



inCarlow

**CHIEF EXECUTIVE'S
REPORT ON THE DRAFT
CARLOW COUNTY
DEVELOPMENT PLAN
2022-2028**

Public Consultation

**VOLUME 1
NOVEMBER 2021**

Table of Contents – Vol I

Part 1: Introduction	3
Part 2: Summary of Submissions by the Regional Assemblies and the Office of the Planning Regulator and the Chief Executive’s Opinion and Recommendations	9
Part 3: Summary of Submissions and the Chief Executive’s Opinion and Recommendations	47
Chapter 1: Introduction and Context	49
Chapter 2: Core Strategy and Settlement Strategy	53
Chapter 3: Housing	59
Chapter 4: Enterprise and Employment	69
Chapter 5: Sustainable Travel and Transport	77
Chapter 6: Infrastructure and Environmental Services	95
Chapter 7: Climate Action and Energy	115
Chapter 8: Community Development	135
Chapter 9: Landscape and Green Infrastructure	145
Chapter 10: Natural and Built Heritage	155
Chapter 11: Tourism and Recreation	191
Chapter 12: Urban Design and Placemaking	213
Chapter 13: Rural Design Guidelines	217
Chapter 14: Rural Development	221
Chapter 15: Town and Village Plans / Settlement Boundaries	231
Chapter 16: Development Management Standards	285
Appendices to Vol I Chief Executive’s Report	293
(i) List of persons / bodies who made submissions	295
(ii) Copy of Advert – Notification of Draft Plan	299
(iii) List of Bodies Notified	303
(iv) Update Core Strategy Table	307
(v) Tullow and Muine Bheag Strategic Policy and Constraints Maps	310
(vi) Implementation and Monitoring	313
(vii) Flood Risk Assessment Mitigation Measures for Settlement Plans	319
(viii) Record of Protected Structures – Conservation Assessments	343

Note: See Chief Executive’s Report on Vol II for amendments / responses to Appendices

Part 1: Introduction

1.1 Introduction

Carlow County Council are now at an advanced stage in the process of reviewing and preparing a new County Development Plan for the period 2022-2028. The key stages in the review process are summarised in Figure 1.

The pre-draft stage (stage 2) of the County Development Plan 2015-2021 review and preparation of a new County Development Plan 2022-2028 formally commenced back in June 2020 with an eight (8) week Pre-Draft consultation phase and publication of an Issues Paper.

The second stage of public consultation (stage 3) relating to the publication of the Draft County Development Plan 2022-2028 is now complete and involved the public display of the Draft Plan over a ten (10) week period from 21st July 2021 to 1st October 2021.

This Chief Executive's Report summarises the 130¹ submissions and observations received during the consultation period, which are set out alongside the Chief Executive's opinion and recommendations for the issues raised in same.

The Report is presented in two volumes, Volume I which groups and addresses all submissions received as relating to Chapters 1 to 16 of the Draft Plan, and Volume II which groups and addresses all submissions received as relating to Appendix I to X accompanying the Draft Plan.

The overall level of engagement was high and included much positive commentary.

1.2 Legislative Context for the Making of the County Development Plan

A development plan is required to set out an overall strategy for the proper planning and sustainable development of the area of the development plan. It consists of a written statement and a plan or plans indicating the development objectives for the area in question.

In accordance with Section 11 (1)(a) of the Planning and Development Act 2000 (as amended), the review of the existing County Development Plan and preparation of a new County Development Plan by the Planning Authority is required to be strategic in nature for the purposes of developing –

- (a)** The objectives and policies to deliver an overall strategy for the proper planning and sustainable development of the area of the Development Plan;
- (b)** The core strategy; and,
- (c)** Shall take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

¹ Excludes 3 no. duplicates, 3 invalids and 1 no. withdrawn.

Development Plan Process

5 stages in reviewing and making a development plan

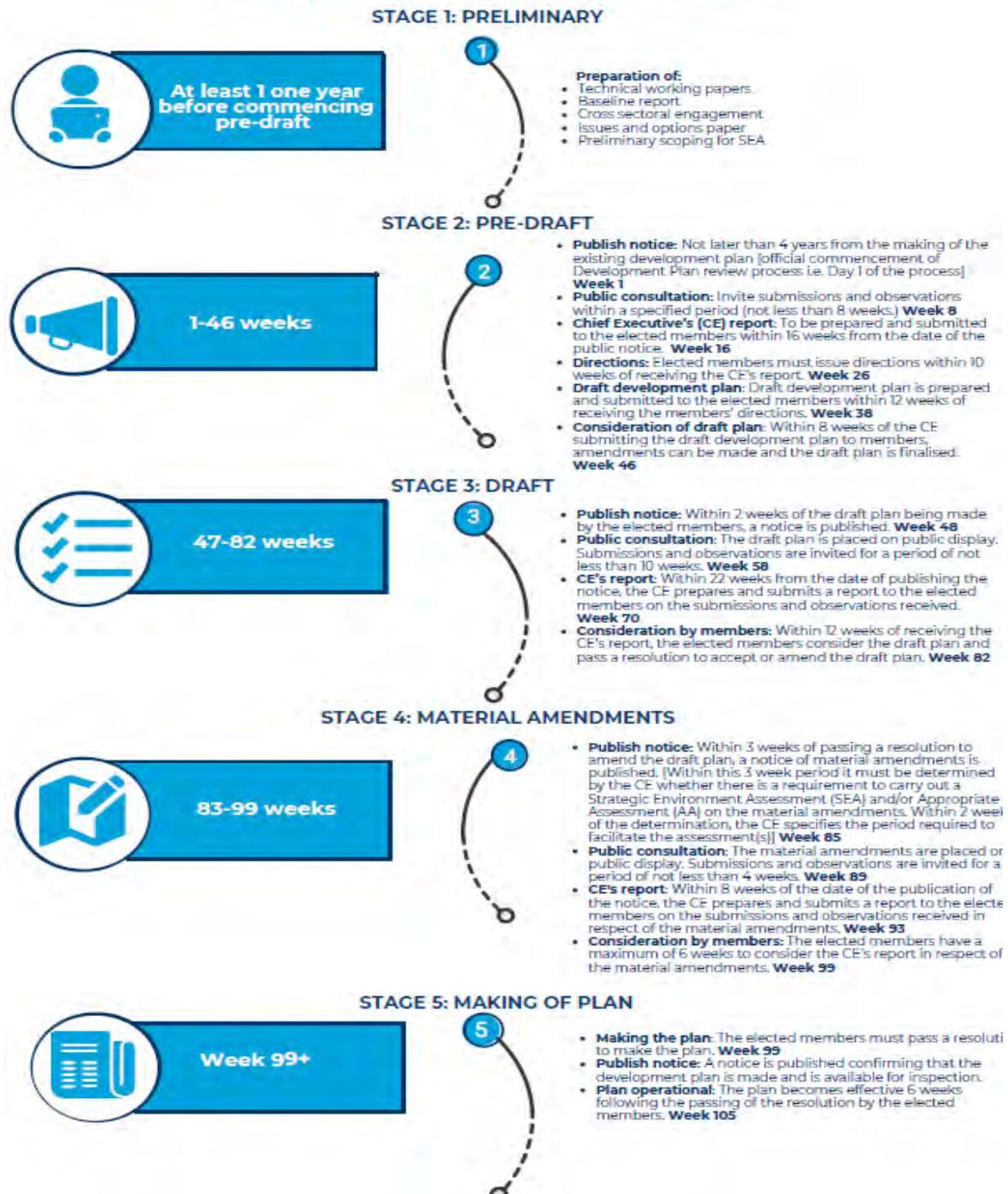


Fig 1: <https://www.opr.ie/wp-content/uploads/2020/06/Development-Plan-Process-Infographic.pdf>

1.3 Purpose of Report

The Chief Executive's Report on the Draft County Development Plan consultation period reports on submissions received during the period and on matters arising out of the consultation. The report:

- Lists the persons or bodies who made submissions or observations, as well as any persons or bodies consulted;
- Provides a summary of the issues raised in the submissions or observations as made by any persons or bodies, including the Office of the Planning Regulator.
- Summarises the issues raised and recommendations made by the relevant Regional Assembly and outlines the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Draft Plan.
- Gives the response of the Chief Executive to the issues raised in the submissions or observations, the proper planning and sustainable development of the area, the statutory obligations of any local authority and any relevant policies or objectives of the Government or of any Minister of the Government.

1.4 Overview of Consultation

The process of reviewing the Carlow County Development Plan 2015-2021 commenced with the Pre-Draft public consultation stage and publication of an Issues Paper, which took place from 24th June 2020 to 20th August 2020 (inclusive). A total of 57 submissions were received during the Pre-Draft consultation period. The Pre-Draft submissions, along with the opinions, views and ideas expressed and recorded at public consultation events, were summarised and responded to in a Chief Executive's Report that was considered by the Elected Members at a Special Council Meeting held on the 30th November 2020. At the Special Council Meeting a number of Directions were issued by the Elected Members requesting strategic matters to be addressed in the Draft Plan.

The Draft Carlow County Development Plan 2022-2028 was then prepared and circulated to the Elected Members on the 28st May 2021 and was considered by them through a number of in committee workshops over the following month in June. The Draft Plan was formally submitted for the consideration of the Elected Members at a Special Council meeting held on the 2nd July 2021. At this meeting the Elected Members approved by resolution the Draft Plan subject to amendments.

(a) Publicity

The various restrictions in place arising from the Covid-19 pandemic created some challenges in terms of public consultation and public display, however all statutory requirements were met.

The Council announced that a Draft County Development Plan for the period 2022-2028 had been prepared through publication and issuing of a press release, together with the issuing of a statutory notice in the Carlow Nationalist (20/7/21) and the Irish Independent (21/7/21). The notice informed the public that the Draft Plan was:

- Accompanied by a Strategic Environment Assessment (SEA) Environmental Report, an Appropriate Assessment (AA) Natura Impact Report, and a Strategy Flood Risk Assessment (SFRA).
- Available for inspection on the Council's online consultation portal at <https://consult.carlow.ie>
- Available to view by appointment only at the Council's Planning Department and in Public Libraries in Carlow, Tullow, Muinebheag, and Borris.

Submissions to the Draft Plan could be made via the online consultation portal or via post by writing to the Senior Executive Officer, Draft Carlow County Development Plan 2022-2028, Planning Department, Carlow County Council, Athy Road, Carlow.

(b) Letters and emails

The Council also wrote to all the prescribed bodies, Elected Members, relevant stakeholders/ infrastructure providers, the Public Participation Network and Members of the Strategic Planning Committee informing them of the preparation and public display of the Draft County Development Plan 2022-2028.

(c) Online

The Draft Plan was available to view and download on the Council's online consultation portal at <https://consult.carlow.ie>. The portal comprises a dedicated webpage which has been designed to keep members of the public up to date with the Council's preparation of the Draft Plan throughout the 2-year period of the plan making process. In addition to the option for a postal submission, submissions or observations to the Draft Plan were facilitated through the online consultation portal. The portal included an instruction video on how to make a submission or observation.

As referred to above, public health restrictions were in place during the public display period which did create some challenges. However, the online consultation portal provided a comprehensive and interactive space that enabled the public to view the Draft Plan in detail from their own home, and in an informative manner as would be available through a physical display in-person.

The significant number of submissions that were received through the portal is evidence of the effectiveness of the online consultation portal in the public consultation process.

Carlow County Council wishes to express its appreciation to those who made submissions, all who visited the online consultation portal and all those who viewed the Draft Plan at the Council's Planning Department and libraries in Carlow, Tullow, Muinebheag and Borris. It is clear that the community care strongly about what happens in the County. We also wish to thank all the Elected Members who supported and encouraged participation in the plan making process.

1.5 Interpretation of Chief Executive's Report

Please note in this document, proposed omissions to the text in the Draft Carlow County Development Plan 2022-2028 are indicated in ~~striketrough~~ and any amended / additional text is indicated in **green** font.

1.6 Next Steps

The Elected Members have up to twelve (12) weeks to consider this Chief Executive's Report on the Draft Plan and the submissions and observations received.

The Executive will facilitate a number of in-committee workshops with the Elected Members for further discussion on the report, which are to take place in December 2021 and January 2022.

A Special Council Meeting for the formal consideration of the Chief Executive's Report by the Elected Members is scheduled for 3rd February 2022. In accordance with statutory requirements in Section 12 of the Planning and Development Act 2000 (as amended), the following must be taken into account:

- Following consideration of the Draft Development Plan and the Chief Executive's Report, where a planning authority, after considering a submission of, or observation or recommendation from the Minister, or the Office of the Planning Regulator, or the Regional Assembly, decides not to comply with any recommendation made in the draft plan and report, it shall so inform the Minister, the Office of the Planning Regulator and] the or the Regional Assembly, as the case may be, as soon as practicable by notice in writing which notice shall contain reasons for the decision.
- Where following the consideration of the Draft Development Plan and the Chief Executive's Report, it appears to the Elected Members that the draft should be accepted or amended, they may, by resolution, accept or amend the draft and make the development plan accordingly.

Should the Elected Members decide to pass a resolution to make amendments to the Draft Development Plan, the material amendments must be prepared and placed on public display within a period of three (3) weeks of the passing of the resolution. Once on public display, members of the public then have a period of four (4) weeks to view and make submissions or observations on the material amendments.

Within a period of eight (8) weeks of the public display (notification) of the material amendments to the Draft Development Plan, a new Chief Executive's Report is prepared on the submissions and observations received and is submitted for the consideration of the Elected Members. The Elected Members will then have a maximum of six (6) weeks to consider the Chief Executive's Report on the material amendments.

Part 2: Summary of Submissions by the Regional Assemblies and the Office of the Planning Regulator and the Chief Executive's Opinion and Recommendations

Key Issue	Chief Executive's Opinion & Recommendation
<p>2.1 Southern Regional Assembly</p>	
<p>Observations and Recommendations:</p> <p>1.0 The Vision, the Strategic Themes and Strategic Objectives in Chapter 1 together with the Core Strategy Strategic Aims in Chapter 2 provide a strong basis for the overall policy framework of the Draft Plan. All of these elements are related, and it is considered that the Draft Plan could be strengthened by showing – in table, diagrammatic form or otherwise – how these key strategic elements are linked and relate to each other.</p>	<p>The content of this observation is noted and will be reflected in a graphic representation.</p> <div data-bbox="898 507 2078 699" style="border: 1px solid black; padding: 5px;"> <p>Development Plan Vision</p> <p><i>The Vision for County Carlow is to champion quality of life through local employment provision, high quality development, healthy placemaking and transformational regeneration, to grow and attract a diverse innovative economy, to support the transition to a low carbon climate resilient environment, to embrace inclusiveness and enhance our natural and built environment for future generations.</i></p> </div> <div data-bbox="898 703 2078 1311" style="border: 1px solid black; padding: 5px;"> <p>Strategic Themes and Objectives</p> </div>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
	<p data-bbox="913 483 1267 507"><i>Strategic Aims of Core Strategy</i></p> <ul style="list-style-type: none"> <li data-bbox="965 549 2056 603">(i) To guide the future development of County Carlow in line with national and regional objectives set out in the NPF and RSES and other national guidelines and policies. <li data-bbox="965 644 2056 762">(ii) To promote and facilitate the development of the County in accordance with the provisions of the Core Strategy, including directing development in line with the settlement hierarchy and promoting development at an appropriate scale that is reflective of the terms of the Core Strategy Table and accompanying land-use zoning maps. <li data-bbox="965 804 2056 890">(iii) To apply the Settlement Hierarchy to determine the scale, rate and location of proposed developments and apply appropriate development management measures to ensure compliance with the Settlement Hierarchy including the population targets for the County. <li data-bbox="965 932 2056 986">(iv) To promote the delivery of at least 30% of all new homes that are targeted in settlements within their existing built-up footprints. <li data-bbox="965 1027 2056 1082">(v) To support the achievement of more self-sustaining towns and villages through residential and employment opportunities together with supporting social and community facilities. <li data-bbox="965 1123 2056 1241">(vi) To monitor and maintain a record of residential development permitted in the County in line with the Settlement Hierarchy in order to ensure compliance with the population allocations defined by the Core Strategy and to adjust the approach to permitting development proposals in instances where Core Strategy objectives are not being met. <p data-bbox="902 1321 1099 1345">Recommendation</p> <p data-bbox="902 1353 1727 1377">Include graphic representation to reflect the foregoing inter related provisions</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
<p>2.0 The Regional Assembly consider that additional clarity and analysis of the Core Strategy and the methodology underpinning it is required to strengthen the strategy and to demonstrate that the approach taken is consistent with the RSES including RPO 3 (settlement hierarchy and growth rates), RPO 11 (key towns) and the Guiding Principles under Section 3.3 A Tailored Approach for determining appropriate levels of growth in the Core Strategy. In reviewing the Core Strategy, the Local Authority are asked to address the primacy of Carlow Key Town in the context of allocations for Tullow, Muine Bheag and other settlement categories and ensure any adjustments that might result from the review strengthen the Core Strategy and would demonstrate that the approach followed is consistent with the RSES. This review should also include clarity on the projections and growth rates underpinning the allocations in the Core Strategy .</p> <p><i>The following points are noted in relation to the Core Strategy:</i></p> <ul style="list-style-type: none"> • <i>The strategy table does not include growth rate projections or percentage allocations for the settlements and categories within the Settlement Hierarchy . This hinders an analysis and understanding (including for the public) of the methodology underpinning the strategy. In this regard RPO 3 - Local Authority Core Strategies states that 'In preparing Core Strategies, local authorities shall determine a hierarchy of settlement and appropriate growth rates in accordance with the</i> 	<p>Additional clarity in the context of allocated growth levels has been provided for in the amended Core Strategy Table as contained in Appendix (IV). (See Housing Target %)</p> <p>The Core Strategy Table provides allocations of growth from the housing target of 3,107 at the following rates:</p> <ul style="list-style-type: none"> - Carlow Town at 42.8% - Tullow at 13%, - Muine Bheag at 10% - Small Towns at 12.6%, - Larger Serviced Villages at 4.8%, - Smaller Serviced Villages at 3.8% - and Rural remainder at 13%. <p>Growth across the settlement hierarch seeks to direct the largest part of future growth to Carlow Town followed by a proportionate distribution of growth across small centres within the settlement hierarchy which accords with RPO 3 and RPO 11. An updated infrastructural assessment has also been included in Appendix X Vol II to support land use zonings as contained within Chapter 15.</p> <p>Recommendation See Appendix (iv) Core Strategy Table</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
<p><i>guiding principles (including environmental protection) and typology of settlement in the RSES.</i></p> <ul style="list-style-type: none"> <i>The allocations included in the table indicate growth rates to 2028 of 15.3% for Carlow, 19.7% for Tullow and 24% for Muine Bheag. Given the critical role of Carlow Key Town in underpinning the RSES and the overall support for Carlow Key Town contained elsewhere in the Draft Plan there is concern regarding the higher growth rates allocated for Tullow, Muine Bheag 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 under Section 3.3 of the RSES.</i> 	
<p>3.0 Having regard to the potential for collaboration and sub-regional growth opportunities through the development of the networks identified at Section 3.8 and RPO 30, the planning authority is requested to include additional content or policy references to reflect potential steps that could be taken to develop opportunities along the Waterford -Kilkenny-Carlow-Dublin M9/Rail network/axis or the development of other Rural Settlement Networks and other cross-boundary collaborations also supported by RSES policy, which the planning authority may wish to consider other options for smaller scale networks of collaboration and partnership.</p>	<p>Agreed. Additional Text to be included in Section 4.4. Enterprise and Employment</p> <p>Recommendation Include additional Policy in Section 4.4. It is the policy of the Council To drive economic growth arising from opportunities within Carlow due to its strategic location and connectivity on the Waterford-Kilkenny-Carlow-Dublin M9/Rail Network, to support collaboration and growth with strategic settlements on this route and to support the creation of Inter Urban Networks of Collaboration and Growth in accordance with RPO 30.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
<p>4.0 It is considered that Chapter 4 could be strengthened to include policies and objectives that support 'capacity building' to build economic resilience and funding resources, including international good practice, bidding capacity and the use of /development of a shared evidence base.</p>	<p>Agreed</p> <p>Recommendation Include additional text in Section 4.0. The Council will seek to build economic resilience by supporting an inherent part of the economic strategy for the Southern Region which focuses on building capacity while being responsive to emerging challenges. It acknowledges the need to ensure sufficient capacity is available in the Southern Region to bid for and win competitive bids for funding and to be ready to address potential risks to the economy. A key focus for the Council will be to develop and strengthen its bidding capacity, to identify infrastructure deficits and opportunities, to prepare strong business cases, to identify funding sources, to bid, and successfully attract competitive funding in accordance with RPO 70.</p>
<p>5.0 In relation to Section 6.8 and the content on Digital Strategy, it is considered that this section could be strengthened by reference to RSES policy on Developing Smart Cities and a Smart Region and RPOs 133 – Smart Cities & RPO 134 Smart Cities and Smart Region.</p>	<p>Agreed. Include additional text in Section 6.8 as outlined in green.</p> <p>Recommendation 6.8 Information and Communications Technology Telecommunications investment is essential for furthering the social and economic development of County Carlow. The importance of advanced communications infrastructure is recognised for an information-based society, and as a key support for business, education and research. The RSES supports the development of a Smart City and Smart Region (RPO 13 and 134) involving a systematic integration of information and communication technologies (ICT) in planning, design, operations and management. Intensive digitisation of telecommunications offers a competitive advantage in attracting economic development and investment and contributing to sustainability goals by facilitating more flexible working arrangements, enabling people to work and communicate remotely. To this end, the need to build new infrastructure to provide increased capacity, improve the quality of coverage and to meet the demand for services is recognised. Carlow County Council acknowledges the importance of telecommunications, particularly broadband telecommunications, in terms of capitalising on investment opportunities and will encourage the further co-ordinated and focused development and extension of telecommunications infrastructure including broadband connectivity in the county, as a means of improving economic competitiveness.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
<p>6.0 The Council is requested to strengthen the Draft Plan's policies for social inclusion and education including additional policy content to address Lifelong Learning and the development of the Southern Region as a Learning Region.</p>	<p>Section 8.4 address the issue of social inclusion with various other sections supporting Social Inclusion (8.5. & 8.6 Social Enterprises, 8.7 Community Participation, 8.8. Planning for Diversity and Inclusivity etc). Additional text to be included in Section 8.10 to reflect RPO Policy in support of lifelong learning and support the development of the Southern Region as a Learning Region.</p> <p><u>Include additional text and policy in Section 4.4.3 Education and Skills - The RSES also recognises that lifelong learning and access to a variety of opportunities beyond school, is increasingly important. The role of employers in the development and provision of learning to ensure its relevance to the needs of the workforce is also supported.</u></p> <p>It is the policy of the Council to support the development of the Southern Region as a Learning Region in support of RPO 186 and RPO 190 in partnership with the Regional Assembly, Local Authorities and other agencies as appropriate.</p>
<p>7.0 It is considered that Sections 9.10 & 9.11 would benefit by reference to Blue as well as Green infrastructure to recognise the interaction between green infrastructure and rivers, streams, and other water bodies.</p>	<p>Agreed include reference to Blue Infrastructure in Section 9.9.</p> <p>Recommendation Re-title and amend Sections 9.10 – Section 9.11 replacing Green Infrastructure to Green and Blue Infrastructure and include following text in Section 9.10: Green and blue infrastructure is essentially the green spaces and the water environment.</p>
<p>8.0 It is recommended that Chapter 10 be strengthened by the inclusion of policy objectives to address the All-Ireland Pollinator Plan in support of RPO 128 All-Ireland Pollinator Plan.</p>	<p>Agreed include additional policy in Section 10.2</p> <p>Recommendation Include additional policy in Section 10.2 It is the policy of the Council to support the implementation of the All Ireland Pollinator Plan 2021-2025 and to incorporate actions as appropriate into a Biodiversity Plan for County Carlow providing more opportunities for biodiversity in accordance with RPO 128.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.1 Southern Regional Assembly	
<p>9.0 Remote Working and Co-working is addressed in the context of Rural Development. It is considered that the policy on Remote Working, Co-working and home-based economic activity is a policy area relevant to both urban and rural areas. In this regard, it is suggested the policy may be more appropriately located in chapter 4 – Enterprise and Employment</p>	<p>Agreed</p> <p>Recommendation Relocate Section 14.15 and 14.15.1 to Chapter 4 Section 4.4.1. as provisions apply across all areas within the County.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly	
<p>Submission focuses on issues directly linked to the Eastern and Midland Region. It focuses on three particular areas as follows:</p> <p>(i) <u>Consistency and alignment with RSEs</u> Submission acknowledges strategic context of Plan demonstrating spatial hierarchy and requirement for consistency with NPF and RSES for the Southern Region and welcomes inclusion of a number of key strategic aims for Carlow Town (i.e. interregional role, requirement for Joint Urban Plan). Maintaining consistency with the RSES for the Southern Region and key principles arising is referenced. It is further submitted that given that Carlow borders the EMRA Region, and shares the Key Town of Carlow-Graiguecullen, the inclusion of a statement that the Plan be cognisant of the long-term strategic planning and economic framework of the adjoining EMRA Region as it is expressed in the EMRA RSES would be a positive addition to the Plan.</p>	<p>(i) Policy CSP3 provides specific reference to the relevant RPO applicable to Carlow Town (RPO 4.75) as contained in the Eastern and Midlands RSES.</p> <p>Policy CSP 3 states as follows: It is the policy of the Council to <i>Prepare a statutory Joint Urban Area Plan (UAP) for the Greater Carlow Urban Area with Laois County Council which will be informed by the preparation of a local transport plan prepared in consultation with NTA and TII. The UAP will align with the aims of this Core Strategy while having regard to the regional policy objectives as contained in the Regional Spatial and Economic Strategy for the Southern Region (RPO 11 and 14) and the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (RPO 4.75).</i> It is considered that the foregoing will ensure appropriate alignment with the EMRA RSES.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly	
<p>(ii) <u>Inter-regional matters</u></p> <p>(a) the submission welcomes inclusion of content and policy objectives that support <u>Carlow as a Key Town</u> (including support for continued growth and sustainable development to act as a regional and inter-regional growth driver, policy to support preparation of Joint Urban Plan with Laois to be informed by Local Transport Plan, aligning with Core Strategy and relevant policies of RSEs documents, provisions to prioritise preparation of JUAP etc).</p> <p>(b) Reference is made to potential to promote <u>strategic connections</u> including the Grand Canal, Barrow Line and policy contained within the EMRA to further develop the Barrow Blueway. In this regard, the EMRA welcomes policies in the Plan which support tourism industry which seek to maximise direct and indirect opportunities afforded by the River Barrow etc (ED P16), and other similar policies listed.</p> <p>(c) Submission welcomes <u>transport connections</u> and inclusion of policy RR.01 to support and facilitate the planning, design and completion of the Southern Relief Route including a new bridging point over the Barrow to improve connectivity between the Midlands and the South East Region and to address local traffic management consideration thereby contributing to</p>	<p>(a) – (d) Noted</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.2 Eastern and Midlands Regional Assembly	
<p>the local economy of the Greater Carlow Graiguecullen Urban Area.</p> <p>(d) Assembly welcomes the importance given to <u>education institutions</u> (ITC and ST. Patrick's College) both of which have important links with surrounding regionals with supporting policy to strengthen and reinforce Carlow's regional and inter-regional role in education, research and innovation capacity.</p>	

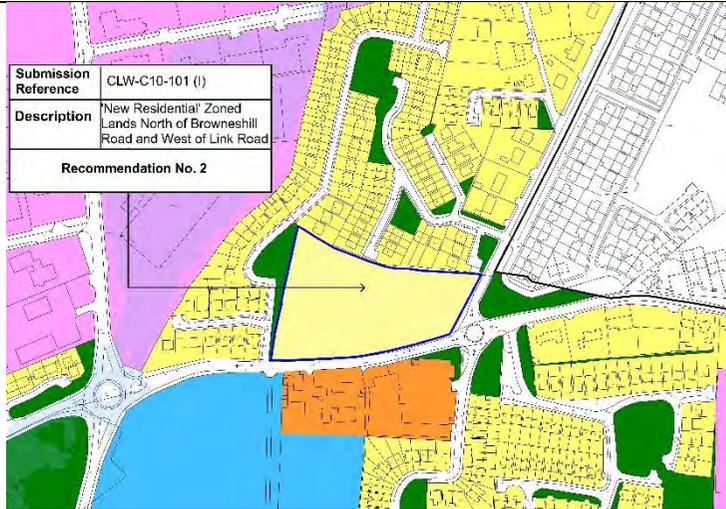
Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>Recommendation 1 – Core Strategy Table: In accordance with section 10(2A) of the <i>Planning and Development Act 2000</i> (as amended), and having regard to the <i>Guidance Note on Core Strategies</i> (2010), the planning authority is required to supplement the Core Strategy tables in Chapter 2 of the draft Plan with the following:</p> <ul style="list-style-type: none"> (i) in respect of the area in the Plan already zoned for residential use or a mixture of residential and other uses (not just Town / Village Centre lands), provide details of the size of the area in hectares, and the proposed number of housing units to be included at settlement level; (ii) confirm the density assumptions used to calculate the land area requirements for each neighbourhood area / settlement over the plan period, ensuring that the assumptions are consistent with the <i>Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities</i> (2009); and (iii) adjust the area of land use zoning as necessary consequential to (i) and (ii) and having regard to section 4.4 'The Core Strategy and Zoning for Residential Land' of the <i>Draft Development Plans Guidelines for Planning Authorities, Consultation Draft</i> (August 2021). Note: Appendix A of the <i>Draft Development Plans Guidelines for Planning Authorities, Consultation Draft</i> (August 2021) provides a useful reference and illustrative example of a core strategy table. 	<ul style="list-style-type: none"> (i) An amended Core Strategy Table is provided in Appendix IV. Statutory land use plans for settlements in excess of 1,500 persons are currently in place for Carlow Town, Tullow and Muine Bheag. Areas already zoned for residential use or a mixture of residential and other uses and potential units have been indicated. Settlements below this level with the exception of Tinnahinch (pop 306) have no existing land use zonings in place. (ii) 'The Sustainable Residential Development in Urban Areas Guidelines' and accompanying 'Urban Design Manual' and Circular Letter NRUP 02/2021 have informed the application of indicative density standards to sites throughout the settlements as indicated in amended Table 3.3 (see OPR Recommendation no. 5 and cross referenced in the Core Strategy Table). It is considered that the application of graded densities in towns and villages is appropriate having regard to their role in the settlement hierarchy and to ensure that development is commensurate to the character of the built environment. In this regard many of the smaller towns and villages have been deemed appropriate to accommodate lower densities particularly on sites outside town centre lands and or on the edge of the built up settlement in order to provide an alternative to one -off housing in the rural area, to support the viability of many small towns and villages and in support of NPO 18(b) 'new homes in small towns and villages'. Further policies on increased densities / increased heights are provided in Section 3.8 of the Draft Plan and will inform development management over the Plan period. (iii) It is considered that the Core Strategy, settlement hierarchy and allocations of growth to the settlement centres throughout Carlow and the rural areas as presented are appropriate having regard to the foregoing. Some additional residual provision for housing has however been provided in

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>higher order settlements of Carlow, Tullow Muine Bheag, and the small towns of Rathvilly, Borris and Carrickduff. This is to ensure sufficient choice for development potential is safeguarded and has been provided for in the Core Strategy Table (Ref: Section 4.4.3 of the Development Plan Guidelines). The levels of allocation are considered proportionate, support the settlement hierarchy policies of directing development to higher order settlements facilitating consolidated development serviced by adequate infrastructure, transitioning to a more climate resilient economy and creating more sustainable vibrant and viable towns. Zoning of lands as part of the Carlow Urban Area Plan and Local Area Plans will accord with sequential development patterns, town centre first principles, proximity to services and facilities and the need to reduce carbon emissions.</p> <p>Recommendation See updated Core Strategy Table Appendix (IV) which addresses the foregoing provisions.</p>
<p>Recommendation 2 – Land Use Zoning and Compact Growth: Having regard to NPO 3c for compact growth the planning authority is required to review and reconsider the following proposed land use zoning objectives of Carlow Key Town and the Small Towns, in addition to the settlement boundaries of several Smaller Serviced Towns in order to ensure the achievement of NSO 1 compact growth to:</p> <p>(i) 'New Residential' lands (c.1.6ha) north of Browneshill Road and to the west of Link Road, Carlow Town;</p>	<p>(i) The referenced lands are located to the east of Brownhill Road within the established built footprint of Carlow Urban Area. The lands are located within the former town council area approx. 1km to the established historic town centre, within a residential area, opposite an established neighbourhood facility, proximate to</p>

Key Issue

Chief Executive’s Opinion & Recommendation

2.3 Office of the Planning Regulator



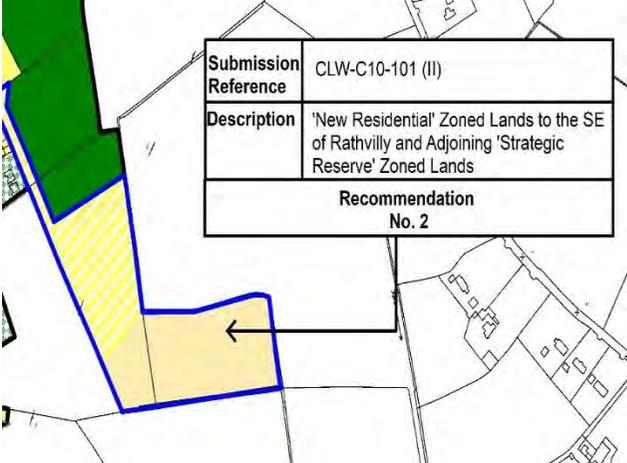
- (ii) 'New Residential' lands (c.1.9ha) to the south-east of Rathvilly and adjoining 'Strategic Reserve' (c.2ha);

significant employment facilities and community facilities including educational facilities to support population expansion in this area.

It is considered that the Core Strategy as it relates to Carlow Town complies with the provisions of the NSO 1 compact growth. In particular the Plan provides for over 66% of all units to be delivered in Carlow Town to be accommodated within the former Town Council Urban Area, with over 40% allocated to town centre zoned lands. Compact growth is supported by key policies and objectives in the Plan to encourage urban regeneration, the implementation of Project Carlow 2040 and detailed principles to support urban design and regeneration.

The lands at Brownshill Road are appropriately serviced, do not leapfrog more appropriately located lands proximate to the town centre and comply fully with the 10-minute town concept having regard to its strategic location proximate to services and facilities in the area. On the basis of the foregoing it is considered that the lands are appropriately zoned in the Draft Development Plan.

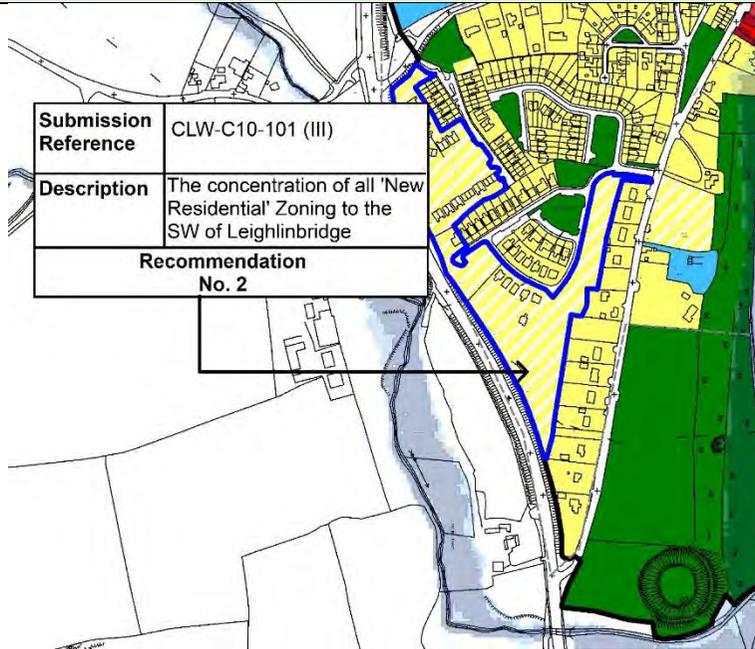
- (ii) Lands to the south-east of Rathvilly adjoining existing sport facilities / open space and amenity lands are within Council ownership and have been subject to a Part 8 to facilitate future housing demand in the area. It is anticipated that future social housing demand in Rathvilly over the Plan period is circa. twenty number units and accordingly provision has been made to facilitate same with remaining lands identified as strategic reserve. Having regard to the statutory obligation of the Council to provide Social Housing to meet demand, the Councils ownership of the lands and given the current housing crisis it is considered

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
 <p>(ii) The concentration of all 'New residential' zoning to the south west of Leighlinbridge;</p>	<p>appropriate in the circumstances to retain a level of zoning anticipated to meet social housing demand in the area.</p> <p>(iii) The concentration of new residential zonings in Leighlinbridge to the south west of the settlement encompasses two unfinished estates Ballyknockan Manor and Friar's Lough. Permission also exists in this area for 41no. units and the zoning supports same. Furthermore, it is Council policy to encourage and facilitate the completion of these estates in the interests of public safety, residential amenity and the proper planning and sustainable development of the area. On the basis of the foregoing it is considered appropriate to retain these lands as new residential as provided for in the Draft Plan.</p>

Key Issue

Chief Executive’s Opinion & Recommendation

2.3 Office of the Planning Regulator



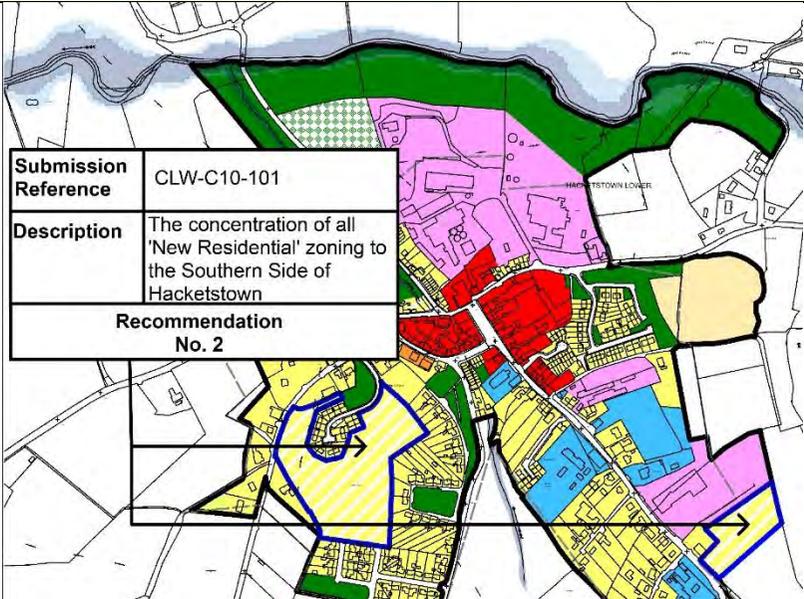
(iv) The concentration of all 'New Residential' zoning to the southern side of Hacketstown; and

(iv) The main urban centre of Hacketstown is located to the south of the R727 with the majority of services, facilities, community uses, and housing located to the west, south and east of the Main Street. Lands to the north comprise significant underutilised industrial lands and have been identified as a key intervention area (Section 15.3.5.9) for the town. Having regard to historic uses in the area, the high level of unemployment and population decline experienced within the town it is deemed appropriate that lands in

Key Issue

Chief Executive’s Opinion & Recommendation

2.3 Office of the Planning Regulator



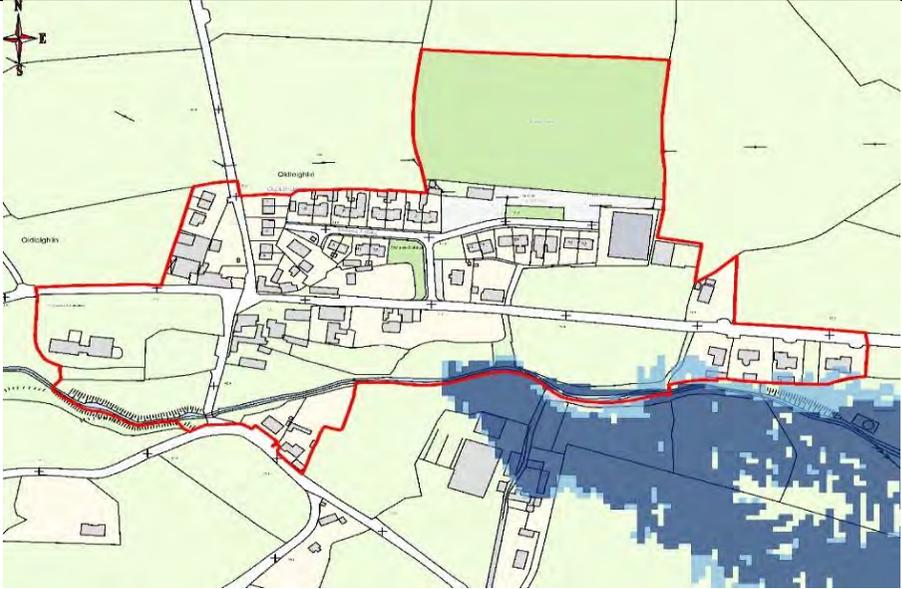
this area be retained for employment related uses which has the opportunity to deliver a range of higher end employment uses supporting the rejuvenation of the town and significantly enhancing the overall character of the town. The area of new residential lands to the west of the town at Slate Row is also within the ownership of an Approved Housing Body and having regard to the provisions of the Housing Strategy it is deemed appropriate to retain the zoning of these lands subject to an agreed master plan (Ref: Policy HT P14) to facilitate social / affordable housing as maybe deemed appropriate.

(v) Settlement boundaries for the Smaller Serviced Villages of Ballinkillen, Bennekerry and Old Leighlin, having regard to the housing allocation and anticipated housing yield. Where the subject zonings/ settlement boundaries cannot be justified on an evidence basis they are required to be omitted.

(v) Within the settlement boundaries of Ballinkillen, Bennekerry and Old Leighlin are established amenity lands in use by sporting organisations. These areas are illustrated in darker green on the following maps.

