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22<sup>nd</sup> March 2022

**RE: Proposed Material Alterations to the Draft Carlow County Development Plan 2022-2028**

**SRA File Ref: 20/002**

A Chara,

I refer to your Notice of the publication of Proposed Material Alterations to the Draft Carlow County Development Plan 2022-2028 received on 22<sup>nd</sup> February 2022. We appreciate this further opportunity to comment on the Draft Carlow County Development Plan process.

We acknowledge and commend the continued work undertaken in the preparation of this Development Plan and set out below our observations on the Proposed Material Alterations.

These observations are intended to assist and support the Council in achieving successful alignment of the Development Plan with the RSES and National Policy Objectives.

It is acknowledged that these are the Material Alterations and that non-material alterations may be made in response to our initial submission on the Draft Development Plan where appropriate.

**1.0 Observations on the Proposed Material Alterations (PMA)**

[Chapter 1 Introduction & Context](#)

It is noted that Amendments 1 to 4 strengthen the focus of the Strategic Themes and Objective on the circular economy, biodiversity, ecosystem services and sustainable tourism

and include additional text to refer to the SEA Directive and transposing regulations. These Amendments are noted and welcomed.

## Chapter 2 Core Strategy & Settlement Strategy

The Proposed Material Alterations to Chapter 2 include additional policy text in relation to green infrastructure in Carlow Town, policies to support sustainable development, transport and mobility in the District Towns of Tullow and Muine Bheag and strengthen policy on Active Land Management, Monitoring and Evaluation & the strategic function of the national roads network. Amendments 5,6,7, 9, 10 and 11 relating to the additional policies/content outlined above are noted and welcomed.

In relation to Amendment no. 8 – the Core Strategy Table (Table 2.7), we note the following:-

- A small reduction in the projected population increase for Carlow Town to 2028 (from 3064 to 3017).
- A small increase to the projected population for the large, serviced villages of Ballinabrannagh and Tinryland along with an increase in the projected number of housing units and the quantum of land zoned as 'New Residential' combined with a reduction in the percentage of units to be accommodated on brownfield/infill sites.
- An increase in the quantum of land zoned as 'New Residential' in Rathvilly, Ballon, Hacketstown and Kildavin – also reflected the zoning maps, combined with a reduction in the percentage of units that can be accommodated on brownfield/infill sites in both instances.

Amendment 8 provides for further population allocations away from Carlow Town. Carlow is identified as a Key Town and is important in underpinning the RSES and the proposed amendment fails to respond to the Regional Assembly's observation on the Draft Plan (October 2021) that *'there is concern regarding the higher growth rates allocated for Tullow, Muine Beag and the Small Towns category in the Core Strategy compared to the allocation for Carlow Town. with a potential imbalance in the strategy and concerns regarding consistency with NSO 9 of the NPF and RPO 3 & 11 and the Guiding Principles (on settlement typology) under Section 3.3 of the RSES'*.

**1.0** *The Regional Assembly consider that clarity is required to demonstrate how proposed Amendment no. 8 (the Core Strategy Table) would be consistent with the RSES including RPO 3, RPO 11 and, in particular, the Guiding Principles under Section 3.3 - A Tailored Approach for determining appropriate levels of growth in the Core Strategy.*

## Chapter 3 Housing

In relation to Amendment 12, it is noted that additional analysis pursuant to the Affordable Housing Act 2021 has resulted in amendments to the Housing Strategy and policy HS P5.

In relation to Amendment 3.8, it is noted and welcomed that Policy DN P5 now refers to 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities (2009) and the accompanying Urban Design Manual (2009), Circular Letter NRUP 02/21 and includes additional indicative residential density standards in Table 3.3.

It is noted that Proposed Amendments to 14 to 20 provide for additional information on Traveller Accommodation and relate to amendments to Section 3.16 – policies for single housing in the countryside.

## [Chapter 4 Enterprise and Employment](#)

It is noted and welcomed that Amendment 21 to section 4.0 has been amended to address SRA OB/Rec No. 4 and includes additional content in relation to building economic resilience and bidding capacity including an additional reference to RSES RPO 70 – Bidding Capacity.

It is noted and welcomed that Amendment 22 provides for an additional reference to the potential opportunities for the Waterford-Kilkenny-Carlow-Dublin M9/Rail Network to support collaboration as an Inter Urban Network including an additional reference to RSES RPO 30 – Inter Urban Networks as Regional Drivers of Collaboration and Growth.

