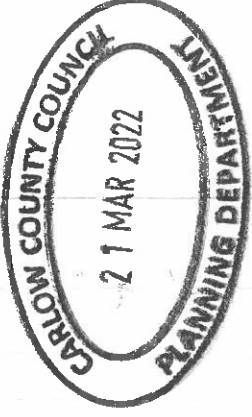


Senior Executive Officer  
Planning Department  
Carlow County Council  
Athy Road  
Carlow



22 March 2022

**Re: Material Alterations - Draft Carlow County Development Plan 2022-2028 - Observations**

We support **Amendment No. 47** and in particular the recognition of flood risk management and the compliance with the EU Habitats Directive.

*'Section 6.10.5 Flood Risk Management – Objectives (Amendment No. 47) Insert additional text to Objective FR O2, Section 6.10.5 'Flood Risk Management – Objectives' (page 145), new text in green as follows: FR O2: Facilitate the provision of new, or the augmentation of existing flood defences and protective measures, where necessary including natural flood management measures where deemed appropriate and to support the implementation of proposed flood schemes while also seeking to ensure zoning or development proposals support and do not impede or prevent the progression of these schemes subject to compliance with the requirements of the EU Habitats Directive, the protection of natural and built heritage and visual amenities.'*

We support **Amendment No 65** promoting a network of walking and cycle trails.

*'Section 9.11 Green Infrastructure – A Strategy for Carlow (Amendment No. 65) Insert additional text in green to Policy GI P7, Section 9.11 'Green Infrastructure Policies' (page 230) as follows:- GI P7: Promote a network of walking and cycling trails to enhance accessibility to the County's green infrastructure network, and ensure such proposals are subject to feasibility (including alternatives to the use of existing green infrastructure) and route/site selection processes so that impacts to biodiversity and nature conservation interests are avoided'*

We support **Amendment 98** Greenways and Blueways.

*'Section 11.6 Greenways and Blueways (Amendment No. 98) Insert additional text in green to Policy GB P3, Section 11.6 'Green and Blueway – Policies' (page 272) as follows: GB P3: Support the development of a tourism masterplan for the River Barrow, and in collaboration with adjoining local authorities and stakeholders as appropriate, which sets out an integrated framework for tourism development along the River Barrow.'*

We support the proposal to develop both Greenways and Blueways along the river Barrow. The previously missed opportunity was unfortunate and we have to be mindful of the health, both physical and psychological, benefits of walking and/or cycling whether as individuals or groups particularly given the impact of the pandemic restrictions on individuals and families over the last two years. There are areas of the Barrow track that are clearly inaccessible to some people particularly during the Winter months. By not developing greenways and blueways, then not only are we contradicting the policies of sustainable development from a commercial perspective but we are also dismissing the concept of an inclusive society where we are ignoring those less able to access the Barrow track as a result of poor trafficability.

We support **Amendment No. 120** Section 15.3.2 Leighlinbridge Plan.

*'New section and text after Section 15.3.2.11, with new additional corresponding policy after Section 15.3.2.17, new text in green as follows: 15.3.1.12 Flood Risk Management The flood risk mitigation measures and justification tests for Leighlinbridge are detailed in Section 7.21 and Section A.9 of the Strategic Flood Risk Assessment (SFRA) prepared as part of this County Development Plan (See Appendix III). General guidance on development management and flood risk is set out in Section 6 of the SFRA.*

*Additional policy after Section 15.3.2.17:*

*Flood Risk Management It is the policy of the Council to: LB. P20: Manage flood risk in Leighlinbridge in accordance with the following provisions: 1. Manage flood risk in Leighlinbridge within the existing town centre and existing residential affected by flood risk in accordance with the following provisions: ▪ Any future planning applications for extensions/refits/change of use should be subject to an FRA which should follow the general guidance provided in Section 6 of the SFRA and must specifically address the following: ▪ The sequential approach should be applied if possible; ▪ FRA should address climate change scenarios in relation to operational levels and potential mitigation measures; ▪ Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; ▪ Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events.'*

We object to **Amendment No. 121**, namely Amend Leighlinbridge Land Use Zoning Map to rezone land on Milford Road from 'Agriculture' to 'Strategic Reserve'

There are 5 No. land plots delineated in the 'Amended Infrastructure' as annotated on the Leighlinbridge Objectives Map. All land plots, L1 to L5 inclusive, are noted in Appendix X Infrastructure Assessment using the 'traffic light rating system' as green colour which indicates that infrastructure/services are available.