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	 <p data-bbox="1680 1125 1803 1157">Ballinkillin</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	 <p data-bbox="1675 1201 1800 1228">Bennekerry</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	 <p data-bbox="1675 1015 1805 1038">Old Leighlin</p> <p data-bbox="1144 1110 2085 1262">These uses comprise part of the community infrastructure of the settlements and recognition of same is appropriate within the settlement boundaries. As these areas have established amenity uses it is considered that the remaining areas within the development boundary of the settlements are not excessive in the context of anticipated growth levels for the relevant settlement.</p> <p data-bbox="1144 1302 1346 1326">Recommendation</p> <p data-bbox="1144 1334 1406 1358">No change to Draft Plan.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>Observation 1 – Compact Growth and Regeneration: Having regard to the NPO 3c and NPO 6 of the NPF, the planning authority is advised to:</p> <p>(i) define on map in its settlement plans those areas that will contribute to meeting the minimum compact growth target of 30%, in addition to any proposed regeneration areas, 'intervention areas' and also retail opportunity sites; or</p> <p>(ii) clarify whether proactive interventions are intended by the local authority for the identified 'intervention sites' and, if so, to detail in the Plan what interventions are proposed and the timeline for implementation of same.</p>	<p>Agreed</p> <p>(i) Objectives Maps will be amended to highlight areas within the settlement which will contribute to meeting compact growth target of 30%, regeneration sites/ intervention sites and opportunity sites identified under the retail strategy (Carlow, Muine Bheag and Tullow).</p> <p>Recommendation Additional maps to be included to reflect requirements of submission.</p> <p>(ii) Section 2.23.2 outlines active land management measures to support delivery of the core strategy and the promotion of regeneration sites as follows:</p> <p>2.23.2 Active Land Management</p> <p>The delivery of the Core Strategy will be supported through the implementation of an active land management strategy. The Planning Authority will adopt a multi-faceted approach to active land management including leveraging central government funding streams including, amongst others, the Urban Regeneration and Development Fund and the Rural Regeneration and Development Fund to activate and support the delivery of the Core Strategy and policy objectives of the Plan. Furthermore, the Council will seek to incentivise development and will work collaboratively with key stakeholders to support the achievement of these objectives.</p> <p>It is an objective of the Council to:</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>CS O1: Seek to secure competitive funding under the Urban Regeneration and Development Fund and any other funding streams that may become available to support regeneration projects in Carlow Town as provided for in Project Carlow 2040: A Vision for Regeneration to address building vacancy and refurbishment, public realm improvements, enabling infrastructure, sustainable mobility and a transition to a low carbon and climate resilient future.</p> <p>CS O2: Seek to secure EU and National funding opportunities including those made available under the Urban Regeneration and Development Fund / Rural Regeneration and Development Fund and any other funding streams that may become available to support job creation, address de-population of rural communities and support improvements in eligible towns and villages throughout the County.</p> <p>CSO 3: Seek to implement any forthcoming government programme for new homes in towns and villages (NPO 18b) in conjunction with infrastructure agencies and local communities subject to the availability of financial resources.</p> <p>CSO 4: Promote an active land management approach through enhanced co-ordination with relevant stakeholders and infrastructure providers in the delivery of enabling infrastructure in order to accelerate the development of higher order settlements and regeneration areas.</p> <p>It is recommended that an additional objective should also be included reflecting statutory provisions (i.e. Derelict Sites, Housing Act, Residential Zoned Land Tax etc) available to support redevelopment and renewal of areas in need of regeneration which will be promoted and implemented as appropriate throughout the County.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>Recommendation Additional objective to be included in Section 2.23.2 "It is an objective of the Council to actively promote the redevelopment and renewal of areas in need of regeneration through appropriate active land management measures including availing of statutory powers under the Derelict Sites Act, Housing Act, Vacant Site Levy and supporting implementation of the Residential Zoned Land Tax together with other statutory provisions to actively promote regeneration of urban and rural areas within the County".</p>
<p>Recommendation 3 – Infrastructure Constraints: Muine Bheag and Leighlinbridge: Having regard to NPO 72c of the NPF which provides that land that cannot be serviced within the life of the plan should not be zoned for development, the planning authority is required to review the wastewater infrastructure capacity for Muine Bheag and Leighlinbridge. The outcome of this review may require a more detailed policy framework in the draft Plan in relation to development of these settlements, including appropriate objectives for the phasing of development in line with Irish Water's anticipated timeline for upgrade works. If these constraints cannot be resolved within the lifetime of the Plan affected lands should not be zoned for development in the plan period, and the planning authority will be required to revisit its Core Strategy and Settlement Strategy.</p>	<p>Irish Water have advised through their submission to the Draft County Development Plan Consultation that the <i>"WWTP Upgrade project to Muine Bheag is progressing to increase capacity of WWTP to 9,200pe. The project has not commenced on site but current timelines indicate a completion date of Q1 2024. It is envisaged that capacity will be available to cater for proposed population targets in the Draft CDP within the lifetime of the CDP."</i> Having regard to the foregoing it is appropriate that the Core Strategy accommodate a proportionate level of growth to Muine Bheag (District Town) and Leighlinbridge (Small Town) both of which provide important housing, employment and service functions to the towns and wider rural hinterland.</p> <p>As the infrastructure constraints are to be addressed within a reasonable period of the adoption of the Plan, a review of the core strategy and settlement strategy in light of same is not required.</p> <p>Recommendation: No change to Draft Plan.</p>
<p>Observation 2 –Tiered Approach to Zoning Infrastructure Assessment: Having regard to the detailed requirements of NPO 3c, NPO 72a (and Appendix 3), NPO 72b</p>	<p>Agreed</p>

Key Issue	Chief Executive's Opinion & Recommendation
<p>2.3 Office of the Planning Regulator</p>	
<p>and NPO 72c of the NPF, concerning the Tiered Approach to Zoning, the planning authority is requested to review the Infrastructure Assessment (Appendix X to the draft Plan) to:</p> <ul style="list-style-type: none"> (i) assess all lands which are being considered for land use zoning for development, not just residential; (ii) include a reasonable estimate of the full cost of delivery of the specified services for each site identified as Tier 2 land in order to inform the land use zoning proposals; and (iii) consider including a map to clearly differentiate between Tier 1 and Tier 2 zoned lands in relevant settlements. <p>Note: The Development Plans, Guidelines for Planning Authorities – Draft for Consultation (August 2021) provides a useful reference in the Settlement Capacity Audit approach, which would be appropriate to consider in your response to this submission.</p>	<ul style="list-style-type: none"> (i) Appendix A of the Draft Development Plan Guidelines has been reviewed as advised regarding Settlement Capacity Audits. The Infrastructure Assessment can be amended to also consider land use zoning for development on town centre/mixed use lands, which also includes brownfield/infill lands within the built-up footprint of the settlements in question. (ii) The specified services required for Tier 2 lands identified in the Infrastructure Assessment relates to the Larger Serviced Settlements of Clonegall and Tinryland. These two settlements have capacity constraints at their wastewater treatment plants. The Council will continue to engage with and be advised by Irish Water regarding the delivery of upgrades to these wastewater treatment plants under their “Small Towns and Villages Growth Programme”. Estimated costs for the delivery of upgrades to these plants have not yet been identified by Irish Water. However, Irish Water have advised that for their Investment Plan 2020-2024 they will continue to work through the list of remaining settlements nominated by the Council to prepare projects for consideration for the 2025-2029 investment period, focusing on the higher priority sites including Clonegall and Tinryland. (iii) The objectives maps included in Chapter 15 of the Draft Plan can be amended to differentiate between Tier 1 and Tier 2 zoned lands. <p>Recommendation See also Appendix X, Volume II which addresses the foregoing including amended Objectives Maps which in addition to residential lands, now also identify town centre and mixed-use zonings, as well as brownfield and infill lands. The maps also differentiate between Tier 1 and Tier 2 zoned lands.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>Recommendation 4 – Update to Zoning Maps for Tullow and Muine Bheag: Having regard to the provisions of sections 18(4)(b) and 19(2B) of the Planning and Development Act 2000 (as amended), which require the planning authority to amend or replace the local area plans for Tullow and Muine Bheag within one year of the making of the development plan, the planning authority is required at a minimum to identify the compact growth area, key regeneration sites, significant constraints such as flooding, sustainable mobility objectives and relevant key future priorities for these in order to ensure greater consistency with the draft Plan, the principles of compact growth, and to clearly set out how the objectives in section 10(2) of the <i>Planning and Development Act 2000</i> (as amended) are to be achieved in the interim pending the adoption of Local Area Plans for these settlements.</p>	<p>The land use zoning maps will be reviewed having regard to the Core Strategy and overarching policies and objectives as contained in the County Development Plan as adopted. Appendix (V) contains a Strategic Policy and Constraints Map for both Tullow and Muine Bheag to reflect the content of this submission identifying key consolidation sites within the town centre zoned areas, regeneration / opportunity sites, retail opportunity sites, core retail area etc. Additional policy is also recommended for inclusion to support compact growth and sustainable mobility objectives.</p> <p>Recommendation Include Strategic Policy and Constraints Map for both Tullow and Muine Bheag and additional policy as follows:</p> <p>Compact Growth Policy: It is the policy of the Council to support the continued growth and sustainable development of Tullow and Muine Bheag with appropriate levels of growth as provided in Table 2.7 Core Strategy. As part of the review of the Local Area Plan sustainable compact growth of town centre zoned sites will be prioritised together with a renewed focus on the town centre first principles and the appropriate development of regeneration / opportunity sites.</p> <p>Sustainable Mobility Objective: Include objective in section 2.8.2 District Towns as follows: It is an objective of the Council to carry out an Area Based Transport Assessment for the District Towns of Tullow and Muine Bheag as an iterative process with the review of the relevant Local Area Plan which will support and inform the implementation of transport, demand management and land use measures to ensure the sustainable integration of land use and transport planning with an emphasis on enabling sustainable transport and mobility objectives for the Plan area.</p>

Key Issue	Chief Executive's Opinion & Recommendation															
2.3 Office of the Planning Regulator																
<p>Recommendation 5 – Density Standards: Having regard to the Sustainable Residential Development in Urban Areas' Guidelines (2009), the planning authority is required to generally review the density provisions at Table 3.3 (Chapter 3 – page 55) of the draft Plan to ensure consistency with density targets and allowances in the Guidelines and specifically make reference to same. In particular, the planning authority is required to remove caps of 30 units net per hectare in town centre and edge of centre locations in Muine Bheag and Tullow to allow for the potential for higher density developments where appropriate and at suitable locations in these settlements.</p>	<p>Agreed. Amend Policy DN P4 and Table 3.3</p> <p>Recommendation Amend Policy DNP 4 with inclusion of additional text: 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.</p> <table border="1" data-bbox="1146 807 1771 1166"> <thead> <tr> <th></th> <th>Town / Village Centre</th> <th>Edge of Centre</th> </tr> </thead> <tbody> <tr> <td>Carlow Town</td> <td>>35ha</td> <td>25-30ha</td> </tr> <tr> <td>Tullow Muine Bheag</td> <td>>30ha</td> <td>20-30ha</td> </tr> <tr> <td>Smaller Towns</td> <td>25-30ha</td> <td>20-25ha**</td> </tr> <tr> <td>Villages</td> <td>20-25ha</td> <td>10-20ha</td> </tr> </tbody> </table> <p>** 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) .</p>		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
	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														
<p>Recommendation 6 – Active Land Management: Having regard to NSO 1 of the NPF, and RPO 10, RPO 34 and RPO 37 under the RSES, and the significant challenge</p>	<p>Agreed</p>															

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>for planning authorities in implementing compact growth and the regeneration of towns and villages, the planning authority is required to amend the draft Plan to include:</p> <ul style="list-style-type: none"> (i) appropriate objectives under section 2.23.2 committing to the implementation of the Vacant Sites Register, the Vacant Sites Levy and the provisions of the <i>Derelict Sites Act 1990</i> (as amended); and (ii) as part of an overall implementation and monitoring approach in the Plan, measurable targets and appropriate timelines for the implementation of an Active Land Management strategy. 	<p>Recommendation</p> <ul style="list-style-type: none"> (i) Additional objective (as outlined in response to observation 1) to be included in Section 2.23.2 "It is an objective of the Council to actively promote the redevelopment and renewal of areas in need of regeneration through appropriate active land management measures including availing of statutory powers under the Derelict Sites Act, Housing Act, Vacant Site Levy and supporting implementation of the Residential Zoned Land Tax together with other statutory provisions to actively promote regeneration of urban and rural areas within the County". (ii) Include additional policy in Section 2.24 Monitoring and Evaluation to support monitoring and implementation of Active Land Management measures. <p>Recommendation</p> <p>Include additional policy in Section 2.24 as follows: It is the Policy of the Council as part of the two-year progress report to review and report on the implementation of active land management measures within the County, to monitor progress in activation of lands and to establish measurable targets thereafter for monitoring on an annual basis.</p>
<p>Recommendation 7 – Traveller Accommodation: Having regard to the requirements of section 10(2)(i) of the <i>Planning and Development Act 2000</i> (as amended), the planning authority is required to identify in the Plan the use of particular areas for traveller accommodation.</p> <p>This will include the identification of specific locations in the land use zoning maps for the county.</p>	<p>Agreed</p> <p>Existing facilities are in place in Carlow, at Ardristan Tullow, and St Brigid's Place, Carlow Town along with a site at Bestfield, Athy Road, Carlow. Under the existing Traveller Accommodation Programme 2019-2024 the main source of accommodation units for Travellers will comprise social housing, which may include RAS, standard local authority accommodation, leased accommodation, HAP and AHBs. Traveller specific accommodation for the County's indigenous Traveller Community will be provided where</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>possible. It is the policy of the Council as provided in the Draft County Development Plan 2022-2028 (Policy TA P1) to implement the "Traveller Accommodation Programme 2019-2024" or any updated plan during the lifetime of the County Development Plan".</p> <p>Recommendation The following map identifies locations of authorised Traveller Specific Accommodation.</p>

Key Issue

Chief Executive's Opinion & Recommendation

2.3 Office of the Planning Regulator



Key Issue	Chief Executive's Opinion & Recommendation
<p>2.3 Office of the Planning Regulator</p>	
<p>Observation 3 - Bulky Goods Retail Floorspace: Having regard to the requirements of the <i>Retail Planning Guidelines</i> (2012) the planning authority is requested to:</p> <p>(i) review the core shopping area defined for Carlow with a view to ensuring that the vitality and viability of the principal shopping streets are maintained and improved;</p>	<p>(i) The Core Retail Area contained in the Draft Development Plan represents a reduction in the area designated as the Core Retail Area under the current County Development Plan, 2015-2021. The Core Retail Area contained in the Draft Development Plan has regard to the existing footprint of retail uses within Carlow Town in line with the Retail Planning Guidelines, 2012. Unlike many other Towns, the shopping centres within Carlow Town, including Fairgreen Shopping Centre, the Penney's Site and Carlow Town Shopping Centre, are located in the Town Centre in line with the provisions of the Retail Planning Guidelines, 2012. Due to their proximity to the historic core and the traditional retail streets of the Town, these centres form part of the Core Retail Area as reflected on Map CT1: 'Carlow Town Core Retail Area' of Appendix A of the Draft Retail Strategy.</p> <p>The Core Retail Area also includes a number of Opportunity Sites, as set out in Appendix A of the Draft Retail Strategy, including <i>inter alia</i> Barrack Street, Penney's Site & associated shopping area, Kennedy Avenue, Plas na Saoirse, Stonemason's / Crotty's Site and Penny Lane Building. This is in line with the Urban Framework Approach outlined in the Retail Planning Guidelines, 2012 which promotes the identification of opportunity sites, of different sizes and in the different locations of the core retail area. These opportunity sites, as part of an integrated approach to the strategic planning of Carlow Town and its planned long-term development, have regard to and complement the 6 no. Intervention Areas contained in Project Carlow 2040: A Vision for Regeneration. Interventions such as the Potato Market and Barrack Street and the Link Streets (Dublin Street and Tullow Street) will enhance and promote the redevelopment of the Town Centre Opportunity Sites contained in Appendix A of the Draft Retail Strategy.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>(ii) reconsider the general allowance for additional bulky goods floorspace under section 4.7.3 of the draft Plan, to ensure consistency with the findings of the Retail Strategy, including appropriate limits, restrictions or other such policy objective requirements; and</p>	<p>Having regard to the foregoing considerations the Core Retail Area of Carlow Town as set out in the Draft Development Plan is considered to be appropriate as it includes the principal shopping streets, shopping centres and opportunity sites within the Town Centre. The reduction in size of the Core Retail Area from that contained in the current County Development Plan, 2015-2021 will also allow the Planning Authority to better manage, protect and enhance the retail offer and vitality of these main shopping areas, ensuring their vitality and viability are maintained and improved.</p> <p>Recommendation No change to Draft Core Retail Area.</p> <p>(ii) Section 4.7.3 of the Draft Plan as well as pages 116 and 124 of the Draft Retail Strategy address the issue of bulky comparison floorspace as raised in the submission. In this regard a rationale is provided in relation to the specific situation in Carlow where due to the quality and location of some of the existing bulky comparison floorspace there will be opportunities to transition this floorspace to other non-retail uses over time and this will begin to address the capacity issue and support the case for more conforming bulky comparison floorspace at appropriate locations. This would present the opportunity to address some of the legacy issues in Carlow relating to bulky comparison floorspace and will allow the Local Authority to be proactive in managing the transition of existing space which is no longer suitable while still considering new opportunities subject to assessment on a case by case basis.</p> <p>Completely limiting the provision of any new bulky comparison floorspace would mean the above transition could not occur and existing issues with</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>regard to supply of inappropriate and poor-quality bulky comparison floorspace in Carlow would persist through this development plan period and beyond.</p> <p>As set out in the Draft Development Plan and Draft Retail Strategy flexibility is considered to be required with regard to the provision of new bulky comparison floorspace. However, having regard to the points raised in the observation, amendment to the wording relating to bulky comparison floorspace is considered appropriate to address the comments in relation to the 'open-ended' nature of the current provisions of the Draft Development Plan.</p> <p>Recommendation It is recommended that the wording of Section 4.7.3 of the Draft Plan relating to bulky comparison floorspace is amended as follows;</p> <p>From: "The lack of capacity for bulky comparison floorspace has been identified in the Retail Strategy. Additional floorspace has not been allocated for bulky comparison goods. However, this should not preclude bulky comparison floorspace (i.e. retail warehousing) in instances where it can be demonstrated that there will be a contribution to town centre vitality and viability due to its location, quality, accessibility and retail offer."</p> <p>To: "The quantitative assessment of the Retail Strategy has highlighted the lack of capacity for bulky comparison floorspace. However, a capacity assessment does not deal with the quality of floorspace which in the case of Carlow is quite poor in places and poorly located. In this context, it is not considered appropriate to make any floorspace allocation as part of this Retail Strategy. However, this should not preclude bulky comparison floorspace (i.e. retail warehousing) in instances where it</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>(iii) identify the core shopping areas and define the retail opportunity sites for the main settlements in map form under the settlement plans in Chapter 15 of the draft Plan.</p>	<p>can be demonstrated that there will be a contribution to town centre vitality and viability due to its location, quality, accessibility and retail offer. There should also be an evidenced based approach to any new bulky comparison floorspace and all planning applications should include a full retail impact statement which addresses existing bulky comparison provision in the town including as appropriate any change of use of existing retail bulky comparison premises elsewhere within the town to other non-retail uses since the making of this Retail Strategy."</p> <p>(iii) Agreed. Core Shopping Retail Areas and Opportunity Sites to be identified on Carlow Town Map and New Map for Tullow and Muine Bheag.</p> <p>Recommendation</p> <p>Amended maps for Carlow Town, Tullow and Muine Bheag to be prepared outlining retail core area and opportunity sites.</p>
<p>Recommendation 8 – Evidenced Based Model Share: In order to ensure the effective planning, implementation and monitoring of the development plan requirements under section 10(2)(n) of the Planning and Development Act 2000 (as amended), the planning authority is required, in consultation with the National Transport Authority (and Transport Infrastructure Ireland), as appropriate, to include in the Plan:</p> <p>(i) existing baseline figures for modal share for the overall county and modal share targets for the plan period. It is recommended that this could be provided for at key and district town status and at aggregate level for the rural areas, as identified in the Core Strategy; and</p>	<p>Section 5.3 of the Draft County Development Plan addresses Sustainable Mobility / Modal Shift identifying modes of travel to work, school and college at a County level and modes of travel to work at settlement level for Carlow Town, Tullow and Muine Bheag. MS O1: Provides an objective to support modal shift at a County level from private vehicles to access work, school, college from 23% in 2016 to 28% in 2028. This objective could be further clarified to reference Table 5.1. In relation to the higher order settlements i.e. Carlow Town, Tullow and Muine Bheag NTA Active Travel Funding has been approved to Carlow County Council to deliver Transport Studies/Mobility Plans for these Towns. TII in conjunction with NTA have also recently published ABTA Guidance Document Pilot Methodology (Sept 2021). An ABTA is recommended as the preferred form of technical assessment, which can be used to appraise and guide the formulation of transport policies within the LAP and more generally the integration of land use and transportation</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>(ii) an effective monitoring regime for the implementation of the planning authority's sustainable transport strategy and the modal share targets in particular.</p>	<p>in the form of LAPS accompanying Local Transport Plan (LTP). The assessment methodology for the ABTA requires the establishment of Mode Share Ambitions (Ref: Fig 3 of Guidelines) with requirements to monitor Mode Share Ambitions with benchmarking of performance. Having regard to the foregoing it would be premature to establish Modal Share Targets for Carlow Town, Tullow and Muine Bheag pending the carrying out of transport plans/ mobility plans which will require implementation of the defined methodology as outlined in the ABTA Guidelines. It is recommended that an additional objective be included in Section 5.3 to address the foregoing.</p> <p>Recommendation</p> <p>Provide clarity in relation to MS O1 with additional text as follows: MS O1: Support modal shift at a County level from private vehicles to sustainable modes (walking, cycling Bus or Train) to access work, school, college from 23% in 2016 (Ref: Table 5.1) to 28% in 2028.</p> <p>Include objective in section 5.3 as follows: It is an objective of the Council to carry out an Area Based Transport Assessment / Local Transport Plan in consultation with NTA, TII, IE and relevant stakeholders for Carlow Town, Tullow and Muine Bheag which will form an iterative process with the review of the relevant Local Area Plan and will include specifying baseline figures and ambitions /targets for modal share, in order to encourage a modal shift away from the private car to more sustainable forms of transport, such as public transport, cycling and walking.</p>
<p>Observation 4 – Car Parking Standards: To ensure consistency with NPO13, the planning authority is requested to provide additional flexibility in car parking standards for development (including residential) in urban areas based on performance criteria in order to achieve targeted growth.</p>	<p>Agreed. Amend Section 5.14 Car Parking with inclusion of additional policy and Include further text in Section 16.10.11 Car Parking to support provisions of NPO13.</p> <p>Recommendation Amend Section 5.14 and Include additional policy as follows:</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>5.14 Car Parking The Planning Authority will require car parking to be provided at the rates set out in Chapter 16 Development Management Standards. Reduced car parking provision may be considered for commercial town centre sites in order to tackle urban decline, promote investment and help sustain more sustainable travel modes. Flexibility in car parking standards for development (including residential) may also be applied in urban infill and brownfield sites in urban areas based on performance criteria in order to achieve targeted growth.</p> <p>Include new policy in Section 5.14 It is the policy of the Council to apply flexibility where appropriate in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in urban areas subject to strict qualitative criteria being achieved and provided public safety is not compromised and the environment is suitably protected.</p> <p>Include additional text in Section 16.10.11 as follows: National Policy Objective 13 of the NPF advocates that planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes. The development management standards regarding car parking provision may be relaxed in urban infill and brownfield sites subject to strict qualitative criteria and provided public safety is not compromised and the environment is suitably protected.</p>
<p>Recommendation 9 – Flood Risk in New Developments: Having regard to detailed requirements of the <i>Planning System and Flood Risk Management – Guidelines for Planning Authorities</i> (DEHLG and OPW, 2009) and clarifying <i>Circular PL2/2014</i>, the planning authority is required to:</p> <ul style="list-style-type: none"> (i) omit the proposed Enterprise and Employment within the flood risk zone to the northeast of Carlow Town as the plan-making justification test cannot be applied; 	<ul style="list-style-type: none"> (i) The lands subject of this submission and the adjoining lands to the west are currently zoned residential and are within the ownership of the IDA. The site is within the former town council boundary, with further additional zoned lands within the Carlow Environs LAP to the East. It is considered that the lands c. 1.3km from the historic town centre are not peripheral in the context of the greater urban area. Works are currently at an advanced stage to facilitate a development permitted pursuant to permission

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>(ii) carry out the plan-making justification test for Community and Education lands at Ballon, Existing Residential and Enterprise and Employment lands at Borris, Community and Educational lands and</p>	<p>reference no. 19/437 following a material contravention procedure. A flood risk assessment including hydraulic modelling accompanied the planning application and was subject to detailed assessment as part of the consideration of the file. It is noted that the permitted development constitutes 'less vulnerable development' which is not contained in Flood Zone A (1% AEP). Furthermore, the permission is subject to conditions requiring appropriate finished floor levels and the location of the building footprint outside the CFRAM (0.1% AEP) Flood Zone B. No vulnerable development is located within the flood zones being restricted to access roads, open space and some car parking provision. Any further potential development at this location within the flood zones is minimal and will be subject to the detailed provisions contained in the SFRA together with the Flood Risk Management Guidelines as appropriate. It is recommended that the mitigation measures identified for this site in the SFRA be included in Chapter 15: Section 15.1. Having regard to the foregoing it is considered that the lands be zoned to reflect authorised employment uses and subject to appropriate mitigation measures as identified in the SFRA.</p> <p>Recommendation Include mitigation measures for site (Ref: SFRA Section A4.4 Enterprise and Employment) in Section 15.1.</p> <p>It is the policy of the Council to ensure that the following mitigation measures are applied to development within the Flood Zones: The Justification Test for Enterprise & Employment 1 zoned lands to the north east of the settlement has found that significant redevelopment within Flood Zone A/B would not be appropriate until the flood relief scheme for the area is delivered.</p> <p>(ii) Agreed, the Justification Test have been applied to the relevant sites as outlined (See Appendix III Vol II).</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
<p>Tourism Lands at Leighlinbridge. Any lands which do not pass the Justification Test should not be zoned for highly vulnerable (Flood Zones A and B) or less vulnerable Flood Zone A) development;</p> <p>(iii) include the non-structural (and structural, if applicable) flood risk management measures from point 3 of the Justification Test under the SFRA for each relevant settlement in Chapter 15 of the draft Plan; and</p> <p>(iv) improve the clarity of the flood risk zones in the final Plan maps.</p> <p><u>Advice note</u> comment on FR P3 – needs to be strengthened by highlighting that development in areas at risk of flooding should be avoided in the first instance. Notes flood risk categories to be referred to in the plan and specific reference in policies and objectives.</p>	<p>Recommendation The Justification Test has been applied and passed for these zonings with caveats to ensure that the sequential approach is applied, and flood risk is managed appropriately. Mitigation measures have been identified and will be included in the relevant settlement Plan.</p> <p>(iii) Agreed See Appendix VII of this report.</p> <p>Recommendation The provisions contained within the justification tests will be incorporated into the relevant settlement plans as contained in Chapter 15.</p> <p>(iv) Agreed. Improved illustration of flood lines will be incorporated into finalised mapping.</p> <p>Recommendation Flood risk mapping zones will be clarified in finalised maps.</p> <p><u>Advice note</u> FR P3 states that the sequential approach should be applied, which is the same as highlighting the avoidance principle. Referring to Flood Zones can be done in the written statement and this would be defined in the general text under flooding.</p>

Key Issue	Chief Executive's Opinion & Recommendation
2.3 Office of the Planning Regulator	
	<p>Recommendation <u>Advice note</u> Include text on Flood Zones in Section 6.10.3</p> <p>Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning. There are three types or levels of flood zones defined for the purposes of these Guidelines:</p> <p>Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);</p> <p>Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding);</p> <p>and</p> <p>Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.</p>
<p>Observation 5 – Implementation and Monitoring: Having regard to the duty and function of the planning authority under section 15(1) and 15(2) of the Planning and Development Act 2000 (as amended), the planning authority is advised to provide for Plan implementation monitoring as part of the Plan.</p>	<p>Agreed.</p> <p>Recommendation Additional detail to be included in the Plan see Appendix VI .</p>

Part 3: Summary of Submissions and the Chief Executive's Opinion and Recommendations

Chapter 1: Introduction and Strategic Context

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.1 Chapter 1: Introduction and Strategic Context		
3.1.1 Vision		
<p>Details that there is potential to include a direct reference to the Circular Economy in Chapter 1. Suggests the following wording - <i>Carlow County Council plays a fundamental role in the transition from a linear to a circular economy as they are responsible for key policies in public services that affect citizens' wellbeing, economic growth and environmental quality. This plan will foster the linkages to transition from linear model to a circular model which keeps resources in use for as long as possible.</i></p>	CLW-C10-107	<p>A reference to the circular economy can be included in Section 1.6.</p> <p>Recommendation Include additional text in green in Section 1.6 as follows:- <i>The Vision for County Carlow is to champion quality of life through local employment provision, high quality development, healthy placemaking and transformational regeneration, to grow and attract a diverse innovative economy, to support the transition from a linear to a circular economy, and to a low carbon climate resilient environment delivering in a manner that embraces inclusiveness and enhances our natural and built environment for future generations.</i></p>
3.1.2 Strategic Objectives		
<p>DAU suggests that the wording of Objective S.O10 be reworded to - <i>To conserve, protect and enhance the County's Green Infrastructure (including ecosystems and habitats) and associated biodiversity and so provide communities with a wide range of environmental, social and economic benefits (ecosystem services).</i></p>	CLW-C10-103	<p>Agreed . Strategic Objective S.O10 can be reworded as advised, including reference to blue infrastructure.</p> <p>Recommendation Amend Strategic Objective S.O10 to: Conserve protect and enhance the County's Green Infrastructure and ecosystem services supporting the sustainable management of natural assets and the biodiversity of the County's protected habitats and species to provide a wide range of environmental, social and economic benefits to communities including ecosystems and habitats) and associated biodiversity and so provide communities with a wide range of environmental, social and economic benefits (ecosystem services).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.1 Chapter 1: Introduction and Strategic Context		
Requests that tourism be detailed as a Strategic Objective - S.O14: <i>Support and promote tourism in the county as a key economic driver in a sustainable manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county's natural environment.</i>	CLW-C10-60	<p>Agreed. An additional Strategic Objective can be included to address the issue raised.</p> <p>Recommendation Include additional Strategic Objective to support and promote tourism: - Support and promote tourism in the county as a key economic driver in a sustainable manner that is compatible with the sensitivity of rural areas, the existing quality of life, and the protection and enhancement of the county's natural environment.</p>
3.1.3 Carlow Urban Area Plan		
TII indicates that it would welcome consultation in relation to the review of the Joint Urban Area Plan for the Greater Carlow Urban Area and the proposed review of the Tullow Local Area Plan having regard to the national road network interactions in both plan areas.	CLW-C10-16	<p>Noted and agreed. The Council will engage with the TII as appropriate as part of the relevant statutory plan making process.</p> <p>Recommendation No change to Draft Plan.</p>
Recommends that the reference to Joint Urban Area Plan in Section 1.5.1 be amended to Joint Local Area Plan for consistency of terminology with the EMRA RSES and Draft Laois County Development Plan 2021-2027.	CLW-C10-48	<p>The content of this submission is noted, however the terminology used in the Draft Plan is in compliance with the Southern Region RSES (See Policy Objective RPO 14) and the NPF (see National Policy Objective 70). The Council is however, committed to undertaking the review of the Joint Urban Area Plan in a collaborative manner with Laois County Council.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.1 Chapter 1: Introduction and Strategic Context		
<p>Submits that there should be reference in a policy/objective to a collaborative approach to green areas/parkland for the Carlow Graiguecullen Urban Area.</p> <p>Inclusion of a policy/objective referencing a collaborative approach to the allocation of development contributions in cross border projects with Laois County Council, which would allow greater community benefit.</p>	CLW-C10-48	<p>This issue will be addressed as part of the Urban Area Plan for Carlow.</p> <p>The allocation of development contributions is outside the remit of the Development Plan.</p> <p>Recommendation No change to Draft Plan.</p>
3.1.4 General Comment		
<p>Notes that Section 9(4) of the Planning and Development Act requires that the plan must have regard to plans in adjoining counties.</p>	CLW-C10-61	<p>The Draft Plan as indicated in Section 1.2 has been prepared in accordance with the requirements of the Planning and Development Act 2000, as amended. Section 1.2 also notes the legislative basis for the preparation and adoption of the Plan in Sections 9 to 12 of the Act. The Council has engaged with adjoining Planning Authorities as part of the public consultation process and submissions received considered as appropriate as part of this report.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 2: Core Strategy and Settlement Strategy

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Core Strategy and Settlement Strategy		
3.2.1 Core Strategy		
<p>TII recommends inclusion as a Core Strategy Objective reference "to maintaining the strategic function, capacity, and safety of the national roads network, and to ensure that the existing extensive transport networks, which have been greatly enhanced over the last two decades are maintained to a high level to ensure quality levels of service, safety, accessibility and connectivity to transport users".</p>	CLW-C10-16	<p>Agreed. Policy CS. 09, Section 2.25 to be amended to include maintenance of the strategic function of the national road network in the County.</p> <p>Recommendation Amend Policy CS. 09 in Chapter 2, Section 2.25 to:- Promote the integration of spatial planning and transport policy, ensure the maintenance of the strategic function of the national roads' network in the County, and promote sustainable public transport including a public bus service for Carlow town and active travel alternatives throughout the County.</p>
<p>With reference to the Core Strategy it is stated that the extractive industry should be considered crucial to unlocking the county's potential i.e. provides the necessary raw materials for the majority of building and infrastructure development in Ireland, for homes, roads, schools, hospitals, colleges, water and sewerage systems.</p>	CLW-C10-73	<p>Policies, objectives and related provisions in Chapter 14, Section 14.16 of the Draft Plan, recognises the role of the extractive industry in supplying aggregates and building materials to a variety of sectors, together with supporting the extractive industry and to RSES policy for the adequate supply of aggregate and mineral resources to ensure the continued growth of the County and wider region.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Requests that a mandatory residential density be put on any new development on town centre zoned sites, noting in this regard that many towns in Carlow suffer from a lack of people living in town centres. States that a failure to apply mandatory residential density will continue the existing trend of low residential densities in town centres and drive through retail only development.</p>	CLW-C10-46	<p>Policies and related provisions in Chapter 3, Section 3.8, promote higher residential densities in town centre/regeneration sites, provided that proposals achieve a high-quality design and ensure a balance is achieved between the protection of residential and environmental amenities and the protection of the established character of the surrounding area. This is in accordance with Sustainable Residential Development in Urban Areas' Guidelines and accompanying 'Urban Design Manual' and Circular Letter</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Core Strategy and Settlement Strategy		
		<p>NRUP 02/2021. The Core Strategy Table has also been updated to reference indicative densities.</p> <p>Recommendation Include Indicative densities in Core Strategy Table.</p>
Submission recommends zoning of sufficient land for housing developments.	CLW-C10-102	<p>Chapter 2 Core Strategy addresses the content of this submission. Zoning of lands accords with the target population allocations as provided in the National Planning Framework Implementation Roadmap and the Housing Supply Target Methodology for Development Planning: Guidelines for Planning and the Draft Development Plan Guidelines (2021).</p> <p>Recommendation No change to Draft Plan.</p>
3.2.2 Carlow Urban Area Plan		
Laois Co Co supports reference to the prioritisation of the preparation of a Joint Urban Area Plan for the Greater Carlow Urban Area in partnership with Laois County Council, together with clarification on housing allocation in the Carlow Environs LAP and Graiguecullen LAP area.	CLW-C10-48	<p>Comments are noted and welcome.</p> <p>Recommendation No change to Draft Plan.</p>
In relation to Section 2.8.1 states that the NTA is willing to work with the Council in facilitating a Local Transport Plan (LTP) as part of the preparation of the Joint Urban Area Plan for the Greater Carlow Urban Area with Laois County Council (Policy CS.P3 and Objective PT.O1).	CLW-C10-97	<p>Comments are noted and welcome and reference has been made to engagement with relevant stakeholders including NTA and TII in additional objective for inclusion regarding preparation of ABTA / LTP for Carlow, Tullow and Muine Bheag in Section 5.3 (See response to OPR submission on Modal Share Recommendation no. 8).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Core Strategy and Settlement Strategy		
<p>In relation to Section 2.8.2 states that the NTA is willing to work with the Council in determining the requirements for local transport planning in District Towns (Policies CS.P5, CS.P6, and CS.P7 regarding compact growth and consolidation).</p>		<p>Recommendation Include objective in Section 5.3 identified in response to OPR (Modal Share Rec. no. 8)</p>
<p>Submission suggests that a focus on strengthening of Green Infrastructure network should also be included in Section 2.8.1 (Key Town – Carlow), noting that the River Barrow is part of an internationally important nature conservation site.</p> <p>Regarding Section 2.23.1 (Plan Making) it is stated that 'The preparation of the UAP should be informed by a Green Infrastructure Plan which would be in keeping with the Council's Ecosystems Services Approach. Recommends a survey of existing habitats including the River Barrow and the Burren River, woodlands as well as other existing green spaces. Indicates also that consideration should also be given to strengthening the Green Infrastructure network in accordance with RPO 124 of the RSES for the Southern Region.</p>	CLW-C10-103	<p>Recommendations are noted regarding the inclusion of a focus in Section 2.8.1 on strengthening the green infrastructure network in Carlow Town. It is considered that an additional policy can be included in Section 2.8.1 to take account of the recommendation.</p> <p>The Draft Plan sets out the intention of the Council to develop a Green Infrastructure Strategy for the County as outlined in Chapter 9, Section 9.11 and reflected in Objective GI. O1. This is in addition to policies GI. P1 to GI. P10 in Chapter 9, which seek to ensure that existing and planned green infrastructure is identified, protected, maintained, and added to, including through local area plans and collaboratively with neighbouring local authorities. The importance of green and blue infrastructure will be considered as appropriate in the preparation of the UAP.</p> <p>Recommendation Include additional Policy CSP. 5 in Section 2.8.1 to:- Protect, strengthen and enhance the biodiversity and ecological function of the green infrastructure network in Carlow Town, including the River Barrow, which is a designated Special Area of Conservation.</p>
<p>TII welcomes and supports the approach outlined in the Draft Plan in relation to the preparation of the Joint Urban Area Plan for the Greater Carlow Urban Area supported by ABTA and is available for consultation with the Council and the NTA.</p>		<p>Comments are noted and welcome and reference has been made to engagement with relevant stakeholders including NTA and TII in additional objective for inclusion regarding preparation of ABTA / LTP for Carlow, Tullow and Muine Bheag in Section 5.3 (See response to OPR submission on Modal Share Rec. no 8).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.2 Chapter 2: Core Strategy and Settlement Strategy		
		<p>Recommendation Include objective in Section 5.3 identified in response to OPR (Modal Share Rec. no. 8)</p>
3.2.3 Climate Action		
<p>Reference is made to Section 2.21 Climate Action and recommends that the Council should protect the green engineering infrastructure of the River Barrow in the County Development Plan 2022-2028.</p>	CLW-C10-78	<p>Policies contained in Chapter 9, Section 9.11 of the Draft Plan, include provision for the protection, maintenance, and enhancement of the County's existing green infrastructure, including its biodiversity and ecological function. The protection of the green engineering infrastructure of inland waters, including the River Barrow, is also addressed in the policies set out in Chapter 10, Section 10.7.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 3: Housing

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
3.3.1 Social and Affordable Housing		
<p>(i) Laois Co Co requests that the Housing Strategy should identify the social housing provision in Carlow/Graiguecullen Urban Area to ensure a more balanced approach to development locations and the avoidance of social housing clusters.</p> <p>(ii) Requests that a policy/objective be included in the Draft Plan which states that any social housing requirements in County Laois on behalf of Carlow County Council should also include a policy/objective regarding the appropriate mechanisms for Taking in Charge.</p>	CLW-C10-48	<p>(i) Carlow County Council does not have the statutory remit to extend the housing strategy beyond the functional area of the County.</p> <p>(ii) Policy provision regarding Taking in Charge is outside the remit of the Development Plan process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission focuses on housing provision and in particular the need for more affordable, private and social housing within the boundaries of Bagenalstown,</p>	CLW-C10-102	<p>Chapter 3 Housing and Chapter 2 Core Strategy address the content of this submission. Provision of social and affordable housing in Bagenalstown will be provided in accordance with the provisions of the Housing Need Demand Assessment and the Housing Delivery Action Plan.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
Submission focuses on housing provision and in particular the need for more affordable, private and social housing within the boundaries of Bagenalstown,	CLW-C10-102	<p>Chapter 3 Housing and Chapter 2 Core Strategy address the content of this submission. Provision of social and affordable housing in Bagenalstown will be provided in accordance with the provisions of the Housing Need Demand Assessment and the Housing Delivery Action Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Chief Executive Recommendation HNDA / Social and Affordable Housing</p> <p>The draft Carlow Housing Strategy and associated Housing Need and Demand Assessment (HNDA) ('the Housing Strategy') was prepared during the first half of 2021, prior to the passing of the Affordable Housing Act 2021. This new law defines two new forms of affordable housing (Affordable Dwelling Purchase and Cost Rental). It also amends the legislative underpinnings and requirements of the Local Authority Housing Strategies (under Part V of the Planning and Development Act 2000) in several ways, including:</p> <ul style="list-style-type: none"> — Introducing a requirement that a Housing Strategy makes an estimate of need for affordable purchase and cost rental housing (including through an assessment of rental affordability); and — Raising/restoring Part V housing requirements to 20% of land granted residential planning permission, at least half of which (i.e. at least 10%) must be reserved for social housing and up to half of which may comprise affordable housing. <p>The Carlow Housing Strategy and HNDA 2022-2028 therefore is now required to make an assessment of need for these affordable housing tenures (in addition to social housing) and must use this estimate to determine the breakdown of Part V housing requirements between social and affordable over the period of the development plan.</p>		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
<p>This annex meets the new statutory requirements while minimising changes required to the Draft Strategy. This assessment has been undertaken using the Department of Housing, Local Government and Heritage's (DHLGH) HNDA Tool and Guidance² (published April 2021), as this provides an additional functionality not available at the time the Housing Strategy was drafted. This supplemental assessment is a focused analysis of affordable housing need which fulfils the new statutory requirements and focuses solely on the need for affordable housing.</p> <p>Updates to the Draft Carlow County Development Plan 2022-2028 comprise:</p> <p>Amend Policy HS P5 on foot of Updates to Housing Strategy:</p> <p><i>HS P5: To apply a 10% social housing and up to 10% affordable housing requirement, pursuant to Part V of the Planning and Development Act 2000 (as amended), to land zoned for residential use, or for a mixture of residential and other uses, in respect of which permission for the development of houses is granted, except where development would be exempt from this requirement. Affordable housing requirements will be subject to the demand for and viability of affordable housing on individual sites; the Council reserves the right to determine the appropriateness of 'Part V' affordable housing delivery for individual sites on a case-by-case basis.</i></p> <p><i>3.4 Housing Strategy /Housing Need Demand Assessment (HNDA)</i></p> <p><i>The preparation of a Housing Strategy is a mandatory requirement under Part V of the Planning and Development Act 2000, as amended. The purpose of the Housing Strategy is to evaluate the housing needs of the existing and future population in the County.</i></p> <p><i>The NPF (NPO 37) also requires each local authority to develop a Housing Need Demand Assessment (HNDA) which must underpin and support the preparation of housing strategies and housing policy. A HDNA is defined as "a database which allows local authorities to run a number of different scenarios to inform key decisions on housing need and supply". The HNDA will provide long-term estimates of future housing needs to support the preparation of Housing Strategies and inform housing policy outputs. While no formal guidance has issued regarding the expected requirements of the HNDA, the Department has published Section 28 Guidelines entitled 'Housing Supply Target Methodology for Development</i></p>		

