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# Town Planning Submission

Draft Carlow County Development Plan 2022-2028

October 2021



Formal Submission on behalf of:

Firtree Developments Ltd.  
Garryhill,  
Bagenalstown,  
Co. Carlow



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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by Firtree Development Ltd., to make a submission on the Draft Carlow County Development Plan 2022-2028. This submission is made in response to a public notice dated 21<sup>st</sup> July 2021, inviting submissions up until 1<sup>st</sup> October 2021, in relation to the Draft Carlow County Development Plan 2022-2028.

In summary, our submission reviews the Core Strategy of the draft plan with specific regards to the future development of Muine Bheag / Royal Oak. The submission relates to 2 no. parcels of lands within the area and requests that Carlow County Council consider applying a specific local objective to one of the parcels of land to accord with the Core Strategy of the draft County Development Plan. Additionally, it is considered that the permitted land uses within the zoning matrix could be expanded to facilitate a mixed-use development. We also suggest to Carlow County Council to consider rezoning second parcel of land when the Local Area Plan review is commenced. The parcels of lands are as follows:

1. Site of former Meat Factory, Royal Oak Road (Parcel A); and
2. Lands at Royal Oak Industrial Park (Parcel B).

A justification for the above requests pertaining to the 2 no. aforementioned parcels of lands will be provided in a subsequent section of this submission. From the outset, we would submit that the proposed local objective of Parcel A and the proposed rezoning of Parcel B accords with the Core Strategy of the draft County Development Plan, in addition to Regional and National Planning Policy.

## 2.0 Submission Lands

The submission lands comprises 2 no. parcels of land located within the Muine Bheag / Royal Oak area of Carlow County. Both lands are considered to be strategically located and, accordingly, underutilised at present.

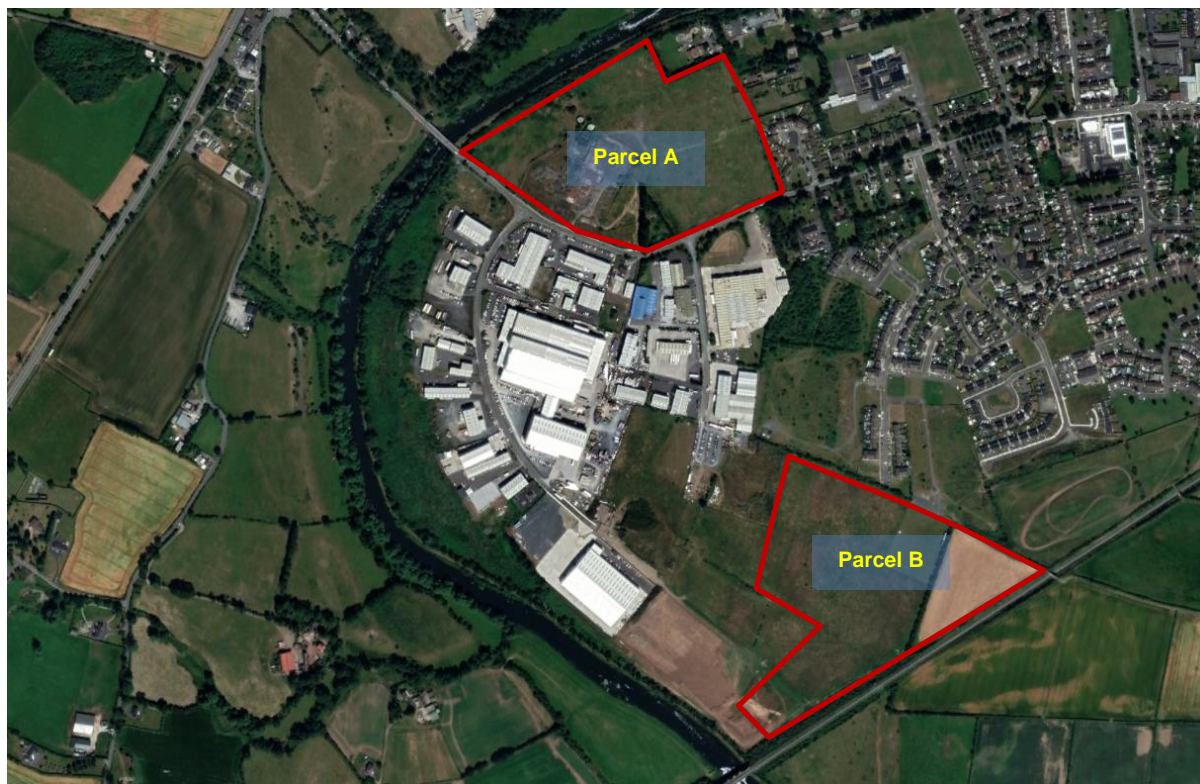


Figure 1.0 Aerial image showing the two subject parcels of land.



Figure 2.0 Aerial image showing the subject lands in the context of the wider Muine Bheag / Royal Oak Area.

Both parcels of land are located within Muine Bheag / Royal Oak, a planned town which was founded in the 18<sup>th</sup> century. The town was originally laid out in a grid pattern with the core of the town located east-west along Regent Street and Church Street and connected to the north and south by a series of perpendicular streets and lanes. The town expanded eastwards and southwards following the provision of a railway line. The grid pattern was also expanded.

The town has undergone significant growth, however, the presence of the River Barrow and the Dublin-Waterford Railway Line result in a very clear town centre boundary. Accordingly, it is considered that there are several lands within the confines of the town which would benefit from development, including Parcels A and B which are subject of this submission.

## 2.1 Parcel A Lands

This parcel of land comprises approximately 12.2 Ha of area, located to the north of the Royal Oak Road. The site is bound to the east by the Chestnut Court Housing estate; an individual dwelling; and O'Neill Engineering. The site is bound to the north and west by the River Barrow. Access to the site is provided from the Royal Oak Road, the R724, a regional road within Carlow which commences at the Royal Oak junction, through Bagenalstown, and terminates in Kildavin at the N80.

The site is currently in a state of dereliction which began following the closure of the Fair Oak Foods Factory Complex located on site. The meat factory ceased operations in the late 1990s and has been demolished. Remnants of the structure are present on site.



Figure 3.0 Aerial image of Parcel A lands (approximate outline).



Figure 4.0 Street view image of Parcel A lands, taken in 2019.



Figure 5.0 Street view image of Parcel A lands, taken in 2019.



Figure 6.0 Street view image of Parcel A lands, taken in 2011.

### 2.1.1 Planning History

A review of the Carlow County Council planning register has revealed the following planning applications at the subject site.

**Reg. Ref. 07/591** Planning permission granted by Carlow County Council on 27<sup>th</sup> April 2008 for a development comprising *'202 dwellings, including 13 serviced sites, 183 no. 2 storey detached/semi detached/terraced houses and 6 apartments in a 3 storey apartment block, new vehicular access road from Royal Oak Road, with all parklands, roadways and associated site development works. This proposal will involve the demolition of the existing Fair Oaks Foods Factory complex and adjoining manager's residence. The proposed development adjoins Eastwood House a protected structure, and involves removal of stone walls adjoining curtilage of house. This proposal forms the first phase of an overall mixed use development to be completed on an additional 2.58 hectares, which will include a creche serving the proposal. part of the development falls within the boundaries of the Barrow/Nore SAC, special area of conservation.'*

**Reg. Ref. 05/402** Planning permission refused by Carlow County Council on 15<sup>th</sup> July 2005 for a development comprising *'95 no. dwellings which consists of the following house types: 16 no two storey 3 bedroom terraced house units (small), 2 no two storey 3 bedroom semi-detached house units (small), 7 no two storey 5 bed detached house units with garage, 4 no two storey 4 bed detached house units, 28 no two storey 4 bedroom semi-detached housing units, 38 no two storey 3 bed semi-detached housing units, new site entrance and all associated site works'*.

