the Planning and Development Regulations 2001 - 2021

by

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February 2021  
No. 20332

## Table of Contents

1.0	Introduction.....	2
2.0	Site Location and Development Context.....	2
3.0	Development Proposal.....	3
4.0	History and Heritage .....	7
4.1	Planning History .....	8
5.0	Strategic Planning Policy Context.....	9
5.1	National Planning Framework (NPF).....	9
5.1.1	National Strategic Outcomes .....	10
5.1.2	National Policy Objectives .....	10
5.1.3	NPF and National Development Plan .....	11
5.2	Regional Spatial and Economic Strategy for the Southern Region (RSES) .....	11
5.3	Sustainable Travel & Transport (National Cycle Manual, 2011; Permeability Best Practice Guide, 2015; and Design Manual for Urban Roads and Streets (DMURS).....	12
5.4	National Planning Guidelines .....	13
6.0	Local Planning Policy Context.....	14
6.1	Carlow County Development Plan 2015-2021 .....	14
6.2	Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 (as extended).....	15
6.3	Project Carlow 2040 – A Vision for Regeneration .....	16
7.0	Environmental Impact Assessment (EIA) .....	17
8.0	Appropriate Assessment (AA).....	17
9.0	Conclusion.....	18

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# 1.0 Introduction

Cunnane Stratton Reynolds have been appointed to prepare this Planning Statement to accompany the application seeking the redevelopment and extension of Presentation Building, Tullow Street, and College Street, Carlow. The application is made in accordance with Part XI of the Planning and Development Act 2000, as amended and Part 8 of the Planning and Development Regulations, 2001 – 2021.

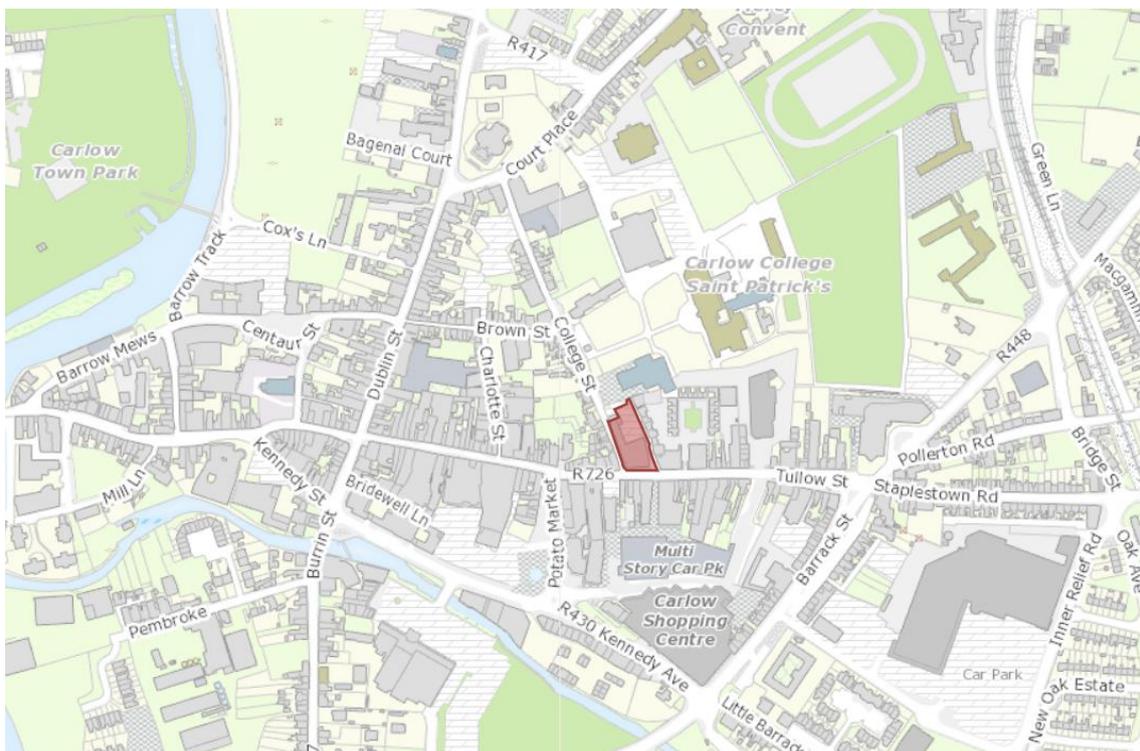
The purpose of this document is to report the compliance performance of the development proposal against relevant development policies and objectives at national, regional and local levels. This report should be read in conjunction with the drawings and other reports that have been prepared for the proposed development and are submitted with this application.

Carlow County Council envisages that Presentation Building is an integral part of urban space that ties into and enhances the existing Cultural Quarter of Carlow Town, Public Realm Plan and fulfils the cultural needs of the town and surrounding areas. In 2020 the Local Authority appointed a design team led by Carr Cotter & Naessens to explore the redevelopment and extension of Presentation Building in order to improve the use of the building as a cultural hub and library. The proposal has been developed in accordance with the policies in the relevant statutory plans as is demonstrated in this report.

