

a unique opportunity to enable
sustainable enterprise growth at
Dublin Road, Carlow

Submission to the Draft Carlow County Development Plan 2022-2028

Submission to the Draft Carlow County Development Plan 2022-2028

Prepared on behalf of Mr Michael Quinn by Turley,
4 Pembroke Street Upper, Dublin 2, D02 VN24.

Turley

01.10.21

The subject lands present an opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road.



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01.

Introduction

Senior Executive Officer
Draft Carlow County Development Plan 2022-2028
Planning Department
Carlow County Council
Athy Road
Carlow
R93 E7R7

Friday, 1 October 2021
[By Online Portal]

Dear Sir/Madam

RE: SUBMISSION ON THE DRAFT CARLOW COUNTY DEVELOPMENT PLAN 2022-2028 IN RESPECT OF LANDS AT DUBLIN ROAD, CARLOW

1.0 Introduction: Submission to Secure More Appropriate Zoning

1.1 Amendment to Plan Sought

Mr Michael Quinn¹ has instructed Turley Town Planning Consultants² to make a submission in respect of the Draft Carlow County Development Plan 2022-2028 in relation to lands at Dublin Road, Carlow. (See Figure 1.1 (inside cover) and 1.2.) (For the purposes of this Submission, the Lands are identified as “The Dublin Road Lands”.)

The subject lands (approximately 4.5 hectares / 11 acres in size) are strategically located close to key employment centres including MSD, approximately 4 kilometres from Carlow Town Centre and located on one of the main arterial routes of the Town – R448, Dublin Road providing rapid access to the Town and also the M9 via Junction 4.

1.2 Purpose of this Submission

The purpose of this submission is, namely, to seek the:

Rezoning of the lands at Dublin Road from their existing ‘Community-Educational-Institutional’, to ‘Objective H - Enterprise and Employment’ Zoning.

The subject lands present an opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road. The Carlow County Development Plan (and associated further statutory plans) must ensure that sufficient lands are zoned to support economic development in Carlow Town and that zoned lands are located appropriately in order to complement and support existing enterprise and to allow employment generating hubs/clusters to be established.

The purpose of this submission is, namely, to seek the:

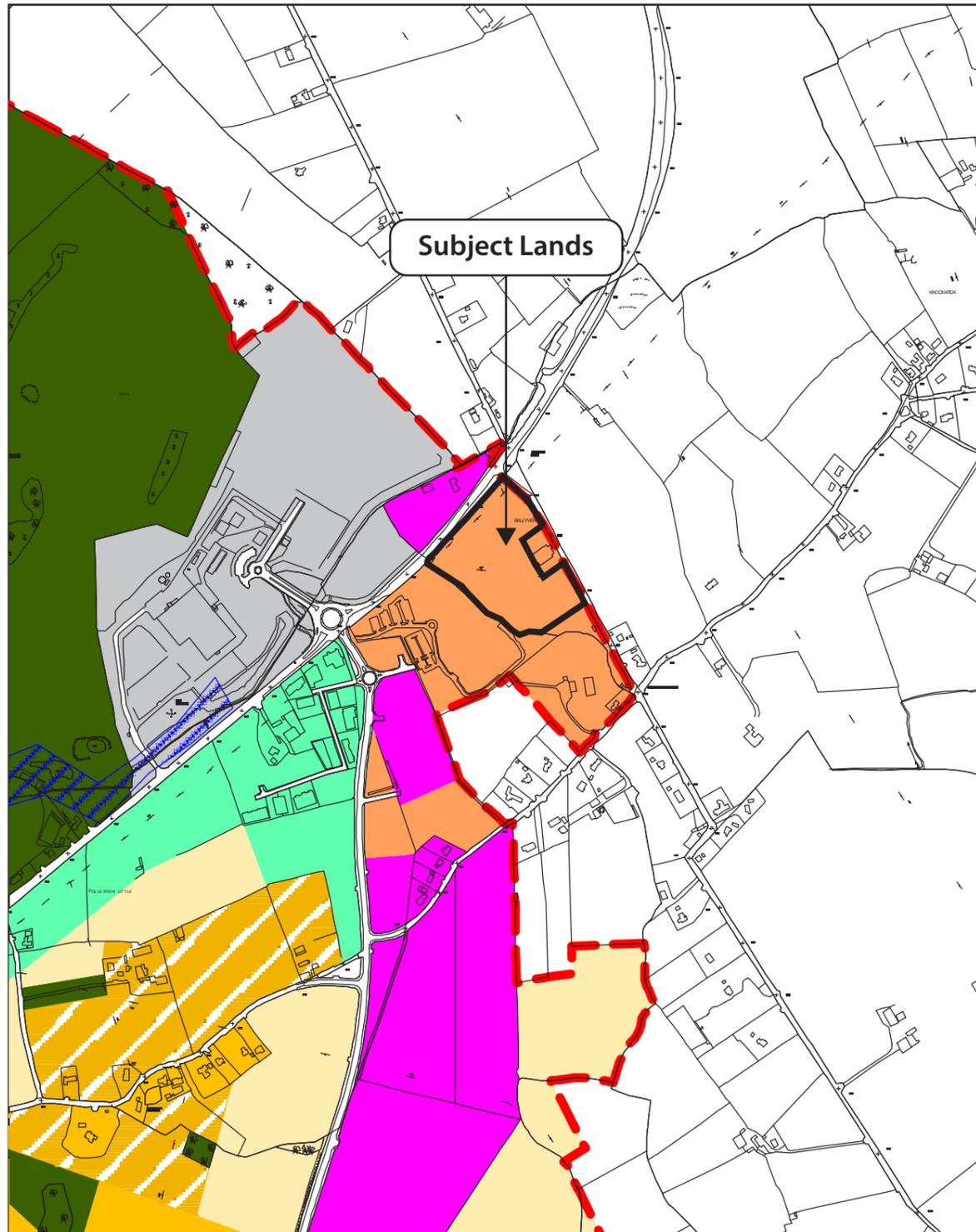
Rezoning of the lands at Dublin Road from their existing ‘Community-Educational-Institutional’, to ‘Objective H - Enterprise and Employment’ Zoning.