## 2.2 Parcel B Lands

Parcel B comprises approximately 10 Ha of undeveloped lands. The site is bound to the east by the Dublin-Waterford railway line; to the south by the River Barrow; to the west by the Royal Oak Industrial Estate; and to the north by a residential housing estate and additional undeveloped lands. This landholding also includes a community playing field which is accessed from the housing estate.

The site itself is not publicly accessible. Access to the existing pitch is provided via the housing estate. The remainder of the lands could be accessed by the continuation of the road which serves the Royal Oak Industrial Estate.

The landowner of the subject lands would be interested in donating the soccer pitch to the local community as it is in active recreational use, in accordance with the current zoning objective. The remaining lands are considered to be more suitable for the continuation of the business park.



Figure 7.0 Aerial image of Parcel B lands (approximate outline).



Figure 8.0 View of Bagenalstown Industrial Park and subject lands from River Barrow to the southwest.



Figure 9.0 View of Bagenalstown Industrial Park and subject lands from R448 to the west.

### 2.1.2 Planning History

A review of the Carlow County Council planning register has not revealed any planning applications at the subject site. The following planning applications within the adjoining industrial park are of note:

#### **Reg. Ref. 19313**

Planning permission granted by Carlow County Council on 16<sup>th</sup> October 2020 for a development comprising *'the construction of 4 No. industrial buildings accessed from the existing industrial park access road, comprising: Unit A (8,283m<sup>2</sup>) will consist of a single storey industrial unit with an attached two storey building consisting of ancillary toilets, canteen, locker room and offices; Unit B (8,584m<sup>2</sup>) will consist of a single storey industrial unit with an attached two storey building consisting of ancillary toilets, canteen, locker room and offices; Unit C (3,399m<sup>2</sup>) will consist of a single storey industrial unit with an attached two storey building consisting of ancillary toilets, canteen, locker room and offices; Unit D (3,594m<sup>2</sup>) will consist of a single storey industrial unit with ancillary toilets. Other works as part of the development include: new access road continuing from existing industrial park access road to serve the site; connection to existing services; landscaping; boundary treatment; and all associated works to facilitate the development. An Environmental Impact Report and A Natura Impact Statement are submitted with this application.'*

The site of the above planning application directly adjoins the subject parcel of lands. The provision of 4 no. additional light industrial units was subsequently welcomed by Carlow County Council who granted permission for the development. It maybe considered that additional units at the subject parcel of lands would be equally as appropriate.



Figure 10.0 Approved site plan of the development. The provision of the road will open Parcel B lands for further development. It is considered appropriate for the continuation of the business park.

### 3.0 Current Planning Policy Context

It is considered prudent to note the current planning policy as it pertains to relate to the submission lands. The following section will discuss the relevant national, regional and local planning policy which relate to the submission lands.

#### 3.1 Project Ireland 2040 – National Planning Framework (2018)

The National Planning Framework seeks a more balanced and concentrated growth, particularly within the five major cities in Ireland. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas as per the following commentary from Project Ireland 2040 document:

*‘A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. The rest of our homes will continue to be delivered at the edge of settlements and in rural areas’*

Furthermore, we consider that the following national policy objectives are also relevant:



**National Policy Obj. 3a** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.*

**National Policy Obj. 35** *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

**National Policy Obj. 6** *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.*

**National Policy Obj.11** *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

### 3.2 Regional Spatial & Economic Strategy for the Southern Regional Assembly (2020)

The Regional Spatial & Economic Strategy for the Southern Region 2040 provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region. County Carlow is identified as a 'Key Town' with an attribute of having 'large population scale urban centre functioning as self-sustaining regional drivers. Strategically located with accessibility and significant influence in a sub-regional context.' The following is the vision for the RSES for the Southern Region:

- *Nurture all our places to realise their full potential;*
- *Protect and enhance our environment;*
- *Successfully combat climate change;*
- *Achieve economic prosperity and improved quality of life for our citizens;*
- *Accommodate expanded growth and development in suitable locations; and*
- *Make the Southern Region one of Europe's most creative, innovative, greenest and liveable regions.*

The strategic location of Carlow provides a strong link to both the Midlands and the Greater Dublin Area through a well-connected transport infrastructure inclusive of road and rail. This makes for a strong land of opportunity for independent enterprises. This application seeks to enhance the region and provide its product to the surrounding areas, utilising the strong transport links available.

The following Regional Policy Objectives are relevant to preparing for the future growth of the region:

**RPO 8** *The prioritisation of housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.*

**RPO 14** *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 29** *Support Government policy and targets of the Housing Agency under Rebuilding Ireland: Action Plan for Housing and Homelessness and Local Authority actions that contribute to progress under the key pillars of addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilizing the existing building stock within our region.*

### 3.3 Carlow County Development Plan 2015-2021

The current Carlow County Development Plan 2015-2021 designates Muine Bheag as a ‘*District Town*’ which acts as an important driver for local economies in the Central Development Area, including a large rural hinterland, and provide complementary role in tandem with gateway towns. The plan estimated that there would be a population increase of 440 people over the lifetime of the Development Plan. This equates to a housing requirement of 255 units that would be needed in order to facilitate such growth. It is a key strategy of the Development Plan to meet the housing requirements with a sustainable and consolidated approach, ensuring that new homes would be built in tandem with social and infrastructural development. In order to achieve delivery of new homes, the Development Plan incorporated a phased approach with specific land-zoning requirements. A total of 12.8ha of zoned land was designated within Muine Bheag / Royal Oak to facilitate the orderly development of the town.

### 3.4 Muine Bheag / Royal Oak Local Area Plan 2017-2023

At a local level, the subject parcels of lands are contained within the area of the Muine Bheag / Royal Oak Local Area Plan 2017-2023. The vision for the area is as follows:

*‘To build on Muine Bheag / Royal Oak’s unique strengths including its distinct character of built and natural heritage and to provide a focused approach to planning for future growth in a coherent, sustainable, spatial fashion. The Plan aims to achieve a more consolidated urban form that facilitates a sustainable economic base and creates sustainable and integrated communities while balancing future development with the conservation and enhancement of the town’s natural and built environment.’*

The provisions of the Local Area Plan are discussed below.

#### 3.4.1 Zoning Objective

The following section will discuss the relevant zoning provisions of the subject parcels of land.

##### Parcel A

The majority of the Parcel A lands are located on ‘M1’ zoned lands. The objective of which is ‘*to facilitate an appropriate mix of employment uses within a high quality landscaped development including office-based industry, enterprise, incubator units, business, science and technology.*’ A small area of land is also zoned ‘F’ – open space.