It is noted and welcomed that Amendments 23 & 24 include new text at section 4.43 - Education and Skills in relation to Lifelong Learning and support RSES objectives RPO 186 and 190 for the development of the Southern Region as a Learning Region.

It is noted that Amendments 25 and 26 include additional content in relation to retail policy.

## [Chapter 5 Sustainable Travel and Transport](#)

We note and welcome amendments to Chapter 5 which will strengthen sustainable travel and transport objectives and content in the areas of Sustainable Mobility, including an additional objective to carry out Area Based Transport Assessments, modal change and additional support for bus and rail transportation and additional content in relation to national roads policy and car parking.

## [Chapter 6 Infrastructure and Environmental Services](#)

In relation to Amendments 39 to 50, we note additional policy content in relation to water, flood risk and other environmental issues. We note and welcome Amendment 44 on Information and Communications Technology and reference to RSES policy on Smart City and Smart Region (RPOs 133 and 134) and overall transport policy and policies in relation to sustainable mobility, Roads and Streets and car parking.

In relation to Amendment 42, new policy SW P6 states the objective to 'Require all new developments to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems *where appropriate* in new development and the public realm'. Section 7.13.6 Sustainable Urban Drainage Systems (Amendment No. 56) states that 'the Council is preparing a new SuDS policy/guidance document which will be adopted during the lifetime of this Plan & that 'It is an objective of the Council to require *all development* (including extensions to existing development) proposals to incorporate SuDS measures'. The RSES strongly supports the development of SuDS as a core component of the local authority approach to drainage systems and note that clarity is required between Amendment 42 & 56.

## [Chapter 7 Climate Action & Energy](#)

In relation to Amendments to chapter 7, we note and acknowledge additional policy content to strengthen policy on renewable energy as well as the amendment noted above (Amendment No. 56) in this chapter to provide for a new SUDs policy to be adopted during the lifetime of the Plan, which would strengthen alignment with RSES policy in Section 5.2 and RPO 122 with regard to 'the integration of sustainable water management solutions such as the use of SUDs'

## [Chapter 8 Community Development](#)

In relation to Amendments to chapter 8, we note and acknowledge additional policy content to strengthen policy on children and young people, people with disabilities, education facilities and arts and cultural facilities, including amendment 61 which highlights the positive contribution that arts and culture can make to the public realm, including urban development, regeneration, and placemaking.

## [Chapter 9 Landscape and Green Infrastructure](#)

In relation to Amendments to chapter 9, we note that there are only minor amendments and that the chapter in the Draft Plan already included a strong set of policies in relation to Landscape and Green Infrastructure

## [Chapter 10 Natural & Built Heritage](#)

In relation to Amendments to chapter 10, we note and acknowledge additional policy content to strengthen policy on natural heritage, biodiversity and protection of Natura 2000 sites. The proposed amendments also provide for strengthened policy content on non-designated areas, habitats and species at section 10.5, geological heritage, invasive alien species. In this regard the references to RSES RPOs 126 – Biodiversity and RPO 128 - All Ireland Pollinator Plan are noted and welcomed.

Proposed Amendments to strengthen built heritage, architectural heritage and archaeological heritage content are also noted.

## [Chapter 11 Tourism and Recreation](#)

In relation to Amendments to chapter 11, we note and welcome additional content to strengthen policy on tourism, culture and arts and recreation and sporting facilities including the additional support for implementation of Regional Tourism Strategies in Amendment 91.

## [Chapter 12 Urban Design and Place Making](#)

We note that there are no Amendments to chapter 12

## [Chapter 13 Rural Design Guide](#)

In relation to Amendments to chapter 13, we note and welcome strengthened policy content to support biodiversity and protect watercourses in Landscaping and boundary treatments.

## [Chapter 14 Rural Development](#)

In relation to Amendments to chapter 11, we note and acknowledge additional policy content on intensive agricultural installations.

## [Chapter 15 Town and Village Plans / Settlement Boundaries](#)

In relation to Amendments to chapter 11, we note and acknowledge strengthened policy content in relation to flood risk management for Carlow Town and other settlements.

In relation to proposed amendments which provide for a change of zoning in Carlow Town, we note that these are relatively small site-specific zoning changes which in some cases will provide for additional residential infill zoning within the built-up area of the Town.