# 2.0 Site Location and Development Context

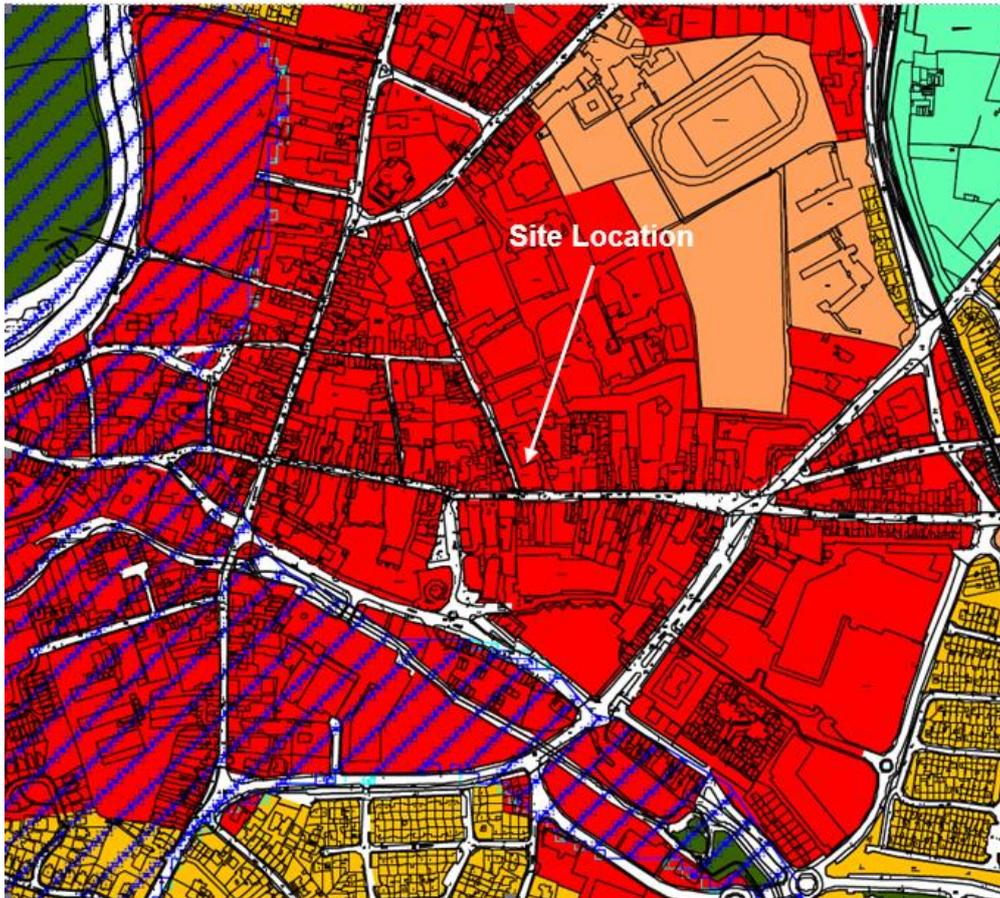
The Presentation Building [the site] is located in the eastern part of Carlow Town Centre at the junction of Tullow Street and College Street with Presentation Place to the east of the site. The site is roughly rectangular in shape and approximately 0.15 hectares in area. It encompasses Presentation Building which is a Protected Structure recorded in the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 (as extended) (Record of Protected Structure (RPS) no. CT97) and it is located within an Architectural Conservation Area (ACA).

Figure 1 Site Location



Tullow Street, to the front of Presentation Building and Dublin Street, further west of the Building form the original street grid of Carlow, with their outlines clearly visible on early maps of the town. Tullow Street represents one of Carlow’s principal shopping streets but also a gateway into the historic and cultural quarters of the town. College Street is a narrow street that bounds the west of the site. College Street is predominately comprised of religious and cultural buildings and uses. It also includes residential development and some restaurants and local services Presentation Place to the east of the site is comprised of commercial and residential uses.

**Figure 2** Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area Zoning Map showing the Site Location within the Town Centre Zoning shaded in red



### 3.0 Development Proposal

The Presentation Building offers a wide range of services which are provided by the Carlow County Library Service including access to technology, e-services, children’s services, special collections, local studies, genealogy and archives, community information, lifelong learning initiatives, regular events and programmes. The site also holds the Carlow Tourist Office and Museum which are within the Presentation Building. The proposed redevelopment works do not include the museum.

The Presentation Building is an excellent example of a public facility that promotes and maintains the cultural identity and history of the local area and exists to attract visitors thus encouraging activity within an existing urban centre. The building holds the following public services to support the citizens of Carlow Town and the County generally as well as visitors to Carlow:

- Carlow central library lending branch
- Carlow county archive

- Carlow local studies
- Carlow county library headquarters
- Carlow tourist office
- Carlow arts office
- Carlow county museum

The building is currently constrained in terms of the delivery of service it can offer due to a lack of space. Since opening in 1998, developments in ICT, expansion of services and service types, growing population, increased usage and demand mean the current building is inadequate and in urgent need of extension and refurbishment.

The upgrade and extension of this building will help meet the requirements for a modern library service in accordance with the Public Libraries Strategy 2018-2022.

Permission for the redevelopment and extension of Presentation Building is sought by Carlow County Council within their own jurisdiction. Therefore, the proposal is for development by a Local Authority. The process for seeking consent for such development is prescribed under Part XI of the Planning and Development Act, 2000 as amended and Part 8 of the Planning and Development Regulations, 2001 as amended.

The proposed development will consist of the demolition of the existing 1990's library extension to the rear of the old convent building and the construction of a double height extension to the rear of the old convent measuring 1105m<sup>2</sup> including basement to include a library, cultural, civic and learning space. The proposed development includes internal reconfiguration and conservation and restoration works to Presentation Building including removal of the existing lift shaft, repair of windows, repair of the roof, new render to the front, sides and rear and essential repairs of internal and external features. The proposal also includes exterior signage, removal of existing carpark, the provision of bicycle spaces and all associated site works, ICT antenna and mechanical/electrical equipment.