² <https://www.gov.ie/en/publication/ea99-housing-need-and-demand-assessment-hnda/>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
<p><i>Planning'. These Guidelines underpin the development of the projected demand for the Housing Need and Demand Assessment (HNDA) tool for each county. The projected demand will inform the development of multi-annual social housing targets from 2021. As outlined in Section 3.1.3 this Plan must cater for an overall household demand of 3,107 households.</i></p> <p><i>The Housing Strategy has determined that 926 households will not meet the affordability criteria for private ownership or private rental. These households are considered to require social and affordable housing. This equates to 29.8% of the anticipated households during the plan period. Additional analysis pursuant to the Affordable Housing Act 2021 has determined that 10.7% of households will not be able to afford private market housing but will not be eligible for social housing, and will require affordable housing tenures. In accordance with the Urban Regeneration and Housing Act 2015 Affordable Housing Act 2021 there will be a requirement for up to 10% 20% social and affordable housing in developments on lands in respect of which permission for the development of houses is granted zoned for residential use or a mixture of residential and other uses with more than nine four residential units. Full details of the Housing Strategy are set out in Appendix IV.</i></p>		
3.3.2 Rural Housing		
<p>Kildare Co Co notes in relation to Section 3.16.1 that the areas adjoining the Kildare County boundary is defined as an Area Under Urban Influence and will be considered in the context of the formulation of the Rural Housing Policy in the Draft Kildare Development Plan.</p>	CLW-C10-15	<p>Noted.</p> <p>Recommendation No change to Draft Plan.</p>
<p>TII would welcome consideration by the Council of including a cross reference in Section 3.16 Single Houses in the Countryside referencing Policy NR. P2 Council policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing accesses to the national road network to which speed limits greater than 50 km/h apply.</p> <p>In relation to Section 3.16.5 would welcome that all references in the Draft Plan to the NRA DMRB should be updated to TII publications.</p>	CLW-C10-16	<p>Policy RH. P6 under Section 3.16.5 can be amended to include a reference to the need to comply with the Spatial Planning and National Roads Guidelines for Planning Authorities DECLG (2012) as referred to under Policy NR. P2 in Chapter 5.</p> <p>Agreed. Referencing of documents will be updated as requested.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
		<p>Amend Policy RH. P6 in Section 3.16.5 to include additional bullet point:- The need to comply with the Spatial Planning and National Roads Guidelines for Planning Authorities DECLG (2012).</p> <p>All references to NRA DMRB to be updated to TII publications.</p>
<p>(i) The DAU advises that Rural Housing Policy (RH 1) and Zone 2 which lies partly within the Derreen River Freshwater Pearly Mussel Catchment, must be subject to Appropriate Assessment at CDP level. The use of a catchment-based approach to the consideration of in combination effects should be taken.</p> <p>Advises that Rural Housing Policy (RH. P1) and Zone 2, which lies partly within the Derreen River Freshwater Pearl Mussel Catchment, must be subject to Strategic Environmental Assessment.</p> <p>(ii) In relation to Policy RH. P6, it is recommended that the Sustainable Urban Drainage Systems (SUDS) reference should be more specific and should include reference to the 'SUDS Manual' by the UK's Construction Industry Research and Information. Association (CIRIA</p>	CLW-C10-103	<p>(i) Noted. Provisions relating to Rural Housing Policy, including those relating to Rural Housing Policy Zone 2, are being subject to AA and SEA. Measures have been integrated into the Draft Plan that will mitigate effects arising from these provisions. It is proposed to add additional explicit mitigation regarding this issue.</p> <p>Recommendation The following requirement for Single Housing in Rural Housing Policy Zone 2 to be included:</p> <p>Any single housing developments within Rural Housing Policy Zone 2 will be required to demonstrate that new on-site wastewater treatment systems associated with single housing in Rural Housing Policy Zone 2, alone and in combination with existing systems, will not result in significant adverse effects on the River Slaney Valley Special Area of Conservation, including the Freshwater Pearl Mussel, which is a qualifying interest of the site.</p> <p>(ii) Agreed. Amend part vii. of Policy RH. P6.</p> <p>Recommendation Amend the wording of part vi. of Policy RH. P6 to:- The ability of a site to accommodate an appropriate on-site surface water management system in accordance with Sustainable Urban Drainage Systems (SuDS) measures, Carlow County Council SuDS Policy, Urban</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
<p>C753) and also to consider removing the reference to B.S. 8301:1985 which has been replaced.</p> <p>(iii) Advises that planning applications relating to the replacement of derelict houses in the countryside and restoration and re-use of vernacular structures and houses in the countryside must be accompanied by a bat survey report, as required and appropriate.</p>		<p>Drainage Systems (SuDS) B.S. 8301:1985 the 'SuDS Manual' CIRIA C753, and BRE Digest 365.</p> <p>(iii) Agreed. Policy RH. P13 in Section 3.16.11, relating to the replacement of derelict houses in the countryside to be amended to include reference to a bat survey report, as required and appropriate.</p> <p>Recommendation Amend the wording of Policy RH. P13 in Section 3.16.11 to:- Facilitate the sensitive replacement of a structurally unsound derelict house (i.e. structure in ruinous or dangerous condition) as an alternative to the construction of a new single house elsewhere in the countryside. The development proposal, in terms of siting, scale, layout and design, shall be sympathetic to the character of the original structure and the site. Documentary evidence in the form of a structural survey and photographs shall be submitted in support of the application, and a bat survey report as required and appropriate. Subject to the findings of the survey, a derogation licence under the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) may be required. All other normal siting and design requirements will be applied and the applicant/occupant will not be required to comply with rural housing policy criteria.</p>
<p>Submission notes the need to accommodate local people to build homes on their own lands in their own community.</p>	CLW-C10-102	<p>Chapter 3, Section 3.16 addresses Rural Housing and recognises the need to accommodate persons who have a functional social requirement (i.e. for a person who has lived in a rural area wishing to build a home for their own use) subject to compliance with proper planning considerations.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
3.3.3 Traveller Accommodation		
<p>Makes the following observations/recommendations:</p> <ul style="list-style-type: none"> (i) Traveller specific accommodation developments completed under the last development plan period should be outlined in the Development Plan. (ii) National-level planning guidelines for Development Plans set out the relationship between the Traveller Accommodation Programme (TAP), the Housing (Traveller Accommodation) Act, 1998 and the statutory Development Plan. Requests projects committed to under the 2019-2024 Traveller Accommodation Programme should be listed as objectives in the Development Plan with clear timelines as per the Housing (Traveller Accommodation) Act 1998 PART III (27) (10), and sites should be identified and zoning of land for Traveller specific accommodation, including transient accommodation, should be mapped and illustrated in the programme, in line with the Planning and Development Act, (2000) as amended, particularly s10(2)(i). (iii) Given the high recognised need and targets set for one off rural housing in the Carlow Traveller Accommodation Programme 2019-2024 this should be accounted for and planned for, with corresponding zoning of land within the Carlow County Development Plan. The current Traveller Accommodation Programme suggests a target of 50 one off rural housing for Travellers across the Traveller Accommodation Programme. 	CLW-C10-105	<ul style="list-style-type: none"> (I) It is a function of the Traveller Accommodation Programme to address progress in the achievement of objectives. (II) Section 3.14 of the Draft Plan addresses Traveller accommodation and policies to support same. To fully accord with the requirements of Section 10(2)(i) of the Act the use of particular areas for Traveller accommodation have been identified (See OPR response above : Recommendation 7). The Draft Plan also sets out Council policy as follows: <i>"Implement Accommodation Programme 2019-2024" or any updated plan during the lifetime of the County Development Plan</i>". (iii) Zoning of land within the rural area for one off housing is not considered appropriate and sufficient policy support to facilitate relevant categories of persons have been outlined in Chapter 3 subject to compliance with environmental and proper planning considerations.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
(iv) Given the lifespan of the development plan, consideration should also be given for how sites will be identified for Traveller Specific Accommodation in the next Traveller Accommodation Programme, including transient sites.		<p>(iv) This is an issue for consideration as part of the review of the Traveller Accommodation Programme.</p> <p>Recommendation Include Mapping as provided for in OPR submission – Recommendation no. 7</p>
3.3.4 Climate Action and Housing		
3CEA Submission requests that climate mitigation measures for housing be addressed in relation to, NZEB, passive house design, reducing upfront embodied CO ² emissions, requirements in the initial design phase, use of low carbon construction types and materials and use of renewable energy.	CLW-C10-111	<p>Chapter 3 of the Draft Plan requires that housing delivery consider design in terms of potential implications of climate change, together with the need to improve the energy efficiency of buildings. This is in addition to Chapter 7 which outlines approaches to, and provides the policy context for climate change mitigation and adaptation in the County including the use of renewable energy. In terms of rural house design, the use of sustainable energy approaches and technology is promoted, including the achievement of high BER energy ratings, NZEB, and the maximisation of solar gain.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission addresses the provision of clean affordable energy, and energy efficient homes in Traveller specific accommodation. The following is stated:</p> <ul style="list-style-type: none"> ▪ The Council should plan to review existing Traveller specific accommodation with a view to bringing it up to the current regulatory standards in terms of energy efficiency of the dwellings and in terms of access to sustainable energy sources. 	CLW-C10-105	<p>Policy SC. P3 in Section 3.6 seeks to <i>Promote energy conservation, energy efficiency and the use of renewable energy services in new and existing buildings, including retro-fitting of energy efficiency measures in existing building stock, energy efficiency in traditional buildings and initiatives to achieve Nearly Zero-Energy Buildings (NZEB) standards in line with the Energy Performance of Buildings (EPBD).</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.3 Chapter 3: Housing		
<ul style="list-style-type: none"> ▪ All planned Traveller specific accommodation should seek to ensure that homes built have the highest level of building airtightness combined with effective ventilation systems. ▪ The Council must meet near zero energy building (NZEB) requirements under current regulatory requirements and demonstrate that energy used by the NZEB must be from renewable sources "to a very significant extent", including energy from renewable sources produced on site or nearby. 		<p>The aforesaid is also reflected in Policy DP. P4 in Chapter 3 which seeks to <i>Encourage building design and layout that maximises daylight and natural ventilation and incorporates energy efficiency and conservation measures that will improve the environmental performance of buildings in line with best practice.</i></p> <p>Energy efficiency that is specific to traveller accommodation may as appropriate be addressed as part of the review/update of the Traveller Accommodation Programme 2019-2024.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 4: Enterprise and Employment

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
3.4.1 Town Centre Development		
<p>Submission outlines the following observations:</p> <ul style="list-style-type: none"> ▪ Support the use of targeted financial incentives to re-establish the role of town centres and encourage a greater take up of town centre development opportunities. ▪ Support investment in town and villages centres so that they become more diverse. ▪ Ensure the best quality of design is achieved for all new commercial and residential development. ▪ Support the ambitious regeneration of underused town centre, brownfield and infill lands. ▪ Maintain and update the Vacant Site Register. ▪ Facilitate the implementation of the Urban Regeneration and Housing Act 2015. ▪ Promote the consolidation of town centres with a focus on the regeneration of underused buildings and strategic sites. ▪ Work with the National Land Development Agency. ▪ Require all development proposals for strategic brownfield and infill sites to be accompanied by a site brief and/or masterplan. ▪ Set out measures to reduce vacancy and the underuse of existing building stock. ▪ Encourage pilot projects for the re-use of brownfield sites. 	CLW-C10-40	<p>The Draft Development Plan supports Town Centre Development and recognises the important role of town centre development to the sustainable development of the County over the Plan Period. Chapter 4 Economic Development and Enterprise addresses the importance of economic development in the town centres of Carlow, Tullow, Muine Bheag together with Small Towns and Villages with Retail Policies and Objectives addressed in Section 4.7. Active land management measures are also addressed in Section 2.23.2 with Regeneration Areas addressed in Section 3.3. Detailed urban design and placemaking guidance is also considered in Chapter 12. The key brownfield sites referred to will be addressed as appropriate in the relevant Joint Urban Area Plan / Local Area Plan as appropriate. The Council will continue to engage with relevant stakeholders while seeking to secure the improvement of town centre development areas thereby improving the vitality and viability of town centres throughout the county.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
<ul style="list-style-type: none"> ▪ Key brownfield sites include Greencore on the Athy Road, Slaney Valley Business Campus Tullow, Meat packer site Royal Oak Bagenalstown, and Odlum's site St. Mullins. 		
3.4.2 Carlow Town / MD – Enterprise and Employment		
<p><u>Submission addresses Project Carlow 2040 / Town Centres Issues</u></p> <ul style="list-style-type: none"> ▪ Acknowledges that the Carlow 2040 plan once implemented will make a big difference to Carlow town centre and requires continued momentum. ▪ Recommends that the Council prepare a sustainable regeneration plan for all publicly owned land so as its use and benefit is maximised. ▪ The Council should seek to create and accept only a high-quality public realm to enhance the urban fabric as well as the functioning of our towns and villages. ▪ The Council should target key derelict buildings throughout the county and look to apply CPO process to these buildings. 	CLW-C10-40	<p><u>Project Carlow 2040 / Town Centres Issues</u></p> <p>The content of this submission is noted. The Draft Plan addresses priorities for Carlow Town which includes regeneration of Carlow Town including implementation of Project Carlow 2040, the promotion of Carlow Town as a Regional and Inter-regional growth driver, supporting sustainable population growth, addressing vacancy and dereliction and promotion of public realm improvements. Detailed urban design and placemaking guidance is also addressed in Chapter 12. The Council will continue to use active land management measures e.g. regeneration plans, securing funding and use of statutory powers e.g. derelict sites, CPOs etc to activate lands and improve the public realm, vitality and viability of town centres.</p> <p>Recommendation No change to Draft Plan.</p>
<p>In relation to Policy ED. P7 for Carlow Town Economic Development Laois Co Co requests that additional text be included regarding the former Sugar Factory Site:- <i>The redevelopment of the former Sugar Factory site should provide for lands within Laois and recognise the need for natural amenity areas and protection of the River Barrow SAC as set out in the SAC objectives.</i></p>	CLW-C10-48	<p>While the content of the submission is noted the area referenced is outside the functional area of Carlow County Council however, it is acknowledged that same can be more appropriately dealt with as part of the new Joint Urban Area Plan with Laois County Council.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
<p>The PPN highlights issues relating to work, economy and resources at MD level, in summary the following is outlined:</p> <p><u>Within Carlow MD, the following is noted requirement for,</u></p> <ul style="list-style-type: none"> ▪ infrastructure: bus services, additional train services, broadband, ▪ redevelopment of vacant shop and business parks ▪ education and skills ▪ Promote job diversity, provision of micro loans ▪ Establish a craft centre, Pop-up craft gallery, Re-establish artisan bakeries ▪ Increase Garda funding for more Gardai on the street. <p><u>Within Muine Bheag MD, the following is noted requirement for,</u></p> <ul style="list-style-type: none"> ▪ Provision of social enterprise hubs ▪ Micro loans, lower insurance costs for businesses ▪ Inter-agency communication ▪ Greater information in different languages <p><u>Tullow MD</u></p> <ul style="list-style-type: none"> ▪ More social farming, Changing farming back to organic ways ▪ Broadband vital <p>Education and training</p>	CLW-C10-38	<p>The importance of the issues raised for each of the Municipal District Areas as submitted by the PPN is noted. The Draft Plan contains a suite of policies and objectives aimed at addressing and supporting the issues raised for communities regarding work, economy and resources. This includes, in Chapter 4, support for the preparation of a new Local Economic and Community Plan for Carlow (LECP. P1), support for the implementation of the InCarlow Economic Development and Business Support Strategy and Local Economic Development Plan (Policy EDS. P1), support for increased education and skills training (Policies ES. P1 to ES. P5, and Objective ES. O1), and support for community organisations to develop local economic initiatives (Policy PM. O2). The Council will continue to work with relevant parties with regard to support for education and training, and community and economic development.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.3 Social Enterprises		
Requests inclusion of the following key commitments:	CLW-C10-2	It is considered that the content of this submission regarding social enterprises are adequately addressed in Chapter 8, Section 8.5 of the Draft Plan. Section 8.5 includes policies (SE. P1 to SE. P4) which seek to support and promote the role of social enterprise as

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
<ul style="list-style-type: none"> ▪ to facilitate, enable and support the development of a vibrant Social Enterprise sector, as a valuable and important component of the overall Economic Development vision. ▪ to work with Social Enterprises to access and develop appropriate fit for purpose land and buildings as spaces to enable development and growth of new services and products. ▪ to include Social Clauses in Public Procurement. ▪ to identify and disseminate best practice local examples of social enterprises and increase public understanding of their contribution to society and the economy. 		<p>a tool for economic development, as well as the transition of community facilities to social enterprise centres where appropriate. This is in addition to an objective (SE. O1) to develop a Social Enterprise Strategic Plan for the County.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.4 Climate Action and Enterprise and Employment		
<p>Submission outlines that economic development must be sustainable and achieved within the context of carbon reductions and submits that this is lacking within the tone and wording of Chapter 4. It is submitted that the policies within the new Carlow County Development Plan therefore should be clear, targeted, and focused, demonstrating how renewable forms of energy are to be encouraged and in what areas of the local economy they can particularly assist. Notes that the use of renewable energy like solar can stimulate jobs and reduce reliance on fossil fuels.</p>	CLW-C10-19	<p>Chapter 4 adequately addresses the relationship between renewable energy and economic development. Recognition is given to the fact that impacts of climate change can drive innovation and stimulate economic growth, promoting the development of low carbon and green tech businesses and industries (Policy PS. P3). Furthermore, it supports the development of industries that create and employ green technologies (Policy PM. P4).</p> <p>The economic benefits of renewable energy are also dealt with in Section 4 of the Draft Renewable Energy Strategy.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission references role of wind energy in economic development, noting:</p> <ul style="list-style-type: none"> - that, for every MW of wind energy capacity installed gives rise to investment of approx. €1.25M. 	CLW-C10-51	<p>The content of this submission is noted. In this regard, the economic benefits of renewable energy, including wind energy, are adequately dealt with in Chapter 4 and in Section 4 of the Draft Renewable Energy Strategy. The importance and role of wind energy in climate action and renewable energy generation is also adequately addressed in Chapter 7.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
<ul style="list-style-type: none"> - ongoing investment and economic development benefits during the 30+ year operational design of wind farms take the form of rents payable to landowners, financial support to local communities and commercial rates to local authorities. - wind energy is of strategic importance in addressing climate change and in growing the Carlow economy - the energy sector is a key sector for job growth and wind energy development can generate significant construction and operation jobs. 		<p>Recommendation No change to Draft Plan.</p>
<p>Submission notes that the potential future development of data centers or large industrial sites, requires that consideration be given to including policies that require such developments to be designed and planned to operate on a net-zero carbon emissions or climate positive basis.</p>	<p>CLW-C10-110</p>	<p>The energy efficiency and conservation policies in Chapter 7, including Policy EE. P2, seek to <i>Encourage consideration of energy efficiency and low-carbon design solutions when carrying out pre-planning discussions for major residential, commercial, and industrial development.</i> Section 16.12 also requires the submission of an Energy Statement for all applications of 1000+sqm to demonstrate what energy efficiency and carbon design measures are being considered.</p> <p>Elsewhere in the Draft Plan, Objective RE. O2 in Chapter 14 addresses rural development and requires <i>applications for larger scale industrial and enterprise development to submit a carbon footprint calculation and demonstrate how new buildings and processes / activities will seek to achieve the targets set out in the Climate Action Plan 2019 or any amendments to these targets.</i></p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
3.4.5 Infrastructure and Enterprise and Employment		
Submission references Broadband Policies by seeking to ensure economic competitiveness for enterprise and commercial sectors, support the delivery of high-capacity information communications technology infrastructure, broadband connectivity and digital broadcasting throughout the county.	CLW-C10-40	Chapter 6 Section 6.8 Information and Communications Technology addresses the content of this submission. Policies support the promotion and facilitation of the sustainable development of a high-quality ICT network including broadband and other technologies throughout the County in order to achieve balanced social and economic development, while protecting the environment of urban and rural areas. Recommendation No change to Draft Plan.
Submission notes that the potential future development of data centers or large industrial sites, must ensure water and electricity use do not place an unsustainable burden, or undue risk on the reliable and cost-effective supply of these utilities to the public.	CLW-C10-110	In terms of water and electricity use, Irish Water is responsible for public water services in Ireland, and Eirgrid is the state-owned company with responsibility for the safe, secure, and reliable transmission of electricity. Recommendation No change to Draft Plan.
3.4.6 Retail		
TII would welcome consideration of a cross reference to Policy NR. P2 for Table 4.7, and consideration to the inclusion of a new policy objective included in the Development Plan to include the explicit presumption against large out of town retail centres located adjacent or close to existing, new or planned national roads/motorways reflecting policy outlined in the Retail Planning Guidelines, 2012.	CLW-C10-16	The content of this submission is noted. The Draft Development Plan contains a policy which addresses 'Inappropriate Retail Development' prohibiting significant new retail development that due to its scale and / or location would negatively impact, either individually or cumulatively, on the vitality and viability of existing town centres. The Council will continue to support this, with the recommendation to include an additional policy to address the issue of large out of town retail centres located adjacent or close to existing, new or planned national roads/ motorways.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.4 Enterprise and Employment		
		<p>Recommendation Include an additional policy under Section 4.8 to take account of the Retail Policy Context in the Retail Planning Guidelines 2012 regarding national roads/motorways:</p> <p><u>RP 14: Large Out of Town Retail Centres</u> -There will be a general presumption against large out-of-town retail centres in particular those located adjacent or close to existing, new or planned national roads/motorways, in accordance with the provisions of Retail Planning Guidelines for Planning Authorities, 2012.</p>

Chapter 5: Sustainable Travel and Transport

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
3.5.1 Policy References Sustainable Travel and Transport		
<p>Dept of Transport makes reference to important policy developments since the last plan relevant to accessible and integrated transport which it submits should be reflected in the proposed plan and in particular Chapter 5 Movement and Transport. These include:</p> <ul style="list-style-type: none"> • Publication of the "Whole of Government" National Disability Inclusion Strategy (NDIS) 2017-2022, which includes specific actions assigned to Local Authorities. • The ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD). • The DMURS Interim Advice Note – Covid-19 Pandemic Response which was published on the DMURS website in 2020. • The publication by the National Transport Authority (NTA) of its 'Local Link Rural Transport Programme Strategic Plan 2018 to 2022'. • Also notes reference to PLUTO which was working title of the DoT forthcoming land use investment framework, is no longer in use – accordingly requests replacement with Department of Transport's forthcoming long-term investment framework for land transport. <p>Requests wording change to Section 5.1.1 to state - <i>The national investment priorities that will underpin the implementation of the National Planning Framework are contained in The National Development Plan 2018-2027 and will be further supported by the publication of the</i></p>	CLW-C10-10	<p>The suggestions and requests are noted and can be addressed as follows:</p> <ul style="list-style-type: none"> • Reference to both the 'National Disability Inclusion Strategy (NDIS) 2017-2022 can be included in Chapter 8, Section 8.8.3 entitled 'People with Disabilities'. • Ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), can be included in Chapter 8, Section 8.8.3 entitled 'People with Disabilities'. • Reference to the DMURS Interim Advice Note – Covid-19 Pandemic Response (2020) can be included in Section 5.1.6. • Reference to the 'Local Link Rural Transport Programme Strategic Plan 2018 to 2022' can be included in Section 5.5.2. • Reference to PLUTO in Section 5.1.1 can be replaced with the Department of Transport's forthcoming long-term investment framework for land transport <p>Recommendation</p> <ul style="list-style-type: none"> ▪ Include reference to the 'National Disability Inclusion Strategy (NDIS) 2017-2022 and ratification by Ireland in 2018 of the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), in Chapter 8, Section 8.8.3 entitled 'People with Disabilities'. ▪ Amend text in Section 5.1.6 to state:- <i>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</i>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p><i>Department of Transport's forthcoming long-term investment framework for land transport.</i></p>		<p><i>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).</i></p> <ul style="list-style-type: none"> ▪ <i>Amend text in Section 5.5.2 to state:- The NTAs 'Local Link Rural Transport Programme Strategic Plan 2018 to 2022' aims to provide a quality nationwide community based public transport system in rural Ireland which responds to local needs. Its key priorities include the reduction of social exclusion and the integration of rural transport services with other public transport services. In addition, one of its key objectives is greater interaction/co-ordination with Local Authorities regarding the assessment of strategic transport needs and in the development of proposed transport plans for local areas. While a service is provided in County Carlow greater connectivity and service provision is required between settlements in the county and wider region.</i> ▪ <i>Amend text in Section 5.1.1 to state:- The national investment priorities that will underpin the implementation of the National Planning Framework are contained in The National Development Plan 2018-2027 and will be further supported by the publication of the Department of Transport's forthcoming long-term investment framework for land transport."</i> ▪ <i>Replace references to DTTAS with Department of Transport (DoT).</i>
3.5.2 Motorway and National Roads		
<p>TII makes the following observations and recommendations:</p> <p>(i) Welcomes and supports the approach taken in the Draft Plan to safeguarding the motorway network and national road network and associated junctions. Indicates its availability to assist the Council in</p>	<p>CLW-C10-16</p>	<p>(i) The content of this submission is noted, and the Council will engage with TII as part of the preparation of the Carlow Urban Area Plan and Local Transport Plan as appropriate.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>the development of proposals for consideration as plan-led 'exceptional circumstances' cases in accordance with the provisions of the DoECLG Guidelines. Notes that development in the vicinity of national road junctions, including those in the Carlow Urban Area Environs, will require particular care and robust assessment of development proposals to ensure development proceeds complementary to safeguarding the strategic function of the national road network in accordance with Government objectives. TII would welcome and is available for consultation in relation to any Local Area Plan or other frameworks prepared by the Council where there may be implications for the strategic national road network and associated junctions.</p> <p>(ii) In all instances, national road improvement schemes should be developed complementary to safeguarding the strategic function of the national road network and proposals impacting on the national road network should be developed in consultation with and subject to the agreement of TII.</p> <p>(iii) Would welcome clarification in the Draft Plan relating to the proposed application of Section 5.9 to national road schemes in the interests of avoiding risk to proposed national road schemes, in the interests of clarity and in the interests of adherence to the provisions of official policy. Requests that the Council give careful consideration to the decision to include the requirement to apply Section 5.9 'Infrastructural Improvement Process' to national road schemes in order to avoid any unintended consequences and to avoid any ambiguity in relation to the delivery of such schemes. TII would not</p>		<p>Recommendation No change to Draft Plan.</p> <p>(ii) Noted and agreed.</p> <p>Recommendation No change to Draft Plan.</p> <p>(iii) Section 5.9 to be clarified as requested.</p> <p>Recommendation Section 5.9 to be amended indicating that the Infrastructural Improvement Process outlined excludes TII National Road Schemes which will be progressed in accordance with TII Project Management Guidelines and Project Appraisal Guidelines.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>support any additional requirements imposed on the development of national road schemes in addition to processes already applied to national road scheme planning and would welcome clarification of this matter in Section 5.9.</p> <p>(iv) <u>Ancillary Policy Provision and Issues</u> <u>Service Areas:</u> Would welcome the inclusion of a policy position reflecting the requirements outlined in Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads in the Draft Plan.</p> <p><u>Safeguarding National Road Drainage Regimes:</u> Would welcome consideration by the Council of the inclusion of a new objective outlining that; <i>'The capacity and efficiency of the national road network drainage regimes in County Carlow will be safeguarded for national road drainage purposes'</i>.</p>		<p>(iv) <u>Ancillary Policy Provision and Issues:</u> Issues noted and agreed</p> <p>Recommendation <u>Service Areas:</u> Include additional policy in Section 5.8.2 as follows: It is the policy of the Council to implement Section 2.8 of the DoECLG Spatial Planning and National Roads Guidelines relating to the provision of service areas and roadside facilities on national roads or any updates thereto during the life of this Plan and subject to meeting all other planning and environmental criteria.</p> <p><u>Safeguarding National Road Drainage Regimes:</u> Include additional policy in Section 5.8.2 as follows: It is the policy of the Council to seek to ensure that the capacity and efficiency of the national road network drainage regimes in County Carlow are safeguarded for national road drainage purposes'</p>
3.5.3 Roads Objectives		
<p>Suggests that the following be carried out at Royal Oak:</p> <ul style="list-style-type: none"> ▪ Narrowing of the main carriageway through the Royal Oak to slow traffic. 	CLW-C10-31	<p>The content of this submission is noted. Royal Oak is within the designated development boundary of the Muinebheag Royal Oak LAP. Therefore, any infrastructural improvements for Royal Oak will be given more detailed consideration as part of the review and preparation of a new LAP for the area.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<ul style="list-style-type: none"> ▪ Provision of on-street car parking lined on one or both sides of the main carriageway with the additional space provided by narrowing the carriageway. ▪ Provision of a pedestrian crossing to link both sides of Royal Oak to each other. ▪ Development of a village green near / around Matty's Car Park with access provided by the pedestrian crossing for people visiting the distillery and local shop. 		No change to Draft Plan.
Submission suggests creating orbital routes around Graiguecullen-Kilkenny Road-Wexford Road.	CLW-C10-40	This is provided for in NR 02 and RR01 regarding the Carlow Southern Relief Road. Recommendation No change to Draft Plan.
<p>Laois Co Co supports reference in objective NR 02 to the improvement/work on the N80 and the Carlow Southern Relief Road and also objective RR 01 to the completion of the Southern Relief Route N80-R448, which would improve connectivity between the Midlands and the South East Region.</p> <p>Suggests that an objective be included to provide a pedestrian/cycle link from Crossneen to the Kilkenny Road (IT Carlow).</p>	CLW-C10-48	<p>The content of this submission is noted. In terms of a pedestrian/cycle link from Crossneen to the Kilkenny Road, Objective WC.07, Section 5.4 seeks to provide a pedestrian and cyclist footbridge to connect IT Carlow with the River Barrow Way to improve sustainable travel choices. The potential of a pedestrian/cycle from Crossneen to the Kilkenny Road will be given more detailed consideration as part of the preparation of a new Joint Urban Area Plan with Laois County Council.</p> <p>Recommendation No change to Draft Plan.</p>
3.5.4 Integration of Land Use and Transportation		
TII would welcome the incorporation of reference to TII Publications Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns	CLW-C10-16	Agreed. Include reference to TII Publication Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' in Policy UR P1.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
and Villages on National Roads' in Chapter 5 of the Development Plan in association with reference to DMURS, in the interests of providing clarification that such a standard will be applied, in the interests of road user safety, on national roads.		<p>Recommendation Amend Policy UR. P1 as follows; Ensure that all urban roads and streets in our towns and villages, including residential streets in housing estates are designed in accordance with the principles, approaches and standards set out in the 'Design Manual for Urban Roads and Streets' (2013/2019) and any further update to the Manual during the life of this Plan and to implement TII Publication Standard DN-GEO-03084 'The Treatment of Transition Zones to Towns and Villages on National Roads' as appropriate.</p>
3.5.5 Sustainable Travel		
Submission supports the delivery of bus projects and the Local Link Rural Transport Programme and the promotion of the development of a sustainable greenway.	CLW-C10-40	<p>The content of this submission is noted. It is considered that the Draft Plan contains a suite of policies, objectives and related provisions in Chapter 5, 7, 11, 12, and 16, which adequately address and support the issues raised regarding public transport, greenways and sustainable travel (walking and cycling).</p> <p>Recommendation No change to Draft Plan.</p>
<p>NTA makes the following observations:</p> <ul style="list-style-type: none"> (i) <u>Section 5.5 Public Transport</u> <ul style="list-style-type: none"> ▪ Support provisions of Objectives PT.O1 to O5 to improve public transport offer in rural and urban areas. ▪ NTA has statutory responsibility for securing the provision of public transport services which in respect of Carlow would relate to a Public Service Obligation (PSO) contract between the NTA and Irish Rail, 	CLW-C10-97	<p>(i) <u>Section 5.5 Public Transport</u></p> <p>Content of submission is noted.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>between the NTA and Bus Éireann, direct award contracts for the operation of bus services, and the licencing of commercial bus services.</p> <ul style="list-style-type: none"> ▪ The NTA provide rural transport services through the Local Link Rural Transport Programme. <p>(ii) <u>Planning for Bus Service Provision</u></p> <ul style="list-style-type: none"> ▪ Notes the critical importance the Draft Plan places on the provision of bus services to the community in order to achieve more sustainable travel and less reliance on the car and the implementation of development plan policies will have a critical role to play. Recommends that the development plan includes a policy to support and develop public transport routes throughout the county through collaboration with the NTA. ▪ Recommends that policies are included which ensure that public transport infrastructure is considered as part of any significant residential or commercial development i.e. evaluation for requirement for new bus stops, turnaround facilities, pedestrian access and layover facilities. ▪ Recommends that the requirements of public transport should be considered in all plans and projects relating to the county's urban settlements, including local area plans, traffic management schemes and public realm improvement projects. 		<p>(ii) <u>Planning for Bus Service Provision</u></p> <p>Policy PT. P2 in Section 5.5 seeks to <i>Support transport agencies in the provision of new public transport services and routes, enhancement of the quality, frequency and speed of existing train and bus public transport services with measures incorporated to facilitate access for all.</i> This policy could be amended to include reference to the NTA.</p> <p>It is also considered that an additional policy could be included to ensure that public transport infrastructure is considered as part of any significant residential or commercial development.</p> <p>Recommendation Amend Policy PT. P2 as follows:- Support transport agencies, including the National Transport Authority (NTA) and Iarnród Éireann, in the provision of new public transport services and routes, enhancement of the quality, frequency and speed of existing train and bus public transport services with measures incorporated to facilitate access for all.</p> <p>Additional public transport policy as follows:- Ensure that public transport infrastructure, as required and appropriate, is considered as part of any significant residential or commercial development</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>(iii) <u>Provision of Public Transport Services in Rural Areas</u></p> <ul style="list-style-type: none"> ▪ Notes that this is a matter of particular importance for Carlow given the rural nature of large parts of the county and associated pattern of small urban settlements and rural hinterlands. ▪ Rural economy and rural social fabric should be supported through the provision of better local connectivity and connectivity to services and commercial activities in cities and towns. ▪ NTA provision rural transport services through the Local Link Rural Transport Programme. ▪ It is recommended that the development plan acknowledges the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns. 		<p>proposals e.g. evaluation for requirement for new bus stops, turnaround facilities, pedestrian access, and layover facilities.</p> <p>(iii) <u>Provision of Public Transport Services in Rural Areas</u></p> <p>Section 5.2.2 of the Draft Plan notes <i>Transport for Ireland Local Link provides a rural local public transport bus service. The key priorities of the Local Link Rural Transport Programme seek to address rural social exclusion and the integration of rural transport services with other public transport services. While a service is provided in County Carlow greater connectivity and service provision is required between settlements in the county and wider region.</i></p> <p><i>Carlow County Council will facilitate the improvement and expansion of bus services where they strengthen linkages to other areas of the county, adjoining regions including the Greater Dublin Area, designated key towns and the rest of the country.</i></p> <p>Additional text can be included to acknowledge the role rural transport services can perform in providing for social and economic connectivity between small villages/rural areas and larger towns.</p> <p>Policy MS. P1 also seeks investment in sustainable transport solutions, improved walking and cycling connectivity routes, the provision of a public bus service in Carlow Town and the expansion of rural transport initiatives throughout the county.</p> <p>Recommendation</p> <p>Include additional text in Section 5.2.2 of the Draft Plan notes <i>Transport for Ireland Local Link provides a rural local public transport bus service. Rural transport services can perform an important role in providing for social and economic connectivity between small villages/rural areas and larger towns.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>(iv) <u>Section 5.1.4 Car Parking, Chapter 16 Table 16 Car Parking Standards.</u></p> <ul style="list-style-type: none"> ▪ Supports the Draft Plans use of maximum standards and in particular for non-residential uses. In locations where the highest intensity of development occurs an approach that caps car parking on an area wide basis should be considered. ▪ It is recommended that criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be used to determine the most appropriate level of parking provision with the maximum standards specified. ▪ Within larger urban settlements PTALS and ATOS approach would be best supported by the preparation of Local Transport Plans. <p>(v) <u>Section 5.15 Bicycle Parking Facilities.</u></p> <ul style="list-style-type: none"> ▪ Inclusion of bicycle parking standards, specified as minima, is supported. 		<p>The key priorities of the Local Link Rural Transport Programme seek to address rural social exclusion and the integration of rural transport services with other public transport services.</p> <p>(iv) <u>Section 5.1.4 Car Parking, Chapter 16 Table 16 Car Parking Standards</u> Noted further consideration regarding car parking can be considered as part of the Local Transport Plan for Carlow Town as appropriate.</p> <p>Recommendation No change to Draft Plan.</p> <p>(v) <u>Section 5.15 Bicycle Parking Facilities</u> Section 5.15 and Policy BP. P1 recognise the increasing contribution cycling provides as a healthy form of transport for work, education and leisure trips, and the importance of cycle parking facilities for promoting cycling as a sustainable mode of transport. Cycle parking standards are also included in Chapter 16, Section 16.10.13 and Table 16.6.</p> <p>Recommendation No change to Draft Plan.</p>
<u>Pedestrians, Cyclists and Transport (Section 5.4) / Park and Ride (Section 5.6)</u>	CLW-C10-16	<u>Pedestrians, Cyclists and Transport (Section 5.4) / Park and Ride (Section 5.6)</u> Carlow County Council will engage with TII as a prescribed body with reference to any application that may have implications for the national road network and will

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>Submission would welcome consideration by the Council that where there may be implications for the national road network in the area, TII would welcome consultation on the proposed Active Travel, Public Transport and Green and Blueway Infrastructure in Carlow.</p> <p>Where there may be implications for the national road network in the area, would welcome consultation on the proposed Park and Ride proposals in the County.</p>		<p>engage with TII regarding any local authority projects which may have an impact on the national road network.</p> <p>Recommendation No change to Draft Plan.</p>
<p><u>Cycleways and walkways</u></p> <ul style="list-style-type: none"> ▪ Promote walking and cycling as efficient, health, and environmentally friendly modes of transport, by securing the development of a network of direct, comfortable, convenient, and safe cycle routes and footpaths. ▪ Ensure provision of appropriate bicycle parking facilities as part of new applications in urban areas. ▪ Improve pedestrian and cycle connectivity to public transport interchanges. ▪ Improve the streetscape environments for pedestrians, cyclists, and people with special mobility needs. ▪ Link new schools and workplaces with walking and cycling routes. ▪ Open space provision that considers different types of recreation and amenity uses. ▪ Encourage transition towards sustainable and low carbon transport modes. ▪ Work with the National Trails Office, Coillte, the Department of Planning Housing and Local Government and other relevant stakeholders to improve level of infrastructure for walking and cycling. ▪ Facilitate the provision of electric vehicle charging infrastructure. 	CLW-C10-40	<p>The content of this submission is noted. It is considered that the Draft Plan contains a suite of policies, objectives and related provisions in Chapter 5, 7, 11, 12, and 16, which adequately address and support the issues raised regarding public transport, greenways, and sustainable travel (walking and cycling).</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<ul style="list-style-type: none"> ▪ Maintain the current level of on-street car parking until better public transport, cycling and walkways is put in place. 		
<p>Requests that additional policies/objectives for walking and cycling and disused railways should be included, and reference made to provisions in other county development plans, relating to:</p> <ul style="list-style-type: none"> - Safe walking trails, Access to scenic uplands, Mapping network of traditional paths, Employ a walks officer, Support development of hiking/walking routes. - Scheme to indemnify private landowners, Protect strategic walking routes and access to upland routes. - Facilitate and support development of coherent network of safe cycle routes, Employ a cycling officer, Produce cycle maps, Support National Cycle Framework 2009. - Support and establish interlinked walkways. - Support and development network of greenways. - Provide adequate car parking and/or lay-bys for walkers and cyclist. - Develop strategy to support and underpin funding for walking/cycling trails. - Utilise links from residential areas for enhancement and extension of existing walking/cycling routes. - Support alternative 'quiet' routes for walking and cycling. - Protect routes and prohibit development which would hinder creation of greenways, Support and promote development of disused railways for greenways. 	CLW-C10-61	<p>The content of this submission is noted, and it is considered that the Draft Plan includes a comprehensive suite of policies and objectives for walking and cycling. In this regard, the recreation provisions contained in Chapter 11, support all forms of outdoor recreation including implementation of the County Carlow Outdoor Recreation Strategy 2020-2023, together with the feasibility report of a greenway along the disused Carlow to Wexford railway line.</p> <p>Recommendation No change to Draft Plan.</p>
Submission makes the following comments:	CLW-C10-86	The need for safe walking and cycling routes in the County is noted. The importance of both walking and cycling in minimising environmental impacts while also

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<ul style="list-style-type: none"> ▪ Need for safe walking and cycling route provision all over the county but should not try to achieve this at the expense of the few remaining and critical natural environments which still exist such as the Barrow Track. ▪ Requests a close examination of all routes through the county/towns and villages. ▪ Opportunities for creating safe cycling and walking routes need to be incorporated into the plan, which will address the climate issue by reducing emissions along with being a huge benefit to the health and well-being of communities. 		<p>contributing to improved wellbeing and quality of life is recognised and supported in the Draft Plan. It is a key objective to seek the implementation of Project Carlow 2040; A Vision for Regeneration which contains a detailed walking and cycling strategy for Carlow Town. The Draft Plan also seeks to make walking and cycling more attractive modes of travel through the implementation of the Design Manual for Urban Roads and Streets (2013 and updated 2019), the Permeability Best Practice Guidelines (2013), the National Cycle Policy Framework (2013) and the National Cycle Manual (2011).</p> <p>It is considered that support and opportunities for walking and cycling are adequately addressed in Section 5.4 (Policies WC. P1 to WC. P4 and Objectives WC. O1 to WC. O7), and also through the policies and objectives for recreation as set out in Chapter 11 (Sections 11.12.1, 11.13.2 and 11.13.3).</p> <p>Recommendation No change to Draft Plan.</p>
3.5.6 Climate Action Sustainable Travel and Transport		
<p>ESB submits the following in relation to sustainable transport and electric vehicles states:</p> <ul style="list-style-type: none"> ▪ The inclusion of Policies such as EV. P1 and EV. P2 in Chapter 5 of the Draft Plan is consistent with Government Policy and ESB welcome this and Section 16.10.12 of the Draft Plan regarding EV Charging Points. ▪ However, the EU Energy Performance of Buildings Directive calls for an increase to 20% for the number of parking spaces which should have provision for electric vehicle charging infrastructure. 	CLW-C10-76	<p>The content of the submission is noted. The development management standard in Section 16.10.12 of the Draft Plan currently requires all developments to provide facilities for the charging of EV vehicles at a minimum rate of 10% of total car parking spaces or as maybe updated by national guidance.</p> <p>Recommendation Amend Section 16.10.12 to incorporate the standards in S.I. No. 393/2021 EU (Energy Performance of Buildings) Regulations 2021 as follows:</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation										
3.5 Sustainable Travel and Transport												
<ul style="list-style-type: none"> Requests that the standards set out in S.I. No. 393/2021 EU (Energy Performance of Buildings) Regulations 2021 are used to ensure Carlow increases the use of electric vehicles and included in Section 16.10.12 of the Draft Plan (Table provided). <p>On other sustainable transport also states:</p> <ul style="list-style-type: none"> Green renewable hydrogen is expected to play key role in decarbonising Ireland's transport sector in coming years, with hydrogen fuel cell technology particularly suited to heavier passenger and good vehicles. ESB has been actively engaging with Hydrogen Mobility Ireland which is delivering a co-ordinated approach to the delivery of this new technology. 		<p>All developments should provide facilities for the charging of electric vehicles in accordance with the standards in in S.I. No. 393/2021 EU (Energy Performance of Buildings) Regulations 2021 and Table X below, or as maybe updated by national legislation and guidance.</p> <table border="1" data-bbox="1182 614 1937 1390"> <thead> <tr> <th colspan="2" data-bbox="1182 614 1937 646">EV Charging Points</th> </tr> </thead> <tbody> <tr> <td data-bbox="1182 646 1563 906">Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).</td> <td data-bbox="1563 646 1937 906">A minimum of 1 EV charge point space per five car parking spaces (ducting for every car parking space shall also be provided).</td> </tr> <tr> <td data-bbox="1182 906 1563 1070">New dwellings with in-curtilage car parking.</td> <td data-bbox="1563 906 1937 1070">Installation of appropriate infrastructure to enable installation of recharging point for EVs.</td> </tr> <tr> <td data-bbox="1182 1070 1563 1294">Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments).</td> <td data-bbox="1563 1070 1937 1294">Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV charging point.</td> </tr> <tr> <td data-bbox="1182 1294 1563 1390">Developments with publicly accessible spaces (e.g.</td> <td data-bbox="1563 1294 1937 1390">Provide at least 1 recharging point, and a minimum of 1 space per five car spaces</td> </tr> </tbody> </table>	EV Charging Points		Residential multi-unit developments both new buildings and buildings undergoing major renovations (with private car spaces including visitor car parking spaces).	A minimum of 1 EV charge point space per five car parking spaces (ducting for every car parking space shall also be provided).	New dwellings with in-curtilage car parking.	Installation of appropriate infrastructure to enable installation of recharging point for EVs.	Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments).	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV charging point.	Developments with publicly accessible spaces (e.g.	Provide at least 1 recharging point, and a minimum of 1 space per five car spaces
EV Charging Points												
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Non-residential developments (with private car parking spaces including visitor car parking spaces with more than 10 spaces e.g. office developments).	Provide at least 1 recharging point, and a minimum of 1 space per five car parking spaces should be equipped with one fully functional EV charging point.											
Developments with publicly accessible spaces (e.g.	Provide at least 1 recharging point, and a minimum of 1 space per five car spaces											

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation	
3.5 Sustainable Travel and Transport			
		supermarket car park, cinema etc.)	should be equipped with one fully functional EV Charging Point.
3.5.7 Rail			
<p>Iarnród Éireann Makes the following observations:</p> <ul style="list-style-type: none"> ▪ Welcomes Transport and Spatial Planning policies and objectives of the Draft CDP. It notes support for any upgrade of the Limerick-Waterford- Wexford rail link which could potentially support more sustainable travel patterns within Carlow and the Southern Region. This will be considered as part of the wider all-island Strategic Rail Review to be undertaken by DoT/DfI(NI) and Iarnród Éireann will consider the outputs of this Rail Review when completed. ▪ Iarnród Éireann as part of their Strategy 2027 is planning to enhance rail connectivity options to the north of Carlow at Kildare including onward opportunities to Dublin, the West and South West of the country and this should also be referenced in the Development plan. ▪ Iarnród Éireann would appreciate being consulted by the Council in the preparation of the proposed LTP for Carlow Town and we are open to the possibility of making Carlow and Muine Bheag stations transport hubs with full integration of bus, bicycle, car and pedestrians and would be happy to discuss this further with the Council. 	CLW-C10-80	<p>The content of this submission is noted and welcomes the opportunity to consult directly with Iarnród Éireann on the preparation of a LTP for Carlow Town and to the possibility of making Carlow and Muinebheag rail stations transport hubs.</p> <p>Public transport, including the rail network serving the County, is dealt with in Section 5.5. of the Draft Plan. Policy PT. P1 seeks to support and guide agencies such as Iarnród Éireann in delivering improvements to services and infrastructure at rail stations in the County. It is considered that subsection 5.5.1 entitled 'Rail' can be amended to incorporate the submission's reference to:</p> <ul style="list-style-type: none"> ▪ Iarnród Éireann Strategy 2027. ▪ Rail Freight 2040 Strategy. <p>The details regarding the submission's reference to Iarnród Éireann property is also noted, and it is confirmed that there are currently no proposals to add any railway property to the Record of Protected Structures (RPS).</p>	