¹ Mortarstown Lower, Carlow, R93 X7P4.

² 4 Pembroke Street Upper, Dublin 2, D02 VN24.

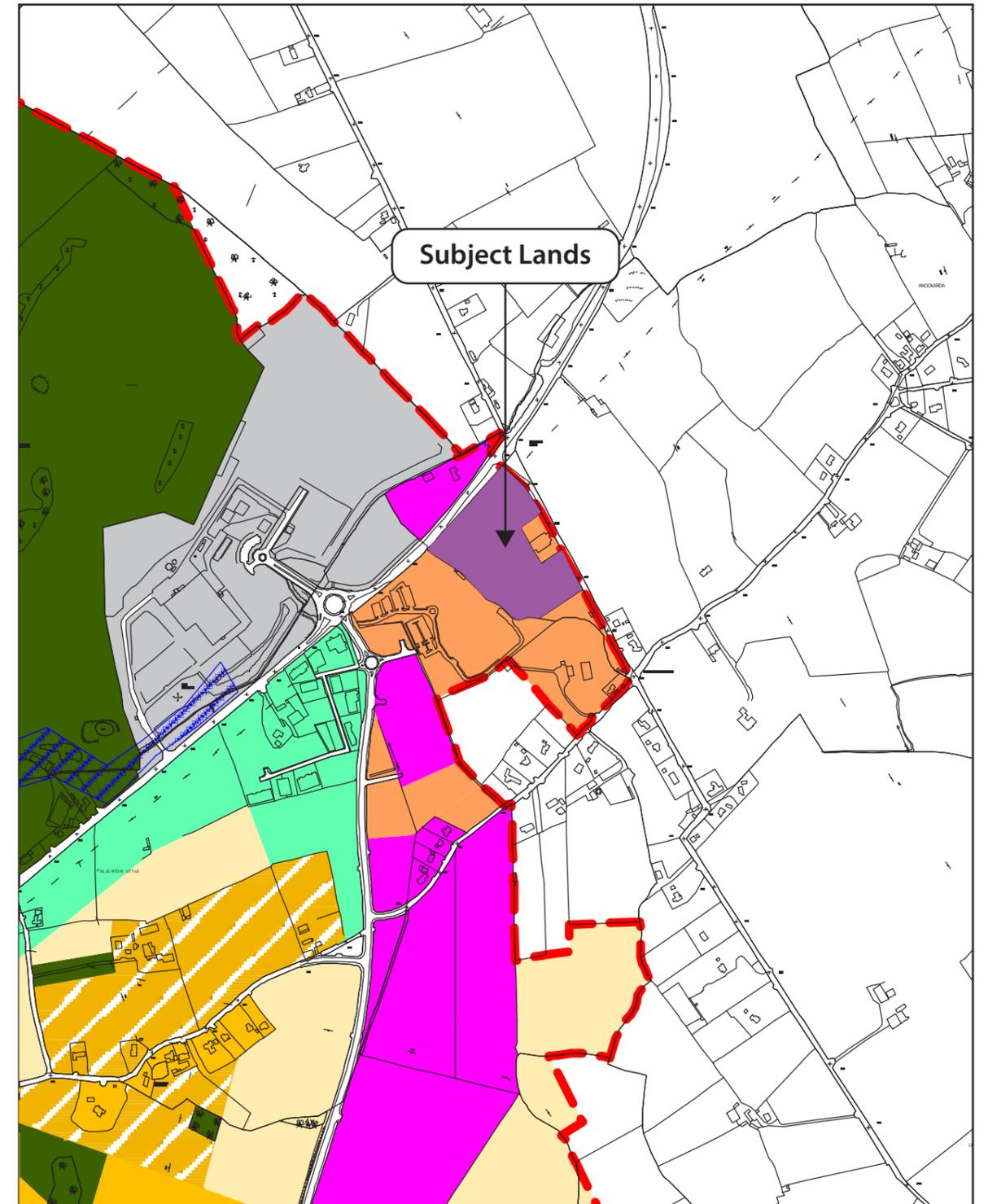
Existing Zoning

The existing Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012 – 2018 (as varied) identifies the lands are being zoned 'Community-Educational-Institutional' which aims "To protect, provide and improve community services including places of worship, primary and secondary education services and institutional uses along with ancillary amenity or recreational uses".



What we seek

in the Amended Draft Carlow County Development Plan 2022-2028 - Zoning 'Objective H - Enterprise and Employment' - "To promote and provide for the development of enterprise and employment generating uses."



01

Purpose of this Submission

The purpose of this submission is, namely, to seek the:

Rezoning of the lands at Dublin Road from their existing 'Community-Educational-Institutional', to 'Objective H - Enterprise and Employment' Zoning.

02

Lands' Strategic Location

The lands are underutilised and provide a major opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road within the boundary of the Greater Carlow area.

In our professional planning opinion, rezoning of the underutilised lands at Dublin Road will serve to realise the policies and objectives of the Draft Carlow County Development Plan 2022-2028, support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.

03

Why is the 'Enterprise and Employment' Zoning Objective Appropriate?

In our opinion, rezoning of the Lands at Dublin Road Avenue to 'Objective H - Enterprise and Employment' is appropriate and in accordance with the proper planning and sustainable development of the Town.

In summary the rezoning:

1. Enables the realisation of the aims and objectives of the Draft Plan;
2. Supports existing business – allowing expansion and cluster;
3. Is supported by Policy at National, Regional and Local Level;
4. Is in accordance with Relevant Guidelines; and
5. Will assist Carlow to Drive Recovery Post-Pandemic and Promote Sustainable Growth.

02.