As stated in your Volume 2 Report on Submissions, Appendix X, *'The Infrastructure Assessment has also been combined with a land use evaluation, which also utilises the traffic light rating system. The land use evaluation takes account of compact growth considerations and physical suitability considerations in terms of built and natural heritage and flood risk.'* Four of the five land plots, L1 to L5, except for L4, are categorised 'Green' under the Land Use Evaluation columns, indicating the most optimal score. L4 land plot is coloured Yellow presumably due to the potential for flooding as it lies with Flood Zone A with a chance of flooding every 100 years.

It does not make sense to propose a designation of Strategic Reserve to an area currently zoned 'Agricultural' as there is clearly sufficient lands available for development with the criteria of sustainability and this proposal does allow for proper planning with a balanced approach to urban development, development of existing infrastructure and in particular compliance with DMURS and the Advisory Notes (see **Amendment No. 28 below**). Should the Strategic Reserve be applied to these lands then the development of housing would necessarily require footpaths and cycle lanes along Milford Road which is a very narrow road and could not cater for the requisite footpaths and cycle lanes in accordance with DMURS.

Milford Road is currently subject to speed monitoring recently installed by the local authority and we understand that the local authority is now considering the installation of a trial speed ramp. However, the difficulty of the speed ramp location has been recognised by the local authority as there is insufficient sight line along Milford Road. The same challenge, namely a sight line in accordance with the statutory requirements from a residential housing estate, would exist for any development that might happen in an area that is designated a strategic reserve. Consequently a further reason that it does not make sense to assign strategic reserve to these agricultural lands.

*'Amendment No. 28 Insert additional text in green to Section 5.1.6 'Design Manual for Urban Roads and Streets' (page 103), as follows:*

*5.1.6 Design Manual for Urban Roads and Streets. The Design Manual for Urban Roads and Streets (DMURS) prepared for the Department of the Environment, Community and Local Government and Department of Transport, Tourism and Sport (updated in 2019) provides mandatory guidance for all urban roads and streets within the 60km/h urban speed limit. . In response to the Covid-19 Pandemic, a supplementary DMURS Interim Advice Note was also published in 2020 on the DMURS website (available to download at [www.dmurs.ie/supplementary-material](http://www.dmurs.ie/supplementary-material) ). The design standards for urban roads and streets seeks to balance the "place function" (i.e. the needs of residents and visitors) with the "transport function" (i.e. the needs of pedestrians, cyclists, public transport, cars and goods vehicles) while incorporating good planning and design practice*

*with a focus on the public realm. The manual recognises the importance of assigning higher priority to pedestrians and cyclists, without unduly compromising vehicle movement in order to create secure, connected places that work for all members of the community.'*

It is noteworthy that only 2 land plots, L4 and L5, on the eastern side of the river Barrow are considered as shown on the Objectives Map. It is suggested that a more balanced planning approach to developing Leighlinbridge would be to consider more lands on the eastern side of the river Barrow particularly given that the location of the primary school and the availability of land in and around the old factory.

It is noteworthy that Chapter 15: Leighlinbridge Plan (Draft Carlow County Development Plan 2022-2028) requires:

**'LB. P8:** *To maximise spin-offs from the Arboretum located on the edge of the settlement by seeking to improve pedestrian connectivity from the site along the public road and the River Barrow to the Town Centre subject to the requirements of the Habitats Directive.'*

If a residential development was to be constructed on the proposed Strategic Reserve (Amendment 121 below) land then this would only present further vehicular traffic and would not comply with LB P8 above.

