



1 October 2021

Senior Executive Officer,  
Review of the County Development Plan,  
Planning Department,  
Carlow County Council,  
Athy Road,  
Carlow

**Re: Draft Carlow County Development Plan 2022 - 2028**

Dear Sir/Madam,

I refer to the above. The Department of Education acknowledges the draft Carlow County Development Plan 2022-2028 and makes the following submission.

The Department notes that the draft plan has to sit within the framework of the ESRI's 50:50 scenario which aligns with the NPF's 2040 population targets and settlement pattern. The NPF Implementation Roadmap projects a population for County Carlow of 64,000 to 65,500 people by 2031. This represents an increase of 7,000 – 8,500 people over the 2016 population of 57,000 people. The Department has regard to the longer-term framework because population and housing targets are the key driver in considering likely school requirements.

The draft plan projects a population for Co Carlow of 64,000 people by 2028. This equates to an increase of 7,000 people over the 2016 population of 57,000.

The Department notes that to supplement the land use zoning objectives and other policy objectives of the Development Plan, there are four local area plans, namely:

- Graiguenamanagh/Tinnahinch Local Area Plan 2021-2026 (currently under review)
- Joint Urban Area Plan (JUAP) for the greater Carlow urban area inclusive of Carlow environs and Graiguecullen – to commence within a year of the adoption of the County Development Plan (CDP)
- Tullow Local Area Plan 2017-2023 – to be reviewed within a year of adoption of the CDP
- Muine Bheag Royal Oak Local Area Plan 2017-2023 - to be reviewed within a year of adoption of the CDP



### Objectives in the draft plan

The draft plan contains a number of objectives relating to schools in Chapter 8 - Community Development and these are generally welcomed by the Department.

In regard to the provision of schools, the Department welcomes Objectives EF P1 and EF P2 concerning the identification of suitable sites for new schools and the development and expansion of existing schools. The commitment to follow the 2008 Code of Practice on the Provision of Schools and the Planning System, is very welcome as it seeks to ensure that school sites are fit for purpose in terms of their location, access to services and the provision of space for recreational and sports activities which can help to support an effective learning and development environment for children, in line with the Department of Education requirements. In regard to the development and expansion of existing schools, the Department suggests that EF P2 be further strengthened as the existing school network is critically important for meeting future requirements, particularly in light of the compact development objective of the NPF and the focus on infill/brownfield development. To address this, the Department suggests a strengthening of the objective along the following lines:

*To ensure that existing school sites are protected for educational use and that land buffers adjacent to existing schools are protected for future educational use in order to allow for expansion of these schools, if required, subject to site suitability.*

Objectives EF P3 and EF P4 concern the out of hours use of school buildings. The Department is supportive of the out of hours use of school buildings where possible and has published guidance for schools on the matter, available at <https://assets.gov.ie/24484/ca5b1787db1b47f98de31f57e977dad0.pdf>

Objective EF P6 is slightly confusing, but it is taken to mean that to encourage the mainstream education provision of children with special needs wherever possible. This is the policy of the Department.

The Department is supportive of EF P7 on providing appropriate access infrastructure for new school buildings at the time of construction. The delivery of footpaths, pedestrian crossings etc. requires engagement of multiple parties (including the Council and the Department).

Objectives EF 01 and EF 02 concerning the good location of new school facilities and the promotion of school campus arrangements are welcome. The Department suggests that EF 02 specifically supports school campus arrangements.