Site Location and
Urban Context

2.0 Site Location and Urban Context

2.1 A Strategic Landholding Located on the Dublin Road

The subject lands (approximately 4.5 hectare / 11 acres in size) are strategically located close to key employment centres including MSD, approximately 4 kilometres from Carlow Town Centre and located on one of the main arterial routes of the Town – R448, Dublin Road providing rapid access to the Town and also the M9 via Junction 4. (Figure 2.1.)

The existing Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012 – 2018 (as varied) identifies the lands are being zoned 'Community-Educational-Institutional'. (We understand that a new statutory Joint Local Area Plan/Urban Area Plan is due to be prepared by Carlow County Council with Laois County Council for the Greater Carlow Urban Area.)

The site is highly accessible, located on the eastern approach to Carlow Town adjacent to MSD, which is one of Carlow's major employers. The lands constitute a greenfield site, comprising agricultural lands.

The lands are underutilised and provide a major opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road within the boundary of the Greater Carlow area.

In our professional planning opinion, rezoning of the underutilised lands at Dublin Road will serve to realise the policies and objectives of the Draft Carlow County Development Plan 2022-2028, support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.

In summary the Lands:

1. Lie adjacent to established employment generating uses and should be used to support the growth and expansion of existing and new enterprise.
2. Promote sustainable travel being strategically located adjacent to the R448 - that partly includes a dedicated cycle lane - providing easy access to Carlow Town Centre.
3. Facilitate the development of an employment generating cluster positioned to complement and support the enterprise eco-systems in the Town. (See Figure 2.2.)
4. Provide easy access to the M9 Motorway.

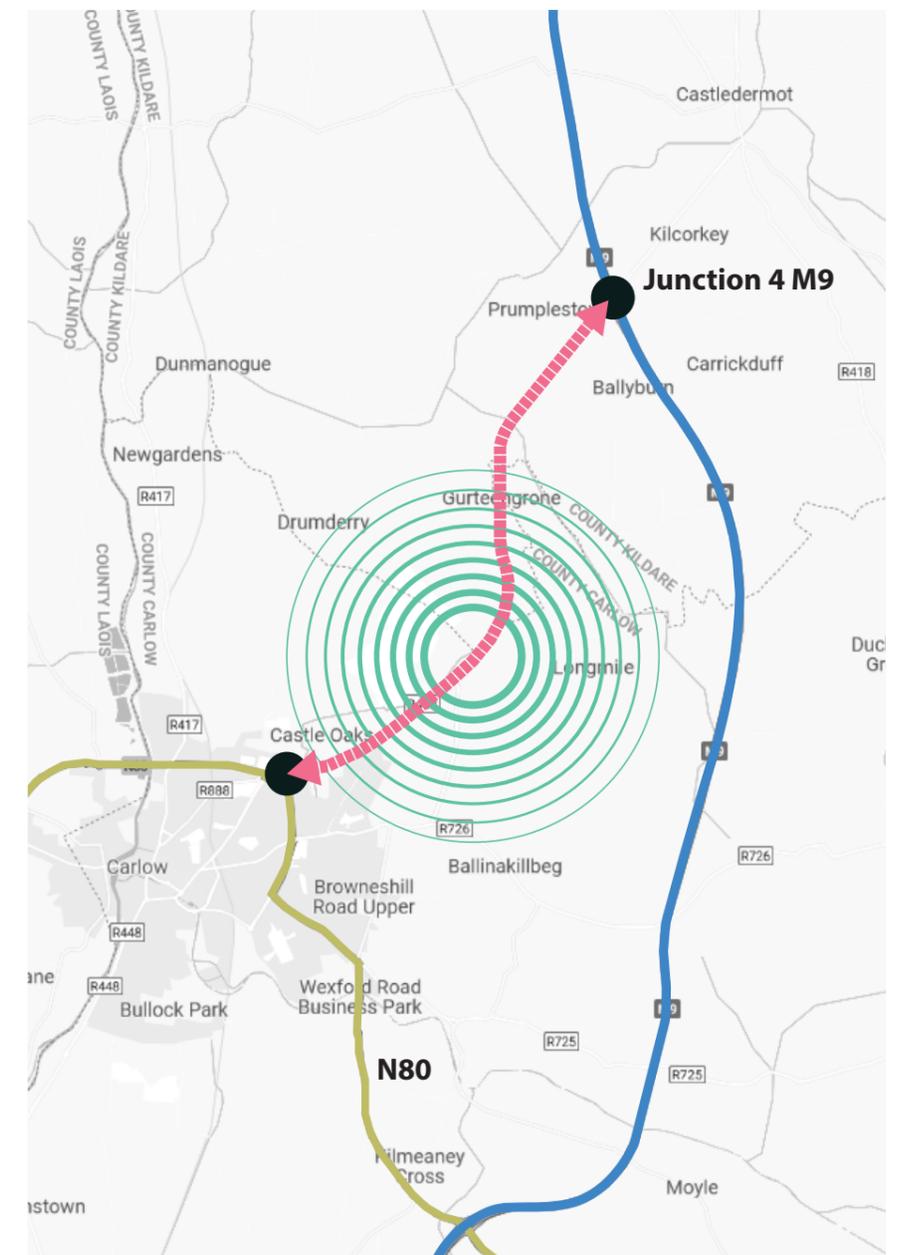


Figure 2.1: Subject Site in Context of Strategic Road Network.