The Draft Leighlinbridge Small Town Plan 2022-2028 (Amendment No. 121) shows how much work is required to get a better balance to town from a planning and sustainable perspective. In fact, Chapter 15 Leighlinbridge Plan requires;

**'LB. P16:** *Ensure that future growth is balanced and sustainable and is appropriate to the scale, size and character of the existing town.'*

The bulk of the town centre is on the eastern side of the river Barrow but the bulk of the development and the 'New Residential' is on the western side of the river Barrow towards the N9 road. A better balance would be to designate a strategic reserve on the eastern side of the river and there is no justification for the proposed designation of lands from Agricultural to Strategic Reserve on the western side of the river Barrow. Chapter 15 Leighlinbridge Plan also requires;

**'LB. P13:** *Promote and facilitate the development of walkways and cycleways at appropriate locations throughout the town to encourage sustainable transport.'*

P13 requirements would be very difficult to achieve if a residential development was to be constructed on the Strategic Reserve lands, particularly on the western side of the river Barrow.

Chapter 15 under 'Housing', the document states that 'It is the policy of the Council to:

**'LB. P14:** Seek to encourage and facilitate the re-use and regeneration of Ballyknockan Manor and Friars Lough (incomplete estates) for residential purposes as indicated on the land-use zoning Map.'

Should the concept of a Strategic Reserve be introduced then this would not be encouraging the re-use and regeneration of the incomplete estates noted above and would not comply with P14 above.

**'LB. P15:** Support and encourage residential development on new residential land, under-utilised and/or vacant lands including 'infill' and 'brownfield' sites, subject to a high standard of design and layout being achieved, and compliance with proper planning and environmental considerations.'

P15 specifically notes 'new residential land' which is annotated on Draft Leighlinbridge Small Town Plan 2022 – 2028. There is no requirement for a Strategic Reserve.

**LB. P24:** Protect individual trees, groups of trees, hedgerows and stone walls in so far as possible on all approach roads and within the town which contribute significantly to the character and visual amenity of the town.

Furthermore, the condition of the walls along Milford Road is an eyesore as a result of wall collapse and re-build over the years. Should the Strategic Reserve be developed for residential purposes at any stage then this is likely to further demolition and loss of stone walls.

Amendment 122 (see Map included at end of text) is an effort at a planning balance but the introduction of an unnecessary strategic reserve only goes to create further potential imbalance of the town's configuration and infrastructure.