The design strategy of the proposed development is set out in greater detail in the accompanying design report prepared by Carr Cotter Naessens. It notes the current challenges caused by the configuration of the existing layout that reflect the need for a clear circulation strategy that was identified at the outset of the design development process.

The proposed development seeks to reconfigure and rationalise the layout by relocating the lift and stairs core to a central location between the existing building and proposed extension. It is proposed that the Tourist Office be relocated to the Shaw Room accessed off the original vestibule and the existing location of the Tourist Office will provide a direct connection between the new library and the County Museum.

The new extension is located parallel to the County Museum and will provide greater definition along the length of Presentation Place. The two-storey extension addresses and reformulates the street face and provides a first floor roof lit reading room overlooking a double height multi-functional library space. The roof profile will drop down to meet the level of the museum façade string course. Book deliveries and a workshop space are located to the rear of the proposed extension.

The basement level makes provision for 'reserve' book collections, archives and services.

**Figure 3** Proposed Site Layout



As stated in the Architects report, the materials proposed have been selected having regard to the specific site context and the design strategy. The proposed restoration of the County Museum indicates how the building may have looked originally with the soft texture and colour of the lime render that is proposed for Tullow Street and College Street elevations.

It is noted that the museum extension that is clad in a flamed weathered limestone sets a precedent for the use of contemporary materials. For the extension, it is proposed to create a limestone plinth that rises to create an entrance porch and falls to define windows. The dark base will contrast with the wall which will be finished with grey lime render. It is proposed to use limestone at the building threshold, making a robust and easily maintained flooring finish.

**Figure 4** Proposed Front (Southern) Elevation



Vehicular access to the site will be via the existing junction on College Street to the rear of the site. There are no proposed modifications to the existing junction at College Street or to the access point onto Tullow Street. Punch Consulting Engineers carried out autotrack assessments on the proposed road network which demonstrate that a variety of vehicles can enter the rear of the site via College Street and manoeuvre inside in the site in order to exit also.

The proposed development will result in a reduction of the existing level of car parking to the rear of the site. This is considered acceptable in accordance with the Local Authority planning policies that allow for a relaxation of car parking standards in Carlow Town Centre; Carlow Town Cultural Quarter and for developments involving Protected Structures being renovated. The proposal includes 22 no. bicycle parking spaces.

**Figure 5** Proposed Rear (Northern) Elevation



1 PROPOSED NORTH ELEVATION  
1:100

## 4.0 History and Heritage

Presentation Building was a former convent that was built in 1873 to a design by William Hague. The Presentation Sisters have a long association with Carlow town which stretches back to 1811. The former convent building is of historical interest because of the role that it played in the social, educational and religious development of the town.

The former Presentation Convent is a protected structure (Record of Protected Structures (RPS) no. CT97). The Record of Protected Structures describes the building as “*Asymmetrical mid-Victorian corner block to Tullow Street extending along College Street to incorporate Georgian complex. Advanced entrance bay with separate roof in French style.*” *Presentation Convent is rated as a building of regional importance on the National Inventory of Architectural Heritage (NIAH) (ref. 1000314).*

As noted within the Joint Spatial Plan, the former Presentation Convent is located within an Architectural Conservation Area (ACA) that includes College Street, a section of the R417/Court Place, Brown Street and Dublin Street.

Historical Ordnance Survey maps document the early development of the Presentation Convent on Tullow Street. The first edition Ordnance Survey map of 1839 shows the original convent which had been established by the Presentation Sisters in 1811 before its replacement by the building that exists today. The then end-of-terrace building is shown with a rear extension that projected northwards into the formal garden. The early map shows that the southern part of the now museum was originally part of the convent and that the convent chapel extended northwards from it. The historic plan from the 1830s also shows the footprint of adjacent structures of interest including the town’s Roman Catholic chapel.

The 1873 map depicts the convent complex as it was immediately prior to the construction of a new convent building. The original Presentation Convent is shown to have had a basement. The map also shows that an extension to the north side of the building had been modified with the loss of a structure from its east side.

The plan documents the 11-bay range along College Street that was now used as the National School. The building’s footprint includes an extension to the northeast corner. A summer house and an ancillary building are shown on the map to the northwest corner of the garden and the convent cemetery is marked within an enclosure along the northern boundary wall.

William Hague’s 1870’s convent is shown for the first time in the cartographic record on the 1907 Ordnance Survey map. The purpose-built National School of 1889 is shown directly to the east of the convent along Tullow Street.

Full details of the sites history and heritage is contained within the following accompanying documents;

- Architectural Heritage and Conservation Report prepared by Carrig Conservation International, and
- The report on Archaeological Test Trenching and Impact Statement prepared by Rubicon Heritage.

The report prepared by Carrig Conservation comprises a record of the extant structures, a condition assessment and an appraisal of the potential impacts of the proposed development. The proposal is appraised for its potential impacts on the Presentation Building (former Convent), the present library extension, the museum building to the west, the rear site, Presentation Place, adjacent protected structures, streetscapes and the wider Architectural Conservation Area.

The Report concludes that the proposed development will have a positive impact on Presentation Building; the demolition of the existing modern library will have a neutral impact; the southern part of the museum’s eastern elevation will experience a neutral impact with mitigation and the northern part of the eastern elevation a positive impact with mitigation. The proposed development will have a neutral impact on adjacent Protected Structures and a positive/ neutral impact on the Architectural Conservation Area. The report finds that:

1. The conservation works to repair the historic fabric and features have been designed to have a positive impact on the health and visual character structure.
2. The conservation works are intended to reverse previous inappropriate interventions to reveal the convent's original floor plan and historic character.
3. The works will halt water ingress and the deterioration of historic fabric, thus prolonging the life span of the structure.
4. The proposed changes adhere to the International conservation principles which include minimum intervention, maximum retention of features and fabric, using-like-for like materials.