In relation to proposed amendments which provide for a change of zoning in Sections 15.3 – Small Towns, Section 15.4 – Larger Serviced Villages and Section 15.5 Smaller serviced villages, we note that there is a pattern of proposed rezonings from unzoned or agricultural land to ‘new residential lands’ and ‘strategic reserve’ but the rationale for some of the additional zonings is not clear and concerns expressed in the SEA Screening at Appendix IV are noted. In relation to one material amendment for a change of zoning (Amendment 129) the SEA states ‘Do not adopt as part of Draft Plan’. In this regard, it has not been demonstrated that all re-zonings are consistent with the Guiding Principles on settlement typology at section 3.3 of the RSES, RPO 3 – Local Authority Core Strategies and RPO 5, Population Growth and Environmental Criteria.

**2.0** *There is concern that some of the re-zonings proposed to settlements in Chapter 15 are not consistent with the Guiding Principles on Settlement Typology at section 3.3 of the RSES, RPO 3 – Local Authority Core Strategies and RPO 5, Population Growth and Environmental Criteria. The Planning Authority should consider the environmental implications of proposed zonings and whether the locations of multiple re-zonings are consistent with the RSES and, in particular, the Guiding Principles on Settlement Typology and the SEA Screening.*

#### [Chapter 16 Development Management Standards.](#)

In relation to Amendments to chapter 16, we note the additional requirements in relation to car parking, EV Charging points and other minor changes to the Development Management Standards.

We also note and welcome the new section – section 16.16.19 in the chapter on Implementation and Monitoring, the links to RSES acknowledged in the Strategic Objectives for the Plan and the focus on funding sources for implementation and also section 16.19. 5, which addresses requirements for Environmental Monitoring.

## **2.0 Appendices**

### [Appendix IV Housing Strategy](#)

It is noted that the Housing Strategy has been updated with Proposed Amendments to provide for:

- Adjusted Plan Demand from the HDNA Model of 3107 units for the County – Core Strategy Table also updated to reflect this projected figure.
- Additional content on the Housing for All Policy of Government
- Updated text to reflect the NDP 2021-2030
- Adjustments to text to reflect the Affordable Housing Act 2021
- A Supplemental Assessment on Affordable Housing to assess the affordable housing needs for Co. Carlow and set out targets for new Build social housing units.
- Amended and updated policies for inclusion in Chapter 3 – Housing to reflect the supplemental assessment

### [Appendix VI Draft Carlow County Renewable Energy Strategy](#)

In relation to Amendments to the Draft Carlow County Renewable Energy Strategy, we note that these relate to:

- minor amendments to the existing energy profile

- an additional section to provide a policy in support of co-location of Renewable Technologies and projects.
- Inclusion of the national target of 70% Renewable Energy supply by 2030 and identified delivery actions for Co. Carlow.

#### Appendix IV Infrastructural Assessment of Material Amendments

It is noted that the Infrastructural Assessment of new residential land use zonings has been updated to include proposed Material Amendments. The additional zonings have been assessed with regard to infrastructure and services and have been found to fall into the categories of either 'Infrastructure/Services available' or 'Further Investment required'.

### 3.0 Environmental Assessment

We note the preparation of an SEA Screening on the proposed Material Alterations at Section 2 of the SEA, a Strategic Environmental Report for 'relevant proposed material alterations', a Natura Impact Report (Appropriate Assessment) for proposed Material Alterations and an updated Strategic Flood Risk Assessment (SFRA) published alongside the proposed Material Alterations to the Draft Plan and some of the observations above relate to these documents.

The Planning Authority should note that the RSES is informed by extensive environmental assessments, contained in the SEA Statement, AA Determination and Natura Impact Report, which are available on the SRA Website. These assessments looked at environmental sensitivities for all parts of the Region and we would recommend that Carlow County Council review these documents to inform the Council's own environmental assessments of proposed material alterations and to ensure that mitigation measures identified to address environmental sensitivities and constraints are included in the Final County Development Plan where relevant.

### 4.0 Conclusion

The SRA welcomes the publication of proposed material alterations to the Draft Development Plan and commend the Planning Department on the inclusion of amendments which address key RSES Strategy policy objectives through their inclusion in the Draft Plan.

These observations are provided to assist and strengthen policy objectives and to strengthen alignment between the Draft Development Plan and RSES Strategy.

Further engagement between the SRA as a key stakeholder and the Planning Department of Carlow County Council in the final phase of the Draft Development Plan is encouraged.

The RSES team are available for further consultation and for any clarification required regarding this submission.

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David Kelly

Director Southern Regional Assembly