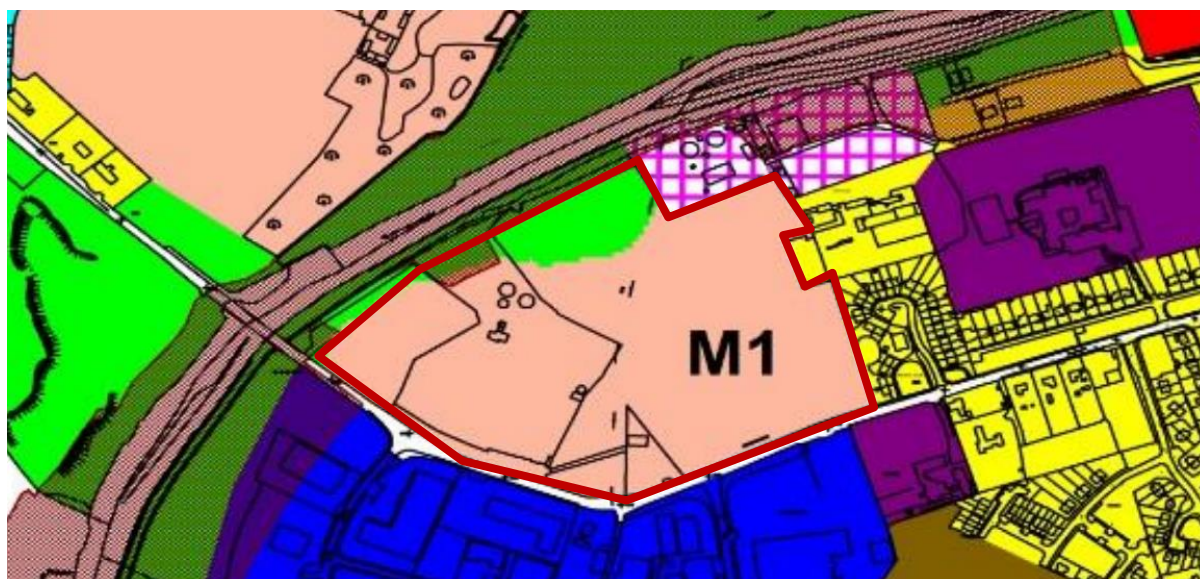


Figure 11.0 Extract of zoning map illustrating subject parcel of land, outlined in red, located on ‘*Manufacturing, Tourism, Enterprise and Employment (M1)*’ zoned lands.

The Local Area Plan states that a comprehensive masterplan, shall be agreed with Carlow County Council for lands zoned Manufacturing, Tourism and Enterprise / Employment on the Royal Oak Road including proposed remediation plans for the brownfield site prior to the granting of permission for any development on these lands. Proposals for development on these lands must integrate with the natural environment of the River Barrow and comprise:

- *A high standard of layout and design.*
- *Low density high quality buildings in parkland setting.*
- *Landscape and habitat considerations.*
- *Sustainable design through use of innovative smart green technologies.*
- *Sustainable transportation with pedestrian and cycle linkages to the town centre.*
- *Not detract from the existing natural landscape.*
- *An appropriately detailed Flood Risk Assessment*

The local area plan contains a matrix of land uses which are deemed to be permitted in principle and open for consideration. The following land uses are considered to be permitted in principle within 'M1' zoned lands:

*'guest house/hotel/hostel; restaurant; health centre; community hall & sports halls; Recreational buildings; cultural uses, library; **offices; petrol station;** motor sales; car parks; repository, store, depot; industry; **industry (light);** workshops; playing fields; park/playground; tourist-related facilities; utility structures; funeral homes; creche/playschool; Adult Education /literacy/ basic education/youth reach facility'*

Additionally, the 'open consideration' land uses within 'M1' zoned lands are as follows:

*'**dwelling;** restaurant; pub; **shop (convenience); shop (comparison);** retail warehouse; school; medical and related consultant; **live/work unit;** garages, panel beating and car repairs; cinema, dancehall, disco; playing fields; broiler house; stable yard; hot food take-away'*

### Parcel B

The Parcel B lands are located on 'F' zoned lands. The objective of 'F' zoned lands is *'to protect and provide for recreation, open space and amenity provision.'*

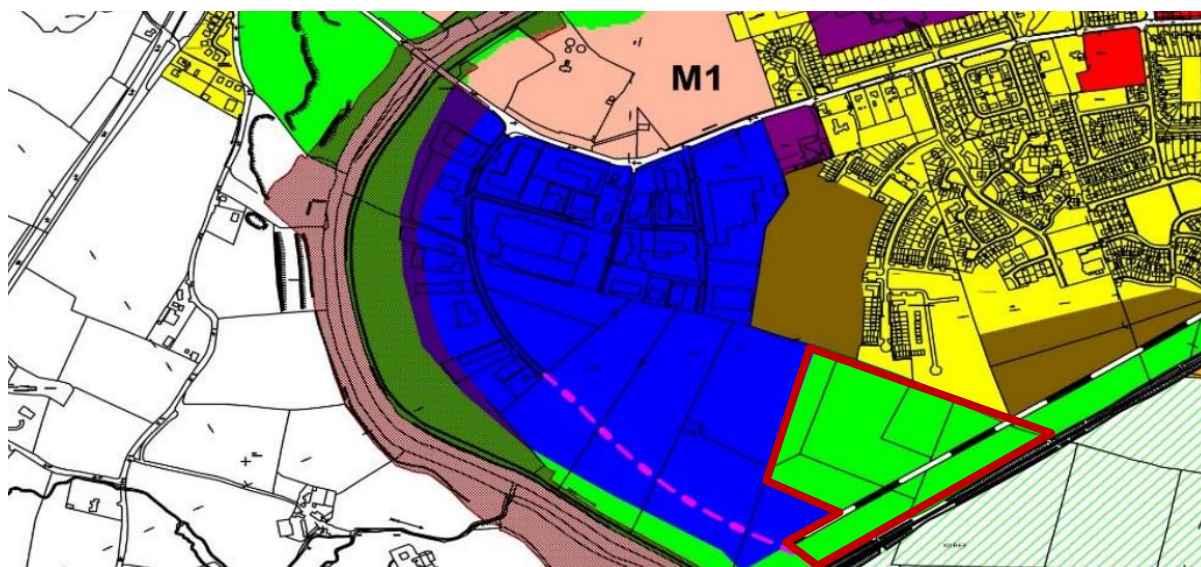


Figure 12.0 Extract of zoning map illustrating subject parcel of land, outlined in red, located on 'Amenity and Open Space (F)' zoned lands. Notably, a proposed relief road (pink dash) is located near the site.

The areas included in this zoning objective cover both private and public open space and are dispersed throughout the town. The aims of this land use-zoning objective include; to protect, improve and provide for recreation, open space and amenity provision; to protect, improve and maintain public open space;

to preserve private open space and to provide recreational and community facilities. The Council will not normally permit development that would result in a loss of open space within the town except where compensatory open space is provided to service the community affected in an appropriate location. Existing agricultural uses in open space areas will continue to be permitted, and reasonable development proposals in relation to this use will be considered on their merits.

The sole land use considered to be permitted in principle on 'F' zoned lands is '*Playing fields.*'

The following land uses are considered to be open for consideration on 'F' zoned lands:

*'School; Community Hall & Sports Halls; Recreational Buildings; Cultural Uses, library; Car Parks; Tourist-related facilities'*

### 3.4.2 Relevant Policies

The following policies are considered applicable to the subject parcels of land.

- EC 1** To accelerate the sustainable development of Muine Bheag / Royal Oak through sustainable employment creation, in a structured and cohesive way, recognising its importance as one of the key drivers of economic growth in south Carlow.
- EC 3** *To foster and support industry and enterprise in Muine Bheag, including indigenous businesses.*
- EC 7** *To support and facilitate the development of start up enterprise units for local indigenous enterprises in Muine Bheag / Royal Oak.*
- EC 8** *To facilitate innovative work practices such as 'live-work' units where they do not negatively impact on residential amenity.*
- EC 11** *To actively encourage the redevelopment of brownfield sites and re-use of disused buildings for enterprise and employment creation, subject to meeting Development Management Criteria as presented in the County Development Plan.*
- ECO 1** *To promote and facilitate the development of light industry, manufacturing, warehousing and logistics on lands zoned industry and warehousing. Developments must achieve a high standard of layout and design including landscaping and screening and the delivery of a high quality working environment which is attractive to both customers and employees.*
- ECO 2** *To facilitate and promote the development of a business park on lands zoned on the Royal Oak with a mix of employment uses within a high quality landscaped development including office-based industry, enterprise and incubator units, business, science and technology.*
- EC 14** *To protect and strengthen the retail primacy of Muine Bheag within the County and more specifically within Southern Carlow. EC 15: To encourage the development of the retail and service role of Muine Bheag / Royal Oak as a self-sustaining centre in accordance with the policies contained in the Carlow County Development Plan 2015-2021 and the Retail Planning Guidelines 2012.*
- EC 24** *To secure the continued consolidation of Muine Bheag Town Centre through progressing the regeneration of backland and brown field areas in the town centre.*