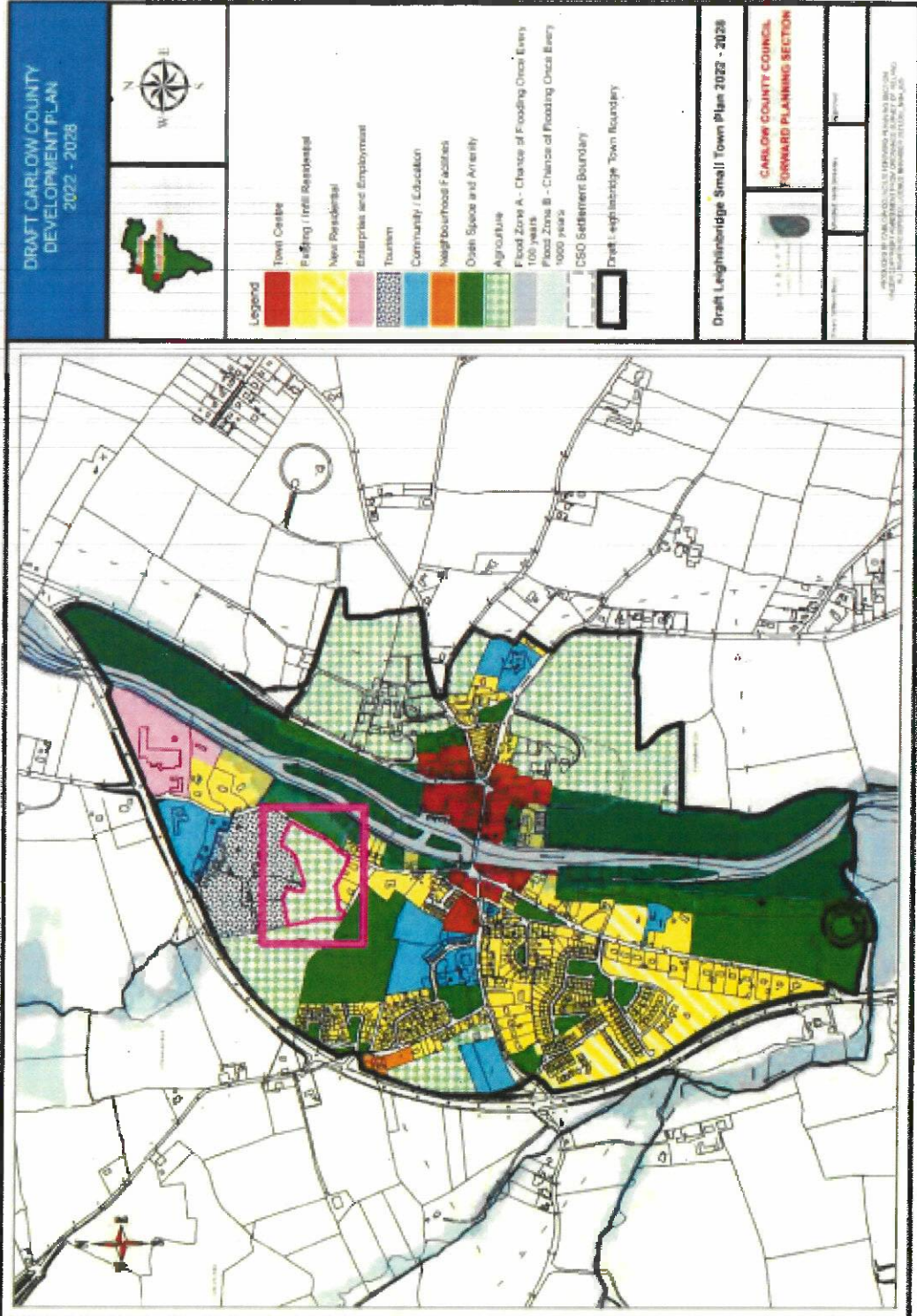
The proposal to include a Strategic Reserve is considered to somewhat contradict Amendment No. 13, in particular the aspect of Sustainable Development, when there are sufficient lands highlighted as L1 to L5 on the Objectives Map and the 'New Residential' plots stippled yellow on the Draft Leighlinbridge Small Town Plan 2022 – 2028. Sustainable residential development is about optimising the lands that are already zoned for new residential and it is NOT acceptable that agricultural lands are given the potential to be developed by designating them Strategic Reserve.