The site as a whole is located within an area of archaeological potential. This site lies within the main zone of archaeological potential (ZAP) for historic Carlow. As noted in the report prepared by Rubicon, there is potential for sub-surface remains of any extra-mural activities to be present. The results from the test trenching programme undertaken as part of the design investigations for this development proposal, identified the remnants of 19<sup>th</sup> Century concrete surface/ pathway in Test Trenches 4 and 6 and a network of linear (drainage) features in Test Trench 3. These remnants are found to be most likely associated with the footpaths and landscaped gardens of the Presentation Convent grounds. There was no evidence of any archaeological features or deposits dating earlier than 1800, in particular no evidence to indicate medieval occupation at or near the site.

The insertion of new ground slab and foundations will require the removal of the network of linear drainage identified in Trench 3 and the concrete surface/ pathway identified in test Trenches 4 and 6. The groundworks could expose further similar material. The report sets out the following mitigation measures:

- A second phase of archaeological test trenching should be carried out at the site after the demolition of the modern extension to the convent building;
- All sub surface groundworks associated with the proposed development works (such as the breaking, and removal of any floor slabs during demolitions, levelling of ground, bulk excavation and excavation of foundation trenches etc) shall be subject to a programme of archaeological monitoring. This should be carried out by a suitably qualified archaeologist under licence and in accordance with the provisions of the National Monuments Acts 1930-2004;
- If significant archaeological material is encountered during the course of archaeological monitoring, then resolution of any such significant material will be determined in consultation with the National Monuments Services
- Where possible every reasonable effort should be made to preserve *in situ* or reduce the impact on any identified archaeological material. Where preservation *in situ* cannot be achieved, either in whole or in part, then a programme of full archaeological excavation should be implemented to ensure the preservation by record of the portion of the site that will be directly impacted upon. This work should be carried out by a suitably qualified archaeologist under licence and in accordance with the provisions of the National Monuments Acts 1930-2004
- A written report will be prepared detailing the results of all archaeological works undertaken.

## 4.1 Planning History

The original Presentation building was constructed prior to the requirement for planning permission in October 1964. A report received from Carlow County Council Planning Department records that there have been three previous planning applications at this site. The relevant details are included below and reflect the permission for the original conversion of the building for use as the County Library in the mid 1990s which is the last application for development at this site.

**Table 1** Site Planning History

<b>Planning Reference Number</b>	PD283
<b>Date Received</b>	10/07/1970
<b>Proposed Development</b>	Extension and Renovation of Presentation Secondary School
<b>Decision</b>	Conditional Permission
<b>Planning Reference Number</b>	PD2888
<b>Date Received</b>	18/09/1992
<b>Proposed Development</b>	Permission for wall and alterations at Presentation Convent
<b>Decision</b>	Conditional Permission
<b>Planning Reference Number</b>	PD3063
<b>Date Received</b>	20/05/1994
<b>Proposed Development</b>	Permission to convert old school to County Library
<b>Decision</b>	Conditional Permission

## 5.0 Strategic Planning Policy Context

Provided for under statute, guidance for land development proposals in Ireland is governed by national and regional policies attaching to particular geographically defined areas and / or land uses and takes the form of Plans and Guidelines.

The policies and objectives of these national and regional documents underpin the policies and objectives of local Development Plans, Local Area Plans (LAPs) and other non-statutory Plans that in turn, set the detailed local statutory planning context of particular sites.

This section of the report highlights the Strategic Planning Context of the subject lands i.e. this section identifies the key National and Regional Planning and Development Plans, Policies and Guidelines where they relate to the spatial organisation of land use at the subject location and the land use proposed.

### 5.1 National Planning Framework (NPF)

At the making of the NPF in 2018, current trends suggested that the Republic’s population could increase by a further one million people over the period to 2040. Government planning policy acknowledged that this was going to require an enormous shift in thinking in how and where people live, work, participate in recreation and travel. The development potential of existing sites was to be maximised whilst making the most of available infrastructure especially investment in public transport. There is also a requirement to locate development where it will minimise the need to travel and promote linked trips. Planning and development policy was required to assist in the promotion of healthy lifestyles and for a range of facilities and services that assist in improving quality of life.

To address these challenges the Department of Housing, Planning and Local Government produced the National Planning Framework (NPF) on behalf of Government, with input from other Departments and Agencies.

The aim of the NPF is to direct future development and investment in Ireland to sustainable locations and to promote sustainable development and proper planning across the entire State. The National Development Plan (NDP) (Ireland 2040) articulates shared national development goals, including improved living standards, quality of life, prosperity, competitiveness and environmental sustainability and provide greater clarity for private sector investment.

The NPF recognises the value of cultural heritage as a key component of, and contributor to, the attractiveness and sustainability of our cities, towns, villages and rural areas in terms of developing cultural creative spaces, private inward investment, and attracting and retaining talent and enterprise.

Chapter 3 of the NPF looks at the development of Ireland’s urban spaces. Section 3.8 “*Achieving Urban Infill/Brownfield Development*” states:

*“Ireland 2040 targets a significant proportion of future urban development on infill/brownfield development sites within the built envelope of existing urban areas. This is applicable to all scales of settlement, from the largest city, to the smallest village.*

*This means encouraging more people, jobs and activity generally within our existing urban areas, rather than new development mainly taking place on the fields outside and requires a change in outlook. The plan sets out a number of objectives to drive and deliver development over the plan period.”*

The current proposal is for the redevelopment of an existing building, as such it reflects NPF brownfield development objectives.

