



Tionól Réigiúnach  
an Deiscirt

Southern Regional  
Assembly

Tionól Réigiúnach an Deiscirt

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Pórt Láirge,  
X91 F8PC  
Éire.

**Southern Regional Assembly**

Assembly House,  
O'Connell Street,  
Waterford,  
X91 F8PC  
Ireland.

Senior Executive Officer,  
Planning Department,  
Carlow County Council,  
Athy Road,  
Carlow.

12 June 2024

**RE: Proposed Materials Alterations to the Joint Urban Local Area Plan for the Carlow-Graiguecullen Area 2024-2030**

**Our Planning Reference Number: LP 24/003**

A Chara,

I refer to your notice of the publication of proposed material alterations to the Draft Joint Urban Local Area Plan (JULAP) for Carlow-Graiguecullen 2024-2030. The Southern Regional Assembly (SRA) welcome this opportunity to comment on the proposed alterations. The SRA commend the continued work undertaken in the preparation of the Draft JULAP. These observations are focused solely on the published material alterations and are intended to assist both Councils in achieving successful alignment of the JULAP with the Regional Spatial and Economic Strategy (RSES) and National Policy Objectives. The SRA are supportive of the proposed amendments where the recommendations of the SRA's submission to the Draft JULAP have been addressed. Additionally for your consideration, we include below a number of considerations on the proposed alterations to the Draft JULAP.

**1. Chapter 3: Core Strategy & Housing**

Chapter 3 of the Draft JULAP ambitiously sets out *'to direct and facilitate appropriate and sustainable levels of growth and development throughout Carlow-Graiguecullen over the period 2024-2030, with a focus on compact growth, urban regeneration, sustainable travel,*



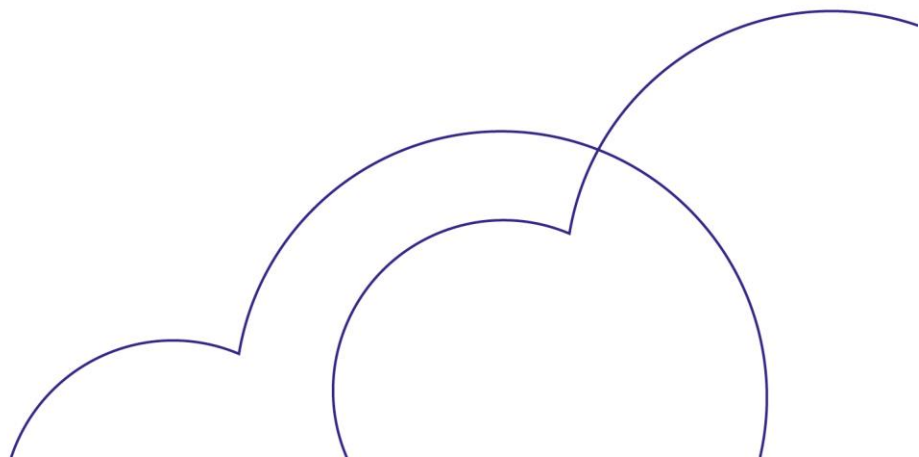
*and healthy placemaking, in accordance with the Core Strategies contained in the Carlow County Development Plan and the Laois County Development Plan*'. This ambition serves as a key strength for the future development of the JULAP area, placing focus on compact growth, regeneration, active travel and placemaking. Under Amendment No. 2, it is noted that an additional 444 units are now allocated over the two year period beyond the Carlow County Development Plan period which is provided for in line with the Development Plan Guidelines for Planning Authorities (2022), and also, the provisions set out in the Core Strategy of the Carlow County Development Plan 2022-2028. It is acknowledged that the allocation of additional housing provision is provided for under Section 4.4.3 of the Development Plan Guidelines for Planning Authorities wherein it is stated that such provision must be set out in the core strategy and that the extent of any such additional landholdings must take into consideration that such lands not exceed 20-25% of the required quantum of zoned land and sites in the settlements, housing supply and population targets, the need for a minimum of 30% of all new residential development to be provided within the existing built up area, the phasing of such lands, that such lands are serviced or serviceable, considerate of location. As noted, there is an additional allocation of 333 units for Carlow Town which accounts for the figure of 444 and aligns with an additional provision for a further two years.