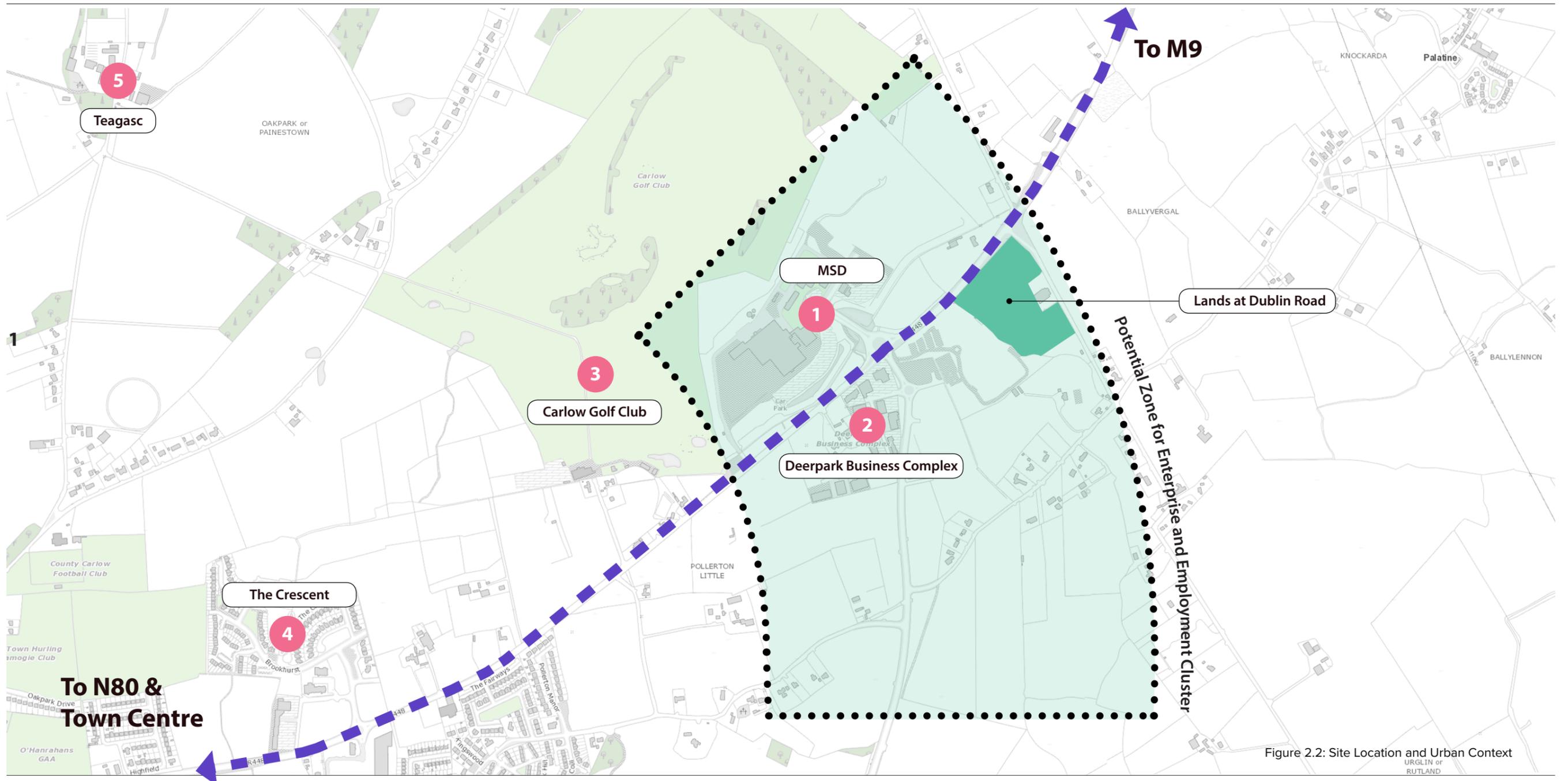


Figure 2.2: Site Location and Urban Context
URGLIN or RUTLAND

03.

Submission and
Town Planning Case

3.0 Purpose of this Submission and Town Planning Case

3.1 Overview

The Draft Carlow County Development Plan 2022-2028 is intended to set the planning parameters for the future development of the County including the subject lands at Dublin Road Carlow.

3.1.1 Existing Zoning – ‘Community-Educational-Institutional’

The existing Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012 – 2018 (as varied) identifies the lands are being zoned ‘Community-Educational-Institutional’ (also see Figure 3.1 below).

The ‘Community-Educational-Institutional’ objective aims “To protect, provide and improve community services including places of worship, primary and secondary education services and institutional uses along with ancillary amenity or recreational uses”. (See Figure 3.1 below.)

In our opinion, the lands’ existing zoning objective is not in accordance with the Strategic Aim of the Draft Development Plan “To promote and facilitate Carlow Town as a driver of economic growth at a regional and inter-regional level”.

3.1.2 What We Seek – ‘Objective H - Enterprise and Employment’ Zoning

We seek that the subject lands are zoned ‘Objective H - Enterprise and Employment’ Zoning in the Amended Draft Carlow County Development Plan 2022-2028. (See Figure 3.1.)

The objective of ‘Objective H - Enterprise and Employment’ Zoning is “To promote and provide for the development of enterprise and employment generating uses.”

The Draft Carlow County Development Plan 2022-2028 states:

“This zoning provides for the creation of enterprise and employment uses apart from traditional commercial functions that should locate within a town or village core area.”

Lands zoned for ‘Enterprise and Employment’ include the use and development of land for high-end research and development, business, science and technology-based industry, financial services, call centres/telemarketing, software development, enterprise and incubator units, small/medium manufacturing, corporate offices in high quality campus/park type development.

This zoning also provides for ‘walk to’ support facilities such as canteen, restaurant or crèche services which are integrated into employment units and are of a nature and scale to serve the needs of employees on the campus.”

3.2 Why is the ‘Enterprise and Employment’ Zoning Objective Appropriate?

In our opinion, rezoning of the Lands at Dublin Road Avenue to ‘Objective H - Enterprise and Employment’ is appropriate and in accordance with the proper planning and sustainable development of the Town.