### **5.1.1 National Strategic Outcomes**

The NPF sets out 10 no. National Strategic Outcomes (NSO's). The proposal directly promotes NSO 1 and 7:

#### **NSO 1 – Compact Growth**

This NSO seeks to manage the sustainable growth of our urban areas to add value and create more attractive places in which people can live and work. NSO 1 promotes the re-use of existing land in urban settlements to provide housing, jobs, amenities and services. The achievement of more compact development forms will require focus on the following four key areas:

1. The liveability or quality of life of urban areas including access to amenities;
2. Making the continuous regeneration and development of existing built up areas;
3. Tackling legacies through holistic social and well as physical regeneration;
4. Linking regeneration and redevelopment initiatives.

#### **NSO 7 – Enhanced Amenity and Heritage**

This NSO seeks to ensure that our urban areas are attractive and offer a good quality of life. This is linked to and must integrate with our built, cultural and natural heritage, which has intrinsic value in defining the character of urban and rural areas and adding to their attractiveness and sense of place. Appealing places are also defined by their character, heritage and sense of community. This includes attractive buildings and street layouts, civic spaces and parks and regeneration of older areas and making places feel safe through active use and design.

### **5.1.2 National Policy Objectives**

In the context of the NPF NSO's the proposal supports several of the National Policy Objectives (NPO's) in the NPF:

National Policy Objective 4 seeks to *“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”* while NPO 6 aims to *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area”*.

The NPF recognises the key elements that contribute to quality of life of citizens including people's ability to access services and amenities and this is reflected in policies included in the plan.

National Policy Objective 28 seeks to “*Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services*”.

National Policy Objective 31 notes the importance of lifelong learning and plans for “*Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified*”.

### **5.1.3 NPF and National Development Plan**

The investment priorities of the NPF are reflected in the National Development Plan 2018. Investment in cultural and civic services and infrastructure is a feature of the NDP that recognises investment in high quality infrastructure is critical for a vibrant heritage and culture sector and that investment in our cultural heritage underpins social cohesion and supports strong, sustainable economic growth. In terms of regional objectives, specific priorities are to enhance arts and culture centres throughout the country, develop the sustainable tourism potential of our culture and heritage infrastructure and improve Ireland’s outdoor recreation infrastructure and natural heritage.

## **5.2 Regional Spatial and Economic Strategy for the Southern Region (RSES)**

The RSES provides the basis for the integration of land use and transport planning in the Southern Region, informing the preparation and implementation of plans, programmes and projects at all levels.

Carlow is identified as a Key Town within the RSES and a regional centre for education, healthcare, public services, shopping and arts, culture, leisure and recreation.

Regional Policy Objective (RPO) 14 seeks 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, while promoting and facilitating economic integration between urban centres in the county including Tullow and Muine Bheag (Bagnelstown), other urban centres within the Southern Region and the Eastern and Midlands Region including the Dublin Metropolitan Area”.*

RPO 14 lists the proposed developments and projects that are supported subject to the outcome of the planning process and environmental assessments. These include investment and support in the delivery of culture, arts and tourism infrastructure together with other physical and community infrastructural requirements identified for Carlow Town and the wider county area and the improvement of the public realm attractiveness of the Town Centre with improved accessibility from the historic Town Centre.

The proposal for the redevelopment of the Presentation Building to deliver improved Library Services within a Protected Structure is also considered to support the following regional policy objectives:

**RPO 26** – for the development of towns and villages.

**RPO 31** – Sustainable Place Framework which states that “*Local authorities, through development plan and local area plan objectives, shall provide for and implement a Sustainable Place Framework to ensure the development of quality places through integrated planning and consistently excellent design. The role of education, learning and health in providing inclusive, dynamic and adaptable urban environments must be included in sustainable place frameworks. The importance of consultation with local communities is supported and recognised*”.

**RPO 34** – seeking regeneration, brownfield and infill development.

**RPO 35** – seeks compact growth.

**RPO 61** states that *“It is an objective to promote the use of Health Place Audits (HPA) for placemaking and develop projects that ensure the creation of an attractive, enterprise development friendly, liveable, well-designed, high quality places that are home to a diverse enterprise base mix and integrated communities that enjoy a high quality of life and wellbeing”*.

**RPO 151** – which supports the integration of land use and transport.

**RPO 174** – which supports and encourages walking and cycling.

**RPO 175** – seeks to improve regional quality of life through infrastructure led planning.

**RPO 176** – encourages the 10-minute city and town concept *“settlements with the “10-minute” city and town concepts, whereby, a range of community facilities and services are accessible in short walking and cycle timeframes from homes or are accessible by high quality public transport services by connecting people to larger scaled settlements delivering these services. Local authorities should ensure that decision making in relation to new infrastructure for improved connectivity is informed by an appropriate level of environmental assessment”*.

**RPO 202** – supports initiatives that enhance and protect our Regions natural heritage, biodiversity and built heritage assets.

**RPO 203** – Revitalisation of Historic Cores.

**RPO 206** – protection of architectural heritage.

**RPO 205** – It is an objective to support targeted investment in the built heritage of our Region including the Built Heritage Investment Scheme and Historic Structures Fund to assist owners maintain our built heritage assets.