### 4.4.3 Regeneration Areas

The Parcel A lands are designated under the local area plan as a potential area for regeneration. The following objective is noted:

- ECO 6** *To provide for the development of vacant sites in designated areas (residential land and / or regeneration land) and to encourage and facilitate the appropriate development and renewal of sites and areas in need of regeneration in order to prevent;*

- *adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land;*
- *urban blight or decay*
- *antisocial behaviour, or*
- *A shortage of habitable houses or of land for residential use or a mixture of residential and other uses*

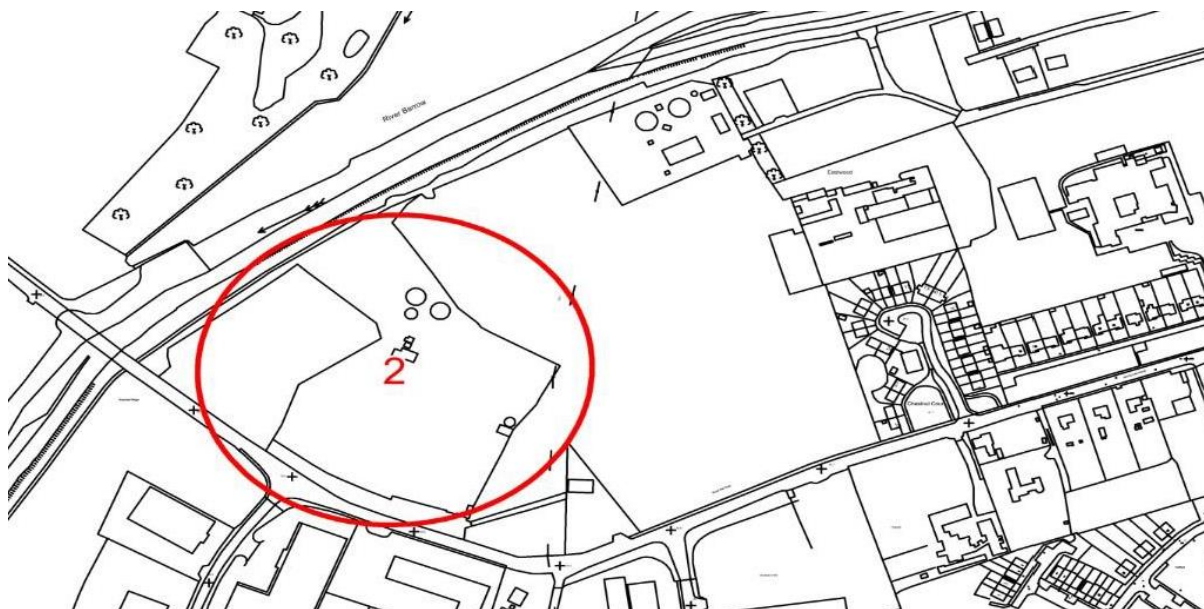


Figure 13.0 Extract of Map 4: Potential Areas for Regeneration of the LAP with Parcel A designated as a potential regeneration site.

### 3.5 Draft Carlow County Development Plan 2022-2028

This submission has been made in respect of the draft Carlow County Development Plan 2022-2028 which is currently on public display. The following provisions of the draft plan are considered of interest:

Muine Bheag is classified as a ‘*District Town*’ which comprises ‘*well developed serviced settlements with jobs supporting services and community facilities. These are important towns at a district level and have capacity for continued commensurate growth to become more self-sustaining.*’

The following strategic objective pertaining to District Towns is of note:

- S O4** *Promote consolidation and growth in the District Towns of Tullow and Muine Bheag along with targeted investment to improve local employment, services and sustainable transport options, building on existing assets.*

#### 3.5.1 Core Strategy

Chapter 2 of the draft Carlow County Development Plan 2022-2028 refers to the Core Strategy of the County. The purpose of the Core Strategy is to set out an evidence-based strategy for the future spatial development of the Plan area. Its primary purpose is to identify and reserve an appropriate amount of land at the right locations to meet population and housing targets. It is a statutory requirement of the Planning and Development Act 2000 (as amended) to ensure consistency with the national and regional objectives as outlined in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Southern Region.

As per the Settlement Hierarchy within the core strategy chapter, Muine Bheag is designated as a Tier 2 Settlement, a District Town, which is described in the following table:

Settlement Tier	Settlement Typology	Description	Settlements
1	Key Town	Large population scale urban centre functioning as self – sustaining regional drivers. Strategically located urban center with accessibility and significant influence in a sub-regional context.	Carlow Town
2	District Towns	Well-developed serviced settlements with a moderate level of jobs supporting services and community facilities with good transport links and capacity for continued commensurate growth to become more self-sustaining.	Tullow Muine Bheag

Figure 14.0 Extract of Table 2.1, 'Settlement Hierarchy,' contained within the Core Strategy.

The following policies relate to district towns:

**CSP 5** *Promote consolidation in District Towns along with targeted investment to improve local employment, services and sustainable transport options, building on existing assets.*

**CSP 6** *Promote social and economic development and new homes in District Towns in accordance with the requirements of the settlement hierarchy and the aims and population targets of the Core Strategy Table and the Housing Strategy.*

**CSP 7** *Promote compact growth, sustainable development, and urban regeneration in District Towns through maximising the delivery of new homes and development on brownfield and infill land and in locations with strong sustainable transport links*

Settlements	Population 2011	Population 2016	Actual Change	% Change	% of Growth 2011-2016
County Carlow	54,612	56,932	2,320	4.2%	
<b>Key Town</b>					
Carlow Town <sup>i</sup>	18,941	19,994	1,053	5.6%	45%
<b>District Towns</b>					
Tullow	3,972	4,673	701	17.6%	30%
Muine Bheag	2,950	2,837	-113	-3.8%	-

Figure 15.0 Extract of Chapter 3 which demonstrates the population change between 2011 and 2016. It is noted that the population of Muine Bheag declined.

Settlements	Population 2016	Population 2028	Population Change 2016-2028	Household allocation 2022-2028	Quantum of undeveloped land zoned Town / Village Centre that can accommodate an element of Residential (Ha)	Potential Units Deliverable on Town Centre / Village Centre Lands	Quantum of Residential Units for land zoned new residential (Ha)	Quantum of land zoned new residential (Ha) to cater for Remainder of Units required	No. and % of Units that can be accommodated on brownfield / infill
<b>Key Town</b>									
Carlow <sup>7</sup>	19,994	23,058	3,064	1352 (*900 within Town Council Area)	8.75ha	370	530	17ha	100%
<b>District Towns</b>									
Tullow	4,673	5,592	919	404	4.31ha	52	295	21ha <sup>8</sup>	Subject to review of LAP (2023)
Muine Bheag	2,837	3,508	671	295	2.42ha	52	362	32.5ha <sup>9</sup>	Subject to review of LAP (2023)
<b>TOTAL</b>	<b>7510</b>	<b>9100</b>	<b>1590</b>	<b>699</b>					

Figure 16.0 Extract of Core Strategy Table which allocates Muine Bheag 295 new households over the lifetime of the plan.

The Core Strategy also discusses the economic development strategy of the County. The plan notes that Carlow Town and the two District Towns of Tullow and Muine Bheag form important employment centres for the County. Of these three, Muine Bheag has the highest jobs to resident workers ratio at 1.466, while Carlow Town has a ratio of 0.881 and Tullow a ratio of 0.703. All three towns present opportunities for economic development building on their strategic location and existing strengths, particularly in sectors such as **engineering, manufacturing** and IT.