In summary the rezoning:

1. Enables the realisation of the aims and objectives of the Draft Plan
2. Supports existing business – allowing expansion and cluster
3. Is supported by Policy at National, Regional and Local Level
4. Is in accordance with Relevant Guidelines
5. Will assist Carlow to Drive Recovery Post-Pandemic and Promote Sustainable Growth

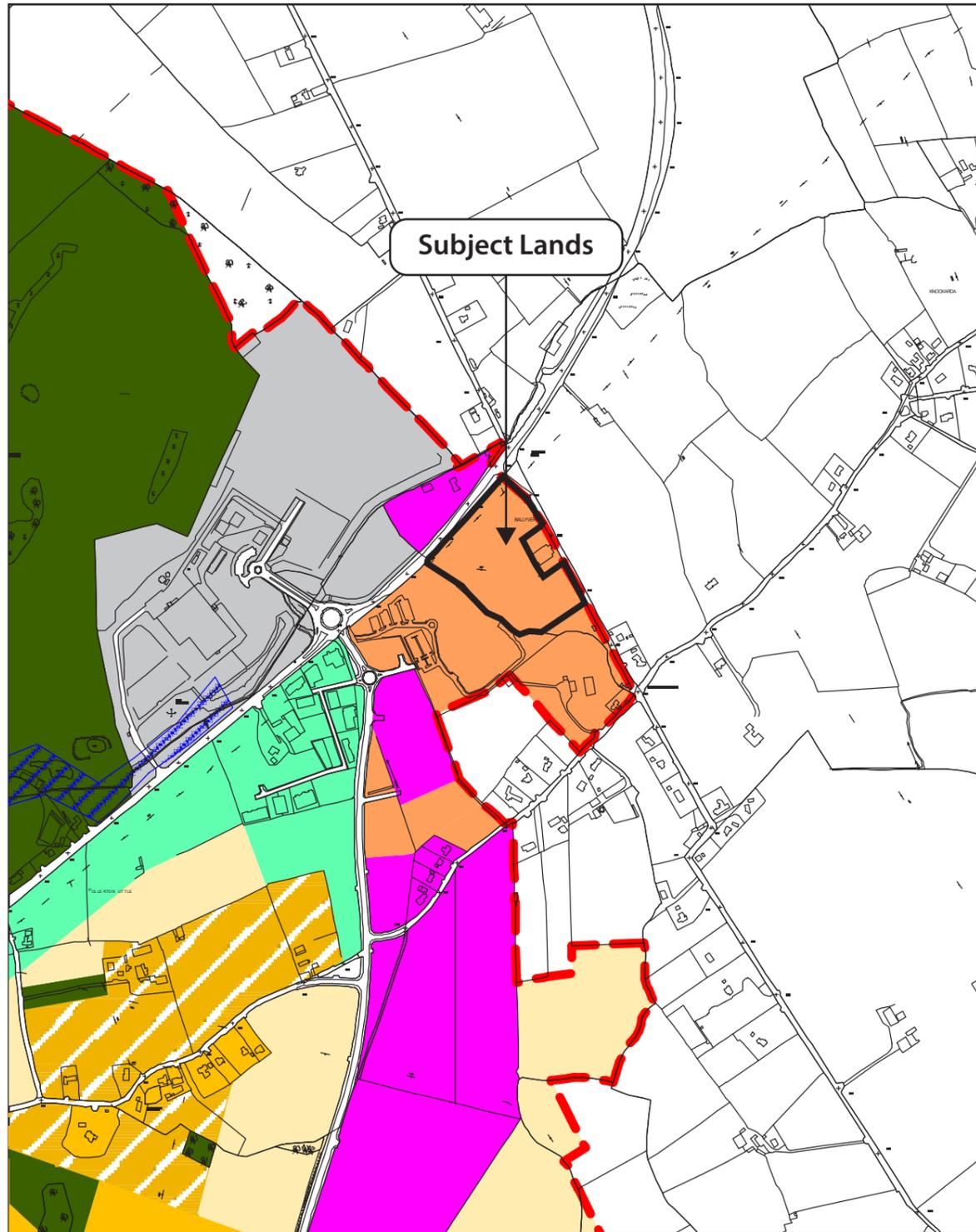
We outline the supporting case below.

3.2.1 Rezoning enables the realisation of the aims and objectives of the Draft Development Plan

The overarching aim of the Draft Development Plan emphasises that Carlow Town is the principal centre of economic activity in County Carlow and one of the larger Key Towns in the Southern Region. It has many economic attributes such as its third level

Existing Zoning

The existing Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012 – 2018 (as varied) identifies the lands are being zoned 'Community-Educational-Institutional' which aims "To protect, provide and improve community services including places of worship, primary and secondary education services and institutional uses along with ancillary amenity or recreational uses".



What we seek

in the Amended Draft Carlow County Development Plan 2022-2028 - Zoning 'Objective H - Enterprise and Employment' - "To promote and provide for the development of enterprise and employment generating uses."