The Department welcomes the following objective:

- WC P4 (Chapter 5) concerning active travel and schools
- prioritization of two primary schools for connection to Broadband in 2021 (Chapter 6)



- promotion of solar technology at public buildings (including schools) and for infrastructure such as traffic lights road information signage (Chapter 7)

### **GIS mapping of existing school sites and zoned school sites**

The Department's policy is to intensively use the sites of existing schools so that their potential is maximized to meet educational requirements. This is in order to meet future educational requirements arising from infill and compact development in existing settlements. It is necessary to protect existing schools and the lands around them in order to be able to meet future needs. The optimum way to meet a future need may necessitate extending an existing school or developing a new school alongside an existing school to form a campus arrangement. therefore, the Department requests that the entire site (buildings, play area and any green areas) be zoned and mapped for educational use. This will strengthen the zoning provision on existing school sites and assist in future planning and delivery of educational requirements. In addition, if possible, could all future education sites be zoned and mapped whereby the mapping and zoning of school sites by the Local Authority would enable the Department to pick up the information on our own GIS system and aid us both in the school planning function.

### **Potential educational requirements arising from the draft plan**

In considering the implications of the Draft Plan for school accommodation requirements, the Department is cognisant of potentially differing scenarios where variances in factors such as household sizes, demographic profiles and housing delivery rates could significantly alter the future school accommodation requirements. The Department also took into account planned school capacity increases in considering the plan, as well as underlying demographic trends at both primary and post-primary levels which will serve to mitigate additional school place demand arising from the population increases that are envisaged in the Draft Plan. Based on all factors, a view has been formed concerning projected future requirements and how they can best be met at each settlement and commentary is provided in this regard. In its assessment of population trends, the Department uses a number of parameters to determine future needs. Requirements at primary level are currently assessed on 11.5% of population and 25 students per classroom. Post-primary requirements are assessed at 7.5% of population numbers.

The draft plan projects that the population growth for the County will take place mainly in three settlements (the key town of Carlow and the district towns of Tullow and Muine Bheag). Between them, the increase of 4,654 people represents two thirds of the county's growth. The remaining one third (2,414 people) is distributed across seven small towns, eight larger villages, ten smaller villages and the rural areas.

Based on its analysis, this Department anticipates that some requirements for additional educational accommodation may emerge over the lifetime of the Plan, should the projected population increases materialize. In respect of the settlements



identified in the Core Strategy Table 2022-2028 (Section 2.16), this Department has the following observations:

## **Key Town**

### **Carlow**

Carlow is the primary administrative centre for the county. Its population was 24,272 people in the 2016 Census (of which 19,994 was located within the Carlow boundary and 4,278 people located outside the county boundary, in Graiguecullen, Co. Laois). Carlow Town is a key focus for urban regeneration. In this regard, the draft plan references “Project Carlow 2040: A Vision for Regeneration” which sets out a strategy for regeneration in Carlow Town. This vision supports increased town centre living and increased building occupancy. The Department notes that the EMRA RSES targets a population growth rate of more than 30% by 2040 relative to CSO 2016 figure for Carlow Town. The distribution of the population between Carlow County Council and Laois County Council has to be agreed as part of a Joint Urban Area Plan for the Greater Carlow Urban area to strategically plan for the growth and development of the town, to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow. The Department notes that all of these policies are embraced in CSP 1 – CSP4.

The draft plan projects a population increase of 3,064 people to a projected population of 23,058 people by 2028. This is an increase of 15% over the town’s 2016 population and it equates to 43% of the overall projected population increase for Co Carlow.

The town is served by nine mainstream primary schools and six post-primary schools. One of the primary schools is in Graiguecullen (within Co. Laois boundary).

The Department considered the capacity of the existing facilities (primary and post-primary) to meet the projected population increase. This assessment included any capital works that are planned/ongoing at the existing facilities. Account has been taken of the demographic data of the existing population and it was overlaid with the projected requirements that will be generated from the increase. In overall terms, it is anticipated that the increase in school place requirements resulting from the projected population increase will be mitigated by the decline in school place requirements as a result of the underlying demographics. Therefore, in principle the existing facilities should be able to meet the future need. However, this is subject to two caveats, namely:

- the distribution of the infill/brownfield element of future development
- the distribution of the population in Graiguecullen (as opposed to the Carlow side)

In regard to infill/brownfield, the Department notes that under the principle of compact development that at least 30% of all new homes to be building in Carlow town are to be



built within the existing built-up footprint of the town. Depending on how this gets distributed, there could be pressure points for increased school places within the town. For this reason, the existing school sites and any land buffers around them are of critical importance as it may be necessary to extend existing schools in order to meet increased requirements. It is for this reason that the Department seeks the strengthening of objective EP 2 (as outlined earlier).