Wellbeing and improving people's quality of life is a core theme in the RSES and a key element of this is achieving improved education, health and public services and facilities for all citizens. In the context of the proposed development, the following regional policy objectives apply:

**RPO 191** states that *“it is an objective to develop a vibrant cultural and creative sector in the Region as a key enabler for enterprise growth, innovation, regeneration, place-making and community development, health and well-being and support measures under Culture 2025, Creative Ireland Strategy 2017- 22 and Action Plan for Rural Development. Local authorities and public agencies should support development of a network of community arts and cultural hubs”*.

**RPO 194** states that *“it is an objective to advocate for investment in infrastructure and initiatives that develop the role of arts, heritage, culture within our Region and communities and assist delivery of actions under arts, heritage and cultural strategies in our Local authorities, including funding streams outlined in Project Ireland 2040 Investing in our Culture, Language and Heritage 2018-2027 and Heritage 2030. Local authorities should ensure that decisions relating to investment in arts, cultural and heritage infrastructure and facilities should be informed by an appropriate level of environmental assessment”*.

### **5.3 Sustainable Travel & Transport (National Cycle Manual, 2011; Permeability Best Practice Guide, 2015; and Design Manual for Urban Roads and Streets (DMURS))**

Maintained and improved transport links alongside hard and soft services infrastructure are necessary to facilitate development. The National Transport Authority (NTA) is tasked with promoting sustainable

travel modality and setting and implementing multi modal transportation for non national roads and future rail schemes.

The NTA, as recorded at their *NTA Statement of Strategy 2018-2022* and *Integrated Implementation Plan 2013-2018* prioritises sustainable modes of transport over the private car. The proposed development prioritises the pedestrian and cyclist through over provision of on site bicycle parking and the installation of a street frontage onto Presentation Place.

In 2011 the NTA produced their **National Cycle Manual**. In this instance, no new public roads are created and cyclists share the roads in the area which is submitted commensurate with the scale and type of uses in the area and its town centre land use zoning. The proposal includes for reduction in on site car parking in favour of increased dedicated cycle parking that accords with the promotion of non-motorised forms of transport in urban centres.

It is felt that the proposed increased legibility onto Presentation Place will strengthen this connection in accordance with the NTA's **Permeability Best Practice Guide in 2015** where prioritisation of walkers and cyclists is foremost in encouraging permeability and the needs of these users should be considered from the perspective of safety, coherence, directness, attractiveness and comfort. This guide sits in parallel to the **Design Manual for Urban Roads and Streets (DMURS)**, a combined publication by DTTAS and DoECLG 2013. The installation of the proposed dedicated cycle parking and maintenance of existing College Street vehicular entrance to the rear of the site will maintain legibility for all road users and pedestrian and cyclist safety as demonstrated by the auto track and review by Punch and Partners separately submitted.

## 5.4 National Planning Guidelines

At national level, the DoHPLG, sometimes in concert with other Departments / agencies, regularly publish Guidelines for Planning Authorities to aid them in administration of planning applications and preparation of Development Plans.

The Guidelines generally refer to standards for development of certain land use categories and are therefore useful guides in designing schemes. The requirements of the Planning Guidelines are incorporated into the current Carlow County Development Plan. It is noted that certain of those Guidelines are required to be referred to in discreet assessments of the development.

The relevant guidance is referred to in accompanying assessments and reports e.g. as required under *The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009*, a Strategic Flood Risk Assessment (SFRA) is part of the Carlow County Development Plan 2015-2021. The design of the development drainage and water supply proposals has had regard to Sustainable Urban Drainage Systems (SuDS) methods and standards. Please refer to the separately submitted drawings by Punch & Partners that detail the drainage arrangements for the proposal.

Please refer also to the Site Services Report prepared by Punch & Partners and supplied under separate cover. No flood hazard or historic incidents of flooding are recorded on or in the vicinity of the site. The site is located within Flood Zone C and as such the proposed development will not cause nor contribute to flooding.

The proposed development has had full regard to the *Architectural Heritage Protection – Guidelines for Planning Authorities (2011)*. The proposed conservation works to repair the historic fabric and features have been designed to have a positive impact on the health and visual character of the structure. The conservation works are intended to reverse previous inappropriate interventions to reveal the convents original floor plan and historic character. The works will halt water ingress and the deterioration of historic fabric, thus prolonging the life span of the structure. The proposed changes adhere to the international conservation principles which include minimum intervention, maximum retention of features and fabric, using like for like materials.

## 6.0 Local Planning Policy Context

The site is located wholly within the planning administrative area of Carlow County Council. Thus, the proposed development is subject to the provisions of the current Carlow County Development Plan 2015 – 2021.

In addition to the Development Plan local authorities are empowered under the Planning and Development Act to make Local Area Plans (LAPs) for smaller areas within their boundaries. Together with Development Plans, LAPs constitute the only statutory Plans for local authorities.

Local government reorganisation in 2014 dissolved Town Councils whose areas became part of municipal districts within their countries. Carlow Town Council was dissolved but the then extant Town Development Plan remained having already been amalgamated with two LAPs; Graiguecullen Local Area Plan 2012-2018 and Carlow Town Environs Local Area Plan 2012-2018. These 3 no. plans together are the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 which has been extended. The site is within Carlow Town and therefore also subject to the provisions of the Joint Spatial Strategy plan

### 6.1 Carlow County Development Plan 2015-2021

The County Development Plan settlement hierarchy designates Carlow as the County Town. Carlow is an important regional centre with a sphere of influence extending northwards into County Kildare and north-west into County Laois. In order to fulfil its role as a County Town, Carlow is to be the main focus for public and private sector investment within the county over the period of the Plan.