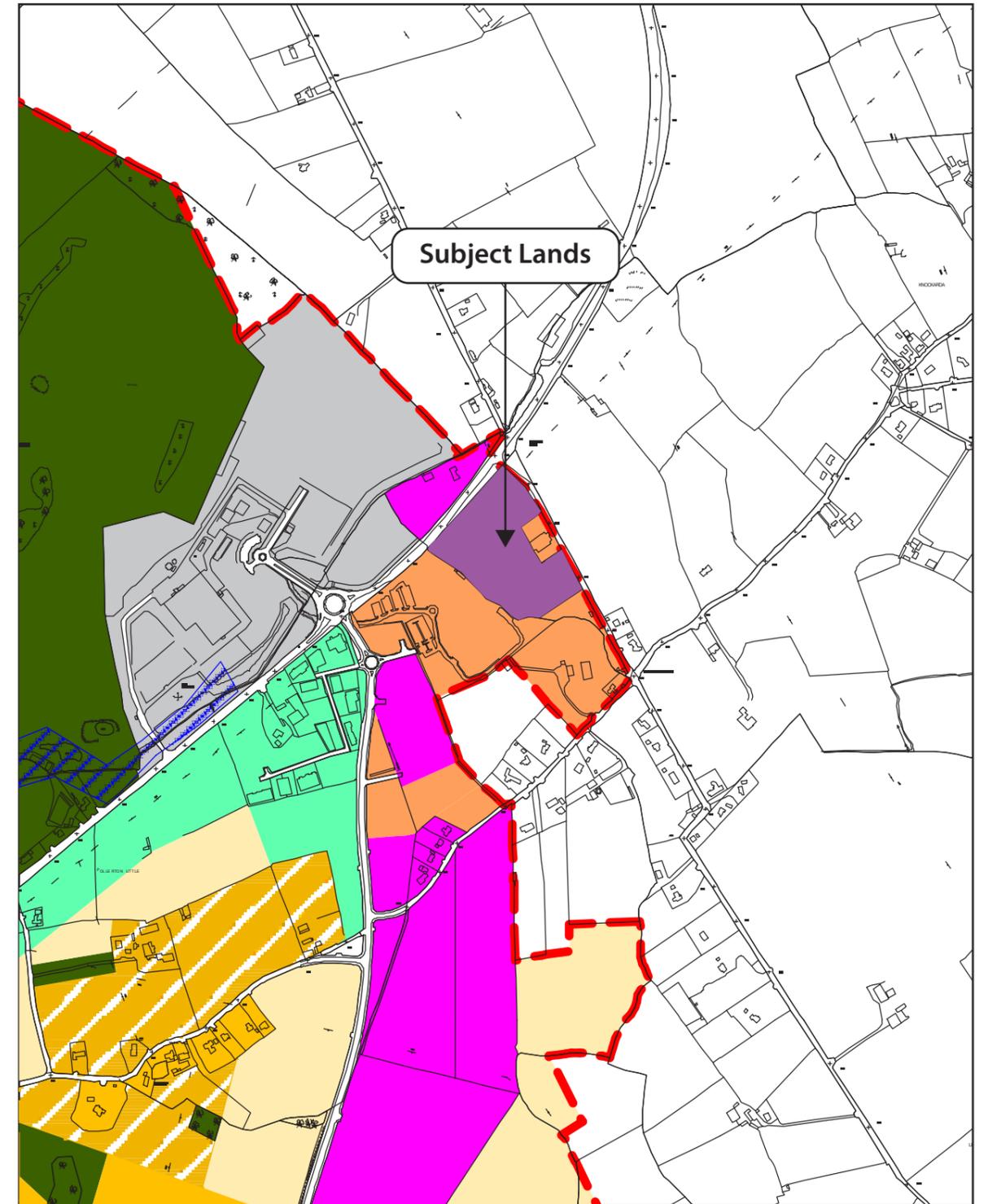


Figure 3.1: Purpose of the Submission.

education provision and other educational institutes, proximity to Dublin, the River Barrow, tourism, retail services and cultural facilities.

It outlines that the Town has a role as a major employment, retail and services centre. Development of Carlow Town as a regional and inter-regional growth driver will require a significant increase in job opportunities to sustain the existing and growing population.

The proposed rezoning will enable Carlow Town to remain as an inter-regional growth driver, supporting the creation of jobs and enterprise in the County.

The Draft Development Plan includes a number of Policies and Objectives, which support the rezoning of the subject lands as set out in Table 3.1 below.

Policy/Objective	How the Proposed Rezoning Supports Delivery
ED P2: Protect land zoned for employment-generating uses from inappropriate development that would negate future economic activity.	Rezoning of the subject lands would ensure that sufficient lands are available in a key enterprise location in Carlow Town, facilitating economic activity over the Plan period.
ED O1: Ensure that an adequate supply of land is zoned and located within the development boundary of settlements to support economic development and employment generating uses, at a scale appropriate to the size and role of the settlement as per the Settlement Hierarchy.	The Development Plan and other statutory plans must not only ensure that an adequate supply of zoned land is available to support economic development but it must be also be provided in appropriate locations, such as the Lands at Dublin Road, which can benefit from adjacent established employment generating uses and a high-level of accessibility.
ED O3: Facilitate innovation and development through the development of business park and enterprise hub solutions which are positioned to complement and support the enterprise eco-systems in the County.	Rezoning of the underutilised lands at Dublin Road will support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.
ED P3: Maximise the economic potential of Carlow by building on its locational advantage along the M9 and N80 and promoting and marketing the Key Town of Carlow for significant economic investment.	The subject lands at Dublin Road benefit from easy access to the M9 and the N80. In order to promote Carlow and attract significant economic investment, the Development Plan must include sufficient lands zoned for enterprise and employment and those lands must be provided in the right locations.
ED P4: Promote Carlow Town as a regional and inter regional economic growth centre, through the expansion of existing enterprise ecosystems and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment lands in central accessible locations.	Rezoning of the Lands at Dublin Road will enable the expansion of existing enterprise ecosystems and support the provision of physical infrastructure and zoned lands to realise the delivery of strategic employment uses.
ED P5: Promote clustering and spin off sectors arising from the existence of a number of multinational corporations within Carlow Town.	Rezoning of the subject lands at Dublin Road will promote clustering and spin off sectors arising from the existence of multinational corporations within the Town.

Table 3.1: Policy Objectives and how the Proposed Zoning Accords.

3.2.1.1 Priority Sectors

The Draft Development Plan states:

“From a sectoral perspective the Plan aims to support and facilitate the economic development of the County across a broad range of sectors while acknowledging, in particular priority sectors identified in The InCarlow Economic Development and Business Support Strategy for County Carlow.

The Strategy identifies a range of sectors which demonstrate competitiveness and opportunity within County Carlow. Some of the sectors are recognised as having potential due to their relative size and clusters which have already been developed, while others are competitive due to their significant growth potential and links to wider sectors.

It is acknowledged that considerable opportunities exist for job creation and economic growth in areas such as green tech and new technology developments.”

The Table opposite, extracted from the Draft Development Plan sets out the Priority sectors for County Carlow.