In regard to Graiguecullen, there is just one primary school in Graiguecullen. The level of development that takes place in Graiguecullen and the capacity of the existing school to meet the need will dictate whether there would be a requirement to zone a site for a future school in the area. This could be addressed in the context of the JUAP and further consultation.

## **District Towns**

### **Tullow**

The population of Tullow was 4,673 people in the 2016 Census. The draft plan projects that it will have increased by 919 people to a total of 5,592 by 2028 (an increase of c.20%) and it equates to 13% of the overall projected population increase for Co. Carlow.

Tullow is served by three mainstream primary schools and one post-primary school.

At primary level, taking into account the underlying demographic trends, it is anticipated that the existing schools could meet the requirements arising from the increased population.

At post-primary level, it is anticipated that additional potential requirement arising from the projected population increase could be met at the existing facility.

### **Muine Bheag**

The population of Muine Bheag was 2,837 people in the 2016 Census. The draft plan projects that it will have increased by 671 people to a total of 3,508 by 2028 (an increase of c.24%) and it equates to c.10% of the overall projected population increase for Co. Carlow.

Muine Bheag is served by three mainstream primary schools and two post-primary schools.

At primary level, taking into account the underlying demographic trends, it is anticipated that the existing schools could meet the requirements arising from the increased population.





At post-primary level, it is also anticipated that additional potential requirement arising from the projected population increase could be met by the existing facilities.

### **Other settlements**

A population increase of 912 people is projected across the seven small towns of Rathvilly, Leighlinbridge, Ballon, Borris, Hacketstown, Carrickduff and Tinnahinch. It is anticipated that the existing facilities will meet the future requirements. It is noted that areas of Borris Vocational School are within Flood Zone A and Flood Zone B and that any future requirement for expansion of the school would have to be subject to a flood risk assessment as provided in the general guidance provided in Section 6 of the SFRA.

No other projected educational requirements were identified at any other settlements.

### **Conclusion**

The planned population increase to 2028 of 7,000 people for Co. Carlow could generate school place requirements in Carlow town, given the growth concentration there. The NPF supports the delivery of a compact settlement form with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands. The existing school network is of paramount importance in meeting future projected needs across all settlements in Carlow. This is particularly critical in established areas where dispersed infill and possibly brownfield development will take place and create a more dense, populous neighbourhood. For this reason, all existing school sites and a land buffer around them (wherever possible) should be zoned and protected to meet the future educational needs in Co. Carlow.

No requirement has been identified for a special school in this submission as it focused on demographic need. However, if a specific need in regard to a special school arises the Department will get in touch with the Council.

As a point of information, the Department's title is now simply the Department of Education. The responsibility for further and higher education now lies with the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) which was put on a legislative footing on 2 August 2020. The Youthreach programme now falls within the remit of DFHERIS.

School accommodation requirements across the county will continue to be kept under review. In that regard, the Department welcomes an ongoing engagement with Carlow County Council and will continue to work closely with the Council in meeting the challenges associated with the provision of new schools and the redevelopment /extension of existing schools. The Department acknowledges the crucial importance of the ongoing work of the Council in ensuring sufficient and appropriate land is zoned for educational needs. The Department wishes to thank the Council for the consideration given to the Department's submission to the Issues Paper in August 2020.



If you have any queries in respect of the above, please feel free to contact me.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alan Hanlon', written over a horizontal line.

Alan Hanlon  
Statutory Plans  
Forward Planning Section