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>The major strategic focus for Iarnród Éireann of relevance to the new County Carlow Development Plan is on the development of enhanced rail accessibility within the County as well as improved rail links to other regions, including Dublin and include:</p> <ul style="list-style-type: none"> ▪ DART + Programme (Upgrade) ▪ Commuter / intercity enhancement options – by 2027 Iarnród Éireann is planning for the following service enhancements 100% increase in services to hourly all-day serviced on the Dublin – Waterford line via Carlow, with some improvement in journey times also planned and commuter service enhancement with services from Dublin to Carlow every 20mins in peak periods and half hourly off peak. Intercity electrification also forms part of the long-term strategy of Iarnród Éireann and should be supported to encourage and enable modal shift to greener modes of transport and reduce emissions. ▪ Re-introduction of Rail Freight- Iarnród Éireann will shortly publish its Rail Freight 2040 Strategy which should be considered in finalising of the Plan. ▪ Accessibility Programme – The Development Plan should support the further expansion of Iarnród Éireann's Accessibility Programme. ▪ Customer Information Services (e.g. real time passenger information) - The development of Customer Information Services (CIS), should be supported by the Development Plan. ▪ Development of Multimodal Facilities – Sustainable Interchange Programmes - will include the provision of facilities within Iarnród Éireann's stations and local environs to provide for ease of interchange between rail and all other modes. ▪ Park and Ride - Iarnród Éireann also wishes to grow the number of strategic Park and Ride sites across the network. Park and Ride sites 		<p>Recommendation Amend subsection 5.5.1 to include additional text as follows:-</p> <p>Carlow and Muine Bheag are serviced by the Dublin to Waterford intercity rail line. <i>The Rail Vision 2030: The Future of Rail Transport in Ireland</i> notes that the Dublin – Carlow line comprises one of high levels of demand on the mainline routes. Services from Carlow however are infrequent, with an hourly frequency at peak times and gaps of up to three hours between services during the day. Improvements to frequency and timetabling would improve Carlow's rail connectivity with the wider Eastern and Southern Region. In this regard, it should be noted that as part of their Strategy 2027, which will have positive implications for rail connectivity from County Carlow, Iarnród Éireann is planning to enhance rail connectivity options to the north of Carlow at Kildare, including onward opportunities to Dublin, the West and South West of the country. Iarnród Éireann will also be publishing a Rail Freight 2040 Strategy that will address the reintroduction of new freight services on the rail network.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>can attract car users, but the benefits of it are contingent on the level of demand. Iarnród Éireann is currently engaging with Councils and the National Transport Authority to develop a Park and Ride Strategy, which will be implemented in line with growing demand. Recommends that the Development Plan should support the implementation of this Park and Ride Strategy when it is agreed by all parties.</p> <ul style="list-style-type: none"> ▪ Level Crossings - Iarnród Éireann works to reduce risk at level crossings, and to eliminate level crossings where possible on a risk-prioritised basis. ▪ Fleet Enhancement –will allow for improvements in capacity and frequency on suburban services in the Greater Dublin Area as well as on Intercity services enhancing local and regional connectivity in Carlow County. ▪ Notes no notices received of any new structures to be added to the RPS and presumes there are no additions on railway property. 		
<p>Waterways Ireland notes that the Policies and Objectives in Chapter 5 meet the maintenance and management goals of Waterways Ireland on the Barrow Navigation and Chapter 10 aligns with our outlook on the Navigations heritage.</p>	CLW-C10-118	<p>The content of this submission is noted.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.8 Freight / Logistics		
<p>Submission would welcome consideration by the Council that any proposals for a logistics park should be plan-led and brought forward in the context of the RSES Regional Freight Strategy. Where such proposals</p>	CLW-C10-16	<p>The content of the submission is noted. Policy FR. P2, Section 5.10 promotes and supports the provision of an appropriately located logistics park within the county together with rail freight services in accordance with the forthcoming Regional</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.5 Sustainable Travel and Transport		
<p>are identified in the vicinity of the strategic motorway and national road network, they should be developed in accordance with the provisions of the DoECLG Spatial Planning and National Roads Guidelines and consultation with relevant stakeholders is considered critical.</p>		<p>Freight Strategy. Following completion of same, detailed consideration will inform as appropriate, a suitable location together with all other planning and environmental considerations including provisions of the DoECLG Spatial Planning and National Roads Guidelines and consultation with relevant stakeholders.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission relates to a proposed location for a Regional Logistic Park at Rathcrogue within 1hour of Dublin, Carlow positioned at Junction 5 of the M9 Motorway, and which benefits from direct access to both the M9 Motorway and the N80 National Primary route from Carlow Town to Wexford.</p> <p>Reference is also made to the policy in the existing development plan referencing the importance of this location and the report of Cunanne Stratton Reynolds in 2015.</p>	CLW-C10-120	<p>As per response to CLW-C10-16 above.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 6: Infrastructure and Environmental Management

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
3.6.1 Infrastructure		
3.6.1.1 Water, Wastewater and Surface Water		
<p>Irish Water supports reference to Irish Water policy documents and policies and objectives within Sections 6.1.6 and 6.2 and requests that the Council consult with Irish Water further regarding the improvement and upgrading of the capacity of Wastewater Treatment Plants, with particular reference to the Carlow Graiguecullen Urban Area, to accommodate new housing development appropriately and proportionately.</p>	CLW-C10-48	<p>The content of the submission is noted and welcome. The Council will continue to engage with Irish Water regarding improvement and upgrading of wastewater treatment plants in the County.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Irish Water makes the following comments:</p> <ul style="list-style-type: none"> (i) <u>Zoning and zoned lands</u> ▪ IW advises that it is available to assist Carlow and Laois Local Authorities with high level synopsis of water networks capacity availability for zoned lands as part of the Joint Urban Area Plan. ▪ IW encourages sequential development in areas with existing water services infrastructure and spare capacity. ▪ Where network reinforcements such as upgrades, or extensions are required, these shall be developer driven unless there are committed IW projects in place to progress such works. ▪ All new residential and commercial/ industrial developments wishing to connect to an Irish Water network are to be assessed through Irish Water's New Connections process which will 	CLW-C10-95	<p>The content of this submission is noted and welcome.</p> <p>(i)– (iii) Zoning and zoned lands, Planned road and public realm projects and STVGP Comments are noted and welcome.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>determine the exact requirements in relation to network and treatment capacity.</p> <ul style="list-style-type: none"> ▪ Where Irish Water assets are within a proposed development site, these assets must be protected or diverted in accordance with IW policies. <p>(ii) <u>Planned road and public realm projects</u> Early engagement in relation to planned road and public realm projects is requested to ensure public water services are protected, enable Irish Water to plan works accordingly and ultimately minimise disruption to the public.</p> <p>(iii) <u>Small Town and Village Growth Programme</u> Irish Water is working with Local Authorities across the country to ensure that the investment is made appropriately in accordance with the relevant county development plan.</p> <p>(iv) <u>Wastewater Treatment Capacity</u> An attached table provides capacity updates for the settlements listed in the Core Strategy (Table 2.7) of the Draft County Development Plan. It identifies three main settlements which are currently constrained by wastewater treatment capacity - Tullow, Muinebheag and Leighlinbridge, and for which IW is progressing WWTP upgrades. It is noted in this regard that:</p> <ul style="list-style-type: none"> ▪ The Tullow WWTP upgrade is currently at construction stage with anticipated timeframe for completion in Q4 2023. 		<p><u>(iv)Wastewater Treatment Capacity</u> Section 6.2 in Chapter 6 deals with 'Public Wastewater Collection and Treatment' and refers to the status of upgrade works to existing wastewater treatment plants in the County. It is considered that the text in this section of the Draft Plan should be amended to take account of the up-to-date information provided by Irish Water regarding wastewater treatment plant upgrades.</p> <p>Recommendation Amend Section 6.2 to include the following text:- The upgrade of Tullow WWTP upgrade is currently at construction stage with anticipated timeframe for completion in Q4 2023. The anticipated timeframe for completion of the</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<ul style="list-style-type: none"> ▪ The Muinebheag/Leighlinbridge WWTP upgrade is slightly further behind the Tullow upgrade but with anticipated timeframe for completion in Q1 2024. ▪ Otherwise, currently it is envisaged that capacity is available to cater for the population targets identified in Table 2.7 for Carlow town, as well as for all of the smaller towns. ▪ At the lower end of the settlement hierarchy, there are constraints in three of the larger serviced villages; IW has recently announced funding for the provision of a WWTP upgrade at one of these villages, Ballinabrannagh, under the STVGP. <p>(v) <u>Wastewater Networks</u></p> <ul style="list-style-type: none"> ▪ Drainage Area Plans (DAPs): A DAP for Carlow town will commence in Q1 2022. The DAP will assess in detail the performance of the wastewater networks in the town. Irish Water will keep Carlow County Council updated on progress with the DAP as the development plan process progresses. In parallel with the DAP, a Strategic Network Development Plans is being progressed for Carlow. ▪ This a high-level study that will help inform how undeveloped zoned sites within the town could be serviced. Irish Water will engage with Carlow County Council to ensure that planned growth in the strategic growth areas is taken account of in these studies. 		<p>Muinebheag/Leighlinbridge WWTP upgrade is Q1 2024. Improvement and upgrade works are also proposed for Mortarstown WWTP in Carlow, and Borris WWTP. At the lower end of the settlement hierarchy, there are constraints in three of the Larger Serviced Villages, and Irish Water has recently announced funding for the provision of a WWTP upgrade at Ballinabrannagh under the “Small Towns and Villages Growth Programme” (STVGP).</p> <p>Irish Water and Carlow County Council are continually progressing sewer rehabilitation activities, capital maintenance activities and other such works. Irish Water and Carlow County Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required over the Plan period.</p> <ul style="list-style-type: none"> ▪ <u>Wastewater Networks</u> <p>It is considered that an additional paragraph should be included in Section 6.2 to take account of Drainage Area Plan and the Strategic Network Development Plan for Carlow Town.</p> <p>Recommendation</p> <p>Amend Section 6.2 to include an additional paragraph with the following text:- Irish Water will commence a Drainage Area Plan (DAP) for Carlow Town in Q1 2022. The DAP will assess the performance of the wastewater networks in the town. In parallel with the DAP, a Strategic Network Development Plan is also being progressed by Irish Water for Carlow Town, which will be high-level study that will help inform how undeveloped zoned sites within the town could be serviced.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>(vi) <u>Water Infrastructure in Carlow</u></p> <ul style="list-style-type: none"> ▪ Indicates that it is envisaged that capacity is available in the water resource zones to cater for the population targets identified in the Draft County Development for all except Tinnahinch. Tinnahinch is served from the Graiguenamanagh water resource zone and capacity constraints in that WRZ are being reviewed through the NWRP full options assessment process with a preferred approach anticipated in Q3 2021. ▪ Irish Water and the Council will continue to monitor the performance of the networks to ensure that the most urgent works are prioritised as required. <p>The submission also outlines recommended amendments and suggested updates as follows:</p> <p><u>Section 6.4 Wastewater Treatment – Commercial and Tourism uses</u></p> <ul style="list-style-type: none"> ▪ IW welcomes the provision of WT – P2 in relation to the intention to prohibit the use of shared wastewater treatment systems for new multi house developments in unserved rural areas. ▪ In relation to WT-P1 IW would draw the Council's attention to Section 5.3.1 of the Draft Water Services Guidelines for Planning Authorities which states:- <i>'It is the policy of Irish Water to facilitate connections to existing infrastructure, where capacity exists, in order to maximise the use of existing infrastructure and reduce additional investment costs. There is a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks. Alternative solutions such as private wells or wastewater treatment plants should not generally be considered</i> 		<p><u>Section 6.4 Wastewater Treatment – Commercial and Tourism uses</u></p> <p>It is considered that Policy WT. P1 should amended to take account of Irish Water guidance on a general presumption that development will be focused into areas that are serviced by public water supply and wastewater collection networks.</p> <p>Recommendation</p> <p>Amend Policy WT. P1 as follows:- Ensure that the proposed wastewater treatment system for development in unserved areas complies with the relevant EPA Code of Practice, the Water Framework Directive, the National River Basin Management Plan 2018-2021 (as maybe updated) and the Habitats Directive. There will be a general presumption that development will be focused into areas that are serviced by public wastewater collection networks where available.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p><i>by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance.'</i></p> <p><u>Section 6.5</u></p> <ul style="list-style-type: none"> ▪ IW welcomes the inclusion of policies to support surface water drainage management and in particular the requirement for the provision of SuDS by all developments. IW would also like to draw the council's attention to our menu of objectives (attached), and specific objectives which we would like to see included in the Development Plan as follows: <ul style="list-style-type: none"> - To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems for foul water. - to ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure. - to require all new development 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. 		<p><u>Section 6.5</u></p> <p>Section 6.5 of the Draft Plan deals with Surface Water Drainage, including the use of Sustainable Urban Drainage Systems (SuDS). The Executive notes the additional policy provisions recommended by Irish Water and considers that reference to same can be incorporated as policies (see recommendation below).</p> <p>Recommendation</p> <p>Include the following additional policies under Section 6.5:</p> <ul style="list-style-type: none"> ▪ Seek to minimise in as far as is practical the discharge of additional surface water to combined (foul and surface water) sewers (in existing combined sewer serviced areas) in order to maximise the capacity of existing collection systems for foul water. ▪ 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.
<p>Submission recommends that future housing developments are accompanied by the proper infrastructure and services for the local area.</p>	CLW-C10-102	<p>Agreed. The Draft Development Plan has zoned lands on the availability of appropriate infrastructure to support anticipated population increase. The Draft Plan also requires the submission of a social infrastructure audit for appropriately scaled residential applications in the settlements throughout the County to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
		<p>Recommendation No change to Draft Plan.</p>
<p>Submission recommends including the use of Integrated Constructed Wetlands in the process of wastewater treatment in the upgrade of all existing and the creation of new wastewater treatment plants throughout the county, to include public access for recreation and amenity where possible.</p>	<p>CLW-C10-69 CLW-C10- 70</p>	<p>The potential use of Integrated Constructed Wetlands for existing or new wastewater treatment plants falls within the remit of Irish Water, who is responsible for the delivery, integration and implementation of strategic public wastewater projects and infrastructural improvements in the county.</p> <p>Recommendation No change to Draft Plan.</p>
<p>DAU Includes the following comments, recommendations, and advice: <u>6.5 Surface Water Drainage</u></p> <ul style="list-style-type: none"> ▪ Welcomes Policy SW. O1 which requires all development (including extensions to existing development) proposals to incorporate design criteria and SuDS measures in accordance with Carlow County Council SuDS Policy in order to reduce the potential impact of existing and predicted flood risks and to improve biodiversity and amenity value. Advice is to encourage above ground SuDS measures, rather than tanks and piped outfalls directly to watercourses, which will benefit biodiversity as well as attenuate floods. ▪ Recommends that a SuDs / Green Infrastructure checklist is included with planning applications, as appropriate, outlining all SuDs measures and the Rationale for selecting/not selecting measure. 	<p>CLW-C10-103</p>	<p><u>6.5 Surface Water Drainage</u> Policy SW. P2 in Section 6.5 seeks to ensure SuDS measures are incorporated into development proposals and integrated with green infrastructure, as an alternative to tanks and piped outfalls directly to watercourses. The policy can be amended to take account of the Department's advice.</p> <p>The potential use of a SuDS/Green Infrastructure checklist as a part of a planning application pack is noted and can be given consideration as an operational matter for the Council's Development Management Team.</p> <p>The benefit of a strategic macro level approach to the design of SuDS is acknowledged and is a matter that can be given more detailed consideration as part of the preparation of the Joint Urban Area Plan for the Greater Carlow Urban Area.</p> <p>A link can be included to the Council's SuDs policy in Objective SW. O1</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<ul style="list-style-type: none"> ▪ The design of SuDS is best addressed at a macro level and consolidated solutions should be examined which allow for the aggregation of volumes in larger parks and open spaces rather than a fragmented and phased approach. This is particularly relevant to the Greater Carlow Urban Area and should be considered as part of the proposed statutory Local Area Plan / Urban Area Plan for the area. ▪ Advises Carlow County Council to consider providing for Strategic SuDs measures which will greater biodiversity benefit to biodiversity than individual fragmented measures as part of the Local Area Plan / Urban Area Plan for the Greater Carlow Urban Area. ▪ Recommends that a link should be provided to the Carlow County Council SuDs policy referenced in Objective SW. O1. 		<p>Recommendation Amend the text of Policy SW. P2 to state:- <i>Ensure, as an alternative to underground tanks and piped outfalls to watercourses, that all development proposals incorporate Sustainable Drainage Systems and promote the use of green infrastructure e.g. green roofs, green walls, planting and green spaces for surface water retention purposes, as an integrated part of SuDS and maximise the multi-functional potential of these systems including benefits for biodiversity and amenity value wherever possible.</i></p> <p>Include link to Council's SuDS policy in Objective SW. O1</p>
3.6.2 Flood Risk		
<p>The OPW highlights the following comments as opportunities for the Draft Plan before it is finalised:</p> <p>(i) <u>Flood Relief Schemes</u> - The OPW welcomes Objective FR02 to facilitate the provision of new, or augmentation of existing flood defences, and to support the implementation of proposed flood schemes. The OPW recommends that the text in this</p>	CLW-C10-24	<p>(i) <u>Flood Relief Schemes</u>: Additional text can be included in FR 02 to ensure that zoning or development proposals support and do not impede or prevent the progression of these schemes. Key flood risk infrastructure in the County will be addressed as appropriate as part of the Urban Plan for Carlow or Local Area Plans as appropriate.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>objective could be clarified to ensure that zoning or development proposals support and do not impede or prevent the progression of these. The OPW requests that Carlow County Council has full regard in the preparation of its Development Plan to the protection, and the need for maintenance, of these schemes. Suggests also that Carlow County Council might consider including a register of key flood risk infrastructure in the County Development Plan where it would not otherwise be readily identified or protected from interference or removal.</p> <p>(ii) <u>Consideration of Climate Change Impacts</u> – Welcomes Policy FR.P6 (Section 6.10.4) to ensure each flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation.</p> <p>(iii) <u>Sustainable Urban Drainage Systems (SUDs)</u> - OPW welcomes the discussion on surface water in Chapter 6 of the plan, particularly policies SWP1-4 and objective SW.O1 requiring all development proposals to incorporate Sustainable Drainage Systems, and to promote Green Infrastructure. OPW further notes that the Guidelines recommend that the SFRA provide guidance on the likely applicability of different SUDS techniques for managing surface water run-off at key development sites, and also that the SFRA identifies</p>		<p>Recommendation Include additional text in FR O2 as follows: FR O2: Facilitate the provision of new, or the augmentation of existing flood defences and protective measures, where necessary 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.</p> <p>(ii) <u>Consideration of Climate Change Impacts</u>: this is embedded at plan making stage and also in Policy FR P4 and FR P6 which ensures consideration of climate change at development management stage.</p> <p>Recommendation No change to Draft Plan.</p> <p>(iii) <u>Sustainable Urban Drainage Systems</u>: There are 32 settlements reviewed under the County Development Plan and specific guidance on key development sites is beyond the scope of assessment. General policy on Surface Water Management ensures the implementation of SuDS and this issue could be specifically investigated in a higher level of detail by Carlow County Council and under SW01.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>where integrated and area-based provision of SUDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.</p>		
<p>DAU Includes the following comments, recommendations, and advice:</p> <p><u>6.10.4 Flood Risk Management</u></p> <ul style="list-style-type: none"> ▪ In relation to policy FR. P5, notes that Riparian Zone policies are contained in Section 10.7 of the CDP and not Section 10.8 as stated. 	<p>CLW-C10-103</p>	<p><u>6.10.4 Flood Risk Management</u> Noted and agreed.</p> <p>Recommendation Change reference in relation to Policy FR P5 from Section 10.8 to Section 10.7.</p>
<p>The following observations are made on flood protection:</p> <ul style="list-style-type: none"> ▪ Ensure the protection of the river Barrow floodplain. ▪ Assess the feasibility of providing financial relief (acknowledgement) to landowners whose lands are periodically flooded providing this flood attenuation relief. ▪ The use of natural flood mitigation strategies over hard infrastructure with a view to providing habitats for wildlife while protecting human livelihoods and centers of urban conurbations. 	<p>CLW-C10-106 CLW-C10- 69 CLW-C10- 70 CLW-C10- 86</p>	<ul style="list-style-type: none"> • Subsection 6.10.6 in Chapter 6 includes Policy FR. P5 which seeks to protect and enhance the county's floodplains and wetlands as "green infrastructure" which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed. • Financial relief is outside the scope of the Development Plan Process • Natural Flood Management measures are now investigated by OPW when undertaking relief schemes. FR O2: to be amended to reflect same. <p>Recommendation Amend Objective FR O2 as follows: 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 subject to compliance with the requirements of the EU Habitats Directive, the protection of natural and built heritage and visual amenities</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
3.6.3 Waste Infrastructure		
<p>The submission welcomes that the role of the Circular Economy is acknowledged in a number of Chapters of the Draft Carlow County Development Plan, including Chapter 6 <i>Infrastructure and Environmental Management</i>.</p> <p>Also refers to the following:</p> <p><u>Proposed inclusion of reference to new Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects</u> (due for finalisation shortly) Recommends that reference be made to these new draft guidelines - in Section 6.6.5 with reference to Construction and Demolition Waste and in Section 16.11.5 on Construction and Environmental Management Plans.</p>	CLW-C10-107	<p>Agreed. The new draft guidelines can be included as requested in subsections 6.6.5 and 16.11.5.</p> <p>Recommendation Amend text in the table in subsection 6.6.5 relating to Construction and Demolition Waste as follows:- Reuse and recycling of construction and demolition waste will be supported by the Council. The Council will have regard to and require compliance with the EPA's 'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects 2021 in the management of waste from construction and demolition projects, which supersedes previous 2006 Guidelines published by the Department of the Environment, Heritage and Local Government.</p> <p>Amend text in part k of subsection 16.11.5 in Chapter 16 as follows:- disposal of construction/demolition waste and details of how it is proposed to manage excavated soil, including compliance with the EPA's 'Best Practice Guidelines for the Preparation of Resource Management Plans for Construction & Demolition Projects 2021, which supersedes previous 2006 Guidelines published by the Department of the Environment, Heritage and Local Government;</p>
<p>The PPN refers to the following infrastructural requirements:</p> <p><u>Carlow MD</u>: making Carlow the first plastic waste free town, having more accessible recycling centres, having more litter pickers and bin facilities and the mapping of boreholes.</p> <p><u>Muine Bheag MD</u>: Proper waste separation.</p>	CLW-C10-38	<p>It is considered that the issues raised in the submission are adequately addressed in Chapter 6 of the Draft Plan, which includes a comprehensive suite of policies, objectives and related provisions supporting waste management, recycling facilities, and broadband infrastructure.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<u>Tullow MD</u> : Improving waste services.		
3.6.4 Broadband		
The PPN refers to the need for better broadband in the Carlow and Tullow MD areas.	CLW-C10-38	<p>It is considered that the issues raised in the submission are adequately addressed in Chapter 6 of the Draft Plan, which includes a comprehensive suite of policies, objectives and related provisions supporting waste management, recycling facilities, and broadband infrastructure.</p> <p>Recommendation No change to Draft Plan.</p>
Supports and facilitates the implementation of the National Broadband Plan and the Carlow Digital Strategy. To ensure economic competitiveness for enterprise and commercial sectors, submission supports the delivery of high-capacity information communications technology infrastructure, broadband connectivity and digital broadcasting throughout the county.	CLW-C10-40	<p>Section 6.8.1 refers to the implementation of the National Broadband Plan, and notes that €32 will be invested to for same in County Carlow. Section 6.8.2 addresses the adoption of the Council's Local Digital Strategy, including 4 key pillars of the Strategy that include the digital economy and digital services. In addition, the role of telecommunications is dealt with in Section 6.8.3, which recognises its importance for economic progress. The aforesaid provisions in the Draft Plan are supported and promoted by Policies IC. P1 to P7, and further by objective IC. O1 relating to the implementation of a Digital Strategy.</p> <p>Recommendation No change to Draft Plan.</p>
The submission welcomes the prioritisation of two primary schools for connections to Broadband.	CLW-C10-104	<p>Noted.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
3.6.5 Transmission Lines / Telecommunications		
<p>Submission references Policies EI. P2, P3 and P5 stating that undergrounding of transmission lines should be considered first. Recommends submission of landscape and visual assessments for proposals in high amenity and mountain areas. In relation to policy IC. P1 states that the impacts on established walking routes should be taken into account.</p>	CLW-C10-61	<p>Policy EI. P2 and EI. P3 in subsection 6.7.3 adequately addresses the undergrounding of transmission lines.</p> <p>Chapter 9, Section 9.6 of the Draft Plan includes requirements, where appropriate, for landscape and visual impact assessment to assist in identifying and assessing the significance of, and the effects of, change from development on the landscape, and on people's views and visual amenity. The provisions of this section are of particular importance to high amenity and mountain areas. Section 9.6 is underpinned by Policies LA. P1 to P11.</p> <p>The provisions of Chapter 11 recognise the importance of established walking routes, including support for the maintenance and development of same. Potential impacts on established walking routes will be assessed at planning application stage.</p> <p>Recommendation No change to Draft Plan.</p>
<p>ESB Makes the following comments:</p> <p><u>Electricity Transmission & Distribution</u></p> <ul style="list-style-type: none"> ▪ The Draft Plan must continue to ensure that the long-term operational requirements of existing utilities are protected and in this regard Policy EI. P1 is welcomed as set out in Chapter 6. ▪ The ongoing need for curtilage management and the restriction of land uses which might affect the ability to consolidate and/or 	CLW-C10-76	<p>The content of the submission regarding electricity transmission and distribution, and telecommunications which supports existing policy provisions of the Draft Plan is noted and welcome.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>expand operations is essential, and therefore Policy EI. P4 is supported.</p> <ul style="list-style-type: none"> ▪ ESB supports the promotion of energy infrastructure objectives and welcome the inclusion of Policy IF. P1. In Chapter 7. ▪ Carlow has a very strong electrical grid and substation network, and this network will be instrumental in supporting the development of the renewable energy industry in the county. <p><u>Telecommunications</u></p> <ul style="list-style-type: none"> ▪ ESB supports the approach and view of the Council that to facilitate the provision of telecommunications services at appropriate location, applicants must demonstrate compliance with national guidance. ▪ ESB Telecoms are working with ESB Networks to upgrade internal ESB Communications Networks to facilitate the roll-out of ESB's Smart Metering project, which is a central component to combating climate change through the reduction of unnecessary energy usage. ▪ Welcome the emphasis on co-location in Policies IC. P1 to IC. P7 and ESB Telecom Mast sites are open for co-location and duplication of infrastructure is reduced as a result. 		
States that the policies and objectives in Chapter 6, meet the maintenance and management goals of Waterways Ireland on the Barrow Navigation.	CLW-C10-118	<p>Noted.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
3.6.6 Water Quality		
<p><u>The Local Authorities Water Programme</u> Requests that the County Development Plan provides for the objectives of the Blue Dot Catchments Programme. It is submitted that the role of the planning authorities includes:</p> <ul style="list-style-type: none"> - Planning for their protection and an awareness of the locations and objectives under the RBMP (on council databases, maps, GIS and the CDP) - Planning for protection of high status objective water bodies may vary depending on location, topography, soil type etc and should involve consultation with environment section and LAWPRO. - The public and stakeholders would need to be aware of their importance and that any proposed development would need to ensure that the proposed development (or in combination with other plans or projects) will not lead to a deterioration of a high-status water body. - Access to information is noted at https://gis.epa.ie/GetData/Download <p>Recommends inclusion of an objective related to the protection and restoration of high-status objective water bodies within the CDP.</p>	CLW-C10-28	<p>Section 6.9.5 addresses the Blue Dot Programme and its role under the RBMP to support the protection of high-status objective sites. It is an objective of the Council under Objective WQ. 03 in subsection 6.9.8 to <i>"Implement the Blue Dot Catchment network programme under the RBMP to protect and maintain the excellent 'High' status water bodies"</i>.</p> <p>Recommendation No change to Draft Plan.</p>
<p>(i) Supports policy WQ. P4 - <i>Promote and support locally led community initiatives aimed at improving local water quality standards subject to compliance with the Habitats Directive.</i></p> <p>(ii) Requests that water testing at popular bathing areas should take place year-round and would also advocate for a review of the</p>	CLW-C10-84	<p>(i) Noted.</p> <p>(ii) This is an operational matter and outside the remit of the Development Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<p>identified bathing waters within the County and to identify popular or 'High' status spots that are currently not being tested for water quality.</p>		<p>Recommendation No change to Draft Plan.</p>
<p>DAU Includes the following comments, recommendations, and advice:</p> <p><u>6.9.1 Water Quality</u></p> <ul style="list-style-type: none"> ▪ Suggests changing '<i>water-dependent ecosystems</i>' to '<i>water dependent habitats and species</i>' in Section 6.9.1. 	CLW-C10-103	<p><u>6.9.1 Water Quality</u> Noted and agreed</p> <p>Recommendation Change reference '<i>water-dependent ecosystems</i>' in Section 6.9.1 to '<i>water dependent habitats and species</i>'.</p>
3.6.7 Air Pollution		
<p>DAU Includes the following comments, recommendations, and advice:</p> <p><u>6.11.1 Air Pollution - Policies</u> Advises that development which may lead to nitrogen deposition, such as agricultural projects including pig and poultry intensive agricultural installations, bioenergy projects and new road schemes, must be subject to screening for appropriate assessment, and if required appropriate assessment. In relation to intensive agricultural</p>	CLW-C10-103	<p><u>6.11.1 Air Pollution - Policies</u></p> <p>Noted. See previous response to NS P2 (sub CLW-C10-103). Include also requirements of submission.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
installations, recent EPA Guidance (2021) on Assessment of the Impact of Ammonia and Nitrogen on Natura 2000 sites from intensive agriculture installations should be consulted when carrying out project assessment		To amend Policy AG P4 as follows: Ensure that all agricultural activities comply with legislation on water quality, such as the Phosphorous Regulations, Water Framework Directive and Nitrates Directive. In relation to intensive agricultural installations, recent EPA Guidance (2021) on Assessment of the Impact of Ammonia and Nitrogen on Natura 2000 sites from intensive agriculture installations should be consulted when carrying out project assessment.
<p>DAU Includes the following comments, recommendations, and advice:</p> <p><u>6.13.1 Light Pollution</u> <i>Advises that the following policy objective should be considered: Ensure that the use of energy efficient (LED) lighting, both in relation to planning applications and local authority projects, does not have adverse effects on biodiversity by limiting lighting only to where it is required (not just replacing existing lighting) and using 'warm white' lighting with a Correlated Colour Temperature (CCT) of less than 4000 kelvins (k), and with a CCT below 2700k in sensitive areas.</i></p>	CLW-C10-103	<p>The content of this submission is noted it is considered that an additional policy can be included to seek to minimise any adverse effects on biodiversity arising from lighting proposals in sensitive areas.</p> <p>Recommendation Include additional policy LP P3 as follows; <i>Seek to ensure that the use of energy efficient (LED) lighting, both in relation to planning applications and local authority projects, minimises any significant adverse effects on biodiversity with the use of appropriate lighting in sensitive areas.</i></p>
3.6.8 Seveso: Accident Directive		
<u>The Health and Safety Authority advises as follows:</u>	CLW-C10-6	Section 6.14 of the Draft Plan addresses the Major Accidents Directive (EU Directive 96/82 EC) on the control of major accidents hazards, commonly referred to as the SEVESO II Directive. Policies MA. P1 and P2 under this section of the Draft Plan have regard to

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
<ul style="list-style-type: none"> ▪ The HSA approach to Land-use Planning is set out in the document 'Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning'. ▪ Requests guidelines to contain: <ul style="list-style-type: none"> - An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 13 of Directive 2012/18/EU. - The Consultation distances and generic advice, where applicable in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority. - A policy on the siting of new major hazard establishments, taking account of Article 13 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments. <p>Also notes that there are currently no notified establishments in the area of the Draft Carlow County Development Plan.</p>		<p>provisions of the Directive, in addition to technical advice of the HSA on any identified SEVESO sites in the county during the lifetime of the Plan. It is considered that the text of Section 6.14 should be amended to take account of the requests in the submission, including reference to HSA document 'Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning'.</p> <p>Recommendation</p> <p>Amend the text in Section 6.14 as follows:- The EU Directive (96/82 EC) on the control of major accidents hazards, commonly referred to as the SEVESO II Directive, was adopted in 1999. The Directive aims to prevent major accident hazards involving dangerous substances and chemicals and the limitation of their consequences for people and the environment. At present, there are no 'Seveso' sites (identified within the 'COMAH Regulations as 'locations where significant quantities of dangerous substances are stored') within County Carlow. The Directive is implemented in Ireland through the Chemicals Act (Control of Major Accident Hazards involving Dangerous Substances) Regulations 2015 (COMAH Regulations). The Directive aims to prevent accident hazards from dangerous substances and to limit the consequence of such accidents through the following measures:</p> <ul style="list-style-type: none"> ▪ The siting of new Major Accident Hazard sites. ▪ Modification of existing Major Accident Hazard sites. ▪ Development in the vicinity of a Major Accident Hazard site which by virtue of its type or siting is likely to increase the risk or consequence of a major accident. ▪ Site specific emergency planning by the local authority and site operator. <p>A Major Accident Hazard Site (SEVESO Site) is a site where the occupier has notified the Health and Safety Authority (HSA) that they meet a specified threshold for quantities of hazardous substance as outlined in the above-mentioned Regulations i.e. sites defined by COMAH Regulations as 'locations where significant quantities of dangerous substances are stored'. The HSA provides advice to Planning Authorities,</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.6 Infrastructure and Environmental Management		
		<p>where appropriate, in respect of planning applications for development within a certain distance of the perimeter of these sites. The Council is required to seek technical advice from the HSA in relation to any planning application directly pertaining to a SEVESO site or within "consultation distance" of these establishments. At present there are no SEVESO sites within County Carlow.</p> <p>The HSA approach to Land-use Planning is set out in the document '<i>Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning</i>', which is available to download at https://www.hsa.ie/eng/Your Industry/Chemicals/Legislation Enforcement/COMAH/Land Use Planning/</p> <p>Amend Policy MA. P2 as follows:- Have regard to the provisions of the Major Accident Directive (EC Directive 2012/18/EU), including any regulations under any enactment giving effect to that Directive, and to the technical advice of the Health and Safety Authority (HSA), in relation to any identified SEVESO sites in the county during the lifetime of this Plan and to the control of development with respect to:</p> <ul style="list-style-type: none"> ▪ The siting of Major Accident Hazard sites. ▪ The modification of an existing Major Accident Hazard site. ▪ Specified development in the vicinity of a Major Accident Hazard site.

Chapter 7: Climate Action and Energy

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
3.7.1 General		
<p>Submission recommends additional text (in Green) for the aim in Chapter 7 suggested as follows: <i>Aim: To combat climate change and its impacts in the County by promoting and supporting policies and objectives which contribute towards a transition to a low-carbon and climate resilient future, and which focus on reducing greenhouse gas emissions and energy demands in line with targets within the Climate Action Plan, through appropriate and effective climate mitigation and adaptation measures'. Reference is also made to absence in Chapter to a central pillar within the Climate Action Plan of 70% renewable electricity generation by 2030.</i></p>	CLW-C10-19	<p>The additional wording suggested is not considered necessary. The Council has prepared a Renewable Energy Strategy to support energy conservation, energy efficiency and the development of alternative sources of energy, namely renewable energy. This is balanced against challenges such as landscape and visual impacts, the availability of supporting infrastructure and competition for land-uses. The potential for each renewable energy type in Carlow is dependent on the abundance of the natural resource available, along with environmental and infrastructural constraints and facilitators. The strategy is tailored to the specific objectives of the county, developed to achieve the overall strategic aim and vision.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission details that Carlow County Council has recently joined the European Climate Alliance (in September 2020), which among other things commits the Council to reduce CO² emissions and means being part of a network dedicated to climate action, teaming with likeminded local authorities.</p>	CLW-C10-113	<p>The content of the submission is noted. Carlow County Council is committed to working towards a transition to a low carbon and climate resilient future. This has been addressed through the provisions of this Draft Development Plan among other actions including membership of relevant organisations which will support climate mitigation and adaptation over the plan period.</p> <p>Recommendation No change to Draft Plan.</p>
<p>References that in the context of climate emergency that all plans should incorporate the following principles:</p>	CLW-C10-3	<p>The content of the submission is noted. It is considered that the issues raised have all been comprehensively dealt in the Draft Plan, and particularly</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<ul style="list-style-type: none"> ▪ Actions, objectives, and policies to be aligned with net zero carbon by 2050. ▪ All climate measures should be cross-cutting. ▪ All new residential development and buildings must be designed to reduce and eliminate car dependent travel. ▪ . ▪ No action should undermine environmental objectives and diminish ecosystem services and biodiversity. ▪ Construction waste hierarchy to be adhered too – reuse, renovate and demolish. ▪ Development must have a biodiversity plan. Soil sealing minimised. ▪ Minimum density guidelines to be followed to ensure compact growth, avoid soil sealing and maximise efficiency of infrastructure. ▪ Encourage third party verification of all principles beyond minimum standards with the Council leading by example. 		<p>through the policies, objectives and relation provision contained in Chapters 5, 6, 7, 9 and 10. The incorporation of climate change mitigation and adaptation as a cross cutting theme in each chapter of the Draft Plan is also specifically addressed by Table 7.2 in Chapter 7 'Climate Action and Energy'.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission welcomes the discussion in Chapter 7 of the plan on climate action, and the policies and objectives therein on adaptation and mitigation,</p>	CLW-C10-24	<p>The content of the submission is noted and welcomed.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.2 General – Renewables		
<p>Makes the following observations under a number of headings:</p> <p>(i) <u>Generation & Renewables</u></p>	CLW-C10-76	<p>The content of the submission is noted and welcomed.</p> <p>(i) Noted</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>ESB acknowledge the overall consistency and alignment of Chapter 7 with the objectives of the NPF and RSES and national guidelines, along with the ambition of the Council to contribute to achieving national targets. Welcomes the commitment set out in Renewable Energy Policy RE. P1.</p> <p>(ii) <u>Energy Storage & Hydrogen Energy</u> Support the ambition of Policy ES. P1. Regarding efficient energy storage systems noting that energy storage systems will be essential to smoothing out the natural variability that occurs in renewable energy sources and to providing electricity at times of peak demand. Utility scale battery storage system are being utilised to enable more efficient use of renewable energy. ESB is installing Battery Energy Storage Systems (BESS) at existing generating facilities across Ireland, which will operate by charging batteries using electricity exported from the national grid. Green hydrogen, which is produced from renewable energy sources, offers potential for large scale seasonal storage.</p> <p>(iii) <u>Hybrid Renewables</u> ESB encourage the Council to consider the inclusion of a Policy Objective in Section 7.10.1 and Section 6 of RES that includes text similar to: <i>"To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for wind energy generation"</i>.</p> <p>(iv) <u>Renewables-Enabling Plant</u></p>		<p>Recommendation No change to Draft Plan.</p> <p>(ii) Noted</p> <p>Recommendation No change to Draft Plan.</p> <p>(iii) The intent of the policy can be supported subject to modification.</p> <p>Recommendation Include new Policy RE. P2 to read as follows:- <i>Support the co-location of renewable energy technologies on a case-by-case basis subject to compliance with planning and environmental criteria.</i></p> <p>(iv) In regard to the submission's recommendation for renewables-enabling plant, it is considered that at this time this matter goes</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>Notwithstanding the Government's aim to increase the percentage of electricity generation from renewables to 70% by 2030, the contribution from non-renewable sources will still consist of 30%. Note that the requirement for renewables-enabling plant is not acknowledged in the Draft Plan.</p> <p>Given that Carlow has access the Gas Network, the inclusion of the following objective is recommended: <i>"It must also be recognised that natural gas, particularly renewable and indigenous gas, will continue to have a role to play in the transition to a low carbon economy. As such, renewable energy developments may require support from such sources in times of high energy demand"</i>. This is noted in regard to fast-responding gas turbines (i.e. FlexGen Plant) for the provision of backup power.</p>		<p>beyond the scope of the RES study and the SEAI LARES methodology.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission notes that County Carlow is doing very poorly in reducing greenhouse gases and needs a climate change officer who will provide the guidance and knowledge on what we should be doing and how and to advise and support voluntary groups, residents' groups, farming groups and others.</p>	CLW-C10-109	<p>The content of the submission is noted. The appointment of a climate change officer is outside the scope of the development plan process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission refers to the need to extend the use of alternative energy concepts, use of smoke free fuel, building energy saving housing, promoting green schools, the need for more electric car charge points, lack of rural transport or car sharing options for rural people and the need for measured law and polices to reduce carbon footprint</p>	CLW-C10-38	<p>The content of the submission is noted. It is considered that the issues raised have all been comprehensively dealt in the Draft Plan, and particularly through the policies, objectives and related provision contained in Chapters 5, 6, 7, 8, 9, 10 and 16. The incorporation of climate change mitigation and adaptation as a cross cutting policy provision in each chapter of the Draft Plan is also specifically addressed and highlighted by Table 7.2 in Chapter 7 'Climate Action and Energy'.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
		Recommendation No change to Draft Plan.
3.7.3 Solar		
<p>(i) Welcome the removal of the current Energy Policy 9 from the Draft Plan (10MW cap on solar farm applications) which it states was unsustainable, creating a regional inequality in the drive towards achieving national targets on renewable energy.</p> <p>(ii) Urge caution in the adoption of Policy SE. P1. It is submitted that preference or undue weight afforded to the use of brownfield land fails to take cognisance of the current land requirements for modern utility scale solar farms. The scale of brownfield required for a solar farm is unlikely to be found within an Irish brownfield context. Submits that the policy is too generic and open to interpretation by third parties and objectors and further clarity could be considered (e.g. cut away bog, landfill however noting that such areas may not be suitable due to biodiversity, ground stability and gas release).</p> <p>(iii) Suggests in relation to innovative approach known as co-location that objective should be included as follows: <i>'Favourable consideration will be given to the re-use, shared use (co-location),</i></p>	CLW-C10-19	<p>(i) Noted</p> <p>Recommendation No change to Draft Plan.</p> <p>(ii) In relation to Policy SE. P1 the submission correctly points out that brownfield sites in themselves might not deliver 'large scale' facilities. However, it also important to note that the use of solar energy in other contexts such as on agricultural lands and for public buildings, is supported in the Draft Plan by Policies SE. P2 to SE. P4. For the purposes of clarity, it is considered that the reference to 'large' in Policy SE. P1 can be removed.</p> <p>Recommendation Amend Policy SE. P1 to read as follows:- <i>Favourably consider the redevelopment of brown field sites for large solar PV projects subject to proper planning and environmental considerations.</i></p> <p>(iii) The reference to co-location is a valid point, which is not specifically addressed in the SEAI LARES Guidance, and which reflects the recent advances in both renewable technology and</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p><i>refurbishment, repair and repowering of existing renewable energy technology developments in order to prolong the life span of developments such as wind farms and solar farms providing that these do not result in unacceptable impacts on the environment or residential / visual amenity.'</i></p> <p>(iv) The Plan should provide clarity to prohibit the unnecessary use of restrictive conditions that prevent an increase in MW export capacity without submitting a new planning application. Suggest that policy provision within the new Development Plan should extend to providing support for flexible and enforceable conditions in any planning consent for a solar farm, to allow minor non-material changes to the panel and infrastructure layout.</p>		<p>associated equipment needed to maximise renewable penetration on the grid. It is considered that a new policy can be included in Chapter 7 and in the RES to address renewable energy co-location.</p> <p>Recommendation Include additional text in subsection 7.10.1 ('Renewable Energy') to address co-location as follows:- <i>Renewable energy technologies can also be successfully co-located, or located alongside installations for energy storage, conversion, and grid stability. This approach can help enable greater penetration of renewable energy on the national grid, as well as integration of renewable electricity with transport and the gas grid.</i></p> <p>Include new Policy RE. P2 to read as follows:- <i>Support the co-location of renewable energy technologies on a case-by-case basis subject to compliance with planning and environmental criteria.</i></p> <p>(iv) The Draft Plan does not have the scope to change normal Development Management procedures in relation to flexibility in planning applications or conditions as this could infringe on planning law. National statutory guidance is the appropriate channel to address these issues.</p> <p>Recommendation No change to Draft Plan.</p>
Submission requests reconsideration be given to the inclusion of the 10MW cap on solar developments in Carlow in the County Development Plan.	CLW-C10-49	The inclusion of a 10MW cap on solar developments would be contrary to national and regional level policy which supports a move to a low carbon