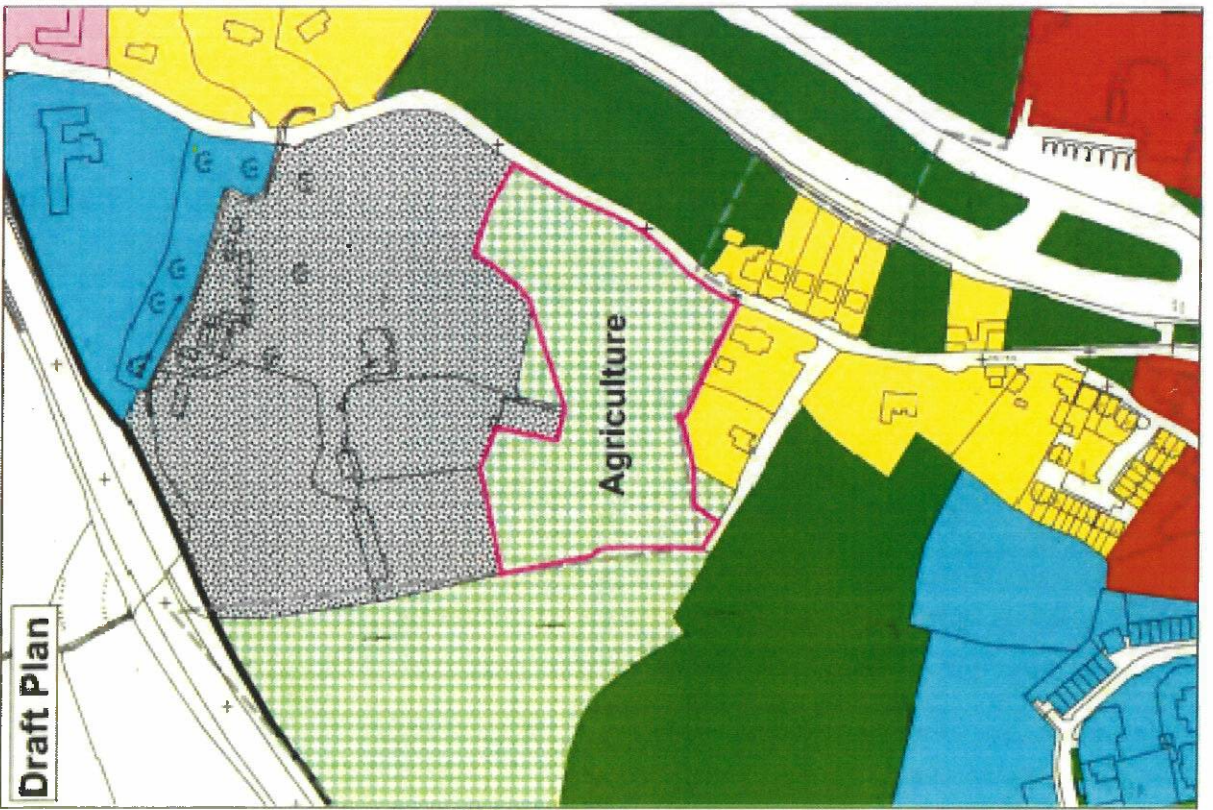
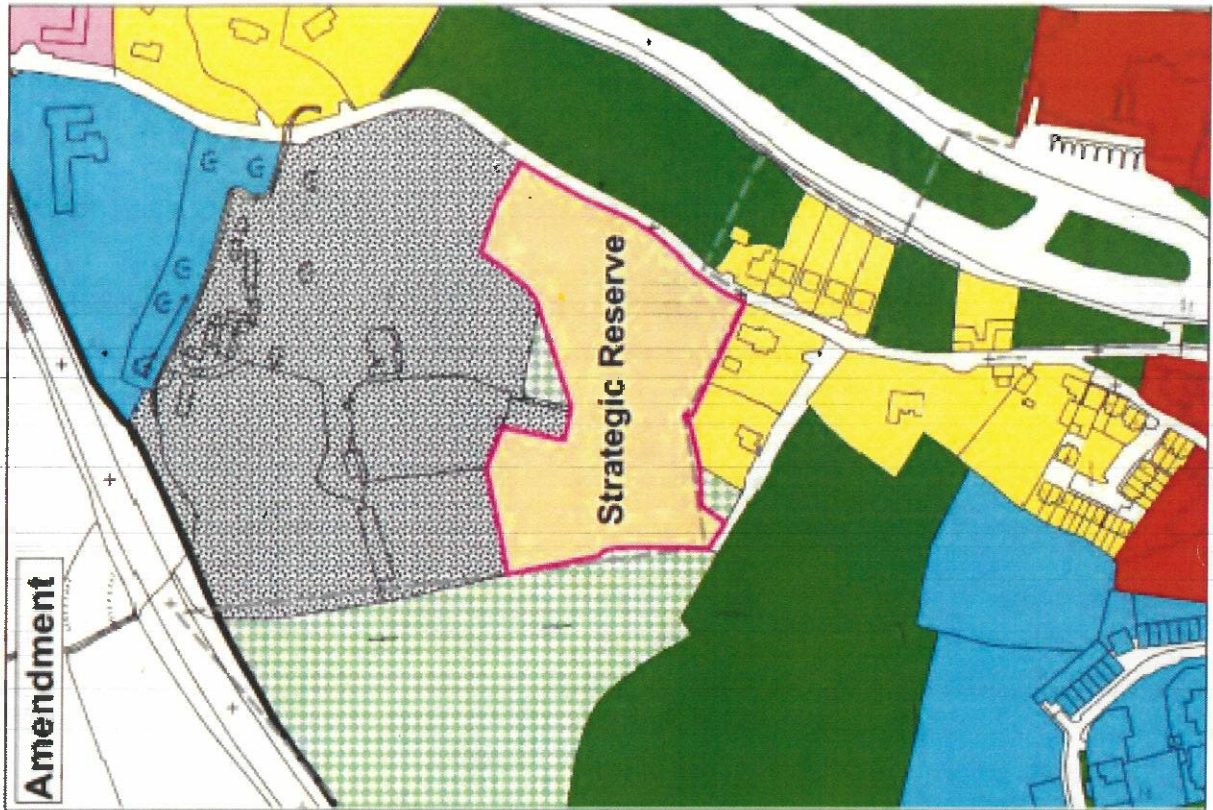
Should the Strategic Reserve designation be applied to currently agricultural lands then it makes a mockery of the assessments by external Consultants that have been commissioned by the local authority. In addition there is no room for a strategic reserve designation on the Objectives Map but there is clearly adequate provision within the current infrastructure and services to develop L1 to L5 and it makes perfect sense for a variety of reasons not least the pedestrian/cycle access currently feeding L1, L2 and L3 plots and other established infrastructure.