At the heart of vision for Carlow is a commitment that Carlow County Council will work for the common good of the people of County Carlow in partnership with the communities and relevant agencies to deliver quality services and to promote sustainable economic, social and cultural development for current and future generations. This Development Strategy for County Carlow for the period 2015-2021 builds upon the vision set out in the Carlow County Development Plan 2009-2015, to achieve a vibrant county of opportunity with a high quality of life and attractive high quality environment.

The Development Plan Vision for the County will be achieved through the pursuit of strategic goals supported by detailed policies. The proposal supports the following strategic goals:

*“To promote the highest quality living environment possible, in both urban and rural areas for all the citizens of County Carlow.*

*To promote balanced and sustainable economic development and employment by ensuring that a diverse range of economic sectors are developed.*

*To build on the tourism opportunities of County Carlow in a balanced and sustainable manner.*

*Facilitate the provision of and improvements to social and recreational infrastructure and provide access to new and existing community facilities throughout the County for all its residents.*

*To protect, conserve and enhance the built and natural heritage and the landscape of County Carlow for future generations; and reinforce the distinctive character of County Carlow through ensuring that sites and species of biodiversity importance are identified, conserved and managed appropriately and by promoting awareness and enjoyment of the heritage of the County.*

*To promote high quality architectural design in all new buildings in urban and rural areas of County Carlow - commercial, residential and public buildings with energy efficiency designed into all new buildings.”*

The County Development Plan recognises that the development and facilitation of an effective social infrastructure network is important in the promotion of Carlow as a county which offers a good quality of life, where social inclusion and community participation are regarded as necessary prerequisites to sustainable development.

The Development Plan states that it is the policy (S. I. – Policy 13) of Carlow County Council to support and promote library services across the County to allow the library service to fulfil multiple roles due to the diverse and constantly expanding set of user needs.

The proposal is compliant with and actively fulfils the above strategic goals and policy provisions of the County Plan.

## **6.2 Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 (as extended)**

Carlow Town and its environs are included in the *Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area*. The joint vision for the Greater Carlow Graiguecullen urban area is as follows:

*“A high-functioning, inclusive, compact and accessible greater urban area, underpinned by a robust and diverse local economy comprising retail, commercial, industrial, education and tourism uses; with characteristics including a strong sense of place, a vibrant and vital town centre, opportunities for education and cultural experiences for all, a network of linked open spaces, recreational uses and other social infrastructure elements to provide for a good quality of life and increased emphasis on sustainable forms of transport and patterns of development”.*

In order to achieve the above vision, a number of joint cross cutting core objectives are set out. The proposed development will support the relevant objectives, policies, goals and related provisions of the Joint Spatial Plan:

### **CO1 Managed Change and Consolidated Growth**

Ensure that change is managed in an orderly manner, is grounded in national and regional policy and happens in the interests of the common good, by giving careful consideration to site-specific sensitivities, consolidating the existing urban form and facilitating developments and projects that make a positive contribution to social, environmental or economic well-being.

### **CO8 A Supportive Community**

Ensure good quality education, health, sport, pastoral and other community-support facilities are provided for and accessible to all residents of the Greater Urban Area; good amenity and community-support facilities are needed in particular in disadvantaged areas.

### **CO12 A Vibrant Culture**

Encourage appreciation of and participation in the arts, recreational and leisure activities in order to enrich the lives of local people; in particular develop the concept of a cultural quarter within the town centre focused around VISUAL and the County Museum for residents and visitors and support the clustering of arts and culture-related businesses within this area.

### **CO14 A Sense of Place**

Recognise and protect the special identity and distinctive heritage assets within the Greater Carlow Graiguecullen Urban Area and ensure future changes are complementary to the existing sense of place with new structures and spaces achieving a high quality of design, respecting residential amenity and contributing positively to the appearance of the public realm.

The Plan sets out the following tourism policies relevant to the proposed development:

**ECN P17** Protect special natural, archaeological and architectural heritage assets along with the vitality and vibrancy of the town centre in order to support the development of tourism in the Greater Carlow Graiguecullen Urban Area.

**ECN P18** Promote the marketing of the Cultural Quarter within Carlow Town Centre.

**ECN P20** Develop, maintain and enhance the County Museum’s collections and curatorship of artefacts and archives, its interpretation of local history and heritage and its displays and exhibits, in consultation with the National Museum of Ireland

The Spatial Plan recognises the role that library services play. It is noted that libraries play a key role in meeting the informational, cultural, educational and recreational needs of the community.

The Plan sets out the following policies specifically related to the maintenance and delivery of Library Services:

**SOC P26** Encourage the use of the Carlow Central Library by residents of the Greater Carlow Graiguecullen Urban Area.

**SOC P27** Support library initiatives to engage with the community and offer opportunities for learning, including the running of book clubs, computer courses, running of festivals such as the Children’s Book Festival, display of exhibits and the development of informal library space for teenagers.

**SOC P28** Support the expansion of library services, including the availability of online, archive and genealogy services.

**SOC P29** Develop links between Carlow Central Library and the libraries at IT Carlow and Carlow College.

**SOC P30** Encourage the use of mobile library services within the Greater Carlow Graiguecullen Urban Area, focusing in particular on peripheral residential or disadvantaged residential areas.

The proposed development is fully aligned with the above planning policy objectives as it seeks to build upon and improve the existing library services.

Elsewhere, the Joint Spatial Plan states in Part 4 Section 1 that it will focus new development on Carlow Town to drive growth within the Greater Carlow Graiguecullen Urban Area and the wider hinterland and ensure Carlow Town Centre remains at the heart of high-order retail, commercial, transport and tourism services provision.