Tullow and Muine Bheag / Royal Oak comprise two key urban settlements which provide important residential, employment and community services for a wider rural area. A review of both Local Area Plans (to commence in 2022) will be carried out as required to ensure a co-ordinated plan-led approach informs future development, facilitates regeneration and renewal and promotes economic development while ensuring the protection of environmental qualities, including bio-diversity.

### 3.5.2 Housing

Chapter 3 of the draft County Development Plan relates to 'Housing'. The plan allocates 3,107 no. additional households within the county over the lifetime of the development plan.

**HS P1** *To provide 3,107 new homes to meet expected future housing demand as identified in the HNDA. New homes shall be provided in a planned and coordinated manner in accordance with the aims and policies of the Core Strategy, the RSES, and the National Planning Framework.*

In relation to additional housing within towns and villages, Chapter 3 of the plan contains the following commentary:

- Existing built up areas, promoting compact growth through the development of infill sites and development of brownfield / regeneration sites.
- Creation of new residential communities on zoned lands within the settlement boundaries.
- Consolidating the growth of rural villages in line with the Core Strategy to support vibrant and viable centres.

The plan acknowledges that there may be some limited opportunities to promote higher density (30/ha) in the town centres of Tullow and Muine Bheag (District Towns) creating more vibrant town centres and maximising the return on infrastructure subject to good design, protection of environmental and visual amenities and development management standards being met. In this regard, the following policy is of note:

**DN P2** *Encourage higher residential densities in town centre / regeneration sites proximate to public transport nodes in the higher order settlements (Carlow, Tullow and Muine Bheag) provided that proposals achieve a high-quality design and ensure a balance is achieved between the*

*protection of residential and environmental amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.*

### **3.5.3 Enterprise and Employment**

Chapter 4 of the draft County Development Plan 2022-2028 relates to enterprise and employment. The plan states that across Central Carlow, manufacturing industries, almost all of which are small-scale and medium, represent a significant employment base. These are integral to the local economy, most notably in Muine Bheag / Bagenalstown and Fennagh, as well as in Carrickduff on the Wexford border.

Commerce and trade followed by manufacturing and professional services comprise the most important industries to the town. While employment levels are strong the traditional town centre experiences significant vacancy level which are impacting on the vitality and vibrancy of the town.

Lands zoned for employment related purposes within Muine Bheag are largely developed and / or committed for employment related purposes. Further lands are therefore likely to be required for employment purposes over the period of this Plan.

The following economic development policies which pertain to Muine Bheag are noted:

It is the policy of the Council to:

- ED P14** *Seek to encourage investment and support the role of Muine Bheag / Royal Oak as an important employment hub within the County, to enhance the provision of local infrastructure and amenities and improved sustainable transport links to surrounding settlements.*
- ED P15** *Maximise the opportunities offered by the existing strong employment base within Muine Bheag and to utilise it as a platform to attract new small and medium enterprises to the town.*
- ED P16** *Support development of the tourism industry and maximise direct and indirect opportunities afforded by the River Barrow, built heritage characteristics and significant beverage industries located within the town.*

Additionally, the following economic development objectives are of note:

It is an objective of the Council to:

- ED O9** *Prepare an economic development spatial strategy for Muine Bheag / Royal Oak as part of the Local Area Plan Review to ensure that the town can fulfil its economic role in the future development of the County.*
- ED O10** *Support the regeneration of the core areas of the town through sustainable targeted measures that address vacancy, encourage economic development and deliver sustainable reuse and regeneration outcomes.*
- ED O11** *Support and seek the implementation of the Town and Village Key Project Plan for Muine Bheag (2018) which seeks to integrate physical, economic, social and environmental renewal measures in order to deliver maximum economic benefit for the population of Muine Bheag.*

It is an objective of the Council to commence a review of the Tullow Local Area Plan and the Muine Bheag / Royal Oak Local Area (which are due to expire in 2023) no later than one year following the adoption of this Plan. Both Local Area Plans will be carried out having regard to the policies, objectives and standards contained in this Plan, demonstrating compliance with the Core Strategy including Core Strategy Policies for District Towns (Ref: CSP 5 - CSP 7). The Local Area Plans will ensure a co-ordinated plan-led approach informs future development, facilitates regeneration and renewal and promotes economic development while ensuring the protection of environmental qualities, including biodiversity.

Chapter 4 of the draft plan provides commentary relating to the Carlow Retail Hierarchy. The Carlow Retail Strategy provides a retail hierarchy for County Carlow having regard to the Retail Guidelines and the following criteria:

- *Current strategic guidance at a national, regional and county level;*



- *The need to protect and enhance the importance of Carlow Town as the principal urban centre and retail destination in the County;*
- *The need to protect the important more localised functions of the town centres in the County such as Tullow and Muine Bheag;*
- *The distribution of future retail floorspace in line with the Core Strategy, settlement hierarchy and future distribution of population growth within the County;*
- *The promotion and facilitation of sustainable forms of transport by locating future retailing in centres that are served by public transport, where possible and practicable; and*
- *The need to facilitate competitiveness and innovation in the retail industry.*

Sub County Town Centres of Tullow and Muine Bheag (Bagenalstown) continue to provide an important service role in support of Carlow Town as well as the villages throughout the County.

They provide a good range of convenience offer and a modest comparison offer and are generally characterised by a large convenience / comparison anchor, a range of mid to low order comparison outlets, local retail services, ancillary specialist convenience outlets, community and social facilities.

Both Tullow and Muine Bheag (Bagenalstown) are integral to the settlement structure of the County and they act as important service centres for their immediate and hinterland populations.

Retail expansion in these settlements should be in line with their planned population growth and should be focussed on the consolidation of existing retail cores and providing further key retail development in order to deliver enhanced choice and competition for consumers. It remains an objective to provide a greater diversity and range of retail uses in these Towns.

#### **3.5.4 Muine Bheag Objectives**

The following objectives relate specifically to Muine Bheag.

- MB 01** *The core retail area should form the primary focus and preferred location for new retail development. Within this area additional retail, particularly comparison retail, as well as other complimentary uses such as cafes, recreational and leisure facilities and restaurants will be encouraged to reinforce the multifunctional role of the Town Centre.*
- MB 02** *Central opportunity sites, as set out in this Retail Strategy, will be prioritised for development.*
- MB 03** *Encourage the utilisation of Market Square as a multifunctional space including its use for local farmers market and other community/civic functions. Improvements to the public realm of the Square, including paving and hard landscaping that is consistent with the architectural heritage of the Town Centre should be promoted.*
- MB 04** *Improvements to pedestrian infrastructure and pedestrian priority within the Town Centre should be encouraged, including enhanced pedestrian crossing facilities. New, as well as improved pedestrian linkages to the River Barrow are to be investigated and encouraged.*
- MB 05** *Opportunities to improve cycle infrastructure and accessibility to the retail core should be promoted. Cycle infrastructure should be considered in the delivery of new developments within the wider Town area and these should integrate with the Town Centre infrastructure.*
- MB 06** *Public realm improvements should be encouraged within the Town Centre, including enhanced hard and soft landscaping, pavement improvements, street furniture and lighting, particularly the key connecting routes to the quays including Singletons Lane and Barrow Lane would benefit from urban realm improvements.*
- MB 07** *Promote the enhancement of the public realm along the River Barrow, including appropriate hard and soft landscaping that integrates with and is legible as part of the public realm of the Town Centre.*
- MB 08** *Enhanced signage between the Town Centre and the River Barrow should be promoted and encouraged.*
- MB 09** *Adopt a car parking management strategy for the Town Centre that reduces the presence of on-street car parking in favour of off-street car parking, including the promotion of backland parking areas. The feasibility of relocating car parking from Market Square elsewhere should be investigated.*

- MB O10** *The provision of on-street and off-street electric vehicle (EV) recharging facilities should be delivered in line with the Development Plan Parking Standards.*
- MB O11** *Encourage and facilitate local niche industries, such as O'Hara's Brewery and Walsh's Whiskey Distillery, to develop a presence in the Town Centre to contribute to and benefit from existing assets and attract event shoppers and tourists to the Town.*

#### 4.0 Submission Request

This submission request pertains to 2 no. parcels of land owned by our client located within the Muine Bheag / Royal Oak Area. This submission aims to inform Carlow County Council, through the development plan process, of the development potential of these lands. Whilst we note that specific zoning requests may be best placed during the review of the LAP, we would contend that a submission on the draft development plan is also appropriate given the strategic level of planning which occurs at the county level. The following sections will detail the submission requests which relate to these parcels of land.