*'Section 3.8 Densities / Increased Heights (Amendment No. 13) Insert additional text in green to Table 3.3 and Policy DN P4, Section 3.8 'Densities / Increased Heights – Policies' (page 55) , as follows: DN P4: Apply graded densities in towns and villages having regard to the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009), Circular Letter NRUP 02/21, the indicative residential density standards contained in Table 3.3, the role of the town / village within the Settlement hierarchy, ensuring that developments are commensurate to the character of the existing built environment. Proposed Amendments to Draft Carlow County Development Plan 2022-2028 12 Town / Village Centre Edge of Centre Carlow Town >35ha 25-30ha Tullow Muine Bheag >30ha 20-30ha Smaller Towns 25-30ha 20-25ha\*\* Villages 20-25ha 10-20ha \*\* Lower density residential development and serviced sites will be facilitated on appropriate sites within smaller towns and villages within the rural area in compliance with the programme for 'new homes in small towns and villages' NPO 18(b).'*

The lands proposed as Strategic Reserve have been addressed in previous submissions with respect to the potential development of a residential area. The observations included an objection to the access through a private lane, the unavailability of a safe sight line from an access/egress along Milford Road (similar to the current challenge facing the local authority whereby a trial speed ramp location does not have sufficient sight line approach), the current level of traffic and lack of space to introduce a footpath and cycle lane.