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>Reference is made to the need to support communities to improve quality of life, the absence of a benefit to the local area arising from such developments and outlining the need for a balance in the protection of rural agriculture.</p>		<p>future and the need to encourage the use of renewable energy resources to reduce greenhouse gas emissions. The following has been considered in this regard:</p> <p>National Policy Objective 54 in the NPF which seeks to <i>"reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions."</i> The transition to renewable sources of energy is an integral part of Ireland's climate change strategy as a means of reducing reliance on fossil fuels, and this is reflected in NPO 55 which seeks to <i>"Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a low carbon economy by 2050."</i></p> <p>At a regional policy level the RSES supports the implementation of the NPF and the Climate Action Plan, by prioritising decarbonisation, resource efficiency and climate resilience. It also recognises that there is significant potential to use renewable energy across the Region to achieve climate change emission reduction targets and in this regard the Strategy supports renewable industries and requirements for transmission and distribution infrastructure. This is reflected in Regional Policy Objectives committed to supporting renewable energy and a low carbon energy future i.e. RPO 85, 87, 95, and 96.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission recommends that representations are made to government regarding the making of planning guidelines for ground mounted solar farms.</p>	CLW-C10-61	<p>Representation to government regarding the preparation of solar farm guidelines is outside of the scope of the development plan process.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
		<p>Recommendation No change to Draft Plan.</p>
<p>Makes the following observations regarding solar:</p> <ul style="list-style-type: none"> ▪ Welcome the support for the development of solar photovoltaics and solar thermal use in the Draft Plan under Section 7.10.3.2. ▪ Wish to highlight the potential for solar farms to be built on agricultural land whilst also accommodating the continued use of land for grazing or incorporating biodiversity, and in this regard welcome Policy SE. P2. ▪ Overall guidance on solar development could be strengthened with the provision for extension of duration of permission and may be appropriate for the planning authority to retain the option to grant permission for a longer period if requested by the development in appropriate circumstances. ▪ Requests that permissions are granted with a lifetime of up to 40 years, noting that the lifetime of solar developments is extending with most technologies now suitable for a minimum of 30 years operation. 	CLW-C10-76	<p>The content of the submission is noted and welcomed.</p> <p>The submission suggests that 30-40 year permissions should be allowed for solar energy. The duration of planning permissions is not within the scope of the development plan process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission welcomes the promotion of solar technology at public buildings.</p>	CLW-C10-104	<p>The content of the submission is noted.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
3.7.4 Wind Energy		
3.7.4.1 Wind Energy – General		
<p>ESB notes the following regarding wind energy;</p> <ul style="list-style-type: none"> ▪ Based on SEAI analysis, February 2020 provided a record-breaking month with 54% of electricity demand met by wind energy. ▪ The RSE includes a comprehensive assessment and spatial evaluation of the County to identify the most suitable locations for renewable energy technologies. ▪ Welcome that the RES was carried out having regard to the Draft Wind Energy Development Guidelines 2020 and note Policy WE.P1 in this regard. ▪ Figures 6.3 and 6.4 in the RES, and Section 16.12.3 in the Draft Plan, provides clear guidance for the development of wind energy projects in the County. ▪ It is noted that there is good consistency between the mapping in the RES and the wind energy strategies for other counties. ▪ Supports the inclusion of Policy WE. P1 regarding the repowering of existing windfarms. 	CLW-C10-76	<p>The content of the submission is noted.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submissions notes Ireland's wind energy target of 40% to 2020 and acceptability of wind energy, the relationship between CO² emissions and global temperature rise together with the criticality of onshore wind and planned Renewable Energy Strategies.</p>	CLW-C10-51	<p>The technical assessment of strategic wind energy potential is clearly set out in the draft RES. The landscape character and settlement pattern of the County means that there are constraints for utility scale wind farms. The wind energy target for Carlow in the Draft RES reflects the policy of the Council (Policy WE. P4) which seeks to take account of the visual sensitivity, scenic</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>Regarding wind energy the submission states that the Council should seize the opportunity and seek to identify enough land to accommodate as much as possible of the additional 4.2GW of additional onshore wind energy required by the Climate Action Plan by 2031 and classify a sufficient quantum of land as being suitable for wind energy to ensure national renewable energy targets. It also identifies a need for consultation with neighbouring planning authorities on preparation of wind energy strategies.</p> <p>Regarding Landscape Capacity & Sensitivity the following is noted:</p> <ul style="list-style-type: none"> ▪ As decarbonisation and renewable energy ambitions increase, wind energy developments will have to extend from the least sensitive landscape area into areas of slightly more sensitive landscape. ▪ There remains significant landscape capacity across the country and across County Carlow to fulfil the state's onshore wind energy and renewable energy ambitions. ▪ Most scenic parts of County Carlow can still be protected and deemed not normally permissible for wind energy in the new wind energy strategy, but it will be necessary to extend the areas that will be considered suitable for wind farm development into slightly more sensitive landscape areas if the requirements of the Climate Action Plan are to be delivered. 		<p>and amenity value of upland landscapes. However, provision is made for micro energy generation and to community energy projects referred to in Section 7.10.2.5. In addition, the Draft RES and Chapter 7 also support an increase in wind capacity through extension and/or repowering of existing wind farms through Policy WE. P2 which states <i>Support the re-powering of existing wind farms when they come to the end of their operational life, and extensions to existing wind farms, subject to compliance with proper planning and environmental considerations.</i></p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Development must be appropriately/suitably located. ▪ Developments must not create a hazard or nuisance and take into account visual amenity. ▪ Should take into account landscape and public rights of way. 	CLW-C10-61	<p>It is considered that the Draft Plan and Draft RES set out a robust policy position for the consideration of wind energy developments in the County, including requirements to comply with proper planning and environmental considerations such as landscape capacity and sensitivity, and the protection of biodiversity.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<ul style="list-style-type: none"> ▪ WE.P1, P3 and P4 - Prepare Wind Energy Strategy within one year of adoption of the plan. ▪ Restrict large scale wind energy structures in rural hinterland and mountain areas. ▪ Wind energy proposals should consider sensitivity of landscape including adjoining landscapes. ▪ Take into accounts impacts on public rights of way in assessing hydro energy schemes. 		<p>Policy provisions for the consideration of public rights of way are contained in Chapter 11, Section 11.14. This includes Policy RW. P2 which seeks to ensure that new development will not have a negative impact on established public rights of way, in particular in areas of high amenity, including the upland areas and waterways of the County.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.4.2 Uplands Areas		
<p>A number of submissions welcome and support the designation of the uplands areas as an area "not normally permissible" for wind farm development noting the sensitivity of the landscape from a visual, biodiversity, habitat perspective together with the economic impact on the local area including the tourism industry</p>	<p>CLW-C10-64 CLW-C10-66 CLW-C10-72 CLW-C10-74</p>	<p>The content of these submission are noted.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>A number of submissions consider that the terminology <i>not normally permissible</i> is not sufficiently robust to protect the upland areas and reference importance of the protection of habitats / biodiversity. Submits that a strengthened policy id required.</p>	<p>CLW-C10-68 CLW-C10-72 CLW-C10-117</p>	<p>The content of the submission is noted. The use of the terminology 'Not Normally Permissible' is standard and accepted planning wording that accords with the Development Plan Guidelines for Planning Authorities. The terminology is also well understood and used across many County Councils in the country. For these reasons, it is considered that there would be no benefit in adjusting the terminology, which is now well established, understood, and appreciated.</p> <p>It is important to note that the protection of the County's landscape and habitats is afforded clarity and certainty through the cross-cutting policy provisions in the Draft Plan. Chapters 9, 10 and 11 of the Draft Plan set out a comprehensive and robust policy position for the protection of the County's landscape and habitats and recognises its importance for natural heritage and tourism. This includes (inter alia) Policies LA. P2, P3 and P4 in Chapter 9, Policies NH P1 to NH. 9 and NS. P1 to P3 in Chapter 10, and Policy HT. P11 in Chapter 11.</p> <p>Recommendation No change to Draft Plan.</p>
3.7.4.3 Wind Energy – Extension and Re-powering		
<p>Submission expresses concern that extending or re-powering wind farms would allow accumulation to occur in relation to Policy WE. P2, and that further development relying on precedent would be to the detriment of highly sensitive and significant cultural and natural landscapes.</p>	<p>CLW-C10-74</p>	<p>The content of the submission is noted. The support included in Policy WE. P2 for extensions to wind farms is <i>subject to compliance with proper planning and environmental considerations</i>. This wording in the policy places emphasis on the relevant cross-cutting policy provisions in the Draft Plan, including policies for the protection of landscape in Chapter 9.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
		Recommendation No change to Draft Plan.
3.7.4.4 Renewable Energy Strategy – Wind Energy and Specific Projects		
Three number submissions have been received which reference specific wind energy projects that are subject to an existing or potential forthcoming planning application. These applications have been / are being prepared under the provisions of the existing Development Plan / Wind Energy Strategy (2008).	CLW-C10-26 CLW-C10-92 CLW-C10-93	It is not the role of the Development Plan process to comment on specific project proposals and it is entirely a matter for the applicants to determine dates of formal application. Any application determined prior to the adoption of the Carlow County Development Plan 2022-2028 will be determined on the basis of the existing Carlow Development Plan 2015-2021 and associated Wind Energy Strategy.
(i)In summary concerns expressed in this submission include: <ul style="list-style-type: none"> • A fundamental conflict between the constraints mapping in the RES for wind energy and the land use policy (WE.P4) which identifies that wind farms are 'not normally permissible' in the 'Upland' Landscape Type. • The identified 18.3MW capacity for onshore wind energy in the County cannot feature in Table 6.4 of the RES based on the land use policy for uplands which identifies that wind farms are 'not normally permissible'. • Potential additional wind capacity for the County to 2030 is 24MW when the 2020 installed capacity is removed. Notes that the level of ambition by the Council needs to be increased. • Policy WE.P4 makes the Draft Plan considerably more restrictive for onshore wind than the current 2015 Plan, and this is contrary to national policy which has increased targets to 2030. 	CLW-C10-26	The technical assessment of strategic wind energy potential is clearly set out in the draft RES. The landscape character and settlement pattern of the County means that there are constraints for utility scale wind farms. The wind energy target for Carlow in the Draft RES reflects the policy of the Council (Policy WE. P4) which seeks to take account of the visual sensitivity, scenic and amenity value of upland landscapes. Policy WE. P4 supports micro energy generation and community energy projects in the upland areas as referred to in Section 7.10.2.5. The Draft RES and Chapter 7 also support an increase in wind capacity through extension and/or repowering of existing wind farms through Policy WE. P2 which states <i>Support the re-powering of existing wind farms when they come to the end of their operational life, and extensions to existing wind farms, subject to compliance with proper planning and environmental considerations.</i>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<ul style="list-style-type: none"> No explanation in the Draft Plan for downgrading the current 'open for consideration' sites other than by reference to findings of Landscape Character Assessment, which also applies to the current 2015 Plan. Policy WE.P4 should be deleted from the Draft Plan and replace with wording in Section 6.1.5.1 (pg. 40) of the RES. This is preferable because it is based on more nuanced consideration of landscape and visual matters at a site-specific level. Notes that there are sometimes/often opportunities in more sensitive landscapes to integrate new and existing wind farms, or to find areas of less prominence where wind farms can be sited without an overall adverse impact. 		<p>The target for wind must be balanced against the relatively ambitious solar targets for the county. It can therefore be argued that the landscape, topography, and solar energy resource in this part of Ireland makes an ambitious solar energy target a sensible strategy for Carlow.</p> <p>Recommendation No change to Draft Plan.</p>
<p>(ii) Submission indicates that suitability of lands to the west of Oldleighlin are being assessed for a number of years, (identified as Lackan in the Carlow County Development Plan 2015-2021) for the siting of a wind farm.</p> <ul style="list-style-type: none"> Notes that these lands are currently designated as a 'Preferred Location' for wind energy development and now identified as an area 'Not Normally Permissible'. It is stated that no substantive rationale has been outlined that would justify such a significant and abrupt policy reversal. Requests that the proposed de-classification for the area identified as Lackan is reversed so that it continues to be designated as a 'Preferred Location' for wind energy development On the basis of key environmental, heritage and amenity criteria under which the planning authority have assessed the suitability 	CLW-C10-92	<p>In addition to the foregoing response to CLW-C10 26 the following should also be noted. For the draft RES wind analysis, a 7.6 m/s lower threshold was employed, to focus on sites more likely to have strategic capacity (turbines with tip height up to 175m). As stated in the draft RES, "<i>The technical mapping exercise in and of itself does not support nor preclude wind energy development</i>". Hence turbines that can work in lower windspeeds and due to technological advances could be considered if a feasible project is developed at appropriate locations.</p> <p>In relation to the 5km² area, this was selected to identify strategic potential for windfarms capable of producing over 50MW electricity and is therefore indicative of potential for larger wind farms as opposed to smaller wind farms. The RES does not, however, prescribe that only windfarms over 5km² should be considered; indeed 'Available Areas' that are less than 5km² are shown on the mapping (turquoise areas in Figure 6-3) and included in the discussion and available capacity calculations (Table 6-2). The methodology</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<p>of areas for wind energy in the Draft RES, the Lackan area exhibits a high degree of compliance with stated requirements and does not contain any overwhelming constraints which would preclude wind energy developments.</p> <ul style="list-style-type: none"> • The subject lands are assessed to have a wind speed in excess of 7.6m/s. • The Draft RES takes the view that a minimum spatial extent of 5km² is required in order to accommodate a wind energy development. However, no evidence base, justification or rationale has been offered for this entirely arbitrary figure. • The Draft RES fails to provide any clear direction or wind strategy map which clearly conveys the location of suitable wind energy • Recommends a re-appraisal of all lands with the county is carried out to identify suitable locations for wind energy development so that wind resource can be fully exploited. 		<p>arrives at indicative areas with scope for wind energy at scale and enables strategic capacity to be estimated, and it does not preclude individual projects of smaller scale – e.g. five turbines or less – from being developed at other locations.</p> <p>In terms of mapping, the SEAI LARES methodology does not require a strategy map for all renewable energy types. In this regard, the technical mapping exercise that was undertaken for wind opportunities and constraints in the county (See Figure 7.7 in Chapter 7) is a tool that can inform land/site selection for wind energy development by identifying areas of having a higher or lower concentration/distance from various sensitive receptors.</p> <p>Recommendation No change to Draft Plan.</p>
<p>(iii) Requests that lands currently under investigation for their ability to accommodate a wind energy development and located c.9km east of Tullow Town, c. 5km southwest of Hacketstown, and c. 1.5km southwest of Clonmore, are designated as a 'Preferred Location' for wind energy development. The following reasons are referred to in support of the request:</p> <ul style="list-style-type: none"> • Have wind speed in excess of 7.5m/s. • Have no overwhelming environmental, heritage, and amenity constraints. • Sufficient spatial extent to provide minimum setback of 500m from dwellings. 	CLW-C10-93	<p>As per response to CLW-C10-26 and CLW-C10 – 92.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
<ul style="list-style-type: none"> • Would not directly interfere with any identified routes or viewpoints. • Failure of Draft RES to identify and designate the subject lands as a 'Preferred Location' for wind energy development is inappropriate and unwarranted. 		
3.7.4.5 Wind Energy and Adjoining Counties		
<p>The submission recommends a regional approach to wind energy acknowledging that Wind Energy Ireland has been advocating for a regional approach to the spatial planning of wind farm developments to complement the local authority level approach and would provide a more appropriate platform for ensuring national policy can be transposed effectively to local level.</p>	CLW-C10-51	<p>The content of this submission is noted. The preparation of a Regional Wind Energy Strategy is outside the scope of the County Development Plan process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission notes that <i>a section of County Kildare east of the River Barrow which borders Kildare has been identified as having viable wind speeds (Fig. 6.3) however, there may be constraints due to number of dwellings in the area. This area is identified as open for consideration for the development of Wind Farms in the Draft Kildare Wind Energy Strategy. Further notes that the area west of the River Barrow appears unviable for potential wind farm development and has also been identified as not normally permissible in the Draft Kildare Wind Energy Strategy.</i></p>	CLW-C10-15	<p>The content of this submission is noted.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission references Wexford CDP and uplands designation for wind energy developments "no longer permissible – located in the not normally permissible area", and notes that wind energy applications will be looked on</p>	CLW-C10-122	<p>It is considered that the Policy provisions as contained in WE P4 is appropriately worded reflecting the sensitivities associated with the upland areas.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
unfavourably in these areas. The submission requests that this is enforced in relation to the Blackstairs and surrounding lands. States that mountain Mooreland maybe inappropriate for wind energy developments for reasons of natural heritage and scenic quality. Notes that offshore wind is taking centre stage.		<p>Recommendation No change to Draft Plan.</p>
3.7.5 Geothermal Energy		
Submission welcome the inclusion of GSI maps in Figures 7.10 (Geothermal Maps for County Carlow) and 7.11 (Geothermal Resource) and highlights two publications which will be of benefit to the County Development Plan's geothermal energy strategy i.e. Assessment of Geothermal Resources for District Heating in Ireland and the Roadmap for a Policy and Regulatory Framework for Geothermal in Ireland.	CLW-C10-54	<p>The content of the submission is noted. It is considered that additional text can be added to subsection 7.10.3.6 to reference the two publications referred to.</p> <p>Recommendation Include additional text after paragraph 1 in subsection 7.10.3.6 to read as follows:- In recognition of the important role geothermal energy plays in decarbonising the energy sector, the Geological Survey of Ireland (GSI) has published 'An Assessment of Geothermal Energy for District Heating in Ireland'. This document supports and complements a simultaneous 2020 publication by the Department of Environment, Climate and Communications entitled 'Geothermal Energy in Ireland, A Roadmap for a Policy and Regulatory Framework'.</p>
With regard to potential future developments of data centers or large industrial sites, requests that consideration be given to including policies that require	CLW-C10-110	Section 7.10.3.9 in Chapter 7 deals with district heating and includes Policies RH. P1 and RH. P2 which support and facilitate the installation of district heating technologies for new developments, including industrial zoned areas.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
such developments to be designed and located in a way that supports the efficient use of excess heat for district heating.		<p>Renewable Heat Objective RH. O2 seeks to achieve 4% <i>heat from renewable resources in the County by 2030 through greater use of bioenergy, district heating systems, and electrical heat pumps in the commercial/industrial sector...</i></p> <p>Recommendation No change to Draft Plan.</p>
3.7.6 Climate Action and Nature Based Solutions		
<p>The following comments are outlined in relation to Section 7.13.4 (Nature-Based Approaches and Green Infrastructure):</p> <ul style="list-style-type: none"> ▪ That developing a Green Infrastructure Strategy for the County is an objective (Gl. O1) of the CDP and not an intention. ▪ Notes that in recognition of the importance of SuDS, and to reduce the potential impact of existing and predicted flood risks and to improve biodiversity and amenity value, the Council has prepared a SuDS policy/guidance document. A link to or reference for this document should be provided. 	CLW-C10-103	<p>It is considered that the text of Section 7.13.4 can be amended to replace the word 'intention' with 'objective' and to refer to objective Gl. 01 in Chapter 9.</p> <p>The Council's Environment Section is currently preparing a new SuDS policy document, and the text of Section 7.13.6 should be amended to reflect same.</p> <p>Recommendation Amend the text of the 4th paragraph in Section 7.13.4 to read as follows (new text in green):- Within County Carlow there are opportunities to expand and strengthen the green infrastructure network and to further explore its integration into both public and private developments in the future. It is the Council's intention an Objective of the Council under Objective Gl. 01 in Chapter 9 to develop a Green Infrastructure Strategy for the County in consultation will all key stakeholders and with the public during the lifetime of this Plan. ‡ The Strategy will identify key green infrastructure aims and objectives for Carlow, taking account of the priority projects identified in this Plan and it will provide for the delivery of these projects including the provision of appropriate funding mechanisms. (Refer also to Chapter 9).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.7 Climate Action and Energy		
		<p>Amend the text of the 2nd paragraph in Section 7.13.6 to read as follows (new text in green):- In recognition of the importance of SuDS, and to reduce the potential impact of existing and predicted flood risks and to improve biodiversity and amenity value, the Council has is preparing a new SuDS policy/guidance document which will be adopted during the lifetime of this Plan. It is an objective of the Council to require all development (including extensions to existing development) proposals to incorporate SuDS measures. (Refer also to Chapter 6).</p>

Chapter 8: Community Development

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
3.8.1 General		
<p>Submission includes a comprehensive list of observations for each Municipal District Areas i.e. Carlow MD, Muinebheag MD, and Tullow MD. The observations relate to the provision of community services, amenities, infrastructure, supports, facilities, training and investment, which are grouped around four key areas that include:</p> <ul style="list-style-type: none"> ▪ Health (physical and wellbeing) ▪ Social and Community Development ▪ Participation, Democracy and Good Governance ▪ Value, Culture and Meaning. 	CLW-C10-38	<p>Chapter 8 of the Draft Plan contains a suite of policies and objectives supporting social and community development, including (inter alia) inclusivity, diversity, volunteerism, participation, universal access, ethnicity, education, and healthcare. It is considered that the provisions of the chapter adequately address the issues raised in the submission. These issues can be further considered as part of the statutory plans for Carlow, Tullow and Muine Bheag.</p> <p>Recommendation No change to Draft Plan.</p>
3.8.2 Education		
<p>Submission references the following topics:</p> <p><u>I.T. Carlow & Carlow College</u></p> <ul style="list-style-type: none"> ▪ Supports the continued development of I.T. Carlow and Carlow College campus, including greater links to Local Enterprise and the ETB. ▪ Assisting the development of a university campus in Carlow Town. ▪ Submits that it is vital that a variety of apartment and student dorms be built to complement the increased student population at I.T. Carlow. 	CLW-C10-40	<p>The significant role of 3rd level education in the County, and specifically in the context of I.T Carlow and Carlow College, is dealt with in subsections 8.10.2 to 8.10.3. These two institutions, together with the Teagasc Agricultural Centre on the outskirts of Carlow Town, have contributed to the recognition given to Carlow as a regional centre for education and research in the RSES. The provisions of the aforesaid subsections are underpinned by a set of policies and objectives that seek to promote and support the further development and expansion of education institutions and facilities in the county, including the aforesaid 3rd level institutions, the development of I.T Carlow as part of a Multi-Campus Technological University of the Southeast (TUSE). Policies EF. P1 to EF. P8 refer, in addition to Objectives EF. O1 to EF. O3.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<ul style="list-style-type: none"> ▪ Notes that developing a well-skilled labour pool in the region will attract both Irish and foreign-owned enterprises to the region. This is supported through the TUSE. ▪ Drive research and innovation in the public and private sector to increase opportunities in the region. ▪ Educational opportunities for lifelong learning and professional development across the region is currently supported by Technological University of the Southeast, Carlow ETB and Solas. 		<p>Student accommodation is addressed in Chapter 3, Section 3.13 of the Draft Plan, including Policy SA. P1, which recognises that the provision of appropriate student accommodation for Carlow Institute of Technology and Carlow College St. Patrick's will enable Carlow to continue to develop as a regional centre for education and research, and which seeks to facilitate the high-quality provision of same.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Dept. of Education outlines the following observations:</p> <p>(i) Suggest that Policy EF. P2 is further strengthened along the following lines: <i>To ensure that existing school sites are protected for education 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.</i></p> <p>(ii) Supports the out of hours use of school buildings in relation to Policies EF. P3 and EF. P4 and refers to Department guidance on this (link provided).</p>	CLW-C10-104	<p>The content of the submission is noted and welcome, providing information regarding the capacity of schools across the settlement hierarchy.</p> <p>(i) Policy EF. P2 under Section 8.10 seeks to <i>Support and facilitate, as appropriate, the development and expansion of education facilities and services in the County.</i> It is considered that the policy should be amended to reflect the recommendation in the submission.</p> <p>Recommendation Amend Policy EF. P2 to read as follows:- Support and facilitate, as appropriate and subject to site suitability, the development and expansion of education facilities and services in the County, including the protection of existing school sites for education use and where appropriate the land buffers adjoining them.</p> <p>(ii) Noted</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<p>(iii) Policy EF. P6 is slightly confusing but is taken to mean to encourage the mainstream education provision of children with special needs wherever possible.</p> <p><u>GIS mapping of existing school sites and zoned school sites</u></p> <p>(iv) Requests that the entire sites (existing schools and lands around them, including buildings, play area and any green areas) be zoned and mapped for educational use.</p> <p><u>Potential educational requirements arising from the Draft Plan</u> are reviewed in the submission and note the following:</p> <p>(v) <u>Key Town Carlow</u> Carlow Town is served by nine mainstream primary schools and six post-primary schools. The capacity of existing schools was considered in relation to projected population increase, and in principle the existing facilities should be able to meet future need, subject to two caveats:</p> <ul style="list-style-type: none"> - The distribution of the infill/brownfield element of future development (could be pressure points for increased school places depending on where this is distributed). - The distribution of the population in Graiguecullen (as opposed to the Carlow side). 		<p>(iii) The comment that Policy EF. P6 is slightly confusing is acknowledged, and it is considered it would benefit from being reworded for the purposes of clarity.</p> <p>Recommendation Amend Policy EF. P6 to read as follows:- Support and facilitate, as appropriate, the development and expansion of education facilities and services in the County. Encourage the mainstream education provision of people with special needs, including the development, as appropriate, of necessary supporting facilities.</p> <p><u>GIS mapping of existing school sites and zoned school sites</u></p> <p>(iv) Existing school sites, including potential expansion lands around them, are zoned as appropriate in the maps contained in Chapter 15 for Carlow Town, six Small Towns, and eight Larger Serviced Villages. Future education sites will be mapped and zoned as appropriate to aid the Department of Education with their GIS system and planning function.</p> <p>(v) <u>Key Town Carlow</u> The capacity of Graiguecullen National School (St. Fiaac's) will be reviewed in consultation with Laois County Council as part of the preparation of a new Joint Urban Area Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<p>In relation to the foregoing, the existing school sites and any land buffers around them are of critical importance and it is why the Department seeks the strengthening of Policy EF. P2. There is just one primary school in Graiguecullen, and the level of development that takes place there and capacity in the existing school will dictate requirement to zone future site. Could be addressed in JUAP.</p> <p><u>District Towns</u> <u>Tullow:</u> The town is served by three mainstream primary schools and one post primary school. At primary and secondary levels, it is anticipated that the existing schools could meet requirements from increased population.</p> <p><u>Muine Bheag:</u> Is served by three mainstream primary schools and two post-primary schools. At primary and secondary levels, it is anticipated that the existing schools could meet requirements from increased population.</p> <p><u>Other Settlements:</u> No other projected educational requirements were identified at any other settlements.</p> <p><u>Conclusion</u></p> <ul style="list-style-type: none"> ▪ All existing school sites and the land buffer around them (wherever possible) should be zoned and protected to meeting future educational needs in the County. ▪ No requirement has been identified for a special school as it is focused on demographic need. However, if such a need arises the Department will get in touch with the Council. 		<p><u>Conclusion</u> Noted</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<ul style="list-style-type: none"> Responsibility for further and higher education now lies with the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS). 		
3.8.3 Young People		
<p>In relation to Policy YP.P1 to <i>support the work and role of community agencies, groups and organisations, in the delivery of facilities and services in local communities for children and young people</i>, it is suggested that Swim Ireland be included as part of this network of organisations in the delivery of facilities and running education courses, programmes, events and providing opportunities to be a part of the aquatic community in Ireland.</p> <p>In relation to Policy YP.P2 to <i>consider the needs of children and young people, including those with disabilities and additional needs, in the provision of indoor and outdoor play and recreational facilities</i> it is suggested that it is particularly important to consult with sporting bodies at the design phase and would suggest an amendment to provide for such consultation.</p>	CLW-C10-84	<p>Subsection 8.8.1 recognises the importance of providing facilities and services for children and young people in the county, and specifically that their needs are being met in relation to childcare, education, play, sports, and recreation. Policy YP. P1 as referred to in the submission would support the role of Swim Ireland as a national governing body for swimming in the delivery of facilities and services in local communities for children and young people. It is considered inappropriate to identify a single organisation within the wording of this policy; however, the importance of swimming is addressed in response to submissions in Chapter 11.</p> <p>It is considered that Policy YP. P2 can be amended to reflect the importance of consultation at the design phase of indoor and outdoor play and recreational facilities where provided by the local authority. Consultation is also provided as part of the statutory Planning Application process and relevant organisations can participate in this process.</p> <p>Recommendation Amend Policy YP. P2 to read as follows:- Consider the needs of children and young people, including those with disabilities and additional needs, in the provision of indoor and outdoor play and recreational facilities, and to consult with relevant stakeholders as maybe appropriate regarding design considerations for local authority developments.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
3.8.4 Social Enterprises		
Submission advises that in Section 8.5 <i>Social Enterprises</i> , direct reference could be made to the relevant opportunities that the Circular Economy could bring, for example social enterprises around activities such as reuse, repair and rental of goods and equipment, as well as recycling initiatives at community level.	CLW-C10-107	The content of the submission is noted, and it is considered that the importance of the circular economy is acknowledged in the Draft Plan, however it would be inappropriate to identify one particular area over other areas of the economy which also have an important role as social enterprises. Recommendation No change to Draft Plan.
3.8.5 Arts and Culture		
<ul style="list-style-type: none"> (i) The submission notes that the Visual Arts Centre is referenced only twice in the Draft Carlow County Development Plan (Section 11.8.1 & Policy CA P3) with no mention of how it can tie into a cohesive tourist offering, become a hub for the arts regionally and nationally, or how the Council plans to support and nurture it over the next six years. (ii) The submission also references other matters of governance and recommends a full review of how the Arts programme is to be carried out as it is stated that there are numerous conflicts of interest. Issues are raised regarding funding, programming, transparency and public engagement. 	CLW-C10-56	<ul style="list-style-type: none"> (i) The role of the VISUAL Centre, and of arts and cultural facilities as a whole, is addressed in Subsection 8.15.2 of the Draft. The VISUAL Centre is specially promoted and supported by Policy CA. P5 which seeks to Continue to promote and support the role of the VISUAL Centre for Contemporary Art and George Bernard Shaw Theatre as a regional and County arts asset venue of national significance, in supporting artists in their practice and providing opportunities for new works to be commissioned, and as a venue for residents and visitors to access. (ii) A review how the Arts programme is carried out would be outside the scope of this development plan process. Instead, it is a matter that could be considered when the review of the County Carlow Local Arts 2016-2021 is commenced. Recommendation No change to Draft Plan.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<p>The Arts Council welcomes recognition given to arts and culture and to the County Carlow Local Arts Development Plan 2016-2021. It is suggested that the Draft Plan gives greater acknowledgement to and recognition of the importance of arts and culture as essential community provision and infrastructure, in addition to museums, galleries etc. It considers that there is greater opportunity for the development plan to reflect and incorporate the increasing important role of arts and culture as community infrastructure which can contribute to placemaking in the spatial planning framework of policies and objectives for the County. In particular the following issues are addressed;</p> <p>(i) <u>Value and Function of 'Arts and Culture' in Planning</u> Notes that the concept of arts and culture goes beyond museums, galleries, theatres, cinema and library facilities. The provision of space and quality in the urban environment as essential community infrastructure, has never been more important. It acknowledged that providing spaces for arts and culture as part of urban development, expansion and regeneration, can contribute to placemaking, engagement of people and communities, and can enhance the aesthetics of the public realm.</p>	<p>CLW-C10-88</p>	<p>(i) <u>Value and Function of 'Arts and Culture' in Planning</u> Agreed. The wider role of arts and culture as potential community infrastructure is acknowledged and can make a positive contribution to the quality of urban spaces, contributing to placemaking and to better engagement between people and communities. It is considered that Policy CA. P1 under 8.15 can be amended to recognise the community infrastructure function of arts and culture.</p> <p>Recommendation Amend Policy CA. P1 under Section 8.15 to read as follows: Encourage the provision of new or improved cultural, arts and entertainment facilities, particularly in the parts of the County where there is a deficiency in such provision, and to recognise and support the role of arts and culture as a form of community infrastructure that can make a positive contribution to the public realm, including urban development, regeneration, and placemaking.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
<p>(ii) <u>Clarity in Development Plan Policy</u> Welcomes specific policy provisions set out under Section 8.15, but difficult to understand what level of facilities are required and where, and how it is intended to implement the policies e.g. CA.P1 to CA.P5. It further states that it is unclear where the responsibility lies for the provision of infrastructure, local authority, private developer or other entity. Notes that in some local authority areas, development plans have sought to consider fiscal measures for the provision of community infrastructure through development contribution levies.</p> <p>(iii) <u>Future Planning for Arts and Culture – Formulation of a Spatial Framework</u> Recommends that specific policies for the provision of community facilities, including certain arts and culture infrastructure, is informed by an evidence-based needs assessment. It references that an evidence-based approach is recommended in the Draft Development Plan Guidelines 2021 and it is suggested that a County register of arts and cultural assets could be established to assist with this.</p>		<p>(ii) <u>Clarity in Development Plan Policy</u> Development Plan policies referred to in the submission support the development and expansion of arts and culture facilities where proposed or where needs are identified. The responsibility for the provision of such facilities and associated infrastructure can rest with multiple stakeholders including the Council, local communities, private developers, government organisations etc., and in most cases through a partnership approach with these stakeholders.</p> <p>The Council's Development Contributions Scheme 2017-2021 provides funding for public infrastructure and facilities, including community facilities and recreation and amenity facilities. A review of the Development Contribution Scheme will be conducted in the short term and is outside the remit of the Development Plan process.</p> <p>Recommendation No change to Draft Plan.</p> <p>(iii) <u>Future Planning for Arts and Culture – Formulation of a Spatial Framework</u> Chapter 8 includes a suite of policies and objectives to address the provision of community facilities for (inter alia) children and young people, older people, and people with disabilities. Section 8.9 specifically addresses community facilities (See Policies CF. P1 to CF. P6)</p> <p>An evidence and needs based approach to the provision of arts and culture infrastructure is addressed in the County Carlow Local Arts Development Plan 2016-2021, stated actions in which include conducting needs analysis of artists with a focus on urban regeneration. It is an objective of the Council as outlined in the Draft Development Plan <i>to support the implementation of the County Carlow Local Arts Development Plan 2016-2021, and any</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.8 Community Development		
		<p><i>updated version of this Plan, as a means of promoting the development of arts and culture in the County (Ref: CA O1).</i></p> <p>Recommendation No change to Draft Plan.</p>

Chapter 9: Landscape and Green Infrastructure

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
3.9.1 General Comment		
<p>Submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Include subsection and policy on Article 9 of the Planning and Development Regulations 2001 (as amended) as relating to restrictions on exemptions involving the fencing/enclosure of land i.e. Article 9(1)(a)(x). The use of wire fencing in upland areas as visual pollution. ▪ Provide and increase managed public access to interesting and attractive landscapes. ▪ Preserve status of traditionally open/unfenced landscapes. ▪ Adopt regional approach to the protection of the landscape. 	CLW-C10-61	<p>The content of the submission is noted.</p> <p>Article 9 as referred to is a legislative provision in the Planning and Development Regulations 2001 (as amended) and comprises a restriction on the exemptions listed in Schedule 2 of these Regulations. Any question on whether Article 9 restrictions apply or not is dealt with by the referral (application) procedure available through Section 5 of the Planning and Development Act 2000 (as amended).</p> <p>In terms of development plan policy, Chapter 11 of the Draft Plan includes polices and related provisions which recognise the outdoor recreation value of the County's uplands (Section 11.13), and which seek to maximise, enhance, and support public access to and use of uplands (Policies R. P8 and HT. P11).</p> <p>The adoption of a regional approach to the protection of the landscape is outside the scope of the County Development Plan process.</p> <p>Recommendation No change to Draft Plan.</p>
3.9.2 Landscape Policies		
Submission requests amendments to the following landscape policies as highlighted in green:	CLW-C10-72	

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<p>(i) LA P1: Protect and maintain the overall integrity of the County's landscape, by recognising its capacity to sustainably integrate and absorb appropriate development, and by ensuring that development protects, retains and, where necessary, enhances the appearance and character of the landscape, and does not unduly damage or detract from those features which contribute to its value, character, distinctiveness and sensitivity e.g. landform, habitats, scenic quality, settlement pattern, historic heritage, amenity, land use and tranquillity.</p> <p>(ii) LA P2: Ensure that development will not have a disproportionate landscape or visual impact in sensitive upland areas of the County (due to siting, layout, design or excessive scale, height and bulk) and will not significantly interfere with or detract from scenic upland vistas, when viewed from the surrounding environment, including nearby areas, scenic views and routes, and from settlements.</p> <p>(iii) LA P4: Ensure that developments on steep slopes or ridges will not be conspicuous or have disproportionate landscape or visual impacts when viewed from the surrounding environment, including from nearby areas,</p>		<p>(i) It is considered that Policy LA. P1 can be amended to reflect the requirements of this submission.</p> <p>Recommendation Amend Policy LA. P1 to read as follows: <i>Protect and maintain the overall integrity of the County's landscape, by recognising its capacity to sustainably integrate and absorb appropriate development, and by ensuring that development protects, retains and, where necessary, enhances the appearance and character of the landscape, and does not unduly damage or detract from those features which contribute to its value, character, distinctiveness and sensitivity e.g. landform, habitats, scenic quality, settlement pattern, historic heritage, amenity, land use and tranquillity.</i></p> <p>(ii) The request for the insertion of the word 'height' into Policy LA. P2 is acceptable and will strengthen and add clarity to the policy.</p> <p>Recommendation Amend Policy LA. P2 to read as follows:- <i>Ensure that development will not have a disproportionate landscape or visual impact in sensitive upland areas of the County (due to siting, layout, design or excessive scale, height, and bulk) and will not significantly interfere with or detract from scenic upland vistas, when viewed from the surrounding environment, including nearby areas, scenic views and routes, and from settlements.</i></p> <p>(iii) The requested addition of text for Policy LA. P4 relating to ground conditions, water quality, biodiversity, and wildlife, are comprehensively dealt with in the suite of policies and related provisions and standards</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<p>scenic views and routes, and from settlements. <i>Ensure that foundations for large scale developments will not adversely affect ground conditions and water quality, biodiversity and environments for wildlife.</i></p> <p>(iv) LA P5: Protect and maintain the landscape quality and visual integrity of river valleys and river corridors, and to ensure development in these sensitive landscape areas does not adversely affect or detract from scenic views, including views from bridges, or from distinct linear sections such as open floodplains. <i>Protect water quality, biodiversity and environments for wildlife.</i></p> <p>(v) LA P7: Facilitate <i>(in areas of low capacity and high capacity)</i>, where appropriate, developments that have a functional and locational requirement to be situated on steep or elevated sites (e.g. reservoir, telecommunication masts or wind energy structures) where residual adverse visual impacts are minimised or mitigated.</p> <p>(vi) LA P10: Ensure that features which contribute to local landscape character, including historic features and buildings, trees, <i>mixed broadleaf and indigenous forestry,</i> hedgerows, shelter belts and stone walls, are retained, protected, and enhanced where appropriate, so as to preserve the appearance and local landscape character of an area, whilst supporting sustainable landscape change</p>		<p>set out in Chapters 6, 7, 10, and 16 of the Draft Plan. Further amendment to this policy is therefore not required.</p> <p>Recommendation No change to Draft Plan.</p> <p>(iv) Policy LA. P5: As per to response Policy LA. P4.</p> <p>Recommendation No change to Draft Plan.</p> <p>(v) It is considered that Policy LA. P7 is sufficiently robust regarding the functional and locational requirement for developments to be sited on steep or elevated sites and the need to minimise and mitigate visual impacts. Therefore, the additional text requested for the policy in the submission is not required.</p> <p>Recommendation No change to Draft Plan.</p> <p>(vi) The reference to 'trees' in Policy LA. P10 is sufficiently broad and robust to cover all tree types which may contribute to landscape quality in the County. The use of the requested text referring specifically to 'mixed broadleaf and indigenous forestry' may serve to limit and/or undermine the use of the policy.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<p>and development. Development proposals necessitating the removal of such features will be discouraged.</p> <p>Also recommends:</p> <ul style="list-style-type: none"> ▪ Recommends a green infrastructure proposal in conjunction with Coillte through their estate to reopen the historic Cranmore to Kilbrannish path from there to identify the cup and saucer at Langford's forest continuing to the large granite glacial greener deposit and up to Black Banks viewing point and from there to the nine stones and link down to the arachnological features in Crannagh. 		<p>Recommendation No change to Draft Plan.</p> <p>It is considered that the recommendation in the submission for a green infrastructure proposal will be addressed by objective of the Draft Plan (Objective GI. O1) which seeks to <i>Prepare a Green Infrastructure Strategy for County Carlow in accordance with international best practice and in partnership with key stakeholders and the public.</i></p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission refers to Policy LA. P5 and notes that the grounds on which the compacted stone and dust surface Blueway application by Waterways Ireland was refused by An Bord Pleanala was because it would have interfered with the character of the existing landscape and 'would be contrary to the proper planning and sustainable development of the area'.</p>	CLW-C10-55	<p>The content of the submission is noted. Policy LA. P5 under Section 9.8 seeks to <i>Protect and maintain the landscape quality and visual integrity of river valleys and river corridors, and to ensure development in these sensitive landscape areas does not adversely affect or detract from scenic views, including views from bridges, or from distinct linear sections such as open floodplains.</i></p> <p>Recommendation No change to Draft Plan.</p>
3.9.3 Landscape Character Assessment		
Submission notes that:	CLW-C10-74	