	Sector
Focus and Step Change	Financial Services ICT Engineering Technology Firms Tourism
Sustain and Grow	Agri-Tourism Pharma Transportation
Monitor and Intervene	Retail (Town Regeneration) Green Energy

The Draft Development Plan includes the following Policies:

PS P1: *Facilitate the development of enterprises including those related to the identified sectors of growth at appropriate locations and facilitate the provision of infrastructure and facilitates that will enable clustering and specialisation in the County.*

PS P2: *Identify and pursue opportunities for enterprise growth, innovation and diversity within the priority sectors, including the potential of enterprise ecosystems in sectors identified in the Regional Enterprise Plans (REPs) and their successors.*

In our professional planning opinion, the proposed rezoning enables the delivery of Policies PS P1 facilitating enterprise growth at appropriate locations and PS P2 enable within the priority sectors, including the potential of enterprise ecosystems, respectively.

3.2.2 Rezoning supports existing business – allowing expansion and clusters to develop

As outlined above, a number of policies in the Draft Development Plan aim to protect existing business and allow for expansion and business clusters/hubs to emerge.

Strong clusters and hotspots facilitate best practice-sharing between companies and are a key factor in driving operational and research excellence including practitioner-to-practitioner knowledge sharing.

Indeed Enterprise 2025 seeks to build on Ireland's strengths and seek out new opportunities for clustering, collaboration and connections.

We set out below an extract from an Irish Times Article entitled Creating clusters will act as an engine for growth by Grainne Millar Thu, Sep 8, 2016:

"Ireland's national enterprise policy, Enterprise 2025, aims to promote inter-organisational collaboration in the form of clusters in key sectors of the economy such as agri-food, engineering, ICT, life sciences and the audio-visual film and animation sector.

It seems like a welcome development, given that similar cluster policies have proved successful across the world. In the US, Harvard Business School's impressive Cluster Mapping project, indicates that 51 traded clusters form the engine of its economy.

Closer to home the majority of EU member states have cluster policies in place to strengthen collaboration and

co-operation between industry and research, support the SME eco-system and internationalisation. These cluster initiatives have been fuelled in part by EU policy and targeted funding programmes to promote economic development through clusters of regional specialisation."

It is clear from the above that promotion of clusters, including the appropriate zoning of land, act as an 'engine' for growth and could allow Carlow Town to take advantage of the presence of an already impressive list of multi-national and indigenous companies.

3.3.3 Rezoning is supported by Policy at National, Regional and Local Level

In our professional planning opinion, the proposed rezoning is supported at a National, Regional and Local Level.

3.3.3.1 National Planning Framework

The National Planning Framework (NPF) sets out the planning policy approach for economic development at a national and regional level. A strong economy supported by enterprise, innovation and skills is a national strategic outcome of the NPF.

It acknowledges that this will require creating places that can



foster enterprise and innovation, attract investment, support opportunities to diversify with associated investment in infrastructure, including digital connectivity, and in skills and talent to support economic competitiveness and enterprise growth.

In our opinion, the proposed rezoning fully accords with the NPF.

3.3.3.2 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (RSES)

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development to sustainably grow the Region to 2031 and beyond.

The RSES states:

“The Region has strong concentrations and/or large employers in Biopharma, ICT, Food and Engineering sectors. There is a cohort of internationally successful Irish owned enterprises involved in engineering, serving a range of markets such as automotive, medical devices, and agri-tech. From records of state enterprise development agencies, a number of sectors displaying

high levels of productivity can be identified, such as ICT related (services, facilities and consultancy), Machinery and Equipment, Electrical Equipment and Chemicals.”

The economic vision for the region is to enable sustainable, competitive, inclusive and resilient growth. The RSES seeks to achieve this vision through a number of economic principles, including clustering. It states:

“Clustering: These are initiatives that create, maintain, or upgrade an economic stronghold, by strengthening linkages or facilitating collective action to improve the cluster-specific business environment. Modern cluster policies aim to put in place a favourable business ecosystem for innovation and entrepreneurship in which new players can emerge and thus support the development of new industrial value chains and emerging industries...”

...the State can play a facilitative and supportive role. There is potential to further strengthen collaboration and clustering activities between foreign and Irish owned enterprises, and between enterprises, Higher Education Institutions (HEIs), and the research base.”

In our professional planning opinion, the proposed rezoning, including its ability to create an enterprise and employment cluster is fully in accordance with the RSES.

3.3.3.3 Regional Enterprise Plan for the South East Region to 2020

The Regional Enterprise Action Plan is developed around five key strategic objectives focused on enhancing the existing environment for enterprise and activity, establishing the South-East as a ‘learning region’ and a place of choice for talent and investment.

In our opinion, the proposed rezoning enables the realisation of the Regional Enterprise Plan by enhancing the existing environment for enterprise and ensuring that Carlow has the capacity to attract talent and investment.

3.3.3.4 Local Context – Development Plan and Joint Urban Area Plan

As highlighted above, in our professional planning opinion, the proposed rezoning enables the realisation of the aims and objectives of the Draft Development Plan.

We understand that a new statutory Joint Local Area Plan/Urban Area Plan is due to be prepared by Carlow County Council with Laois County Council for the Greater Carlow Urban Area. In our opinion, the proposed rezoning is also in accordance with the proper planning and development of the Great Carlow Urban Area.

3.3.4 Rezoning is in accordance with Draft Development Plan Guidelines for Planning Authorities

The Development Plans - Guidelines for Planning Authorities Draft for Consultation dated August 2021, prepared by the Department of Housing, Local Government and Heritage, sets out key guidance in relation to Zoning for Employment Uses (Section 6.2.5). It states:

“Ensuring that the economic or employment strategy of the development plan is translated into the appropriate land use zoning proposals is an important consideration in the plan preparation process. The evidence and rationale underpinning the zoning of land for employment purposes must be clear and strategic in nature. Development plan preparation should include a comprehensive approach to estimating the differing zoning requirements for employment uses. To this end, the development plan must include a spatial analysis of the existing location of employment in the county or city as a baseline...