#### 4.1 Parcel A Lands – Old Meat Factory

We wish to express to Carlow County Council the interest and willingness of the landowner to provide a mixed-use development at the subject lands within the lifetime of the next County Development Plan. A preliminary concept has been prepared by Strutec Ltd, as demonstrated below.

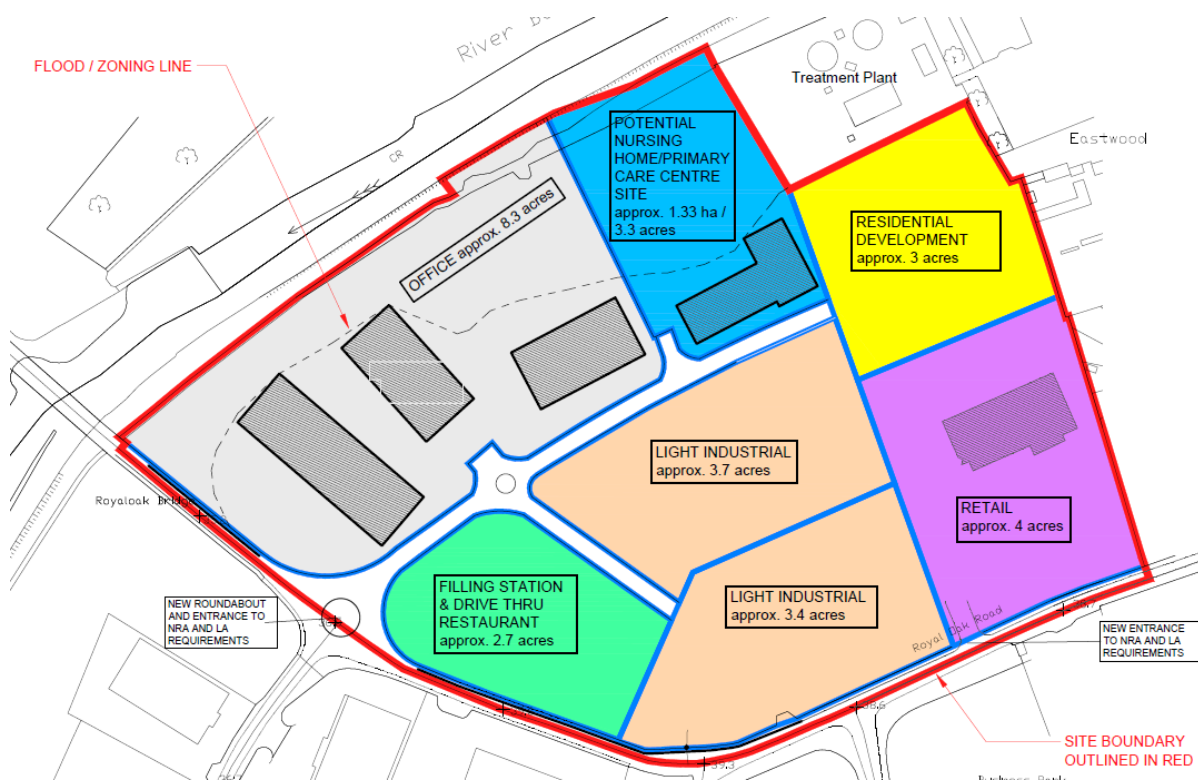


Figure 17.0 Extract of design sketch prepared by Strutec Ltd.

The site is considered to be ideally situated to support the consolidation of Muine Bheag whilst also providing a range of land uses. As indicated above, the land-uses comprise of 'Light Industry', 'Retail', 'Filling Station / Drive Thru restaurant', 'office', 'live-work units' and 'nursing home'. Under the current development plan, a number of the proposed uses are considered permissible or open for consideration. The only element of the sketch plan which is not permissible is the 'nursing home'.

Accordingly, our first request is that Carlow County Council considers expanding the list of permissible and open for consideration land uses to include nursing homes. Although the above drawing is indicative, it demonstrates the potential location of a nursing home. The setting of the nursing home would allow for a large area of open space to serve the residents of the home. There is also capacity, potentially, to provide access to the west to the Barrow Walk. This could be utilised by residents of the

scheme and the wider Muine Bheag area leading to an increased level of walkability and permeability within the town.

The request to allow the provision of a Nursing Home at the subject lands has been informed by many factors. Principally, the shortage of existing facilities within the town, in tandem with the lack of available lands to facilitate the provision of a new-build nursing home within the town. According to the most recent census data, Bagenalstown would be considered to have an aging / older population, as illustrated on the below diagrams:

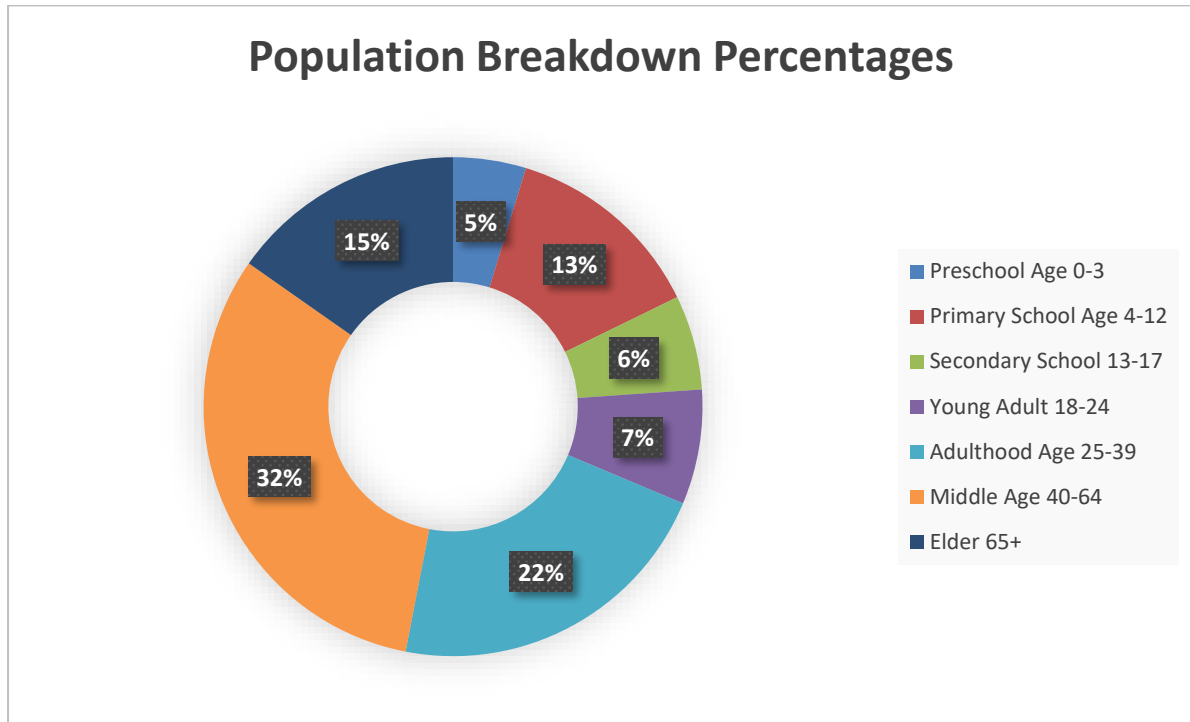


Figure 18.0 Pie chart demonstrating 15% of the overall Bagenalstown ED population as aged 65+.