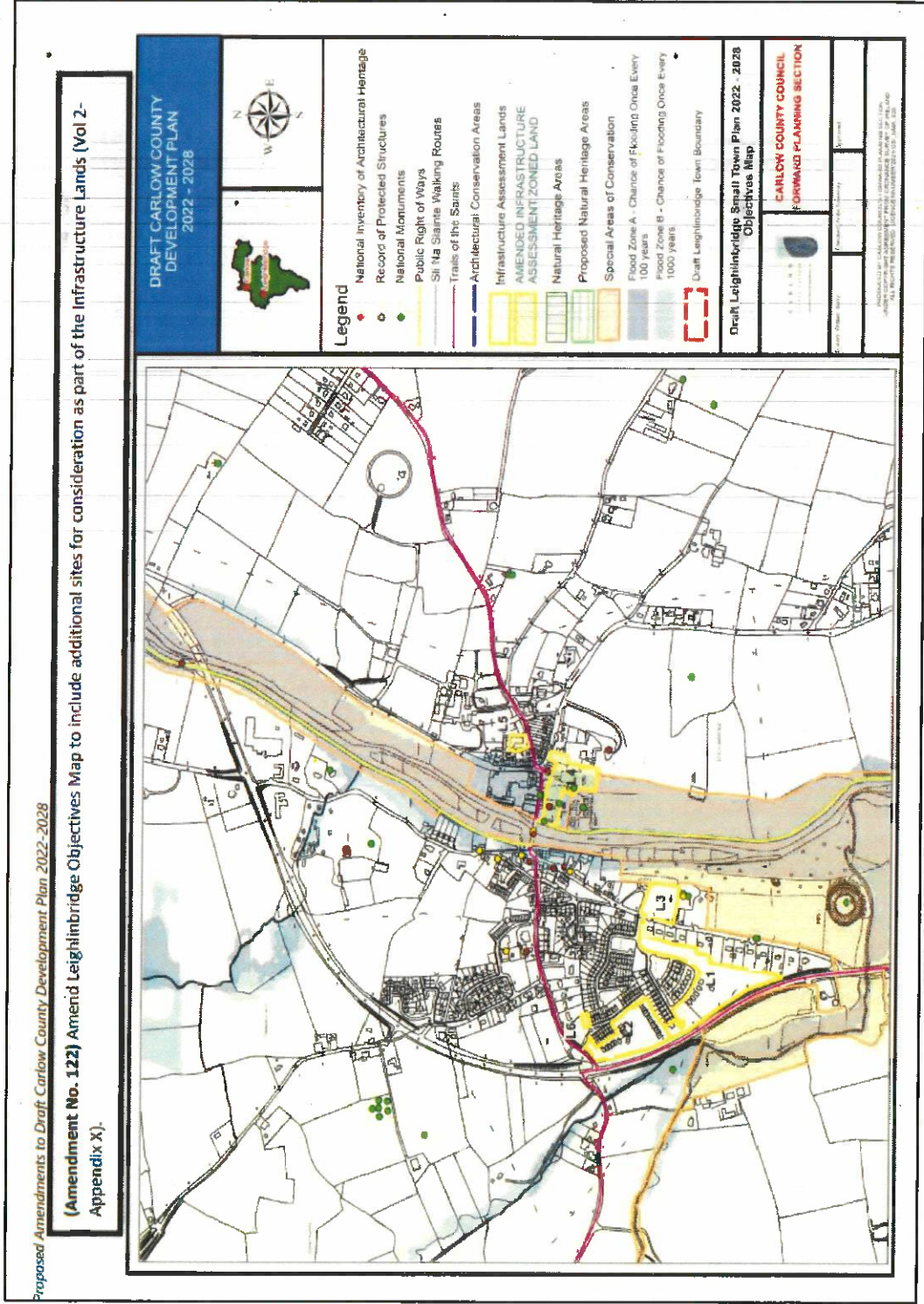
**(Amendment No. 121) Amend Leightonlinbridge Land Use Zoning Map to rezone land on Milford Road from 'Agriculture' to 'Strategic Reserve'.**







We support Amendment No. 122, namely Amend Leighlinbridge Objectives Map to include additional sites for consideration as part of the Infrastructure Lands (Vol 2- Appendix X). In fact, we would suggest that further zoned land should be considered on the eastern side of the river Barrow.



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