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<ul style="list-style-type: none"> ▪ The Landscape Character Assessment and Addendum (Appendix 7) is a careful, considered, and informed assessment of the landscapes of Carlow. ▪ Welcomes and supports proposal that a Historic Landscape Characterisation of the county be carried out during the lifetime of the Plan and suggest that two other key areas in the uplands be added i.e. extensive archaeological heritage of the Blackstairs and the unique drystone-wall field boundary landscape of upland farms. 		<p>The content of the submission is welcomed, areas to be covered as part of the assessment can be considered during the drafting of the terms of reference for the document.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission states that Carlow needs an up-to-date LCA and that the River Barrow should be assessed in a new LCA.</p>	<p>CLW-C10-78</p>	<p>The existing Landscape Character Assessment was originally prepared in 2008 and further reviewed and updated in 2015 with minor amendments incorporated as part of this Draft Plan. The 2008 assessment which was reviewed was determined to be a comprehensive and insightful examination that grouped the landscapes of Carlow. This is further supported by the submission received from the National Scientific Committee for Cultural Landscape which indicated that <i>the Landscape Character Assessment and Addendum (Appendix 7) is a careful, considered, and informed assessment of the landscapes of Carlow</i>. On the basis of the foregoing and in the absence of any further guidance pertaining to Landscape Character Assessment which may warrant a review of the document it is considered that the existing LCA provides an appropriate framework within which development management functions can operate.</p> <p>The importance of the River Barrow is addressed throughout the LCA as a key landscape feature in relation to the Barrow Valley, topography, geology and soils, landcover, ecology, habitats, and tourism. The River Barrow and Barrow Valley are also included under a number of listings in the Tables on Protected Views and Prospects and Scenic Routes included in the LCA.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
		<p>The role of the LCA and the protection of the River Barrow as a landscape feature is adequately supported by Objectives LA. O1 and LA. O2 in Section 9.8, as well as by Policies LA. P5, LA. P6, LA. P8, and LA. P11.</p> <p>Recommendation No change to Draft Plan.</p>
3.4.9 Green Infrastructure		
<p>Submission outlines the following comments:</p> <p>Ensure that any further "Green Infrastructure" development within Carlow does not contradict any biodiversity benefits. Acknowledge and protect existing green spaces currently providing for and fulfilling the role of Green Infrastructure.</p> <p>Note: Reference is made to existing urban areas within Carlow town which need to be protected from unsuitable developments and acknowledged as currently providing green infrastructure which supports biodiversity and human well-being in open green spaces in an urban environment. Re- zonings to open space are being sought for these areas and are addressed in Chapter 15.</p>	<p>CLW-C10-69 CLW-C10- 70</p>	<p>The content of the submission is noted. The protection and enhancement of the biodiversity and ecological function of the County's green infrastructure is specifically provided for by Policy G. P2 under Section 9.11.</p> <p>It is also the policy of the Council (Policy GI. P1) to identify, protect, maintain, and enhance existing and planned green infrastructure assets in the County, and to recognise the wide range of environmental, social and economic benefits of green spaces and nature-based solutions by ensuring the integration of green infrastructure planning and development in the planning process.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Makes the following observations and recommendations:</p>	<p>CLW-C10-103</p>	<p>The content of the submission is noted.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<ul style="list-style-type: none"> ▪ Considers that it should be stated in this section that developing a Green Infrastructure Strategy for the County is an objective (Gl. O1) of the CDP and not an intention. ▪ It should be acknowledged that in order to achieve CDP Green Infrastructure policy objectives, it will be necessary to map existing and proposed Green Infrastructure and ecological corridors (both existing and proposed) at a settlement plan level as well as at a county level. ▪ Recommends the inclusion of a Policy Objective to prepare Green Infrastructure Plans for settlements within the lifetime of this CDP and to map existing and proposed green infrastructure and connections at appropriate scales. ▪ In relation to Objective Gl. P7 existing areas of green infrastructure mostly coincide with important areas for biodiversity and in the main these areas should be avoided where possible. An intention of route selection should be to examine alternatives to the use of existing Green Infrastructure. Any new walking and cycling trails within existing areas of Green Infrastructure will require environmental assessments to be carried out (screening for appropriate assessment and Ecological Impact Assessment). Recommends inclusion of an objective in the CDP: <i>to seek to create new Green Infrastructure corridors incorporating walking and cycling trails, thereby avoiding areas of existing Green Infrastructure and biodiversity loss.</i> 		<p>The Council's stated intention to develop a Green Infrastructure Strategy for the County in Section 9.11 is underpinned by the corresponding commitment to do same under Objective Gl. O1. A reference to the objective in the introductory text for Section 9.11 can be added for clarity.</p> <p>The mapping of existing and proposed green infrastructure will be addressed as part of the preparation of a Green Infrastructure Strategy for the County (Objective Gl. O1 refers), as well as through a County Heritage Plan and Biodiversity Action Plan under Objective NH. P1 in Chapter 10. This Strategy and Plan will also inform the preparation of Green Infrastructure Plans for individual settlements, as will the review of the existing local area plans for Tullow and Muine Bheag.</p> <p>It is considered that the text of Policy Gl. P7 can be amended to ensure routes are subject to feasibility including alternatives to the use of existing green infrastructure.</p> <p>Recommendation Amend Objective Gl. P7 as follows with inclusion of additional text; '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'.</p>
In relation to scenic views the submission states that:	CLW-C10-106	The Landscape Character Assessment (LCA) included as Appendix VII to the Draft Plan provides a comprehensive and robust analysis of the County's landscape with respect to character, type, and sensitivity, and with respect to its capacity to absorb

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.9 Landscape and Green Infrastructure		
<p>The view of the Barrow Valley, Lugnaquilla and the Wicklow mountains, Mt. Leinster and the Blackstairs Mountains, Brandon Hill and Slievenamon, from the elevated ridge to the west side of the county extending from Killeshin and Rossmore in Laois and Clogrenan in Carlow at the north all the way south to Milebush Cross Roads and Coorleagh, should be preserved and afforded protection from development which would hinder the view, especially that at 52.711463, -7.051644, where all of the above can be seen from one point.</p>		<p>development. The policies set out under Section 9.8 in Chapter 9 (Policies LA. P1 to P11) seek to (inter alia) protect and maintain the overall integrity of the County's landscape, including the protection of scenic upland vistas, views and routes, and require where appropriate landscape/visual impacts assessments to be prepared for development proposals. These policies are further strengthened by Objectives LA. O1 to O2 which require the management and assessment of development to take account of the LCA and that landscape/visual impact is a key consideration in the assessment of development proposals.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission requests in relation to green infrastructure that the connection of Carrickduff to Kildavin should be investigated during the lifetime of the Plan for the feasibility of a cycle/pathway in order to improve recreational amenity, safety and a nature corridor.</p>	CLW-C10-121	<p>Existing and proposed green infrastructure on the route can be examined as part of the preparation of a Green Infrastructure Strategy for the County under Objective GI. O1. The feasibility of providing a cycle/pathway along the route is addressed by Policy GI. P7, which seeks to create new green infrastructure corridors that incorporate walking and cycle trails.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 10: Natural and Built Heritage

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
3.10.1 Natural Heritage		
Submission recommends supporting heritage with the appointment of Heritage Officer.	CLW-C10-38	<p>While this is outside the remit of the Development Plan Process it should be noted that a Heritage Officer has been appointed in Carlow County Council.</p> <p>Recommendation No change to Draft Plan.</p>
<p>DAU provides advice and recommendations under a number of headings as follows:</p> <p><u>Section 10.1</u></p> <ul style="list-style-type: none"> ▪ Advises that the following citations should be used in this section and the rest of the CDP: <ul style="list-style-type: none"> - European Union Birds Directive (2009/147/EC) - European Union Habitats Directive (92/43/EEC) - The Wildlife Acts 1976 to 2021 - European Communities (Birds and Natural Habitats) Regulations 2011 to 2021. 	CLW-C10-103	<p><u>Section 10.1</u> Agreed.</p> <p>Recommendation Amend the text of Chapter 10 and all other chapters as required, to refer to relevant and up-to-date citations for:</p> <ul style="list-style-type: none"> ▪ European Union Birds Directive (2009/147/EC) ▪ European Union Habitats Directive (92/43/EEC) ▪ The Wildlife Acts 1976 to 2021 ▪ European Communities (Birds and Natural Habitats) Regulations 2011 to 2021

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p><u>General: Natural Heritage Policies</u></p> <ul style="list-style-type: none"> Recommends the removal of the words '<i>as far as is practicable</i>' from Policy NH. P2 to strengthen the CDP's commitment to biodiversity protection and enhancement and to ensure that the CDP meets its statutory obligations in relation to nature conservation. Considers that Policy NH. P8 'Promote, protect and enhance sustainable and appropriate access to the natural heritage of the county' could undermine the chapters aim 'To protect, conserve, manage and enhance the natural and built heritage features of the County' and advise that this policy should be moved to Chapter 11: Tourism and Recreation. <p><u>General: Natural Heritage Objectives (Objective NH . O1)</u></p> <ul style="list-style-type: none"> A policy objective should be included to implement, monitor and review County Heritage Plan and Biodiversity Action Plan in accordance with RPO 126 of the RSES for the Southern Region. 		<p><u>General: Natural Heritage Policies</u></p> <p>It is not considered that the wording of Policy NH. P2 should be amended as recommended as it provides a reasonable approach to balancing protection of the environment while facilitate where appropriate sustainable development .</p> <p>Recommendation No change to Draft Plan</p> <p>Agreed, Policy NH. P8 can be moved to Section 11.5 in Chapter 11 as recommended.</p> <p>Recommendation Move Policy NH. P8 which seeks to Promote, protect and enhance sustainable and appropriate access to the natural heritage of the county, to Section 11.5 Tourism and Recreation.</p> <p><u>General: Natural Heritage Objectives (Objective NH. O1)</u></p> <p>It is considered that Objective NH. O1 can be amended to better reflect the wording of RPO 126 in the RSES for the Southern Region.</p> <p>Recommendation Amend Objective Natural Heritage Objective NH. O1 to read as follows (new text in green):- Implement relevant actions from the National Biodiversity Action Plan 2017-2021 (and any superseding plan) and to prepare a County Heritage Plan and Biodiversity Action Plan during the lifetime of this County Development Plan in accordance with RPO 126 in the RSES, to ensure the protection and appreciation of heritage and nature at local level including recognition of rich biodiversity of</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p><u>Natura 2000 Sites - Policies</u></p> <ul style="list-style-type: none"> Recommends that the wording of Policy NS. P1 is changed to the following: <i>'Where likely significant effects have been identified in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site, either individually or in combination with other plans or projects, ensure appropriate assessment, in accordance with Articles 6(3) of the Habitats Directive, is carried out. Carlow County Council shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned unless the plan or project is subject to the provisions of Article 6 (4) of the Habitats Directive.'</i> Recommends that the wording of Policy NS. P3 is changed to the following: - <i>'Consider impacts within the plan or project's zone of influence, which may include Natura 2000 sites outside the county, when assessing whether a plan or project is likely to have significant effects on a Natura 2000 sites'.</i> 		<p>designation of existing special areas of conservation i.e. Blackstairs Mountains, Slaney River Valley and River Barrow and River Nore SAC.</p> <p><u>Natura 2000 Sites – Policies</u> Noted. It is considered that Policies NS. P2 and P3 should be amended to reflect the recommended wording provided in the submission, which would add some clarity for readers on the Appropriate Assessment process. No change proposed to Policy NS. P1.</p> <p>Recommendation Replace the wording of Policy NS. P2 with:- 'Where likely significant effects have been identified in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site, either individually or in combination with other plans or projects, ensure appropriate assessment, in accordance with Article 6(3) of the Habitats Directive, is carried out. The Council shall only agree to the plan or project after having ascertained that it will not adversely affect the integrity of the site concerned, unless the plan or project is subject to the provisions of Article 6(4) of the Habitats Directive.'</p> <p>Agreed.</p> <p>Recommendation Replace the wording of Policy NS. P3 with: Prevent development that would adversely affect the integrity of any Natura 2000 site located within or immediately adjacent to the county and protect and maintain favourable conservation status for habitats and protected species, including those listed under the Birds Directive, the Wildlife Act 1976 (as amended), Flora (Protection) Order (or other such Orders), and the Habitats Directive. Consider impacts within a plan or project's zone of</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Suggested that 'to maintain or restore the favourable conservation status of County's Natura 2000 sites qualifying interest habitats and species' is included as a separate policy. <p><u>Natural Heritage Areas – Policies</u></p> <ul style="list-style-type: none"> ▪ Advises that Policy NHA. P1 must be strengthened to a clear commitment to protecting the ecological integrity of NHA's and pNHA's and to ensuring that development does not have a significant adverse effect on these sites. The protecting of visual, recreational and amenity value of these sites must be considered in a separate policy objective. 		<p>influence, which may include Natura 2000 sites outside the County, when assessing whether a plan or project is likely to have significant effects on Natura 2000 sites'.</p> <p>Agreed.</p> <p>Recommendation Include new additional Policy NS. P4: - Maintain or restore the favourable conservation status of County's Natura 2000 sites qualifying interest habitats and species'.</p> <p><u>Natural Heritage Areas – Policies</u> Policy NHA. P1 can be strengthened to reflect the recommended clear commitment. It is not the case that the visual, recreational and amenity value of these sites must be considered in a separate policy in a different section of the Draft Plan. The performance indicator does not require that Development Plan provisions for biodiversity and ecosystem services are separated from provisions and included in different chapters.</p> <p>Recommendation Amend the wording of Policy NHA. P1 as follows (new text in green):- "Contribute towards the protection, from significant adverse effects, of the ecological integrity and the visual, recreational, environmental and amenity value of the County's proposed Natural Heritage Areas (pNHAs) and associated habitats, including any designated Natural Heritage Areas (NHAs) during the lifetime of this Plan."</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Advises that Policy NHA. P2 must be strengthened. The wording 'to minimise impacts' must be changed to 'to avoid significant effects to the sites and ensure no net loss of biodiversity.' ▪ Advises that Policy NHA. P3 to 'Restrict development within a proposed Natural Heritage Area (pNHA) or Natural Heritage Area (NHA) to development that is directly related to the area's amenity potential, subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes' must be broadened to allow development required for the conservation management of these sites. 		<p>Amend Policy NHA. P2 to read as follows (new text in green):- Ensure as far as is practicable that development does not adversely impact on wildlife habitats and species and that biodiversity is conserved for the benefit of future generations in the interests of sustainability. This will include moving towards no net loss of biodiversity from plans adopted by and projects granted permission/authorised by the Council.</p> <p>The recommended amendment for Policy NHA. P2 is noted, the policy can be amended to reflect the wording provided.</p> <p>Recommendation Amend the wording of Policy NHA. P2 as follow (new text in green):- Ensure that development proposals within or adjacent to a proposed Natural Heritage Area (pNHA) or Natural Heritage Area (NHA) are designed and sited to minimise significant impacts on the biodiversity (including net loss) and ecological, geological and landscape value of the site, particularly plant and animal species listed under the Wildlife Act 1976 (as amended), the Habitats Directive and the Birds Directive, including their habitats.</p> <p>The recommended amendment for Policy NHA. P3 is noted, the policy can be amended to include the wording provided.</p> <p>Recommendation Amend the wording of Policy NHA. P3 as follows (new text in green):- Restrict development within a proposed Natural Heritage Area (pNHA) or Natural Heritage Area (NHA) to development that is directly related to the area's amenity potential or development that is required for the conservation management of these sites, subject to the protection and enhancement of natural heritage and visual amenities including biodiversity and landscapes'.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p><u>10.5 Non-Designated Areas, Habitats and Species</u></p> <ul style="list-style-type: none"> ▪ Recommends that the wording of Objective ND. P2 be changed to the following '<i>Ensure that development does not have a significant adverse effect on rare and threatened species, their breeding places, resting places, habitat or environment, as applicable, including those protected under the Wildlife Acts 1976 to 2021, the Birds Directive (2009/147/EC), the Habitats Directive (92/43/EEC) and including plant species listed on the Flora (Protection) Order 2015 (S.I. No. 356 of 2015)</i>' ▪ Recommends the removal of the words '<i>where deemed necessary</i>' from Policy ND. P3. ▪ Recommends that a clear commitment to restricting the use of herbicide is included in Policy ND. P6 '<i>Ensure that the management of the Council's open spaces and parks is pollinator-friendly and provides more opportunities for biodiversity</i>' and that this policy explicitly supports the objectives of the National Pollinator Plan 2021-2025. 		<p><u>10.5 Non-Designated Areas, Habitats and Species</u></p> <p>It is considered that the wording of Objective ND. P2 can be amended as recommended.</p> <p>Recommendation</p> <p>Amend the wording of Policy ND. P2 as follows (new text in green):- '<i>Ensure that development does not have a significant adverse effect on rare and threatened species, including those listed in the Wildlife Act 1976 (as amended), the Birds Directive 1979, the Habitats Directive 1992, and the Flora (Protection) Order 1995, their breeding places, resting places, habitat or environment, as applicable, including those protected under the Wildlife Acts 1976 to 2021, the Birds Directive (2009/147/EC), the Habitats Directive (92/43/EEC) and including plant species listed on the Flora (Protection) Order 2015 (S.I. No. 356 of 2015)</i>'.</p> <p>In relation to Policy ND. P3 it is considered that there may be instances where such an assessment would not be necessary or appropriate e.g. where it would involve duplication of assessment where EIA or AA are being undertaken; or where the habitat was of no or little value e.g. playing fields. Therefore, no change to the wording of Policy ND. P3 is proposed.</p> <p>Recommendation</p> <p>No change to Draft Plan.</p> <p>Restricting the use of herbicide can be included in Policy ND. P6.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Recommends that a section is included which outlines the strict protection afforded species listed in Annex IV of the Habitats Directive as well as licensing requirements. 		<p>Amend the wording of Policy ND. P6 as follows (new text in green):- Ensure that the management of the Council's open spaces and parks is pollinator-friendly and provides more opportunities for biodiversity, supporting the objectives of the National Pollinator Plan 2021-2025. Where it is used, herbicide should be certified and applied as per the manufacturer's instructions.</p> <p>An additional section in the Plan can be included regarding the strict protection under the Habitats Directive that applies to the species listed in Annex IV of that Directive, including plant and animal species.</p> <p>Recommendation Add the following text as a 4th paragraph under Section 10.5:- Strict protection under the Habitats Directive applies to the species listed in Annex IV of that Directive, including plant and animal species. Annex IV includes all bat species and the European Otter. Where Annex IV species are present, measures to avoid damage and disturbance to them must be taken into account in the formulation of proposals for development. Where the risk of damage or disturbance is unavoidable, an application for a derogation licence may be made to the Minister for Housing, Local Government and Heritage under Regulation 54 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2021. It must outline all the alternative solutions considered and indicate which of the reasons listed in the legislation cover the application and also include all suggested mitigation measures. The Council will fulfil its duties in relation to the strict protection afforded to species listed in Annex IV of the Habitats Directive and associated national derogation licencing requirements.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> Recommends a clear policy objective: that biodiversity data generated, during the lifetime of this plan, for the preparation of environmental assessment reports shall be submitted to the National Biodiversity Data Centre (NBDC). 		<p>A policy provision can be added to state that biodiversity data generated during the lifetime of the plan for the preparation of environmental assessment reports, shall be made available to the National Biodiversity Data Centre (NBDC).</p> <p>Recommendation Include new additional Policy ND. P7:- That biodiversity data generated during the lifetime of this Development Plan for the preparation of environmental assessment reports, shall be made available to the National Biodiversity Data Centre (NBDC).</p>
<p>Strategic Environmental Assessment The Department recommends inclusion of a policy objective: To ensure all downstream plans, as defined by Article 2(A) of the Strategic Environmental Assessment Directive (Directive 2001/42/EC), will be required to undertake screening for Strategic Environmental Assessment and if required, Strategic Environmental Assessment.</p> <p>The Department recommends inclusion of a policy objective: To ensure all plans, as defined by Article 2(A) of the Strategic Environmental Assessment Directive (Directive 2001/42/EC), which are supported in whole or in part through policy objectives or otherwise, have undergone screening for Strategic Environmental Assessment and, where required, Strategic Environmental Assessment.</p>	CLW-C10-103	<p>Text to be integrated into the Plan to ensure that all plans or programmes to be adopted by the Council comply with SEA requirements. All Plan provisions, including those that support existing plans, have been assessed by both the SEA and AA for the Plan and mitigation has been integrated into the Plan as relevant.</p> <p>Recommendation Include additional text in green in Section 1.2.1 All plans and programmes³ to be adopted by the Council shall comply with the requirements set out in the SEA Directive (Directive 2001/42/EC) and transposing Regulations.</p>
<p>Appropriate Assessment The Department recommends inclusion of a policy objective: To undertake screening for appropriate assessment and if required, appropriate</p>	CLW-C10-103	<p>Agreed</p> <p>Recommendation</p>

³ As defined by Article 2(a) of the SEA Directive, 'plans and programmes' shall mean plans and programmes, including those co-financed by the European Community, as well as any modifications to them: — which are subject to preparation and/or adoption by an authority at national, regional or local level or which are prepared by an authority for adoption, through a legislative procedure by Parliament or Government, and — which are required by legislative, regulatory or administrative provisions

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ An Historic Landscape Assessment of Co. Carlow with a particular focus on the Blackstairs. ▪ The alteration of policy NH. P2: from - <i>Ensure, as far as is practicable, that development does not adversely impact on wildlife habitats and species, and that biodiversity is conserved for the benefit of future generations in the interests of sustainability.</i> To - <i>Ensure that development there is no net loss to Biodiversity,</i> as it is stated that it is good practice and covers all. 		<p>It is considered that the commissioning of an Historic Landscape Characterisation (HLC) study to complement the LCA could be considered as part of the preparation of the Heritage Plan and / or as an action arising from same.</p> <p>For recommendation regarding Policy NH. P2 see response to submission reference CLW-C10-72, 103 and 117.</p> <p>Recommendation No change to Draft Plan.</p>
Submission requests measures to improve the conservation status of all-natural heritage designated sites including Special Areas of Conservation and proposed Natural Heritage Areas.	CLW-C10-69 CLW-C10- 70 CLW-C10-90 CLW-C10-91 CLW-C10-106	<p>Chapter 10 includes a comprehensive range of policy provisions to support the conservation and enhancement of Special Areas of Conservation and pNHAs. This includes Policies NS. P1 to P3 under Section 10.3, and Policies NHA. P1 to P4 under Section 10.4.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Makes observations regarding Natural Heritage and Green Infrastructure as follows:</p> <ul style="list-style-type: none"> ▪ Welcomes and supports the CDP's proposals in relation to Green Infrastructure and Natural Heritage. ▪ A commitment by Carlow County Council should be made to develop a Local Biodiversity Action Plan no later than 2022. Action is needed in every county at local level if we are to slow down and stop the rate at which species and habitats are being lost. 	CLW-C10-117	<p>It is considered that the commissioning of an ecological restoration plan for the Blackstairs is a potential project that could be given more detailed consideration as part of the preparation of a County Heritage Plan and Biodiversity Action Plan under Objective NH. O1 in Section 10.2 and/or as an action arising from same.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Carlow is ideally positioned to make its contribution to this 30x30 target through an ecological restoration programme of the Blackstairs. ▪ By restoring rather than industrialising these Uplands ecological restoration would make a significant and positive contribution to our biodiversity crisis while also mitigating climate change - a Nature - based Solution to Climate Control. ▪ An ecological restoration programme could also form the foundation of the new County Carlow Local Biodiversity Action Plan. 		
<p>Makes the following comments:</p> <ul style="list-style-type: none"> ▪ The Council has a statutory obligation to conserve and protect designated habitats, species and areas of natural interest. ▪ It is important that the protection of natural heritage is not limited only to designated sites, as they too can also host a diverse and rich variety of protected and vulnerable habitats and species." ▪ The development plan should include the intent to increase the size of the SACs in Carlow and add to protected areas and NHAs. ▪ The River Barrow is one of the country's main ecological corridors, and we must support the riches of life there and seek to create more space for it to thrive, not less. ▪ The financial worth of pollination by the bees and insects that use this corridor crossing between our wild and agricultural lands, should be taken into consideration. 	CLW-C10-112	<p>The content of the submission is noted. Chapter 10 includes a specific section (10.5) addressing non-designated areas, in recognition of the fact that the protection of habitats and species in County Carlow is not confined to areas designated for nature conservation, such as Natura 2000 sites or Natural Heritage Areas (NHAs).</p> <p>Any increase in the area of SACs or pNHAs in the County is outside the remit of the development plan process. The legal basis on which SACs are selected and designated is at a European level under the EU Habitats Directive. At a national level, the National Parks and Wildlife Service (NPWS), who are a Heritage Division of the Department of Housing, Local Government and Heritage, are responsible for the designation of conservation sites in Ireland, including NHAs.</p> <p>It is considered that there is sufficiently robust policy provisions in Section 10.7 of the Draft Plan to support the protection of the County's inland waters such as the River Barrow, and riparian zones.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
		No change to Draft Plan.
<p>Submission notes that the ecosystems services approach is ideally suited to the management of Carlow's heritage and natural environment assets especially when working to comply with National and European legislation concerning climate action.</p> <p>The council is urged to consider adopting a regeneration approach in conjunction with a sustainability approach to protect and improve Carlow's natural resources in the form of regenerating wetlands, rivers systems, broadleaf forests, and open spaces.</p> <p>Notes that Carlow is ideally suited to lead the way in regeneration utilising a range of climate mitigation, adaption, and biodiversity measures in the form of decarbonisation zones (Climate Action Plan 2019: Action 165), particularly in our rural upland and lowland areas in addition to the planned decarbonisation zone in Carlow Town.</p> <p>Such an approach it is stated would help regenerate and protect the unique biodiverse environment within the Blackstairs Mountains and along the River Barrow.</p>	CLW-C10-98	<p>Table 7.2 in Chapter 7 of the Plan identifies how the policies, objectives and related provisions in Chapter 10 on Natural and Built Heritage contribute to climate change mitigation and adaptation. This includes (inter alia) the need to protect and improve riverine floodplains in relation to building resilience to climate change, the need for climate planning for inland waters and riparian zones in accordance with Inland Fisheries Guidance 'Planning for Watercourses in the Urban Environment', the importance of wetlands in sequestering pollutants and reducing the effects of climate change by acting as carbon storage.</p> <p>Decarbonisation zones are specifically addressed in Chapter 7, Sections 7.5.4.1 and 7.6, and by Objective CA. O2 which seeks to <i>Identify and develop a Decarbonisation Zone (DZ) in the County in accordance with Action 165 of the Climate Action Plan 2019 and criteria and guidance issued by the Department of Housing, Local Government and Heritage and the Climate Action Regional Office (CARO), and Heritage and the Climate Action Regional Office (CARO).</i></p> <p>Recommendation No change to Draft Plan.</p>
Submission considers that objective NH. O1 should include the particular inter-relationship between biodiversity and traditional farming in upland areas.	CLW-C10-74	The content of the submission is noted. Policy NH. O1 is a key overarching heritage policy, the purpose of which is to address the protection, management and enhancement of all-natural heritage, biodiversity, landscape and environment assets in the County. Support for the role of farming, including the encouragement of environmentally sustainable agricultural practices, is dealt with under Section 14.4 in Chapter 14, and Policies AG. P1 to P4.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
		Recommendation No change to Draft Plan.
3.10.2 Biodiversity		
Submissions recommend the preparation of a Biodiversity Plan.	CLW-C10-38 CLW-C10-72 CLW-C10-68 CLW-C10-117	The preparation of a Biodiversity Action Plan is addressed by Objective NH. O1 in Section 10.2. Recommendation No change to Draft Plan.
A number of submissions support the appointment of a suitably trained Biodiversity Officer to help: <ul style="list-style-type: none"> - fulfil obligations with regard to biodiversity. - implement the Carlow Town Biodiversity Strategy and Action Plan, The All-Ireland Pollinator Plan and any other biodiversity projects etc and so help improve the status of biodiversity within the county. - linking of biodiversity to climate change and climate justice. - support voluntary groups, residents' groups, farming groups and others. 	CLW-C10-25 CLW-C10-69 CLW-C10- 70 CLW-C10-81 CLW-C10-86 CLW-C10-90 CLW-C10-91 CLW-C10-100 CLW-C10-106 CLW-C10-109 CLW-C10-117	While the content of these submissions are noted the appointment of a biodiversity officer is outside the scope of the Development Plan process. Recommendation No change to Draft Plan.
Submission recommends that some concrete goals and actions should be taken to protect natural habitats and enhance and promote biodiversity,	CLW-C10-100	The formulation of goals and actions to protect natural habitats and to enhance and promote biodiversity, will be developed as part of the preparation of a

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>(iii) Recommends inclusion of a policy objective: To ensure that no net loss of biodiversity occurs as a result of developments, projects, activities, programmes and plans arising from this CDP.</p> <p>(iv) Advises that policy objectives related to biodiversity and ecosystem conservation, protection, enhancement and restoration should be clearly separated from policies objectives related to other matters such as recreation, amenity and landscape both in the CDP and settlement plans to facilitate the securing and monitoring of actions.</p>		<p>Amend Objective Natural Heritage Objective NH. O1 to read as follows (new text in green):- <i>Implement relevant actions from the National Biodiversity Action Plan 2017-2021 (and any superseding plan) and to prepare a County Heritage Plan and Biodiversity Action Plan during the lifetime of this County Development Plan in accordance with RPO 126 in the RSES, to ensure the protection and appreciation of heritage and nature at local level including recognition of rich biodiversity of designation of existing special areas of conservation i.e. Blackstairs Mountains, Slaney River Valley and River Barrow and River Nore SAC.</i></p> <p>(iii) It is considered that Policy NH. P2 can be amended to include reference to net loss of biodiversity occurs as a result of developments, projects, activities, programmes and plans arising from this CDP.</p> <p>Recommendation Ensure as far as is practicable that development does not adversely impact on wildlife habitats and species and that biodiversity is conserved for the benefit of future generations in the interests of sustainability. This will include moving towards no net loss of biodiversity from plans adopted by and projects granted permission/authorised by the Council.</p> <p>(iv) The Development Plan provides a framework for proper planning and sustainable development at County-level. The nature of the strategic Policy measures included in Development Plans mean that they often cross sectoral. Furthermore, when biodiversity/ecosystem mitigation is required to be integrated into Policy measures providing for development it is not practicable to separate biodiversity/ecosystem considerations.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>With reference to the National Biodiversity Action Plan 2017-2021 which seeks to address the main drivers of biodiversity loss in Ireland, the submission notes that this is particularly noteworthy for County Carlow, which is predominantly a rural county, and in which there is a need to ensure development avoids the fragmentation of landscape features, including ecological corridors which allow for the mobility of plant and animal species.' (9.9 Green Infrastructure). Of particular reference in the submission is the ecological corridor of the River Barrow and its grassy towpath, about 70 kms of which runs through County Carlow.</p>	<p>CLW-C10-55</p>	<p>Recommendation No change to Draft Plan.</p> <p>Noted.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission makes the following comments on biodiversity and green infrastructure:</p> <p>(i) Would like to see the benefits of biodiversity being clearly stated in the plan and in turn adequate funding being provided for projects contributing to biodiversity enhancement. At a minimum all existing green spaces need to be protected and lots more suitable trees are needed in urban settings all over the county.</p>	<p>CLW-C10-86</p>	<p>The content of the submission is noted.</p> <p>(i) The importance of green infrastructure as benefitting and contributing to the protection and enhancement of biodiversity is covered in Chapter 9, Sections 9.9 to 9.13. Table 9.5 in the chapter includes a section on 'Biodiversity Benefits'. In addition, Policy Gl. P2 seeks to <i>Protect and enhance the biodiversity and ecological function of the County's green infrastructure network</i>, and Objective Gl. O2 seeks to recognise and promote the benefits that can be achieved for the County's biodiversity through the preparation of a Green Infrastructure Strategy for the County.</p> <p>The protection and enhancement of biodiversity is further supported through a suite of green infrastructure policies for urban areas (Policies Gl. P11 to Gl. P14). Policy Gl. P12 encourages and supports</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>(ii) There could be a requirement built into the planning laws to ensure minimum requirements for biodiversity are met as new development proceeds.</p> <p>(iii) Constructed wetlands could be used to treat wastewater whilst simultaneously providing habitat for wildlife.</p>		<p>the incorporation of elements of green infrastructure and biodiversity into all new developments in urban areas, including the design of building and the use of tree planting, living walls, bird boxes etc. The protection and enhancement of biodiversity is also comprehensively dealt with as a natural heritage policy item in Chapter 11 of the Draft Plan, which includes an objective to prepare a Biodiversity Action Plan for the County (Section 10.2, Policy NH. O1).</p> <p>(ii) The introduction of planning laws is outside the remit of the Development Plan process.</p> <p>(iii) The role of wetlands in green infrastructure and SuDS is recognised in Chapter 9, and specifically by Policy GI. P3.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission includes the following observations, the Council should consult bio-diversity plans, encourage more bee keeping, cease the use of weed killer, use sustainable pest management. Develop a wildlife sanctuary, plant Irish wildflowers on common ground and encourage more broadleaf woodland.</p>	CLW-C10-38	<p>The issues raised in the submission will be examined and addressed through the preparation of a County Heritage Plan and Biodiversity Action Plan, the subject of Objective NH. O1 under Section 10.2 and/or through any actions arising out of same.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>The submission expresses concern about climate change and biodiversity emergencies and notes that we need to be doing our utmost to improve biodiversity and wildlife in the county.</p>	CLW-C10-109	<p>The content of the submission is noted. Chapters 7, 9 and 10 of the Draft Plan set out a suite of comprehensive policies, objectives and related provisions for climate change mitigation and adaptation in the County and the protection of biodiversity.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.3 Biodiversity - Swifts / Bats/ Birds		
<p>A number of submissions include some / all of the following comments and requests:</p> <ul style="list-style-type: none"> • Commission Birdwatch Ireland and the Heritage Council of Ireland to complete a swift survey of County Carlow including the Greater Carlow Graiguecullen Urban area. • Provide a workshop for architects, planners, heritage officer, etc. to raise awareness of the need to take Swifts into consideration in projects to refurbish old buildings and in new constructions. • Physically build in Swift boxes to new buildings within the town and county. • Include planning provisions for the requirement of environmentally sustainable in-built nest boxes for bats and swifts to encourage urban biodiversity in largescale new developments within the county. 	<p>CLW-C10-69 CLW-C10- 70 CLW-C10-81 CLW-C10-86 CLW-C10-90 CLW-C10-91 CLW-C10-106 CLW-C10-114</p>	<ul style="list-style-type: none"> • Commissioning Birdwatch Ireland and the Heritage Council to complete a Swift survey of the County is not within the remit of the development plan process. • Biodiversity workshops can be considered as part of the Biodiversity Action Plan. • There will be scope to consider where appropriate the protection of the County's swift population through the preparation of a County Heritage Plan and Biodiversity Action Plan under Objective NH. O1 in Section 10.2. Actions arising from same will be considered as appropriate. • As per above.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> Legal protection of existing swift colonies in public and council owned buildings. Buildings which are of natural and cultural heritage importance for the preservation of swift nest sites which should be afforded protection include The Carlow Youth Centre (Glendale Avenue, Carlow Town), Carlow College St. Patrick's, St. Dymphna's Hospital, Old Perry's Cash and Carry (Kennedy Street, Carlow Town), Leinster Crescent (Dublin Road, Carlow Town), Cullen's Mill (Leighlinbridge), The Old Mill (Church Street, Leighlinbridge), The Black Castle (Leighlinbridge), Old National School (Ballon), Altamont Gardens Stone Farm Outhouses, Saint Columba's National School (Tullow), Scoil Phádraig Naofa (Tullow), St. Brigid's Church (Clonegal). Support the establishment of the Greater Carlow Graiguecullen Urban area as a 'Swift City' to be the first of its kind in the Republic of Ireland following the lead of the Belfast Swift city initiative. 		<ul style="list-style-type: none"> Section 10.5 of the Draft Plan recognises that certain bird species are becoming rare or threatened, and that the protection afforded by law to certain bird species applies to wherever they are found, including birds listed in the Wildlife Act 1976 (as amended), the Birds Directive 1979, and the Habitats Directive 1992. Under the Birds Directive 1979 all birds are protected, especially during the period of breeding. In this regard, Policies ND. P1 to P6 include provisions to conserve threatened bird species and ensure development does not have a significant adverse impact on them. In particular, Policy ND. P4 seeks to ensure that where evidence exists of species that are protected under the Wildlife Act 1976 (as amended), the Bird Directive 1979, and the Habitats Directive 1992, appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment. <p>In addition to the foregoing Policy GI. P12 in Chapter 9 seeks to encourage and support the incorporation of elements of green infrastructure and biodiversity into all new developments in urban areas, including the design of buildings and their surroundings, and including the use of green roofs, living walls, bird boxes and bat roost sites.</p> <ul style="list-style-type: none"> Consideration of the Greater Carlow Graiguecullen Urban Area as a 'Swift City' may be given more detailed consideration as part of the preparation of the new Joint Urban Area Plan with Laois County Council and/ or as part of the preparation of a County Heritage Plan and Biodiversity Action Plan under Objective NH. O1 in Section 10.2, and/or as an objective or action arising from same. <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
		<p>Recommendation No change to Draft Plan.</p>
Submission requests that where appropriate protect mature trees not formally protected by TPOs.	CLW-C10-61	<p>It is considered that Policy WT P1 sufficiently addresses the content of this submission where it is stated policy of the Council to <i>Protect and manage existing woodlands, trees and hedgerow which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their consideration, protection and management when undertaking, approving or authorising development.</i></p> <p>Recommendation No change to Draft Plan.</p>
Submission submits that the Council should produce a Tree and Hedgerow Survey.	CLW-C10-122	<p>A tree and hedgerow survey of the County can be given consideration as part of the preparation of a County Heritage Strategy and Biodiversity Action Plan under Objective NH. O1 in Section 10.2, and/or as an objective or action arising from same.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.5 Peatlands		
Submission suggest the inclusion of the National Peatlands Strategy 2015 in Section 10.1.		Agreed.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
		<p>Recommendation Reference to the National Peatlands Strategy 2015 to be included in Section 10.1.</p>
<p>Submission recommends that the plan provides for the protection of non-statutory listed but nonetheless natural heritage sites of biodiversity, conservation and cultural heritage importance, including but not limited to the Drummin Bog and Boolyvanannan/Red Bog at Tomard upper.</p> <p>Recommends also active effort by the council and Coillte in this area (Tomard/ Bilboa area) to help restore native biodiversity to this bog and help rehabilitate the site.</p>	<p>CLW-C10-69 CLW-C10- 70 CLW-C10-90 CLW-C10-91 CLW-C10-86 CLW-C10-106</p>	<p>Peatlands Section 10.5, including Policies ND. P1 to P6, comprehensively addresses the protection of non-designated areas, habitats, and species. It is considered that reference to peatlands in the County can be included under Section 10.5 in Chapter 10 relating to 'Non-Designated Areas, Habitats and Species'</p> <p>Recommendation Amend text in paragraph 1 under Section 10.5 in Chapter 10 to reference peatlands as follows:- <i>There are wildlife habitats in County Carlow that are important on a county and local basis, acting as stepping stones in a wider ecological network. These wildlife habitats can include rivers and riverbanks, ponds, wetlands, peatlands, small woods and hedgerows, which are essential to the migration, dispersal and genetic exchange of wild species. Article 10 of the Habitats Directive states that Member States shall endeavour in their land use planning and development policies, to encourage the management of features of the landscape which are of major importance for wild flora and fauna.</i></p>
3.10.6 All-Ireland Pollinator Plan		
(i) Submission requests enactment of the all-Ireland Pollinator plan on public lands to include but not limited to public parks, public roads (roundabouts, road verges), public buildings and grounds (Duckett's Grove etc where possible).	<p>CLW-C10-69 CLW-C10- 70 CLW-C10-86 CLW-C10-106</p>	(i) The Council is already a formally signed up partner organisation committed to supporting the All-Ireland Pollinator Plan 2021-2025 and specifically pollinators on the public land it manages. Policy ND. P6 under Section 10.6 in Chapter 10 seeks to <i>Ensure that the</i>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
(ii) Suggest the inclusion of the National Pollinator Plan 2021-2025 in this Section 10.1.	CLW-C10-103	<p><i>management of the Council's open spaces and parks is pollinator-friendly and provides more opportunities for biodiversity.</i> It is considered that Policy ND. P6 should be further strengthened by a reference to the All-Ireland Pollinator Plan.</p> <p>(ii) Agreed.</p> <p>Recommendation</p> <p>(i) Amend the wording of Policy ND. P6 as follows (new text in green):- <i>Ensure that the management of the Council's open spaces and parks is pollinator-friendly and provides more opportunities for biodiversity, supporting the objectives of the National Pollinator Plan 2021-2025</i></p> <p>(ii) Reference to the National Pollinator Plan 2021-2025 to be included in Section 10.1.</p>
3.10.7 Invasive Species		
Submissions recommend survey and implement a plan to remove all invasive alien species (including Himalayan Balsam, Japanese Knotweed, Winter Heliotrope etc...) from our native waterways / County.	CLW-C10-69 CLW-C10- 70 CLW-C10-106 CLW-C10-86	<p>It is an objective of the Draft Plan (Objective IS. O1 under Section 10.10) to <i>Prepare an Invasive Alien Species Management Strategy, in conjunction with a Hedge and Road Verge Maintenance Strategy, during the lifetime of this Plan.</i></p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>Submission recommends in relation to Policy IS. P1, the inclusion of the following best practice guidance by Transport Infrastructure Ireland (TII):</p> <ul style="list-style-type: none"> - TII (2020) The Management of Invasive Alien Plant Species on National Roads – Standard GE-ENV-01104 https://www.tiipublications.ie/library/GE-ENV-01104-01.pdf - TII (2020) The Management of Invasive Alien Plant Species on National Roads – Technical Guidance https://www.tiipublications.ie/library/GE-ENV-01105-01.pdf 	CLW-C10-103	<p>Noted and agreed. Policy IS. P1 in Section 10.10 can be amended to reference relevant TII guidance documents regarding Invasive Alien Species.</p> <p>Recommendation</p> <p>Amend the wording of Policy IS. P1 as follows (new text in green):- <i>Prevent the spread of invasive alien species in the County, and to require landowners and developers to adhere to best practice guidance in relation to the containment and control of invasive alien species, including: the 'Guidelines on The Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads' (2010 NRA) and</i></p> <ul style="list-style-type: none"> ▪ <i>Invasive Species Ireland guidelines (see www.invasivespeciesireland.com).</i> ▪ TII (2020) The Management of Invasive Alien Plant Species on National Roads – Standard GE-ENV-01104 https://www.tiipublications.ie/library/GE-ENV-01104-01.pdf ▪ TII (2020) The Management of Invasive Alien Plant Species on National Roads – Technical Guidance https://www.tiipublications.ie/library/GE-ENV-01105-01.pdf
3.10.8 Riparian Flood Zones		
(i) Ensure the protection of the River Barrow floodplains which provide seasonal habitat for nationally important wintering numbers of wetland birds such as Golden Plover (Red-listed and Annex I) and Lapwing (Red-listed), allowing the river to maintain its current flooding patterns.	CLW-C10-69 CLW-C10- 70 CLW-C10-86	(i) Policy IW. P8 under Section 10.7 seeks to ensure the protection, improvement, or restoration of riverine floodplains, and Policy WL. P2 under Section 10.8 dealing with wetlands seeks to protect the biodiversity and flood protection value of wetlands and floodplains in the County.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>(ii) Assess the feasibility of providing financial relief (acknowledgement) to landowners whose lands are periodically flooded providing this flood attenuation relief (for the residents of the Barrow valley) and biodiversity resource without the need for any infrastructural flood relief developments.</p> <p>(iii) The use of natural flood mitigation strategies over hard infrastructure with a view to providing habitats for wildlife while protecting human livelihoods and centres of urban conurbations.</p>	<p>CLW-C10-69 CLW-C10- 70</p> <p>CLW-C10-69 CLW-C10- 70</p>	<p>(ii) The issue of providing financial relief is outside the scope of the development plan process.</p> <p>(iii) The use of green infrastructure and nature-based solutions for flood mitigation and alleviation and for the protection of biodiversity is supported in Chapter 9.</p> <p>Recommendation No change to Draft Plan.</p>
3.10.11 Geological Heritage		
<p>The submission includes the following comments on County Geological Sites (CGS):</p> <ul style="list-style-type: none"> ▪ The use of and reference to GSI datasets is encouraged, and a list of publicly available datasets useful to environmental assessment and the planning process is included. 	<p>CLW-C10-54</p>	<p>The content of the submission is noted.</p> <p>It is considered that a further reference to GSI datasets should be included under Section 10.9.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Local authorities are seen as critical partners with Geological Survey Ireland in protecting through the planning system CGS which fall within their county limits. In many cases CGS are often sites of high amenity or educational value and listing in the County Development Plan provides protection for the sites against potentially damaging developments. ▪ CGSs have been adopted in the National Heritage Plan and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures. ▪ Important to note that management issues for the majority of geological heritage sites may differ from ecological sites and in some cases, development may facilitate enhanced geological understanding of a site by exposing more rock sections i.e. quarry extension. 		<p>Amend the second paragraph in Section 10.9 to include the following additional text in green:- <i>The 6 County Geological Sites (CGS) in the County are identified on https://www.gsi.ie/en-ie/data-and-maps/Pages/default.aspx and are listed below. In addition to their information on geological heritage, the Geological Survey of Ireland also produces a wide range of other publicly available maps and datasets ranging from bedrock and quaternary geology, to geotechnical, minerals, geophysics, geochemistry and geohazards. These maps and datasets are also accessible through the web link included in the foregoing.</i></p>
3.10.12 Archaeological Heritage		
<p>Advice and recommendations are provided under a number of headings as follows:</p> <p>Archaeology</p> <ul style="list-style-type: none"> ▪ Note that National Monuments in the Ownership/Guardianship of the State now fall under the remit of the Minister for Housing, Local Government and Heritage. ▪ With regard to the County's Underwater Cultural Heritage, it states that it may be beneficial to include reference to the fact that wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments (Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may 	CLW-C10-103	<p>Archaeology</p> <p>It is considered that additional text can be added Section 10.2 as appropriate to reflect the suggested policy additions.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection.</p> <p><u>Additional Policy/Objectives – for consideration</u></p> <ul style="list-style-type: none"> ▪ To promote and facilitate appropriate forms of access (including disabled access) to archaeological monuments and historic wrecks, including maintaining or developing means of access (including working with landowners to secure appropriate access over private lands), providing appropriate, accurate signage and interpretive material and providing appropriate forms of virtual access where physical access is not possible. ▪ To promote knowledge and appreciation of archaeological and underwater cultural heritage and facilitate access to appropriate guidance regarding its protection and conservation, including at all stages of the development process (including pre-planning application consultations). ▪ To promote early and comprehensive public access to the results of archaeological excavations carried out as a result of development or conservation projects through publications and the provision of on-site interpretive material even where no physical remains are visible. ▪ To support community initiatives and projects regarding preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the guidance and advice of the Department of Housing, Local Government and Heritage. ▪ To protect historic graveyards, including through the avoidance of extensions to them would have an inappropriate level of impact on sub-surface archaeological remains or on their setting or amenity and, 		<p><u>Additional Policy/Objectives – for consideration</u> It is considered that additional text can be added Section 10.2 as appropriate to reflect the suggested policy additions.</p> <p><u>Recommended Climate Change Policies and Objectives for Archaeological Heritage</u> It is considered that additional text can be added Section 10.2 as appropriate to reflect the suggested policy additions.</p> <p><u>Recommendation</u> Include additional text in Section 10.12 stating:- <i>Wrecks over 100 years old (whether previously known or just discovered) and all archaeological objects situated underwater, are protected under section 3 of the National Monuments</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>in that regard, as an alternative to extensions to historic graveyards to endeavor to find alternative locations where additional land for burial is considered necessary.</p> <ul style="list-style-type: none"> ▪ To ensure that historic graveyards in the ownership or care of the local authority are managed and maintained in accordance with appropriate conservation standards and that local communities involved in care and maintenance of historic graveyards receive appropriate advice regarding such standards. ▪ To ensure that all signage placed at or near archaeological monuments is appropriate in both form and accuracy of content. ▪ To support the incorporation of monuments into designated open spaces and public amenity spaces, provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question, in particular through ensuring that such monuments are not left vulnerable, e.g. to erosion or to becoming the focus of vandalism or anti-social behavior, or are not left in, or allowed to deteriorate to be in, a condition incompatible with public safety. Accordingly, where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required. <p><u>Recommended Climate Change Policies and Objectives for Archaeological Heritage</u></p> <ul style="list-style-type: none"> ▪ As part of implementation of the Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage, it is strongly recommended that the Carlow Draft County Development Plan includes appropriate objectives. The following is recommended: ▪ To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change. 		<p><i>(Amendment) Act 1987. Wrecks of any date and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the making of an underwater heritage order, if considered to be of sufficient historical, archaeological or artistic importance to merit such protection. Information on known wrecks can be found in the Department's Wreck Viewer which holds records of over 18,000 known and potential wreck sites in Irish waters.</i></p> <p>Amend the wording of Policy AH. P7 as follows (new text in green): <i>Protect and conserve historic burial grounds within the County, including through the avoidance of extensions to them that would have an inappropriate level of impact on sub-surface archaeological remains or on their setting and amenity, and encourage their management and maintenance in accordance with best practice conservation principles, including 'Guidance for the Care, Conservation and Recording of Historic Graveyards' (The Heritage Council 2011) and 'Ireland's Historic Churches and Graveyards' (The Heritage Council), and in consultation with the National Monuments Service in the Department of Housing, Local Government and Heritage.</i></p> <p>Amend the wording of Policy AH. P8 as follows (new text in green): Promote public awareness of the archaeological heritage of the County, and encourage where appropriate and practicable, the provision of appropriately designed and located signage, interpretative material, and public access (including disabled access) for archaeological sites under the direct ownership, guardianship or control of the Council and/or the state.</p> <p>Include an additional Policy AH. P9 as follows:- Support community initiatives and projects regarding the preservation, presentation and access to archaeological heritage and underwater cultural heritage, provided such are compatible with appropriate conservation policies and standards, having regard to the</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ To identify the built and archaeological heritage in local authority ownership and areas at risk from climate change including, but not necessarily restricted to, the Record of Monuments and Places, protected structures and architectural conservation areas designated in the development plan. ▪ To undertake climate change vulnerability assessments for the historic structures, sites and wrecks in its area. ▪ To develop disaster risk reduction policies addressing direct and indirect risks to the built and archaeological heritage in its area. ▪ To develop resilience and adaptation strategies for the built and archaeological heritage in its area. ▪ To develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works. 		<p>guidance and advice of the Department of Housing, Local Government and Heritage.</p> <p>Include an additional Policy AH. P as follows:- Support the incorporation of recorded monuments into designated open spaces and public amenity spaces, provided this is done in a manner compatible with the protection and proper management and conservation of the monument in question. Accordingly, where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required.</p> <p>Include an additional Policy BH. P6 as follows:- Promote awareness and the appropriate adaptation of the County's architectural and archaeological heritage to deal with the effects of climate change.</p>
<p>The submission details that:</p> <ul style="list-style-type: none"> ▪ The Barrow Navigation is an integral part of the wider Carlow landscape and Waterways Ireland is committed, in line with its statutory remit, to manage, maintain and promote this heritage corridor for this and future generations in an inclusive and sustainable manner. ▪ The policies and objectives in Chapter 10 align with Waterways Ireland outlook on navigations heritage. 	CLW-C10-118	<p>The content of the submission is noted and welcomed.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<ul style="list-style-type: none"> ▪ Requests that the Council safeguard the environment of the Blackstairs Range into the future from any destructive industrial development and instead make the Blackstairs a showcase for biodiversity enhancement, restoration and conservation. ▪ Considers that the Nine Stones Carpark could be improved with enhancement of the heritage drive. ▪ Coillte forestry should support mixed woodlands with both native and non-native species to support wildlife. ▪ Expresses concern over felling time of Coillte forestry plantations and impact of forestry trucks in the Blackstairs. ▪ Considers that heritage scenic routes across the Blackstairs should have deep mixed woodland barriers and corridors along blocks of forestry at roadside locations. ▪ Requests enhancement of river catchment/ channels/valleys etc for biodiversity habitat. 	CLW-C10-122	<p>It is considered that together, Chapters 9 and 10 of the Draft Plan provide a robust policy position for the protection of the landscape of the County, including uplands areas such as the Blackstairs Mountains, inland waterways and riparian zones, and the natural heritage and biodiversity of these key landscape features.</p> <p>It is the policy of the Council under WT. P1 and WT. P3 in Section 10.6 to protect and manage existing woodlands which are of biodiversity value and to prohibit the cutting of hedges during the bird nesting season (1st March to 31st August), except in certain legally defined circumstances.</p>
3.10.13 Built Heritage / Record of Protected Structures		
Submission recommends additional resources for built heritage.	CLW-C10-38	<p>The issue of resources is a budgetary issue and outside the remit of the Development Plan process.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
Submission recommends protecting and enhancing mass rocks and holy wells where necessary.	CLW-C10-61	Recorded archaeological features have sufficient protection provided through policies identified in Chapter 10. Recommendation No change to Draft Plan.
<p><u>Appendix VIII - Record of Protected Structures</u> Requests that Record of Protected Structures (RPS) is amended by the omission of the Limekiln Cooling Tower (Ref. RPS CW77) as part of the new County Development Plan 2022-2028. The submission refers to a previous 2017 submission in support of this request:</p> <ul style="list-style-type: none"> ▪ The previous 2017 submission demonstrated that the Limekiln Cooling Tower is not a structure of architectural heritage which warrants protected structure status based on their 'special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest' as required by Section 51 of the Planning and Development Act 2000 (as amended). ▪ The Limekiln Tower is a steel tower-like structure about 6m in diameter, standing 61m high. It was erected in 1988 and is the third such Limekiln tower on the site since the factory was built in 1926. It is submitted that the Limekiln Tower was constructed in 1988 and therefore is of little historic value, the scientific, social or cultural significance to merit the inclusion of the structure as a protected structure is questioned. <p>It is requested that the Council acknowledge that the structure was not referenced in the NIAH survey of buildings in Carlow and therefore there is little basis for its inclusion in the Record of Protected</p>	CLW – C10-77	The Council engaged the services of Michael O'Boyle Conservation Officer to assess the merits of the removal of the structure from the Record of Protected Structures. On the basis of the advices received it is recommended that the structure be removed from the RPS. (see Appendix VIII) of this report. Recommendation It is recommended that the consultation process regarding the proposal to remove the structure be initiated in accordance with the legislative provisions.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p>Structures, and that there were similar structures in Tuam and Mallow which have all since been demolished.</p> <p>The following comments are also made in support of the delisting request:</p> <ul style="list-style-type: none"> ▪ Appears that the structure is included for sentimental reasons, and that to include it on the Record of Protected Structures based on the fact that the Carlow site is the oldest sugar factory in Ireland, and not taking into consideration that the Lime Kiln only dates from 1988, is inappropriate and does not take into consideration Section 51 and 54 of the Planning and Development Act 2000. ▪ The RPS states that the structure has potential to be used a viewing platform and as a centre for the recall of the industrial and historical past of Carlow, however, it is not feasible for either use and to adopt it for such would require significant investment. ▪ Over the last decade the structure has continued to deteriorate further and a number of external pieces of the tower have fallen off. As time goes on the structure, which has passed its design lifespan, will deteriorate further and will increasingly become a serious health and safety issue. ▪ Wish to advise the Council that Greencore is both willing to undertake and fund the taking down and dismantling of the structure and to erect on some suitable part of the site a piece of outdoor artwork which would symbolize the form use of the lands as a sugar factory. 		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
<p><u>Appendix VIII - Carlow Town</u> - RPS (delisting) Request that 49 Burrin Street be deleted from the Record of Protected Structures. It is indicated that the building is an end of terrace, five bay, two storey house with a rear return, circa 1839. The building opens directly onto Burrin Street and has a large garden area to the rear, currently overgrown. The walls are of random limestone rubble construction with brick construction to the windows and door openings. All windows and door openings are currently sheeted over. The building has a pebble dash finish to Burrin Street and a nap finish to the rear.</p> <p>It is indicated that the building has been vacant and in a semi-derelict state since the early 2000.s. The building was seriously neglected for a period of c. 15 years with at least two serious fires caused by vandalism. The fires destroyed all internal features, partition walls, floors and the roof structure.</p> <p>The shell of the building currently consisting of the front and rear walls, the cross-stairwell walls and part of the rear return only. The building was left open to the elements following the fires resulting in further deterioration until being temporally re-roofed. The site was subject to dumping and serious anti-social behavior.</p> <p>The stated intention is to develop 49 Burrin Street in such a way as to retain the existing street frontage and to restore it in line with current best practice while extending to the rear. To this end Holly Park Studio Architects have been appointed to supervise the project. It is stated that it is intended to preserve the streetscape and features of the building, but the fact that the features listed as protected internally no longer exist may affect development plans internally.</p>	CLW – C10-94	<p>The Council engaged the services of Michael O'Boyle Conservation Officer to assess the merits of the removal of the structure from the Record of Protected Structures. On the basis of the advices received it is recommended that the structure not be removed from the RPS. (see Appendix VIII of this report).</p> <p>Recommendation It is recommended that the structure be retained on the RPS.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.10 Natural and Built Heritage		
It is indicated that the current condition of the building does not warrant it being retained on the Record of Protected Structures as those features which originally prompted its inclusion on the Record no longer exist.		
<p><u>Appendix VIII - Record of Protected Structures (Carlow Town)</u> Requests the delisting of a pair of derelict 19th Century structures (CT 93 and CT 94) on the east side of Shamrock Square at the junction of Barrack Street, Tullow Street, Staplestown Road and Green Lane. A Heritage Assessment Report accompanies the submission and notes that the structures were probably built around 1830-1840 with the shopfronts added during the second half of the 19th Century. A structural condition survey also accompanies the submission. It is indicated that both of the structures were heavily damaged in a fire in 2010 and based on a visual inspection have since become extremely ruinous and structurally unstable. It is indicated that all of the internal structures and roof with the exception of the return wing on Staplestown Road was destroyed.</p>	CLW – C10-41	<p>The Council engaged the services of Michael O'Boyle Conservation Officer to assess the merits of the removal of the structure from the Record of Protected Structures. On the basis of the advices received it is recommended that the structure be removed from the RPS. (see Appendix VIII) of this report.</p> <p>Recommendation It is recommended that the consultation process regarding the proposal to remove the structure be initiated in accordance with the legislative provisions.</p>