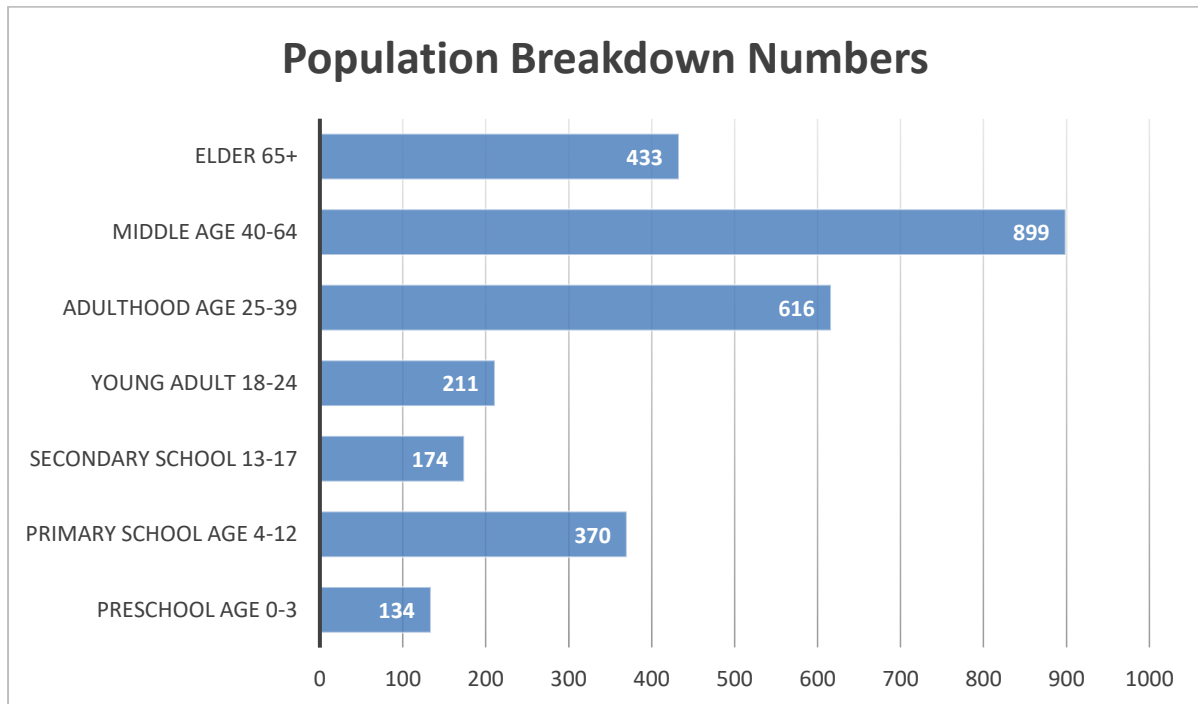


Figure 19.0 Bar Chart demonstrating 433 no. people of the overall Bagenalstown ED population as aged 65+. The next largest group is the 40-64 age group.

It is clear that the existing population of Bagenalstown is comprised of a rather large existing number of over 65 year olds. Additionally, the next largest age group is the middle age class who are aged 40-64. The 40-64 group will, steadily, progress into the 65+ group. Accordingly, there is a need to provide sufficient facilities for the aging population.

In addition to Census data, the Socio-Demographic Profile of Carlow, 2019, also confirms the older population of the town. The following table extract is of note:

	Pre-family	Pre-school	Early school	Pre adolescent	Adolescent	Adult	Empty nest	Retired
State	9.2%	10.0%	11.9%	11.4%	12.3%	25.1%	10.0%	10.0%
SE Region	6.9%	9.3%	11.6%	11.9%	13.4%	24.7%	11.5%	10.8%
Carlow County	7.3%	9.9%	11.9%	12.5%	13.1%	24.9%	10.8%	9.6%
Carlow MD	8.7%	10.7%	12.4%	12.4%	13.3%	22.3%	10.4%	9.8%
Tullow MD	7.1%	9.9%	12.3%	13.3%	13.1%	24.4%	10.9%	9.0%
Bagenalstown MD	5.7%	8.8%	10.9%	11.7%	12.9%	28.9%	11.1%	9.9%

Figure 20.0 Extract of Table 8.1 of the Social-Demographic Profile of Carlow. Bagenalstown has a percentage of 9.9% retired and 11.1% empty nest. This is around the state average and the highest of all areas in Carlow.

It is submitted that there is a demonstrated need for a new nursing home in the area. In addition to the aging population, Muine Bheag has a high level of carers. The Socio-Demographic Profile notes that *'the proportion of persons devoted to caring duties is higher in rural areas (4.2%) than in Carlow Town (3.6%)'. Of the three municipal districts, the Bagenalstown MD has the highest proportion, while the Carlow MD has the lowest'*. The high level of people providing care is a further indication of the requirement for a purpose built nursing home.

At present, there is 1 no. nursing home in the town, with additional facilities located in the nearby settlements of Leighlinbridge and Borris. The existing facility, St. Lazerian's House provides full time care to twenty persons and day care two days a week for a further 50 people. Patrons of the service require mobility as the facility does not provide around the clock care. The service provided is extremely high quality and the facility is a benefit to the town yet there is capacity for a purpose built nursing home in the town to relieve pressure from the many home care providers in the town and allow elderly people to remain residents of the town, rather than moving to a nursing home elsewhere.

Parcel 1, the subject lands under the ownership of our client, is considered appropriately located to facilitate a nursing home. The site enjoys excellent accessibility which allows visitors, staff and residents to access the site. The nursing home will be set back from the main road to allow peace and quiet for residents whilst also having the potential to provide a large open space area near the Barrow Walk. A nursing home could be integrated very well into the mixed-use scheme which is being considered by our client.

A review of sites within Muine Bheag showed that there is a shortage of suitably zoned, serviced and developable lands in the town which could accommodate a nursing home and, accordingly, we would request that the zoning matrix is expanded to include nursing home on the zoning of the subject site.

Our second request is that Carlow County Council considers applying a specific local objective to the site to facilitate a mixed-use development. As the Planning Authority is aware, the site has been left vacant and falling into a state of disrepair since the closure of Fair Oak Foods. The lands have been acquired relatively recently by our client. In the interests of proper planning and the common good, our client wishes to engage with the Planning Authority during the draft plan process to demonstrate the desire to develop a scheme which would have significant positive impacts on the rest of the town. Accordingly, it is submitted that a specific local objective relating to development of the site would encourage development under the next development plan. An example of the wording is as follows:

*It is an objective of the Council to provide for a mixed-use scheme on the site of the former meat factory on the Royal Oak Road over the lifetime of the plan.'*

Alternatively, should the County Council consider such an objective to be better-suited in the local area plan, we request that the draft development plan contains a less specific objective such as:

*'It is an objective of the Council to work with landowners of large underutilised sites within town centres to facilitate comprehensive redevelopment.'*

Parcel A is ideally located to facilitate a mixed-use scheme comprising of a mixture of commercial, residential, community, and industry uses. Accordingly, we request that the Planning Authority has regard to the above submission and consider increasing the land uses acceptable on the site and add an objective to the development plan which encourages the redevelopment of the site.