...The development plan should provide an overview of the existing quantum and rate of take-up of zoned employment land, both developed and undeveloped and should also include relevant servicing information. The plan must include a rationale for any requirement to zone additional lands, based on projected population,

economic and employment growth and change over the lifetime of the development plan. Differing typologies of commercial/industrial land uses will generate different employment characteristics (e.g. high-intensity commercial office use in comparison to lower intensity warehousing/logistics) and these should be considered in the overall strategic assessment...

...Estimating the land-use zoning requirement for employment development may require some flexibility and a strategic, long-term perspective. However, proposed employment zonings must have a credible

rationale, particularly with regard to location and type of employment. It should be possible to demonstrate that the quantum of land zoned is not significantly out of step with estimated future demand arising from population, economic and employment growth and change.”

In our professional planning opinion, the proposed rezoning is fully in accordance with the above Guidance. We emphasise the need for the forthcoming Development Plan and any other Statutory Plans (such as the Joint Urban Area Plan for the Greater Carlow Area) must consider:

Criteria	How the Proposed Rezoning Satisfies the Criteria
Spatial analysis of the existing location of employment	A significant area of employment generating lands (accommodating MSD), exist adjacent to the subject lands at Dublin Road. Rezoning of the subject lands to ‘Enterprise and Employment’ would enable growth of existing enterprise and/or the development of an enterprise cluster.
Differing typologies of commercial/industrial land uses, which generate different employment characteristics	Not all economic activity can occur within Town Centre locations. In that regard, the Development Plan must include appropriately located zoning to allow for enterprise such as industrial, technology and pharmaceutical to establish, sustain and prosper. In our opinion, the proposed rezoning enables that objective to be realised.
Employment development may require some flexibility and a strategic, long-term perspective	The Development Plan, once adopted will be in place for 6 years. Therefore, it must allow for some flexibility and have a long-term perspective in relation to enterprise and employment, if the County is to retain remain economically competitive.

Table 3.2: Criteria of Draft Development Plan Guidelines for Planning Authorities

3.3.5 Proposed Rezoning will assist Carlow to Drive Recovery Post-Pandemic and Promote Sustainable Growth

In January 2021, the IDA launched its new strategy for the period 2021-2024 entitled 'Driving Recovery and Sustainable Growth 2021-2024'.

In Ireland and in our key source markets for investment the Covid-19 economic shock continues to reverberate with elevated levels of unemployment and lasting disruption in some sectors.

IDA's ambition is to capitalise on opportunities to provide MNCs with solutions to the challenges they face in this difficult global environment. The ambition of this strategy is framed through five interlinked pillars of Growth, Transformation, Regions, Sustainability and Impact.

The Department of Enterprise, Trade and Employment press release states:

"At the centre of IDA's new strategy is regional development, with 400 investments - half of all new investments - targeted at regional locations. The strategy will drive recovery and support development in each region, partner with clients to facilitate innovation and upskilling, develop clusters, work with clients to enable remote working opportunities and continue the role out of the Agency's regional property programme. To achieve

this, the strategy has set out delivery goals and target investments for each region."

The Strategy states that the "IDA will target 40 investments for the South-East region in the period 2021 to 2024.

The proposed rezoning at Lands at Dublin Road ensure Carlow Town is best-placed to take advantage of potential FDI, Drive Recovery Post-Pandemic and Promote Sustainable Growth, the Development Plan must include sufficient lands zoned for enterprise and employment and those lands must be provided in the right locations.



3.3.5.1 Planning Must Allow Business to Thrive and Promote Job Creation

In an ever-competitive global economy, it is important the planning policy aids the creation of an environment that promotes enterprise and job creation.

In a recent Article in the Irish Times entitled "Planning system threatens State's reputation abroad, says IDA"¹

We set out an extract from the Article below:

"IDA Ireland, which is the State agency tasked with attracting foreign direct investment, said on Monday that "an efficient planning system is extremely important to Ireland's economic competitiveness".

"Multinational investors require certainty in relation to the timelines for delivery of their planned capital projects," said a spokeswoman. "IDA Ireland fully supports the need for appropriate checks and balances within Ireland's planning processes."

"However, in recent years the efficiency of Ireland's planning system, particularly the protracted nature of the judicial review process, has become an area of reputational risk to the State."

"In an increasingly competitive international marketplace, this has the potential to hinder IDA Ireland's efforts to attract significant overseas investors."

"It may also present an additional obstacle to expansion and second-site investments from existing multinational clients."

Although the article make reference to Judicial Review and the associated challenges it poses to business development, it does also highlight the need for Development Plans and Policy to include sufficient and appropriately located land use zoning that economic development in Carlow Town and complement and support existing enterprise.

¹ <https://www.irishtimes.com/business/economy/planning-system-threatens-state-s-reputation-abroad-says-ida-1.4685093>

04.

Conclusion

4.0 Conclusion

4.1 Opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road

In conclusion, the purpose of this submission is, namely, to seek the rezoning of the lands at Dublin Road from their existing 'Community-Educational-Institutional', to 'Objective H - Enterprise and Employment' Zoning; and

The subject lands present an opportunity to support the growth and expansion of existing and new employment generating uses on the Dublin Road. The Carlow County Development Plan (and associated further statutory plans) must ensure that sufficient lands are zoned to support economic development in Carlow Town and that zoned lands are located appropriately in order to complement and support existing enterprise and to allow employment generating hubs/clusters to be established.

We trust that due consideration will be given to the role of the subject site in the overall future development of Carlow, that this submission will be taken into consideration in preparation of the Carlow County Development Plan 2022-2028 and the forthcoming Joint Local Area Plan/Urban Area Plan for the Greater Carlow Urban Area, and would welcome receipt of submission.

We would be happy to clarify any issues arising, if considered appropriate by the Planning Authority, and would welcome the

opportunity to work with you and your fellow Councillors, to secure these objectives.

Yours faithfully



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