Chapter 11: Tourism and Recreation

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
3.11.1 Tourism		
<p>Submission (Failte Ireland) welcomes the detail contained within the Draft Plan which includes a comprehensive and dedicated chapter on Tourism and includes numerous references to Tourism throughout relating to a number of areas. It states that the majority of recommendations made by Fáilte Ireland at pre-draft stage have been taken into consideration and the vision for the County includes reference to those who visit establishing tourism at a strategic level within the Plan.</p> <p>Proposed statements are based on identified gaps in policy coverage, most recent Fáilte Ireland plans and programmes, and recommended good practice in the area of sustainable tourism.</p> <p>Reference is made to the following additional tourism considerations:</p> <ul style="list-style-type: none"> (i) Regional Tourism Plan which is in preparation for each of the four Regional Experience Brands. The purpose of the Regional Tourism Plans is to identify the sustainable tourism development priorities that will help to unlock the commercial potential of the region bringing benefits to all stakeholders and industry. Each plan will be prepared based on the VICE model which is a methodology for working towards sustainable tourism that seeks to strike an appropriate balance between the needs of the Visitor, the Industry and Community and the Environment. The plans will be for the period to 2025 and will be grounded in Fáilte Ireland's new 	CLW-C10-60	<p>The content of the submission is noted, including the positive feedback on the content of Chapter 11.</p> <ul style="list-style-type: none"> (i) It is considered that Objective FI. O1 can be amended to include reference for the support of Regional Tourism Strategies. <p>Recommendation Amend Objective FI. O1 to include additional text as follows (new text in green):- Support and facilitate Fáilte Ireland and tourism stakeholder initiatives for the development of tourism experiences in the County, which deliver on the Ireland's Ancient East brand and the preparation and implementation of Regional Tourism Strategies.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>Corporate Strategy. There will be a strong spatial element to the plans which will seek to identify where development should take place in order to unlock the tourism potential of the region. The Regional Tourism Plans will also provide a strategic framework for a suite of Destination and Experience Development Plans (DEDPs) which will sit underneath them.</p> <p><u>Failte Ireland requests the inclusion of an objective supporting the preparation and implementation of Regional Tourism Strategies in the County Development Plan, to support the continued collaboration with Fáilte Ireland and tourism stakeholders to ensure successful implementation and delivery of these tourism plans.</u></p> <p>(ii) Promotion of accessible tourism in the county. This entails ensuring that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people. Achieving a high level of accessibility is both socially and economically important.</p> <p><u>Failte Ireland requests inclusion of proposed new policy/ objective to support the provision of accessible tourism.</u></p>		<p>(ii) Policy TD. P1 seeks to promote and maximise the tourism potential of the County in collaboration with relevant agencies and bodies, including Fáilte Ireland. This policy can be amended to include support for the provision of accessible tourism as requested in the submission.</p> <p>Recommendation Amend Policy TD. P1 to include additional text as follows (new text in green):- Support and collaborate with relevant agencies and bodies such as Carlow Tourism, Tourism Ireland, Fáilte Ireland and The Arts Council, and key stakeholders and local communities, to develop, promote and maximise the tourism potential of the County, and to ensure that tourism facilities are accessible to people with mobility issues, learning disabilities, people with visual or hearing impairments, young and elderly people.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>(iii) It is stated that the Visitor Experience Plans going forward are going to form Destination Experience Development Plans (DEDPs). As sections have now been superseded it is recommended that the text should be removed from the Draft Plan as well policy FI. 02. It is recommended that the Development Plan should include an objective to support the preparation of Destination Experience Development Plans and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties.</p> <p><u>Proposed replacement of objective FI.02:</u> <i>FI. 02 The Council will support the preparation of Destination Experience Development Plans (DEDP) and other tourism masterplans both within the county and also those which crosses from the county into neighbouring counties in collaboration with Fáilte Ireland and other tourism stakeholders.</i></p> <p><u>Section 11.4.2 recommends that given that the County Carlow Tourism Strategy and Action Plan 2020-2025 is due to expire during the life of the Development Plan, an objective to review and adopt a new Plan in 2025 should be included in the Development Plan.</u></p>		<p>(iii) It is considered that the wording of Objective FI. 02 can be amended as requested in the submission to reflect this fact.</p> <p>Recommendation Amend Policy FI. 02 to include additional text as follows (new text in green):- Engage and collaborate with Fáilte Ireland and other tourism stakeholders on their 'Tales of Two Worlds Visitor Experience Development Plan' in support of their preparation of Destination Experience Development Plans (DEDPs) and other tourism masterplans within the County and in adjoining counties as appropriate.</p> <p>Amend the text of Section 11.3.2 to read as follows (new text in green):-</p> <p>11.3.2 Tales of Two Worlds Visitor Experience Destination Experience Development Plans In Carlow, Fáilte Ireland has commenced work on the 'Tales of Two Worlds' Visitor Experience Development Plan. This Plan brings together Ireland's historic houses and gardens, and the period in Ireland's history of famine and emigration. Fáilte Ireland's Great Houses and Gardens Experience Development Programme looks at the house and garden experiences available across the County, including ways to develop guiding, events, cost, revenue management and sales distribution. Going forward these Visitor Experience Plans are going to form Destination Experience Development Plan (DEDPs).</p> <p>Omit Section 11.3.3 as text of same is incorporated into Section 11.3.2.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p><u>Recommends altered Tourism Development policy, TD.P1</u> Support and collaborate with relevant agencies and bodies such as Carlow Tourism, Tourism Ireland, Fáilte Ireland and The Arts Council, and key stakeholders and local communities, to further understand the needs of visitors in the County and to develop, promote and maximise the tourism potential of the County.</p> <p>(iv) Section 11.5.8 Natural Heritage and Amenities – Fáilte Ireland would welcome inclusion of an objective which supports the development of shared facility centres for water-based activities in the county to help sustainably manage the increased interest in water sports activities in certain locations as well as improving the overall visitor experience.</p> <p><u>Recommends proposed new objective, to be inserted HT.P15:</u> <u>To encourage the development of shared facilities centres, at inland water bodies, to facilitate greater access to water for areas such as water-sports and water-based activities and events subject to normal planning and environmental criteria.</u></p>		<p>Amend the wording of Objective TD. P1 as follows (new text in green):- Support the implementation of the County Carlow Tourism Strategy and Action Plan 2020-2025, and any updated version of the Strategy and Action Plan.</p> <p>Amend the text of Policy TD. P1 to read as follows (new text in green):- Support and collaborate with relevant agencies and bodies such as Carlow Tourism, Tourism Ireland, Fáilte Ireland and The Arts Council, and key stakeholders and local communities, to further understand the needs of visitors in the County and to develop, promote and maximise the tourism potential of the County.</p> <p>(iv) The request regarding the insertion of an additional Policy HT. P15 is noted and considered to be acceptable.</p> <p>Recommendation Include a new Policy HT. P15 under Section 11.5.8 Natural Heritage and Amenities to read as follows:- Encourage the development of shared facilities centres at inland water bodies, to support greater access to water for water-sports and water-based activities and events, subject to compliance with planning and environmental criteria.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>(v) Section 11.7 recommends section could be further identify recent Fáilte Ireland funding for outdoor dining through the inclusion of the following text.</p> <p><i>It is considered that Outdoor dining and hospitality will now be a permanent feature of our hospitality offering and businesses need to be supported to facilitate this for longer periods throughout the year. As such Fáilte Ireland, under its Outdoor Dining Enhancement Scheme, has provided funding for Tullow Street Upper, as well as Main Street Borris, for permanent outdoor dining structures.</i></p> <p>(vi) Additionally, it is considered that objective DT.O1 could be strengthened to support the role of Carlow as Destination Town as follows:</p> <p>Proposed amended objective DT.O1: <i>To support, promote and maximise the role of Carlow Town as a designated Ireland's Ancient East 'Destination Town', and to engage with Fáilte Ireland in developing and promoting future tourism initiatives in the town, including enhancement of public space, the development of a way finding project and welcome signage, transport links, accommodation, the night-time economy</i></p>		<p>(v) The suggested text provided regarding the importance of outdoor dining and hospitality as a permanent feature of the hospitality offering is noted and agreed with. It is considered that the suggested text can be included in Section 11.10 which deals specifically with Carlow Food, Drink and Craft.</p> <p>Recommendation Include new second paragraph in Section 11.10 Carlow Food, Drink and Craft to read as follows:- The impact of the Covid-19 pandemic has highlighted the important role of the outdoor dining and hospitality offering for businesses, which has now become a more prominent feature across the County. Under its Outdoor Dining Enhancement Scheme, Fáilte Ireland has provided funding for Tullow Street Upper, as well as Main Street Borris, for permanent outdoor dining structures. Businesses need to be supported to facilitate outdoor dining and hospitality for longer periods throughout the year, subject to compliance with planning and environmental criteria.</p> <p>(vi) The advice to strengthen Destination Town Objective DT. O1 with additional text referring to transport links, accommodation etc. is noted and agreed with.</p> <p>Recommendation Amend Policy DT. O1 to read as follows (new text in green):- To support, promote and maximise the role of Carlow Town as a designated Ireland's Ancient East 'Destination Town', and to engage with Fáilte Ireland in developing and promoting future tourism initiatives in the town, including enhancement of public space, the development of a way finding project and welcome signage, transport links,</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p><i>and the sustainable development of our natural and built heritage in order to capitalise on the potential benefit of the funding for the town.</i></p> <p>(vii) Section 11.8 Culture, Arts and Entertainment –it is noted in the submission that a vibrant evening and night-time economy is critical to increasing overnight stays and key to delivering rationality and seasonality and should be captured in the Development Plan. <u>Recommends proposed new objective CA. P4: To encourage and support an improved night-time economy through the increased use of existing and temporary spaces for Culture, Arts and Entertainment uses including through extended opening hours for existing attractions.</u></p> <p>(viii) Tourism Infrastructure and Visitor Services: It is considered that the CDP should support the tourism sector to invest in digital technology, with a particular focus on sectors with low digital presence such as visitor attractions and activities. In this regard a proposed new objective is recommended: <u>Encourage and support investment in digital technology in the tourism sector, with a particular focus on sectors such as visitor attractions and activities with low digital presence and/or integration.</u></p>		<p>accommodation, the night-time economy, and the sustainable development of our natural and built heritage, in order to capitalise on the potential benefit of the funding for the town.</p> <p>(vii) The recommendation for a new Policy CA. P5 in Section 11.8 Culture, Arts and Entertainment, to include support for an improved night-time economy is noted and agreed with.</p> <p>Recommendation</p> <p>Include new Policy CA. P5 for Culture, Arts and Entertainment to read as follows:- Encourage and support an improved night-time economy through the increased use of existing and temporary spaces for Culture, Arts and Entertainment uses including through extended opening hours for existing attractions, subject to compliance with planning and environmental criteria.</p> <p>(viii) It is considered that a new Policy TD. P8 for Section 11.4 can be included to address the recommendation to provide support for investment in digital technology in the tourism sector.</p> <p>Recommendation</p> <p>Include new Policy TD. P8 in Section 11.4 to read as follows:- Encourage and support investment in digital technology in the tourism sector in the County,</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>Other Comments:</p> <ul style="list-style-type: none"> - As referenced in Issues Papers Failte Ireland would welcome tourism policies and objectives clearly set out where possible through the inclusion of maps with key tourism assets and attractions identified on the associated mapping in the Assessment to ensure they are embedded into the Plan and considered at the decision-making stage of the planning process. 		<p>with a particular focus on visitor attractions and activities with low digital presence and/or integration.</p> <p><u>Other Comments</u> The maps referred to in the submission are already included in County Carlow Tourism Strategy and Action Plan 2020-2025, which is referenced in the Chapter and specifically supported by Objective TD. O1.</p>
<p><u>Turas Columbanus</u> Requests that a policy/objective in relation to the development of Turas Columbanus is included facilitating a collaborative approach with Laois County Council and other key stakeholders, for the development of a way finder project and tourism development initiative.</p>	<p>CLW-C10-48</p>	<p><u>Turas Columbanus</u> It is considered that an additional policy can be included to support the development and promotion of the Turas Columbaus route in collaboration with adjoining local authorities and key stakeholders.</p> <p>Recommendation Include an additional Policy R. P12 as follows:- Support the development and promotion of the Turas Columbaus as part of the Columban Way Walk, including appropriately designed and located signage, and in collaboration with adjoining local authorities and key stakeholders as appropriate.</p>
<p>States in relation to tourism that the County Development Plan 2022-2028 needs to acknowledge the contribution of and provide facilities for nature-based tourism opportunities in Co. Carlow which are made possible by the very biodiversity which sustains them, including those involved in outdoors pursuits primarily based on enjoying the natural environment of Carlow including hillwalkers, birdwatchers, runners, cyclists etc...</p>	<p>CLW-C10-69 CLW-C10- 70 CLW-C10-106</p>	<p>The role of nature-based tourism opportunities is recognised and supported through the heritage tourism policy provisions in Chapter 11. Section 11.5 recognises that the natural heritage of the County is alongside built heritage, one of the foundations that attract visitors and Policies HT. P1 and HT. P2 seeks to support the protection and sustainable development and promotion of heritage</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
		<p>tourism, including landscapes, designated sites, habitats and species and water quality.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission makes the following comments:</p> <ul style="list-style-type: none"> ▪ Protect landscape from inappropriate tourism development. ▪ Assess tourism and recreational development against nature and scale appropriate to character of the area. ▪ Direct tourist-based development such as information centres into existing settlements. ▪ Promote and encourage recreational use of rivers and the development of blueways. ▪ Ensure golf club development does not impinge on existing public rights of way. ▪ Adopt bye-laws banning the use of motor bikes and quads in privately owned areas of rough grazing. ▪ Section 11.14, 1st paragraph 1st sentence, should be upgraded to a policy. ▪ Identify and map, on an ongoing basis, public rights of way. ▪ Ensure provision and improvement of signposting and waymarking on public rights of way. ▪ Designate pilgrim paths as public rights of way. ▪ Protect and promote greenways and consider designating them as public rights of way. 	CLW-C10-61	<p>The content of the submission is noted. It is considered that the suite of policies, objectives and related provisions in the Draft Plan for landscape, tourism, recreation and public rights of way, are sufficiently comprehensive and robust to address the issues raised. The content of Chapters 9, 10, and 11 is particularly noted in this regard.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
3.11.2 Heritage Tourism		
<ul style="list-style-type: none"> ▪ It is noted that Policy HT. P11, Policy HT. P12, and HT. P13 relate to the development of tourism and amenity within the River Barrow, River Slaney and the Blackstairs Mountains. It is considered that emphasis should be placed on outlining the international biodiversity and conservation importance of these sites which all include Special Areas of Conservation. Policy should refer to the sustainable use or development of these sites. Opportunities to engage the public about the conservation importance of these sites through provision of suitable interpretative material must be included in amenity development, where appropriate. ▪ Recommends that all development resulting from Policy HT. P11, Policy HT. P12, and HT. P13 must be subject to environmental assessment including, as appropriate, Strategic Environmental Assessment, screening for appropriate assessment, appropriate assessment, Environmental Impact Assessment and Ecological Impact Assessment, as required. In accordance with European case law, appropriate assessment must include complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the SAC concerned. ▪ Advises that all planning applications resulting from Policy HT. P11, Policy HT. P12, and HT. P13 should include Invasive Species Management Plans. 	CLW-C10-103	<p>The content of the submission has been noted, and the matters raised with regard to SEA and AA have been addressed by the SEA and AA of the Draft Plan. It is considered appropriate to include new text in advance of these policies to take account of the recommendations in the submission.</p> <p>Recommendation</p> <p>Insert new text in Section 11.5 in advance of these (HT) policies to read as follows:-</p> <p>Policy HT. P11, Policy HT. P12, and HT. P13 relate to the development of tourism and amenity within the River Barrow, River Slaney and the Blackstairs Mountains. The international biodiversity and conservation importance of these sites, which all include Special Areas of Conservation, is identified in the SEA Environmental Report accompanying this Development Plan and included as Appendix I.</p> <p>Applications for development and emerging plans or programmes arising from Policies HT. P11, HT. P12 and HT. P13, must be subject to screening and subsequent stages of environmental assessment as relevant and appropriate, SEA, EIA, AA and Ecological Impact Assessment. In accordance with European case law, AA must include complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the SAC concerned. Applications for development under these policy provisions must also demonstrate that the proposed use or development is sustainable and must be accompanied by an Invasive Species Management Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>Advises in relation to Policy GB. P1 that the utilisation of riverbanks, for greenways and blueways could result in biodiversity loss through both direct and indirect impacts and must be subject to environmental assessment including Strategic Environmental Assessment, screening for appropriate assessment, appropriate assessment, Environmental Impact Assessment and Ecological Impact Assessment, as appropriate and required.</p>		<p>Insert new text in Section 11.6 in advance of the greenway and blueway (GB) policies to read as follows:- Applications for development/emerging plans or programmes under Policy GB. P1 must be subject to screening for and subsequent stages of environmental assessment as relevant and appropriate, SEA, EIA, AA and Ecological Impact Assessment. In accordance with European case law, AA must include complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the SAC concerned.</p>
3.11.3 Green and Blueways		
<p>Requests that Policy GB P3 which states the Council will "Support the development of a tourism masterplan for the River Barrow which sets out an integrated framework for tourism development along the River Barrow" include "in conjunction with other local authorities" so as to ensure a coordinated approach across county boundaries.</p> <p>Reference made to Regional Policy Objective 4.76 in the EMRA RSES which supports the sustainable development of environmentally sensitive low intensive amenity development associated with the River Barrow. Is of the opinion that the Draft Plan should include policies/objectives to promote links between the Grand Canal, the Barrow Line and to further development the Barrow Blueway connecting Carlow-Graigucullen on the boundary with the Southern Region and extending south to Waterford.</p>	<p>CLW-C10-15</p> <p>CLW-C10-48</p>	<p>The content of the submission is noted. The requested amendment to Policy GB. P3 is considered to be reasonable and appropriate. Additional wording can be included in the policy as requested.</p> <p>As per response above.</p> <p>Recommendation Amend the wording of Policy GB. P3 to read as follows (new text in green):- 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.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>The submission reference numbers listed here relate to some / all the concerns regarding the provisions of Section 11.6 in the Draft Plan and in particular Policy GB. P1 thereunder regarding support for the development of blueways. The content of these submissions address issues and concerns regarding reference to blueways, consultation with Waterways Ireland, the development of a hard surface along the towpath of the River Barrow, and the protection of the River Barrow as a natural amenity. The submissions can therefore be grouped and summarised as follows:</p> <ul style="list-style-type: none"> • Concerned at the repeated attempts to develop a blueway along the River Barrow and particularly within the River Barrow and River Nore SAC. • The Council should not facilitate engagement with relevant stakeholders including Waterways Ireland to promote the development of a "Blueway" on the river Barrow as the proposal has already been refused by both Carlow County Council and An Bord Pleanala. ▪ To support such a development the County Development Plan 2022-28 would be ignoring Section 12(11) of The Act which states that "...in making the [Development] Plan members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates, the statutory obligations of any Local Authority in the area..." ▪ The tow-path along the River Barrow provides a wonderful eco-friendly amenity. ▪ A blueway would not be viable along the River Barrow which is prone to extensive annual flooding and could not facilitate mixed recreational usage as anglers and walkers would be endangered by cyclists. 	<p>CLW-C10-12 CLW-C10-18 CLW-C10-20 CLW-C10-23 CLW-C10-44 CLW-C10-45 CLW-C10-47 CLW-C10-50 CLW-C10-53 CLW-C10-55 CLW-C10-62 CLW-C10-63 CLW-C10-69 CLW-C10-70 CLW-C10-71 CLW-C10-78 CLW-C10-89 CLW-C10-106 CLW-C10-112 CLW-C10-116 CLW-C10-126</p>	<p>Policy GB. P1 as contained in Section 11.6 of the Draft Plan states that it is the Policy of the Council to: <i>Facilitate engagement with relevant stakeholders including Waterways Ireland to promote the development of greenways and blueways at appropriate locations in the County, through the utilisation of disused transport links and routes and/or existing linear open spaces such as riverbanks, as well as opportunities to integrate and link such routes with towns, villages, and communities in the County and existing/proposed such routes outside of the County.</i> The intention of Policy GB. P1 is to support the provisions of the National Planning Framework which identifies that one of the key future planning and development and place making priorities for the Southern Region is the <i>Development of a more integrated network of greenways, blueways and peatways to support the diversification of rural and regional economies and promote more sustainable forms of travel and activity- based recreation.</i> (Ref: also; National Policy Objective 22). The RSES for the Southern Region also recognises the importance of Greenways and Blueways within the Region (Ref: RPO 53 <i>Sustainably develop walking and cycling trails opening greater accessibility to the marine and countryside environment by sustainable modes and promote the sustainable designation and delivery of Greenway and Blueway Corridors. Facilitate appropriate tourism development and in particular a National Greenways, Blueways and Peatways Strategy, prioritising sustainable projects that achieve maximum impact and connectivity at national and regional level</i>). RPO 124 further recognises that <i>any future development of greenways, blueways, peatways, cycleways or walkways will include an assessment by the relevant authorities of any impacts that may arise from increased visitor pressures, in particular, on sensitive European sites and the design of the network will consider the provision of protective measures on sites sensitive to disturbance/visitor pressure.</i> RPO 201 further notes that <i>proposals for investment in walking and cycling facilities, greenway and blueway corridors should be based on rigorous site/route selection studies and Local authorities should ensure that</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<ul style="list-style-type: none"> ▪ The Barrow Track is a well-established amenity for leisure activities like, dog walking, angling, bird watching, leisure walking, along with water activities such as boating, canoeing, swimming etc. The proposal to develop the track to make it suitable for cyclist and cyclist related activities will surely only lead to one outcome and that will be confrontation, resentment, anger, and guaranteed mayhem. ▪ Requests an amendment to Policy GB. P1 under section 11.6 which states "Facilitate engagement with relevant stakeholders including Waterways Ireland...", and notes in this regard that Waterways Ireland's only stake hold in County Carlow is on the River Barrow so the only Blueway that can be developed by Waterways Ireland in County Carlow is on the River Barrow. ▪ Section 11.6 should not support development that will remove or damage the green infrastructure of the Barrow Towpath which is designed with a 12" spit sod surface that is hardwearing and resilient to flooding. ▪ "The County Development Plan must ensure that a balance is achieved in terms of land use and development and the protection of the environment. ▪ "In the making of the Development Plan members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates. ▪ The track itself provides habitat for many floral species as well as feeding opportunities for protected avian waterbird species such as Snipe (Red-listed), Green Sandpiper, Grey Heron, Little Egret, Moorhen, Little Grebe as well as otters which cannot feed on a manmade gravel, grit, tarmac or similar surface. 		<p><i>decision-making in relation to such developments is informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and on biodiversity outside of formal protections such that proposed development does not contribute to loss of biodiversity.</i></p> <p>A number of submissions have been received regarding the reference to the term blueway in the Draft Plan, and in particular the provision of a hard surface track along the River Barrow which has been subject to a previous decision to refuse permission. The sensitivity of the environment along the banks of the River Barrow is highlighted in numerous submissions received. Policies to ensure the continued protection of the River Barrow are contained Section 10.7 (Policies IW. P1 to P12)</p> <p>As County Carlow has a significant network of waterways and the term blueway can extend to uses other than a hard surface trail (e.g. water-based activities) it is considered appropriate that policy provision support the provision of greenways and blueways at appropriate locations in accordance with National and Regional policy. Policy GB P1 however can be further strengthened to ensure protection of the environment as appropriate.</p> <p>In addition, it should also be noted that that Section 10.7 in Chapter 10, which specifically addresses inland waters and riparian zones, sets out a comprehensive and robust policy position for the protection of inland waterways such as the River Barrow. Policies IW. P1 to P12 under Section 10.7 refer.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
		<p>Recommendation Amend Policy GI P1 as follows: <i>Facilitate engagement with relevant stakeholders including Waterways Ireland to promote the development of greenways and blueways at appropriate locations in the County, through the utilisation of disused transport links and routes and/or existing linear open spaces such as riverbanks where appropriate, as well as opportunities to integrate and link such routes with towns, villages, and communities in the County and existing/proposed such routes outside of the County. Any future development of greenways or blueways will include an assessment of any impacts that may arise from increased visitor pressures, in particular, on sensitive European sites and the design of the network will consider the provision of protective measures on sites sensitive to disturbance/visitor pressure. Rigorous site/route selection studies shall be informed by an appropriate level of environmental assessment, including all necessary reports to assess the potential impact on designated European sites and on biodiversity outside of formal protections such that proposed development does not contribute to significant loss of biodiversity.</i></p> <p><i>Applications for development/emerging plans or programmes under Policy GB P1 must be subject to screening for and subsequent stages of environmental assessment as relevant and appropriate SEA, EIA, AA and Ecological Impact Assessment. In accordance with European case law, AA must include complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the SAC concerned.</i></p>
Supports the development of the Blueway which is stated a critical to the future development of County Carlow. Cross sectoral benefits include health, education, conservation tourism and business. Identifies need to	CLW-C10-79	The content of the submission is noted. The cross-sectoral influence and benefits of blueways is promoted and supported in Section 11.6, and by Policies GB. P1 to

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>build the county profile nationally and internationally as a place to lie in, a place to enjoy leisure time and a vibrant place in which to do business. It is stated that the Blueway would not be an intrusion or a threat on nature but rather a resource that would enhance our natural environment. The development Plan must be cognisant of the opportunity to develop the Blueway and include the necessary policies for its delivery.</p>		<p>GB. P3. It is considered that Objective GB. O1 can be amended to include supports for blueways in the County.</p> <p>Recommendation No change to Draft Plan.</p>
<p>The submission makes a number of observations and requests regarding blueways and greenways as follows:</p> <ul style="list-style-type: none"> ▪ Expedite the feasibility study of the greenway from Waterford to St. Mullins. ▪ Develops greenways in appropriate locations with a geographical spread of them in the County over the next 10 years. ▪ Requests the Council commission a feasibility study to create a Blueway on the River Barrow. ▪ Have a schedule of preventative maintenance on the River Barrow to protect the route and to make it a safe space to enjoy. ▪ Consider the placing of more seating on the River Barrow. ▪ Site a second bridge over the River Barrow at IT Carlow. ▪ Include signage along the River Barrow to show distances to next villages. ▪ Consider providing boardwalk along Graiguecullen side of the River Barrow going south to Carlow. ▪ Make the river towpath accessible to all. ▪ Consider a bound surface similar to that in use at St. Mullins for the entire towpath route. 	CLW-C10-40	<p>It is considered that the topics and issues raised in the submission are addressed within the scope of the policies and related provisions set out in Chapter 11.</p> <p>This includes Section 11.6 (Greenways and Blueways), subsections 11.6.1 (Barrow Valley Greenway) and 11.6.2 (Borris Railway Viaduct), Policies GB. P1 to P3 (Greenway and Blueway Policies), in addition to Sections 11.11 dealing with tourist accommodation and Section 11.12 dealing with outdoor recreation. It should be noted that the tow path is under the control of Waterways Ireland (WI) and developments associated with same are primarily a matter for consideration by WI.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<ul style="list-style-type: none"> ▪ Develop hire facilities for bicycles and canoes. ▪ Consider use of brownfield sites along the river for campervans and camping. 		
<p>The submission notes the following:</p> <ul style="list-style-type: none"> ▪ Proposals to develop a Greenway along the path of the defunct railway line from Bagenalstown, through Borris and Glynn are most welcome. Noting that this is the best option to link up with the Waterford Greenway. Recommends that this should be pursued as early as possible and consideration also given to the old line to Tullow. ▪ Support is expressed for other uses along the River Barrow including boating and fishing aspects of the River and that there is much work needed to improve the navigation channel on the river. The overall maintenance of the River itself and the Towpath are also stated as not satisfactory and require the attention of all stakeholders working together. Notes support for local tourism could be achieved by investing in boating on the river. 	CLW-C10-63	<p>The content of the submission is noted. Support for the development of greenways, including the Barrow Valley Greenway, is set out under Section 11.6, subsections 11.6.1 and 11.6.2, and underpinned by Policies GB. P1 to P3 and Objective GB. O1.</p> <p>Chapter 11 supports other uses and water-based activities along the County's inland waterways, including boating, kayaking and fishing. This is reflected in the wording of Policy HT. P15 which seeks to <i>Facilitate infrastructure to enable increased tourism activity associated with water-based activities on the County's waterways, such as boating, cruising, kayaking, angling, and other sustainable water-based interests.</i></p> <p>Recommendation No change to Draft Plan.</p>
3.11.4 Walking and Cycling		
<p>The submission supports the inclusion of policies to facilitate, <i>"the provision of walking and cycling trails"</i>, promoting public access to areas of high amenity in the county (Pol. R. P5 and Pol. R. P8) and is committed to protecting and enhancing the recreation infrastructure in the county</p>	CLW-C10-42	<p>The content of the submission is noted and welcomed.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>including the walking trails at Clogrennan and Kilbrannish Wood (Kilbrannish comprising a Windfarm Loop and sections of the South Leinster Way), as referenced in the <i>Draft Carlow County Development Plan 2022-2028</i>. The submission welcomes the opportunity to explore the provision of further recreation infrastructure at appropriate locations in the Coillte estate, in partnership with the Council and relevant stakeholders in the county.</p> <p>With respect to the tourism sector, the submission welcomes policies of the draft Plan to support the delivery of new <i>"tourism related development, facilities and infrastructure, subject to appropriate siting and design"</i> as well as the provision of appropriate <i>"tourism related development outside settlements."</i> (Pol. TD. P2 and Pol. TD. P6). It is stated that the nature of the Coillte estate can facilitate the provision of appropriate tourism accommodation at suitable locations, with full regard to the unique <i>"natural and built heritage"</i> tourism assets of the county. It is considered that the provision of forest-based accommodation (such as woodland lodges) would fully support and enable the delivery of <i>"new tourism accommodation"</i>, serving the domestic and overseas markets (Pol. TA. P1).</p>		No change to Draft Plan.
<p>The submission requests that Carlow County Council undertake a study of building our own network of cycle friendly routes that could be promoted for shared use. Notes that Carlow could have a cycling infrastructure that would give tourism a real boost if developed and give us an edge on other locations.</p>	CLW-C10-63	Policies and objectives supporting outdoor recreation, including cycling, are addressed under Section 11.12. This includes support for the implementation of the County Carlow's Outdoor Recreation Strategy 2020-2023, which included an audit of cycling routes in the County. Support for the development of cycling infrastructure is included as a recreation policy, and specifically by Policies R. P6 and R. P7. Chapter 6 of the Draft Plan also supports investment in and development of cycling infrastructure under Policies MS. P1, WC. P1 and WC. P2.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
		<p>Recommendation No change to Draft Plan.</p>
<p>Includes the following comments and requests:</p> <ul style="list-style-type: none"> ▪ Publish list with maps of heritage sites open to the public and include additional subsection on this. ▪ Prepare and implement strategy for access to heritage routes. ▪ Seek to negotiate access to lands using access agreements. ▪ Support sensitive developments for provision of access to natural habitats and heritage features. ▪ Preserve open character of commonage land. ▪ Maintain conservation value of Council owned land. ▪ Additional subsections for protection of NHAs, SACs and Ramsar sites. ▪ Protect and encourage access to forestry and woodlands. ▪ In relation to inland waterways, facilitate linear parks, walking and cycling routes. ▪ Support development of greenways and trails along rivers. ▪ Reserve/preserve land adjacent to rivers and canals for public access. ▪ Require developments along rivers to set aside land for pedestrian routes linked to settlements. ▪ Protect and improve natural amenity potential and accessibility of River Barrow and River Slaney and work with relevant authorities in this regard. ▪ Facilitate public access to wetlands. 	CLW-C10-61	<p>In relation to the first point, it is considered that the matter of listing, mapping and access to heritage sites open to the public would be more appropriately addressed as part of the preparation of the County Heritage Plan under Objective NH. O1.</p> <p>It is considered that all other issues raised in the submission are already comprehensively addressed in the policies, objectives and related provisions contained in Chapter 10, and in Chapters 5, 9, and 11.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Makes reference to aims in Section 11.12.1 as relating to infrastructure for recreation and the identification of cross-cutting themes. Asks that the</p>	CLW-C10-54	<p>The content of the submission is noted and welcomed. The inclusion of information on signage for County Geological Sites is reflected in Objective 2 of</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p>design of any future signage to consider the use of information panels as appropriate to highlight the significance of a County Geological Site or an area of geological and/or geomorphological interest in the vicinity of waymarked and signposted walking routes/trails. Requests that geology be considered as a component in the cross-cutting themes.</p>		<p>the Outdoor Recreation Strategy, which seeks more participants, and which includes an action to <i>Identify outdoor recreation collaboration opportunities and priority programmes</i>. Geology is considered as appropriate in the relevant chapters of the Plan (Chapter 10, Chapter 11, Chapter 14).</p> <p>Recommendation No change to Draft Plan.</p>
3.11.5 Swimming		
<p>Submission notes that there is little reference to swimming or the provision of swimming pools in the Draft Plan and would suggest that consideration be made to its inclusion. Swim Ireland (National Governing Body for Swimming, Water Polo, Diving and Synchronised Swimming) advocate to continue their partnership with the local authority, pools, swimming, and water polo clubs in Carlow County.</p> <p>Regarding policies SLP1 – SLP4 it is suggested including National Governing Bodies (NGBs) of Sport in this list. As the delivery agents of National Sports Policy, NGBs are a significant stakeholder and can add considerably to the discourse.</p> <p><i>SL. P5: Promote town and village centre sites for sports and leisure facilities, and to facilitate out of town/village sites where appropriate, (following a sequential test), in servicing large hinterland communities, where the site includes comprehensive off-road parking, conforms to all safety guidelines</i></p>	CLW-C10-84	<p>The content of the submission is noted. It is considered that new text can be included in Section 11.6 to take account of swimming and swimming facilities in the County, and Policy SL. P2 can be amended to also reference National Governing Bodies of Sport (NGBs).</p> <p>Recommendation Amend the first paragraph in Section 11.16 to read as follows (new text in green):- The County has a large number of purpose-built sporting and recreation facilities, provided through a mix of public, private, third level, school, community facilities, and voluntary organisations. There are purpose-built sports and recreation facilities in the County for the GAA, soccer and other playing pitch uses, and for golf, rowing, athletics, tennis, badminton, squash, swimming, sub aqua, and equestrian uses. Apart from purpose-built facilities, the built environment of urban areas and the landscape of rural areas in the County, such as public roads, public footpaths, woodlands, and waterways, also support a range of other sports and leisure activities, such as walking, jogging, cycling, boating, fishing, and outdoor swimming.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
<p><i>and is in accordance with the proper planning and sustainable development of the area.</i></p> <p><i>SL. O2: Seek to deliver a Water Hub Activity Centre in Carlow Town Park subject to the availability of financing and compliance with all planning and environmental criteria.</i></p> <p>Suggest that reference to outdoor swimming be included in Sports and Leisure in recognition of the fact that it has become a year-round activity for many swimmers noting also that changing shelters, notice boards for safety information and marker buoys are examples of things which would add considerably to the development and safety aspect of the outdoor swimming.</p> <p>Notes that there is no reference to the development of outdoor swimming. The open-air pool in Bagenalstown is a great facility and we would hope that it will continue to be maintained and upgraded as necessary over the lifetime of the plan.</p>		<p>Amend Policy SL. P2 to read as follows (new text in green):- Support national sport policies and objectives, including collaboration with Sports Ireland and National Governing Bodies of Sport (NGBs), the County Carlow Local Sports Partnerships, clubs, communities and partnerships within and beyond sport, to increase sport and physical activity participation levels.</p>
<p>The submission draws attention to the need to invest and promote indoor facilities for indigenous population which continues to grow apace. Notes that swimming has been prioritised as one of only 3 participations sports under the Governments Sports Policy 2018-2027 and has been ignored . The requirement for a new purpose-built facility in Carlow is outlined in detail in order to build on success on regional and national level with an eye to international competitors. Requests that a section is incorporated into the plan supporting swimming as a sport/recreational activity in line</p>	CLW-C10-123	<p>See responses and recommendation provided for CLW-C10-84.</p> <p>Support for swimming and all sports and leisure activities is addressed by Policies SL. P1 to SL. P5 in Section 11.6, and by Objective SL. O1 in which seeks to <i>Ensure that sufficient land is zoned in local area plans to facilitate sports clubs and facilities.</i></p> <p>The submissions reference the requirement for a new purpose-built swimming facility in Carlow can be given more detailed consideration as part of the</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.11 Tourism and Recreation		
with national policy and an undertaking is made to provide Carlow with a new purpose-built facility within the lifetime of the Plan.		preparation of a new Joint Urban Area Plan for the Carlow Graiguecullen area, and through policies or objectives arising out of same. Recommendation No change to Draft Plan.
3.11.6 General		
The Policies of Chapter 11 are welcomed when considered against Waterways Ireland maintenance targets over the lifetime of the Development Plan.	CLW-C10-118	The content of the submission is noted. Recommendation No change to Draft Plan.