The Plan further recognises that given the largely developed nature of Carlow Town, the re-development of brownfield sites, site assembly, urban renewal, building refurbishments and changes of use are of particular importance to the future of the functional area of Carlow Town. New development must be carefully integrated with the existing town centre both in terms of design and to allow for easy access and increased permeability within the town.

As per Section 11 of the Joint Spatial Plan, the site is located within the Town Centre Zone. The purpose of this zone is to protect and enhance the vitality and vibrancy of the town centre and to provide for and improve retailing, residential, commercial, office, cultural, tourism, public facilities, amenity and other uses appropriate to the centre of a developing urban core. In light of the wide range of public and commercial services within the town centre, it is an objective of the Council to encourage the full use of town centre buildings and lands including the upper storeys of commercial premises, backlands and vacant properties.

The proposal is for the redevelopment of a Protected Structure in the heart of the County Town, as such it delivers on Joint Spatial Plan objectives that wish to direct development to within the town, and the town centre of that urban area.

### **6.3 Project Carlow 2040 – A Vision for Regeneration**

Project Carlow 2040 is a Regeneration Strategy for Carlow Town. It sets out the long-term strategy and approach to the spatial pattern of development in Carlow Town over the next 20 years. The strategy identifies six Intervention Areas containing public realm projects and development opportunities within Carlow Town. One such Intervention Area is the Cultural Quarter. The vision for this quarter is to provide additional connectivity through the Town Centre, from East to West and from North to South. Permeability through Carlow College as a public space is a key component of the strategy. This Intervention will improve the connections between key retail, recreational, educational and civic spaces in Carlow Town as well as to public transport and will entice people to spend more time in a vibrant and modern Town Centre.

The proposed development supports the vision for this Intervention Area that seeks to optimise the use of underutilised spaces and connections while integrating the existing social, educational, cultural, and historic assets of the town.

The proposal will fulfil the vision of creating a cultural hub within the Presentation Building to act as a connection point between the Town Centre and the college campus ultimately supporting a reimagined Town Centre.

## 7.0 Environmental Impact Assessment (EIA)

The proposed development consists of the redevelopment and extension of a Protected Structure in an established urban area. The cumulative extension area is 1104.9 sqm and the development site area is 0.15Ha.

The proposed development has been subject to Environmental Impact Assessment Screening. The Screening Determination concluded that the proposed development is not a project of a size, scale or typology listed in Part 1 of Schedule 5 of the Planning and Development Regulations 2001 (as amended) requiring a mandatory Environmental Impact Assessment Report (EIAR).

Article 120 of the Regulations requires that where a local authority proposes to carry out a 'subthreshold' development ('threshold referring to mandatory EIAR thresholds as above) that they shall carry out at least a preliminary assessment of the nature, size or location of the development.

Having regard to the projects listed within Part 2, Schedule 5 and the criteria outlined in Schedule 7 of the Planning and Development Regulations 2001 (as amended) it is concluded that the proposed development will have no likely significant effect, indirect or direct, on the receiving environment, either on its own or cumulatively with other development. Having regard to the effects of the proposal it is our professional opinion that no adverse impacts occur such as to warrant the preparation of an EIAR for sub threshold development. Therefore, the preliminary examination has reached conclusion of no requirement for EIA as at Article 120(b)(i) as there is no real likelihood of significant effect on the environment arising from the proposed development.

## 8.0 Appropriate Assessment (AA)

National Planning Guidance includes *Appropriate Assessment (AA) of Plans and Projects in Ireland, 2009*. AA of sequential steps as set out under Articles 6(3) and 6(4) of the Habitats Directive with its purpose described in the guidelines as; “...to determine, on the basis of preliminary assessment and objective criteria, whether a plan or project, alone to in combination with other plan and projects, could have significant effects on a Natura 2000 site in view of the sites conservation objectives.” Article 6(3) is concerned with strict protection of sites by virtue of their having inherent special characteristics or being a special habitat for protected species and 6(4) allows certain limited derogation. The network of sites that are protected by EU Environmental Directives are called Natura 2000 sites, part of the Natura 2000 Network. Planning and Development statutes refer to these sites as 'European sites'.

Where AA determines that significant effects may occur on the Natura 2000 Network it is incumbent upon development proposals to be accompanied by a site and development impact assessment presented as a Natura Impact Statement (NIS). Where a development proposal is by a local authority, Article 250 of the Regulations requires that the authority carry out a screening of the proposed development.

The subject site does not contain nor is it immediately adjacent to any Natura 2000 sites. It is located within 1km of the River Barrow And River Nore SAC (Site Code 002162) that runs through the centre of the town to the east of the site, separated from it by 5 urban streets.

The development proposal is a redevelopment of a building in a portion of an existing, historic urban block that is to utilise extant foul and surface water public infrastructure.

Having regard to the to the nature and scale of the proposed development on an established, historic urban site and its distance and relationship to the nearest European site Appropriate Assessment Screening has found that the proposed development, either alone or in-combination with other plans and/or projects, will have no potential significant impacts on any European site, in light of their conservation objectives. Therefore, progression to Appropriate Assessment is deemed not to be required.

## 9.0 Conclusion

This planning statement has been completed in order to demonstrate the development proposal's meeting of relevant development standards and promotion of relevant planning policy and objectives. The report is intended to accompany an application to seek consent for the proposed development consisting of the redevelopment and extension of Presentation Building for a library, cultural, civic and learning space. The application will be made in accordance with Part 8 of the Planning and Development Regulations, 2001 as amended.

Having regard to the matters set out in this report, the proposed redevelopment of Presentation Building is concluded to be appropriate in the context of the proper planning and sustainable development of Carlow Town and the proposal is in accordance with relevant planning policies and objectives.