Having regard to the role of Carlow-Graiguecullen as a Key Town as designated under RSES Regional Policy Objective RPO 14: Carlow, and the provisions already accounted for under the Carlow County Development Plan 2022-2028, we broadly support the provision of additional population provision to the JULAP area and note the importance of delivering a strong population base to such strategically located key towns.

## 2. Chapter 4: Economic Development, Retail and Tourism

Amendment No. 3 provides for increased densities in the former Town Council area and includes consideration of the new Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024). Of note, the increased density figures result in an increased estimate of land capacity from 763 to 1017 units in the former town council area. We welcome these increased densities as they align with national policy and guidance, promoting sustainable urban growth and will work towards ensuring consistency with regional and national ambition.

Amendment No. 6 relates to Strategic Employment Land, No. 9 – Former Sugar Factory and the preparation of a masterplan for same. The amendment provides additional text in response





to flood risk considerations with the following text now included: *'to ensure that flood risk considerations including storage/mitigation as appropriate informs any future development proposals and that the future development of the site'*. The SRA encourage the consideration of alternatives to flood water storage for water management. Sustainable Urban Drainage Systems (SuDS) / Nature Based Solutions (NBS) offer clear economic, social and environmental benefits to our settlements and work towards promoting a resilient and adaptive urban environment, aligning with best practices in sustainable development and climate resilience. Implementing SuDS and NBS not only afford opportunities to manage flood risk effectively, but also contribute to the overall sustainability and liveability of the area. In this regard, we recommend that the text inserted under Section 4.3: Strategic Employment Land, is amended and that reference to 'storage/mitigation as appropriate' is replaced with text that seeks implementation of flood risk considerations by way of SuDS and Nature Based Solutions.

### 3. Chapter 8: Sustainable Communities

The SRA welcomes the inclusion of Policy Objective EE P17 under Amendment No. 32, which supports the development of a Learning Region. This objective aligns with our commitment to fostering lifelong learning and skill development, promoting innovation, and enhancing the region's socio-economic resilience. Recognition of the role of local policy in the progression towards a Learning Region will encourage commitment and partnership at local level, aiding in the effective implementation and delivery of the ambition set out in the RSES and in the SRA document, *Towards a Learning Region*.

### 4. Chapter 11: Climate Action

Under Amendment No. 47, we note the inclusion of additional text under Section 11.1 of Chapter 11: Climate Action, which provides reference the Southern Regional Assembly's *'Our Green Region - a Blue Green Infrastructure and Nature-based Solutions Framework for the Southern Region'*. We welcome this addition as it supports the active alignment of local policy with regional approaches on the implementation of Nature-Based Solutions (NBS) and Blue Green Infrastructure (BGI). This continued regional alignment will aid implementation of nature-based interventions to solve local challenges in the JULAP area, fostering more effective collaboration and strategic planning towards sustainable development and climate resilience.



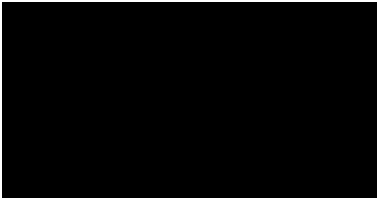
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## 5. Conclusion

The SRA welcomes the publication of the proposed material alterations to the Draft Joint Urban Local Area Plan for Carlow-Graigucullen 2024-2030 and commend the Planning Departments of both Carlow and Laois County Councils on the inclusion of amendments which address key RSES Strategy Policy Objectives. These observations are provided to assist and strengthen policy objectives and to strengthen alignment between the Draft JULAP and the RSES Strategy. The RSES team are available for further consultation and for any clarification required regarding this submission.

**Mise le meas,**



David Kelly  
Director Southern Regional Assembly