#### **4.2 Parcel B – Continuation of Business Park**

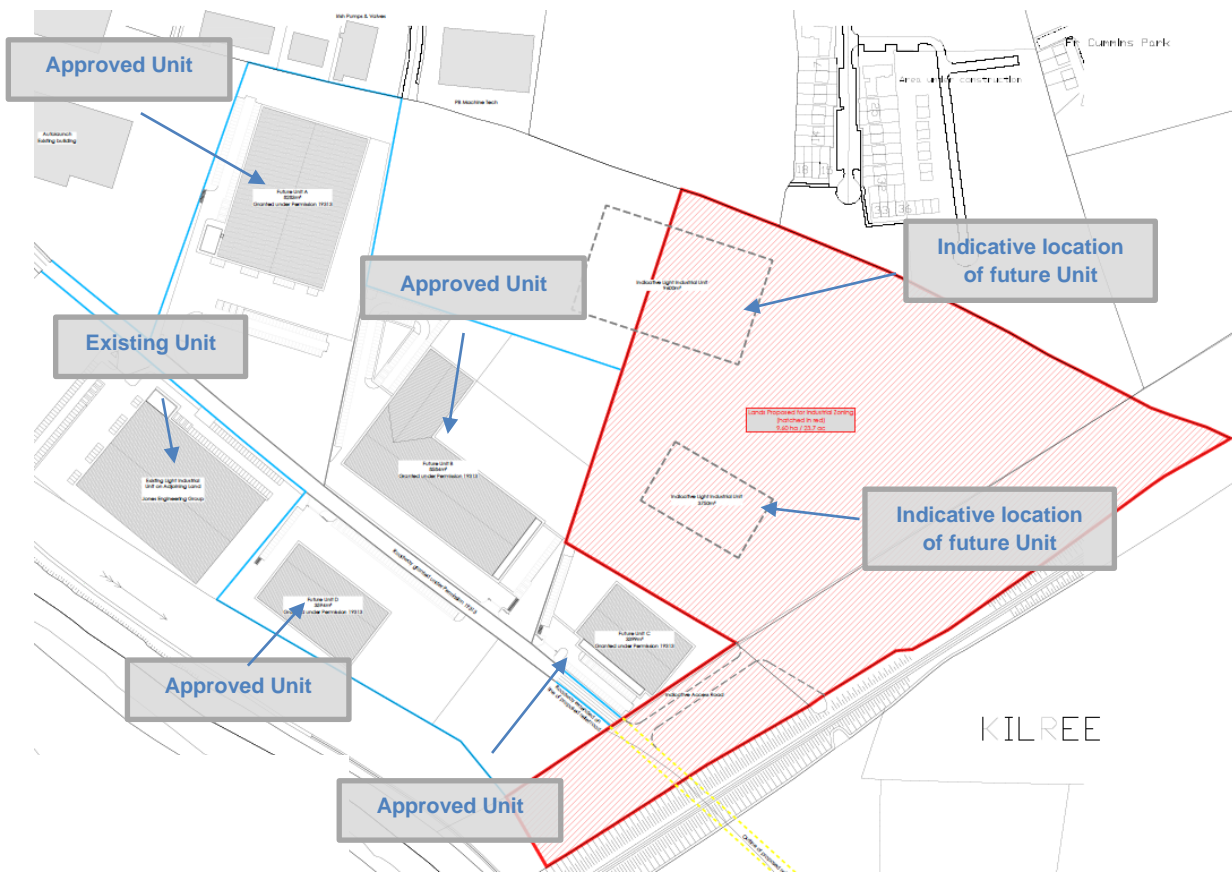
In relation to Parcel B, we wish express to Carlow County Council that there has been interest expressed for industrial / manufacturing units within the town. The concentration of new units at an existing business park is considered to be in accordance with the provisions of the draft development plan. Accordingly, we would request that Carlow County Council considers the rezoning of the lands to 'Industry and Warehousing' to allow the continuation of the business park. Muine Bheag and the Royal Oak have been established and continues to grow and develop as a centre of excellence in precision engineering, where it accommodates a variety of large companies including Autolaunch, Tanco, Hi-Spec, P.B Machine Tech and many more where it has become a global hub with links to international markets everywhere. At the centre of this is the Royal Oak business park which accommodates several of the aforementioned companies plus multiple others.

The existing units within the business park are occupied and future units have recently been granted permission. It is anticipated that these units will be occupied shortly after completion due to the large demand for industrial units in the area. The site would be the ideal location to accommodate interested manufacturing and engineering firms in the industry who wish to locate themselves in an established industrial estate. This would bring several benefits the local economy and employment within the town.

Accordingly, we would request that Carlow County Council considers the rezoning of the subject parcel of lands from 'Amenity and Open Space' to 'Industry and Warehousing'.

The rezoning has been requested having had due regard to the existing infrastructure and geometry which are considered to be more appropriate for the continuation of the industrial zone, as opposed to the provision of additional amenity or open space. The parcel of land is the ideal location for the continuation of the business park due to its location along the proposed relief road. This presents a logical sequence of additional industrial units. The subject land is terminated to the southeast by the existing working railway line. Additionally, access to the subject land as public open/amenity space would be limited to a small number of housing access roads, and offers limited access through to the Barrow. We suggest that there are alternative locations in Muine Bheag with greater possibilities for access and more suitable surroundings for the amenity/open space.

The lands are considered to be situated to facilitate a logical continuation of the existing Royal Oak Industrial Park which is well served by existing transport infrastructure and mutually complimentary businesses and functions. Minimal additional road access to that already constructed or granted Planning Permission is required. The developable area of the subject land is clear of the SAC and flood zones and further visual impact on the housing to the north or Barrow to the south/west would be minimal.



We suggest that the existing infrastructure and geometry are more appropriate for continuation of the industrial zone rather than for amenity/open space as the subject land and the existing boundary to the north (to the existing housing) follow the line of the proposed relief road, presenting a logical sequence, and the subject land is terminated to the southeast by the existing working railway line. Additionally, access to the subject land as public open/amenity space would be limited to a small number of housing access roads, and offers limited access through to the Barrow. It is also considered that there are alternative locations in Muine Bheag with greater possibilities for access and more suitable surroundings for the amenity/open space.

## 5.0 Conclusion

This submission has been prepared in response to the Draft Carlow County Development Plan 2022-2028. This submission relates to 2 no. parcels of land, lands at Royal Oak Road (Parcel A) and lands east of Royal Oak Business Park (Parcel B). In summary, we request that Carlow County Council consider:

- Extending the list of permitted uses on the Parcel A lands to include the use of a nursing home;
- Applying a specific local objective to facilitate a mixed-use development at the Parcel A site. A preliminary sketch has been appended to this submission which demonstrates an example of such a development;
- Rezoning the amenity/open space lands to the east of the Royal Oak Business Park to Industry and Warehousing. The Parcel B lands are located next to the business park and there is potential to facilitate further industrial units to cement Muine Bheag's leading role in the manufacturing and industrial industry. The landowner is open to donating the existing pitch within Parcel B to the local community.

We are looking forward to working with the Planning Authority over the coming stages of the consultation process. Muine Bheag, and the wider Carlow County will be a place for substantial growth in the coming years and we contend that our submission requests have been informed by the targets and strategy of the draft plan. Accordingly, we hope the Planning Authority will take our submission requests into consideration.

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Carlow County Development Plan 2022-2028.



Kevin Hughes MIPI MRTPI  
Director  
for HPDC Ltd.

## **Appendix A**

Preliminary Site Plan of a mixed-use development at the Parcel A lands, prepared by Strutec Ltd.



## **Appendix B**

Preliminary Site Plan of a industrial development at the Parcel B lands, prepared by Strutec Ltd.

## **Appendix C**

Land Registry Compliant Map showing the existing pitch which may be donated to the local community, prepared by Strutec Ltd.