Chapter 12: Urban Design and Placemaking

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.12 Urban Design and Placemaking		
3.12.1 Design		
<p>(i) Requests that an outright ban be put on prominent surface level car parks in town centre sites and states that new development car parks must be underground or hidden in line with good practice.</p> <p>(ii) Requests that consideration be given to height guidelines for specific town centre streets so that building heights and building lines are in proportion to surrounding buildings.</p>	<p>CLW-C10-46</p>	<p>(i) Section 12.8.11 outlines good practice principles regarding the provision of car parking. Within town centres car parking spaces <i>are encouraged to be located behind buildings or underground wherever possible, to encourage the continuity of the streetscape with landscaping and tree planting required to counteract the appearance of parking areas.</i> It is considered that an outright ban on surface car parking would be unduly restrictive and has potential to have an adverse impact on the environment by virtue of archaeological heritage and flood risk considerations. It is considered that the implementation of the foregoing provides an appropriate framework for the design of town centre car parking areas.</p> <p>Recommendation No change to Draft Plan.</p> <p>(ii) Policy DN P6: outlines an appropriate policy response regarding buildings of increased height within the county as follows:</p> <p><i>Consider buildings of increased height in accordance with The Urban Development and Building Heights Guidelines published in 2018 in circumstances where the site / development is:</i></p> <ul style="list-style-type: none"> • <i>Appropriately located in central areas of larger towns close to public transport or on strategic lands proximate to the town centre.</i>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.12 Urban Design and Placemaking		
		<ul style="list-style-type: none"> • <i>Comprise high quality design making a positive contribution in the streetscape, strengthening the sense of place while respecting and responding to the character of the area including nearby properties, especially residential properties or areas of public open space.</i> • <i>Designed to protect and enhance the existing streetscape and heritage characteristics of an area. Proposals should not disrupt or negatively impact on the historic areas of towns, protected structures or intrude on important views or vistas.</i> <p>Section 12.8.8 further outlines design principles for consideration in circumstances where buildings of increased height are proposed.</p> <p>Existing Draft Development Plan provisions provide an appropriate framework for consideration of buildings of increased height over the period of the Plan.</p> <p>Recommendation No change to Draft Plan.</p>

Chapter 13: Rural Design Guidelines

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Rural Design Guidelines		
3.13.1 Key Principles		
<p>Submission recommends additions/ alterations to Key Principles - 13.4.7 Landscaping and Boundary Treatments:</p> <ul style="list-style-type: none"> Notes that keeping gravel weed-free will require the graveled area to be regularly treated with herbicide unless weeds are dug out by hand. Advises that gravel may not be environmentally sustainable and to consider the use of other sustainable paving systems such as grasscrete. Another key principle is to 'The Department advises that the wording of the key principle <i>Plant wild meadows or trim grass areas which are more natural to rural areas.</i>' should be amended. Planting new areas of wildflowers should be seen as a last resort and then only native species of Irish origin should be used. Suggests the following alternative wording '<i>incorporate wildflower meadows by enhancing existing grass areas through reduced mowing. When strimming these areas (in very early spring and late autumn) it is vital to remove grass cuttings.</i>' Recommends the inclusion of the following key principle: '<i>Provide appropriate setback from watercourses (including streams and drains), woodlands and wetlands allowing natural vegetation to develop.</i>' 	CLW-C10-103	<ul style="list-style-type: none"> It is considered appropriate in the interests of environmental protection and biodiversity that: <ul style="list-style-type: none"> reference is made to removal of weeds by hand and not regularly treated with herbicide and that grasscrete would also constitute an appropriate treatment in the rural environment. Agreed wording to be amended to reflect requirements as outlined. Agreed reference to maintenance of natural wetland along biodiversity corridors is considered appropriate. <p>Recommendation Amend three key principles for landscaping and boundary treatment as follows:</p> <ul style="list-style-type: none"> Avoid tarmacadam, concrete and brick driveways. Aim for self-draining grasscrete or gravel which are more suitable for

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.13 Rural Design Guidelines		
		<p>a rural setting in terms of visual impact and surface water drainage. In the interests of environmental protection and biodiversity use of herbicides should be minimised.</p> <ul style="list-style-type: none"> • Plant wild meadows or trim grass areas which are more natural to rural areas. 'Incorporate wildflower meadows by enhancing existing grass areas through reduced mowing. Planting new areas of wildflowers should be seen as a last resort and then only native species of Irish origin should be used'. • Provide appropriate setback from watercourses (including streams and drains), woodlands and wetlands allowing natural vegetation to develop.

Chapter 14: Rural Development

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
3.14.1 Farming		
<p>Submission requests:</p> <ul style="list-style-type: none"> (i) Include additional paragraph in Section 14.4 that commonage and rough grazing land should be regarded primarily as an important recreational, environmental and amenity resource. (ii) Recognise and support the role of farmers as custodians of the natural resources of the countryside. 	CLW-C10-61	<ul style="list-style-type: none"> (i) The primary purpose of commonage (land in common ownership) is to facilitate farming for those persons with legal grazing rights. The Development Plan process cannot establish a separate framework for primary use of these lands which have legal rights established under a separate code. (ii) Sections 14.4. – 14.6 acknowledge the important role of farmers in the rural environment and supports and encourages the development of environmentally sustainable agricultural practices. <p>Recommendation</p> <p>(i)-(ii) No change to Draft Plan.</p>
3.14.2 Forestry		
<p>It is requested that the Council consider the inclusion of reference to the regulatory (licencing) framework which resides with the Department of Agriculture, Food and the Marine as detailed in the submission in the <i>Draft Carlow County Development Plan 2022-2028</i>, while nonetheless continuing to support the forestry industry in the county.</p>	CLW-C10-42	<p>The regulatory licensing framework for forestry is not governed under the Planning Code and it is therefore not considered appropriate to reference same in the Development Plan. Section 14.9 however, provides an appropriate land use policy framework which encourages the development</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
		<p>of a well-managed sustainable forestry sector with a diversity of species and which is compatible with the protection of the environment etc (Ref: Policy FR P1).</p> <p>Recommendation No change to Draft Plan.</p>
Submission requests that no new or replacement of conifer forests on summits generally above 250m.	CLW-C10-61	<p>The consenting process for forestry applications (>50ha) is outside the remit of the planning process resting with the Department of Agriculture, Food and the Marine. The inclusion of the requested provision would not be appropriate, and it is considered that the Landscape Character Assessment outlines appropriate policy considerations regarding visual impacts which can inform referral responses to the Department of Agriculture, Food and the Marine as appropriate.</p> <p>Recommendation No change to Draft Plan.</p>
Requests consideration to the provision of planning polices / land use zoning objectives, to support the provision of development on Coillte lands where suitable; to provide, for example, tourism, commercial, community and/or other uses which would support and enable national, regional and local objectives.	CLW-C10-42	<p>Sufficient policy provision is contained in the Draft Development Plan to support the role of rural areas to support the wider economy of County Carlow. Specific policies are outlined to address Forestry (section 14.9), Rural Tourism (Section 14.11), Rural Enterprises (Section 14.14), Tourism associated with Natural Heritage and Amenities (Section 11.5.8), Tourism</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
		<p>Accommodation (Section 11.11), Recreation (Section 11.12) and Outdoor Recreation (Section 11.13).</p> <p>Recommendation No change to Draft Plan.</p>
3.14.3 Extractive Industries		
<p>Submission requests the new development for aggregate extraction should identify existing public rights of way.</p>	CLW-C10-61	<p>Policy EI P6 of the Draft Development Plan indicates that it is the policy of the Council <i>To ensure that development for aggregates / mineral extraction, processing and associated processes does not significantly impact the following:</i></p> <ul style="list-style-type: none"> - Existing and proposed European Sites; - Other areas of importance for the conservation of flora and fauna; - Areas of significant archaeological potential including recorded monuments; - Important aquifers and sensitive groundwater resources; - Sensitive landscapes; and - <u>Established rights of way.</u> <p>The identification of established rights of way will therefore be required as part of the Development Management process for the extractive industry. In the interests of clarity, it is however recommended that the development management standards for the extractive industry include the requirement</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
		<p>to map any established rights of way through the property subject of the planning application.</p> <p>Recommendation</p> <p>Include additional text in Section 16.16.3 as follows:</p> <p>16.16.3 Extractive Industries</p> <p>The development, continuation of use or diversification of activities relating to the extractive industry will be assessed having regard to the Quarrying and Ancillary Activities (DEHLG 2004) (or any superseding national policy document, Guidelines for Environmental Management in the Extractive Industry (EPA, 2006), Guidance on Biodiversity in the Extractive Industry (NPWS), GSI's Geological Heritage Guidelines for the Extractive Industry (2008), the Archaeological Code of Practice (2009) and the Irish Concrete Federation Environmental Code (2005) and any other relevant superseding policy guidance.</p> <p>Applicants should submit the following information at application stage:</p> <ul style="list-style-type: none"> • Map showing total site area, area to be excavated, and any ancillary proposed development, nearest dwellings or any other development (within 1 km of the site) including any established rights of way through the site; • Description of the aggregate(s) to be extracted, method of extraction, any ancillary processes (such as crushing, concrete manufacture, etc.), equipment to be used, stockpiles, storage of soil and overburden, storage of waste materials, settling ponds; • Total and annual tonnage of extracted aggregates, expected life of the extraction, maximum extent and depth of working, phasing programme;

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
		<ul style="list-style-type: none"> • Description of development works (buildings, fixed and mobile plant, roads, fuel tanks, water supply and drainage, earth mounds, etc.); • Description of water courses and water table depth, natural and cultural heritage, traffic impact and waste management; • Description of cumulative impact when taken together with other quarries in the vicinity; • Likely environmental effects including EIA where relevant; • Proposed mitigation measures; • Phased restoration and after-care proposals; and • Proposals for surface water management and flood risk minimisation.
<p>Submission notes:</p> <p>(i) Section afforded to the extractive industry, aggregates limestone reserves is welcomed, including section 14.16.2 on Clogrennane Lime.</p> <p>(ii) Concern expressed that there is no further emphasis within the chapter regarding the socio-economic benefits of the sector. The Draft CDP should be revised to adequately outline the economic value and significance of the aggregate sector, in terms of economic development and employment. The importance of the sector should be stressed and its significance to construction and development supply chains, as well as the county's growth objectives in terms of meeting population and housing delivery targets.</p>	CLW-C10- 73	<p>(i) Noted</p> <p>(ii) Section 14.16 states: <i>The county has a rich base of aggregate and limestone reserves which are of strategic importance to the local and regional economy and are a valuable source of employment in rural parts of the county.. It is recognised that aggregates are a tied resource and are the essential raw materials from which much of our future infrastructure will be built. Local supplies of aggregates for development within the county are vital in the drive to reduce our carbon footprint and to transition towards a more sustainable society. It is considered that this Chapter appropriately acknowledges the role of the sector in the future development of the county.</i></p>

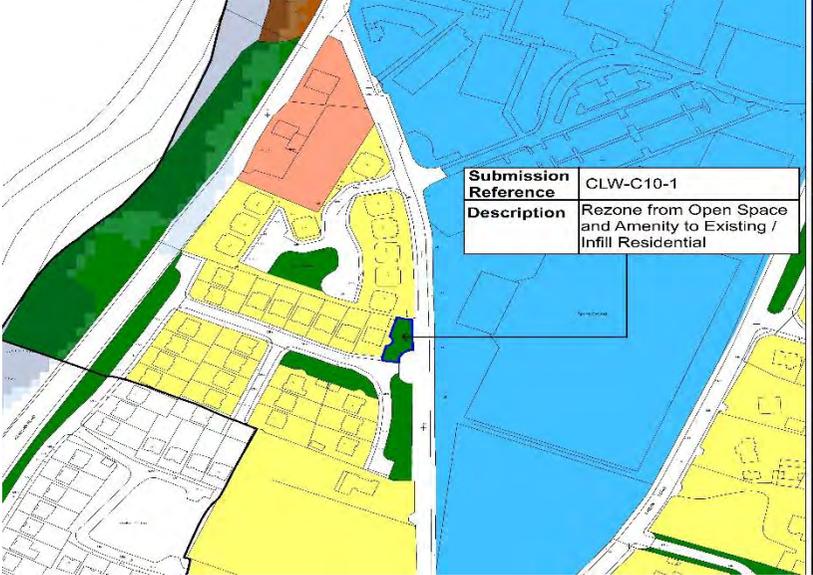
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
<p>(iii) Considered necessary to further emphasise the importance of quicklime and hydrated lime products.</p> <p>(iv) States that it should be ensured that the CDP allows for the provision of adequate aggregate resources to meet future growth needs of the county, and to facilitate the exploitation of such resources where there is a proven need for a certain mineral/aggregate.</p> <p>(v) The Council should have regard to Clogrennane Lime Ltd.'s property asset within the county and the added value this brings to the local, regional and national economy.</p> <p>(vi) The Draft CDP should offer a policy objective on the after use of quarry and extractive sites i.e. <i>To encourage the rehabilitation of disused quarries and extractive sites, to include backfilling with inert soil</i></p>		<p>(iii) Section 14.16.2 addresses these requirements wherein it states <i>Clogrennane Lime Ltd. is Ireland's only producer of quicklime and hydrated lime products and is considered to be of Strategic National Importance.</i></p> <p>(iv) As per response to (ii) above</p> <p>(v) Sufficient policy provision exists in the Draft Development Plan Section 14.16.3 supporting the extractive industry subject to addressing key environmental, traffic and social impacts and details of rehabilitation. Furthermore, Policy EI P3 states that it is the policy of the Council to: <i>Exercise appropriate control over inappropriate development(s) that would significantly hinder the efficient or effective recovery of the county's natural resources, by seeking to prevent incompatible land-uses that could be located elsewhere from being located in the vicinity of the resource, since the extraction of minerals and aggregates is resource based.</i></p> <p>(vi) Section 16.16.3 outlines development management standards for extractive industries and requires <i>submission of phased restoration and after-care proposals.</i> It further identifies that</p>

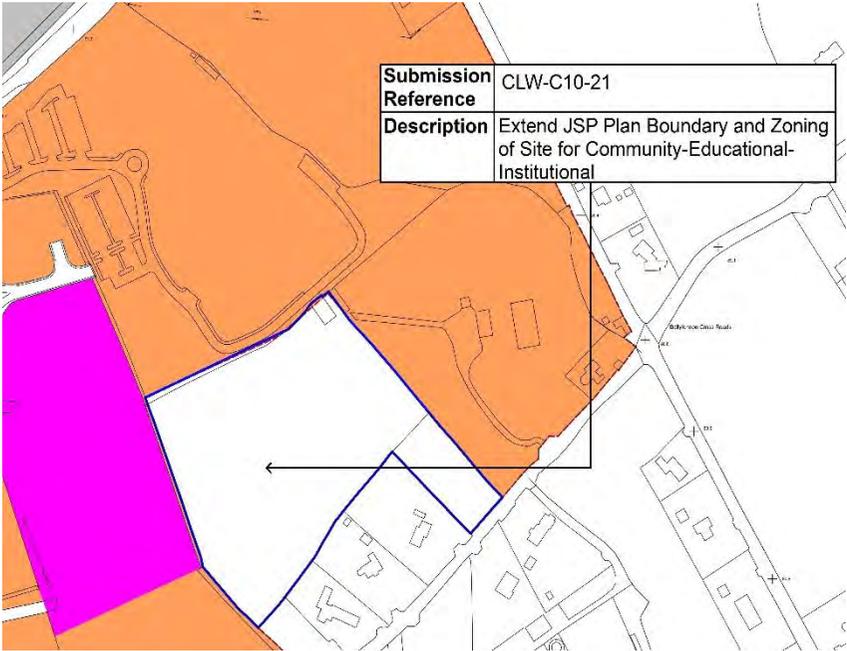
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
<p><i>and stone, and to possible uses including habitat restoration, sustainable forestry, agriculture, recreation/amenities, commercial, industrial, and residential, or a combination of same, subject to normal planning and environmental considerations.</i></p> <p>(vii) The Draft CDP should acknowledge that aggregate resources are not evenly distributed across the county or county and can only be worked where they occur naturally. There is further potential to strengthen policy provisions in relation to identifying and protecting aggregate reserves in the county. Suggest that the Draft CDP highlights areas containing proven deposits on an appropriate map in order to protect them from the future development of incompatible land uses. The Draft CDP should ensure the extraction of aggregates can take place in suitable locations where resources exist.</p>		<p><i>The restoration of disused pits and quarries to productive agricultural use will be encouraged where appropriate having regard to all appropriate environmental considerations. Other possible post closure uses may be considered such as recreational facilities and natural habitat areas. Any other potential after use proposals will be required to comply with all other relevant provisions of the Plan including policies relevant to Rural Development (Chapter 14), Infrastructure and Environmental Management (Chapter 6), Land Reclamation (Chapter 16). The foregoing sufficiently addresses rehabilitation of quarries.</i></p> <p>(vii) Section 14.16 addresses sufficiently the intent of this submission wherein it acknowledges that <i>aggregates are a tied resourceand by their nature can only be worked where they occur</i>. Reference is made to the Geological Survey of Ireland Aggregate Potential Mapping which shows the potential for crushed rocks and for sand and gravel deposits throughout the country. Section 14.16.3 clearly outlines relevant policy provision regarding the Extractive Industry. It is acknowledged that <i>It is important that these resources are developed with the principles of sustainable development and environmental management in mind. The operation of quarries can give rise to land-use conflicts and environmental issues which are required to be mitigated and controlled through the planning system. A satisfactory balance is required between the</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
		<p><i>needs of the building industry and the need to protect the environment (ref Section 14.16.1).</i></p> <p>Recommendation (i)-(vii) No change to Draft Plan.</p>
<p>Submission references</p> <p>(i) <u>Natural Mineral Resources (Minerals/Aggregates)</u> and requests:</p> <ul style="list-style-type: none"> ▪ In regard to Policy EI P4 that the Council consider including the following, which could be included as a condition of planning for future extractive industry permissions: - Allowing access to quarry faces by appropriate scientists during quarrying. - Leave a representative section of a quarry face at the end of the quarry life or inclusion of information panels to promote geology to the public or to develop tourism and educational resources. Geoheritage programme tries to promote a partnership between geological heritage and active quarrying, with such measures outlined in the 'Geological Heritage Guidelines for the Extractive Industry'. <p>(ii) <u>Geochemistry of soils, surface water and sediments</u></p> <ul style="list-style-type: none"> ▪ GSI provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. 	CLW-CI-54	<p>(i) The attachment of conditions to a permission is a function of the development management process and can be considered as appropriate on a case by case basis. Section 16.16.3 of the Draft Plan also indicates that applications for the extractive industry will be assessed having regard to a number of documents including Geological Heritage Guidelines for the Extractive Industry.</p> <p>(ii) Noted</p>

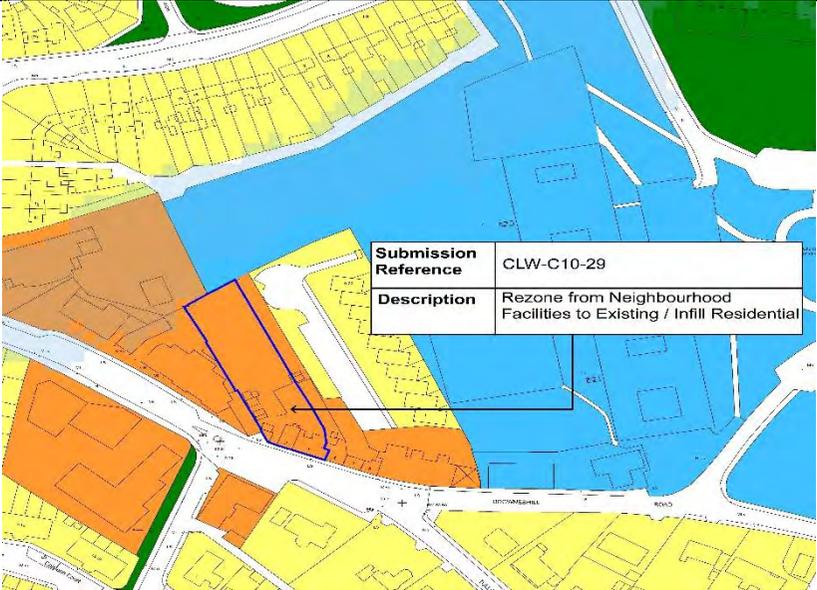
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.14 Rural Development		
<ul style="list-style-type: none"> ▪ Tellus is a national scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. (iii) Geophysical data <ul style="list-style-type: none"> ▪ GSI produces high-resolution geophysical data of soils and rocks as part of the Tellus programme. ▪ This data current covers appropriately 75% of the country and provides supporting geological information on a regional scale useful for assessing environmental impact and risk. 		<p>(iii) Noted</p> <p>Recommendation</p> <p>(i) – (iii) No change to Draft Plan.</p>
3.14.4 Rural Development and National Roads		
<p>TII would welcome consideration to include a cross reference in Chapter 14 of the Draft Plan referring to Policy NR. P2 and the Council policy to avoid the creation of any new direct access points from development or the generation of increased traffic from existing accesses to the national road network to which speed limits greater than 50 km/h apply.</p>	CLW-C10-16	<p>While the request is noted it is considered that the provisions of NR P2 is appropriately located in Chapter 5 Sustainable Travel and Transportation and will apply to development proposals within rural areas seeking to access the national road network and is appropriately referenced in Chapter 5.</p> <p>Recommendation</p> <p>No change to Draft Plan.</p>

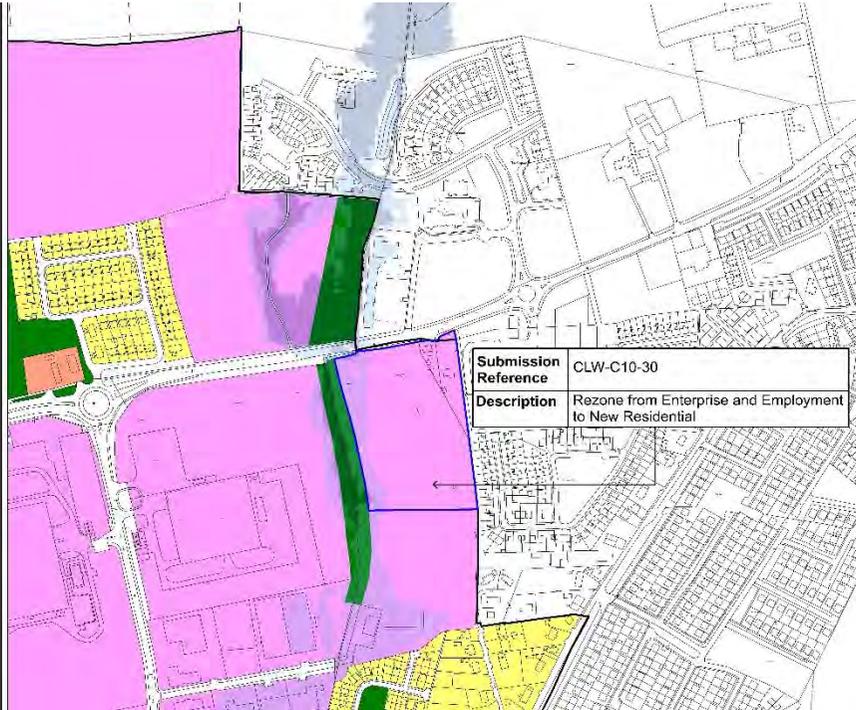
Chapter 15: Town and Village Plans / Settlement Boundaries

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
3.15.1 Carlow Town		
OPW recommends that the key mitigation measures outlined in the Justification Tests for Carlow Town are included into the settlement plan supported by settlement policy objectives.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
<p>Submission states that the land shown east of 1 Southern Gardens and adjacent to the Slip Road is privately owned and should not be zoned as "Public Open Space". Requests that the land be rezoned from open space and amenity to "Existing / Infill Residential".</p> 	CLW-C10-1	<p>Further to a review of planning permissions pertaining to this development it is noted that the area was originally identified as open space but subsequent to correspondence and agreement with the Planning Authority the area was disposed by the developer and incorporated into the grounds of No.1 Southern Gardens subject to construction of a wall to match the existing boundary wall in the estate. Having regard to same it is considered appropriate to rezone the lands from open space and amenity to existing residential infill.</p> <p>Recommendation Change open space and Amenity in Draft Plan to Existing / infill Residential</p>

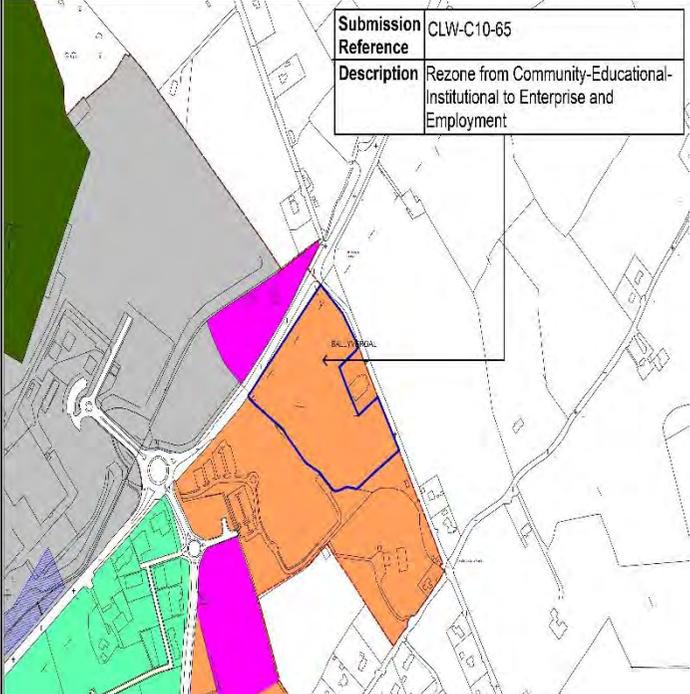
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>Requests that the boundary of the Draft Plan be amended such that the unzoned land is excluded from the draft county plan which would remove an otherwise back land pocket of agricultural land with constrained agricultural potential due to its proximity to surrounding housing and land zoned for development. Rezoning would allow development in conjunction with the adjacent zoned land on the landholding.</p> 	<p>CLW-C10-21</p>	<p>The lands identified as part of this submission are located outside the Carlow Environs Local Area Plan boundary which comprises part of the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area. The review of the Joint Urban Area Plan for Carlow will commence in 2022 at which time a comprehensive review of land use zonings will be conducted. This will establish an appropriate comprehensive framework for the future development of the greater urban area having regard to national, regional and local planning considerations. It would be premature pending a full review of all land use zonings in the area which will be carried out as part of the Joint Urban Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>

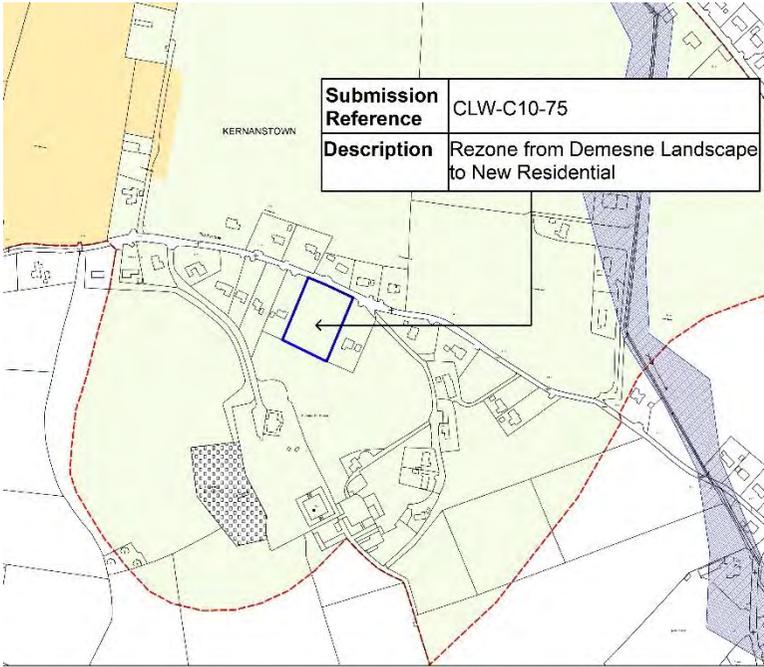
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>Requests that the site (c0.2ha) be rezoned from neighbourhood facilities / centre to residential development for the following reasons:</p> <ol style="list-style-type: none"> Site is fronted by a number of housing units (although noted as empty due to lack of funding and appropriate zoning) and a recent housing development to the east. Empty housing considered large and viability of development would require a denser development. The landowner wishes to develop it for housing and has no interest in developing for commercial stating that there is an over-abundance of commercial units in Carlow. Housing is stated as the priority across the country and submits that the site is ideally suited. 	CLW-C10-29	<p>The area the subject of this submission and the adjoining neighbourhood lands to the east are characterised by a number of commercial uses and residential properties some of which are unoccupied/vacant. The neighbourhood centre zoning as provided for in Table 16.9 provides for dwelling use as permitted in principle in this zone. Having regard to same a change in zoning is not considered necessary. Clarity however can be included in the objective associated with Neighbourhood Facilities / Centre indicating that an element of residential maybe considered appropriate subject to achieving the protection of residential amenities and compliance with development management standards.</p> <p>Recommendation No change to Zoning. However additional text to be included in Chapter 16 Table 16.9 Neighbourhood Facilities / Centre Objective and Guidance <i>An element of residential maybe considered appropriate subject to achieving the protection of residential amenities and compliance with development management standards.</i></p>

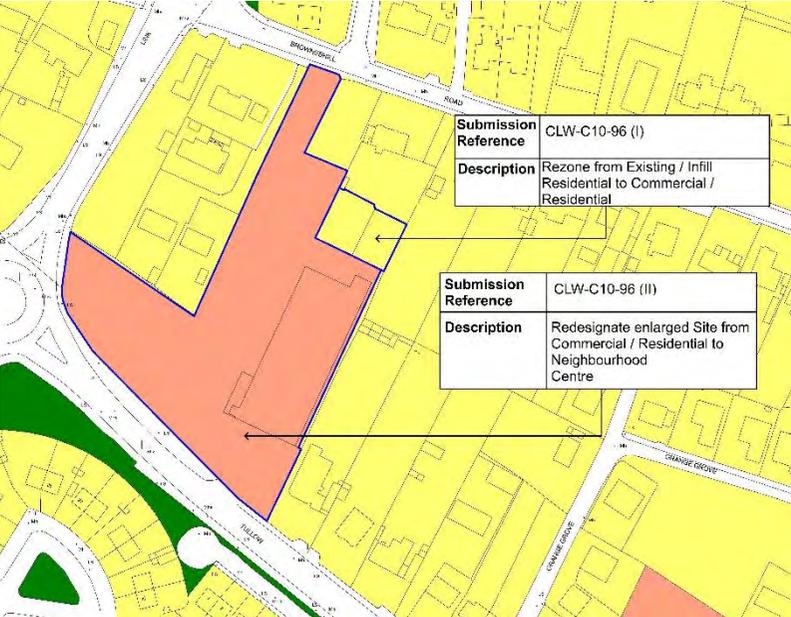
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
<p>Requests that the site (c.2.9ha) on the Dublin Road be rezoned from enterprise and employment to residential development for the following reasons:</p> <ol style="list-style-type: none"> The landowner wishes to develop part of his landholding for housing and has no interest in developing it fully for commercial stating that there is an overabundance of commercial units in Carlow. Site is bounded by housing to the eastern boundary, the underdeveloped former Lapple site to the western side with a small number of commercial units to the rear. Housing would be in accordance with usage in the area. Housing is stated as the priority across the country and submits that the site is ideally suited. 	CLW-C10-30	<p>The site has been identified as an appropriate location for enterprise and employment land for the following reasons:</p> <ul style="list-style-type: none"> Its siting within a strategic location off of the Dublin Road in an existing and emerging enterprise and employment zone. It comprises the remaining area of undeveloped employment related lands to the south of the R448. Division of the landholding between residential and employment related uses with a single access point could give rise to incompatible land uses and conflicting traffic movements.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		<ul style="list-style-type: none"> - An Enterprise and Employment use constitutes a less vulnerable land use in the context of flood risk considerations associated with this site. Part of the site to the west is located within Flood Zone A and Flood Zone B. Provision of housing which constitutes a vulnerable land use within Zone A/B would be contrary to the Flood Risk Management Guidelines and would not pass the justification test. - Sufficient lands have been zoned for residential purposes within the Carlow Town Council boundary and zoning of these lands for residential purposes would undermine delivery of more appropriately located lands within the town centre. <p>Recommendation No change to Draft Plan.</p>
<p>As registered owner of Carlow Retail Park requests consideration of open use planning on the undeveloped lands at Carlow Retail Park in the 2022-2028 Development Plan. It is stated that the owners are willing to develop big box retail on the site which will be of significant attraction and bring additional footfall to the town. Given the town centre</p>	CLW-C10-59	<p>The site is located in an area which is an established Retail Bulky Goods Park. It has been subject to previous permissions for general retail (convenience and comparison) all of which have been deemed unacceptable for a number of reasons including:</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>location of the retail park it is stated that open use units will not affect the town centre but in fact create a draw.</p>		<ul style="list-style-type: none"> - Location remove from the historic town centre and separated by an inner relief road - Unacceptable impact on vitality and viability of the town centre - Constitute a strong counter attraction to the town centre - Contrary to the Retail Planning Guidelines <p>Having regard to the foregoing considerations the provision of open retail planning would be contrary to the proper planning and sustainable development of Carlow Town. Additional retail at this location should be in accordance with the established principle of development on the site for bulky goods retail to support the future vitality and viability of the town centre.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission is seeking the: rezoning of the lands at Dublin Road from their existing 'Community-Educational-Institutional', to 'Objective H - Enterprise and Employment' Zoning. It is submitted that the rezoning of the underutilised lands at Dublin Road will serve to realise the policies and objectives of the Draft Carlow County Development Plan 2022-2028, support existing enterprise and to allow an employment generating hub/cluster to be established in a highly effective business location.</p> <p>In summary it is stated that the rezoning:</p> <ol style="list-style-type: none"> 1. Enables the realisation of the aims and objectives of the Draft Plan; 2. Supports existing business – allowing expansion and cluster; 3. Is supported by Policy at National, Regional and Local Level; 4. Is in accordance with Relevant Guidelines; and 5. Will assist Carlow to Drive Recovery Post-Pandemic and Promote Sustainable Growth. 	CLW-C10-65	<p>The lands identified as part of this submission are located within the Carlow Environs Local Area Plan boundary which comprises part of the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area . The review of the Joint Urban Area Plan for Carlow will commence in 2022 at which time a comprehensive review of land use zonings will be conducted. This will establish an appropriate comprehensive framework for the future development of the greater urban area having regard to national, regional and local planning considerations. It would be premature pending a full review of all land use zonings in the area which will be carried out as part of the Joint Urban Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.15 Town and Village Plans / Settlement Plans						
 <table border="1" data-bbox="577 467 925 592"> <tr> <td>Submission Reference</td> <td>CLW-C10-65</td> </tr> <tr> <td>Description</td> <td>Rezone from Community-Educational-Institutional to Enterprise and Employment</td> </tr> </table>	Submission Reference	CLW-C10-65	Description	Rezone from Community-Educational-Institutional to Enterprise and Employment		
Submission Reference	CLW-C10-65					
Description	Rezone from Community-Educational-Institutional to Enterprise and Employment					
<p>Submission requests that a section of land comprising 0.674 hectares be changed to Residential so that in-fill residential accommodation can proceed. The section in question is on land behind Browne's Hill House. It is stated that this proposal is entirely consistent with Section 3.16.1.2 based on siting and design criteria for rural housing in the countryside. The application is for in-fill within the established guidelines. This change from Demesne to residential status it is stated will preserve the environmental integrity of the area and is consistent with the strategy outlined.</p>	CLW-C10-75	<p>The lands identified as part of this submission are located within the Carlow Environs Local Area Plan boundary which comprises part of the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area. The review of the Joint Urban Area Plan for Carlow will commence in 2022 at which time a comprehensive review of land use zonings will be conducted. This will establish an appropriate comprehensive framework for the future development of the greater urban area having regard to national, regional and local planning</p>				

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		<p>considerations. It would be premature pending a full review of all land use zonings in the area which will be carried out as part of the Joint Urban Area Plan.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission includes three stated proposals and identifies a number of issues as a rationale for each:</p> <p>(i) Realign the zoning boundaries at Lidl, Tullow Road, Carlow Town, to include a portion of land to be acquired to facilitate future expansion (planning application pending for same). The proposed site extension area, it is stated has an extant</p>	CLW-C10-96	<p>(i) <u>Re-zoning at Lidl, Tullow Road, Carlow Town</u> The Planning Authority is supportive of the request to realign the zoning boundaries at Lidl, Tullow Road, Carlow Town, to include the rezoning of a portion of land adjacent to the Lidl store from 'Existing/Infill Residential' in the</p>

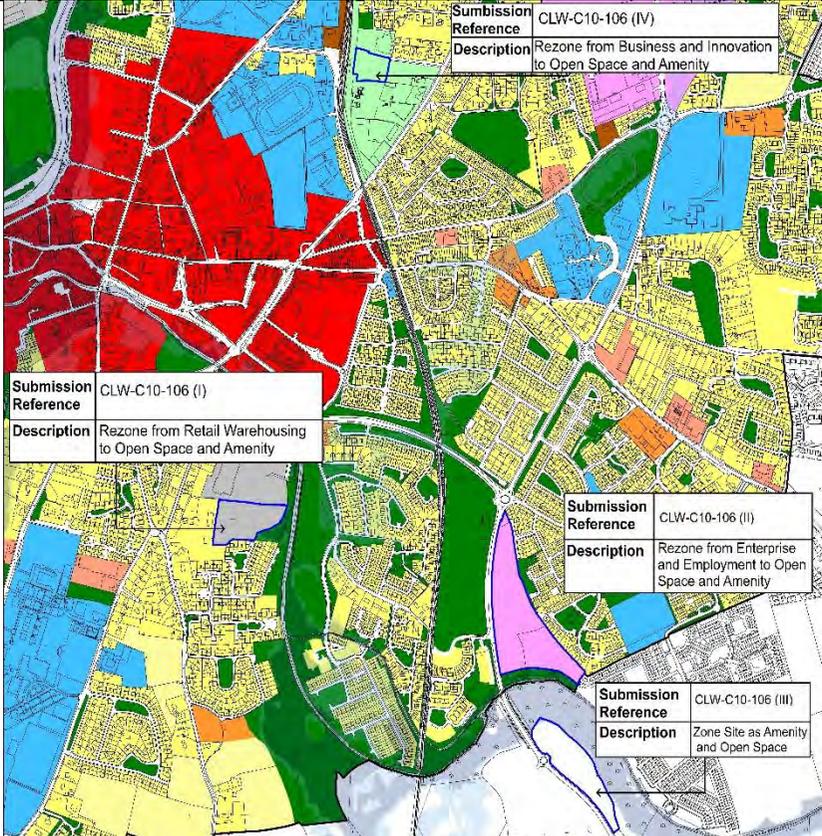
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>long-established commercial use, which is distinct from the adjoining dwelling, being self-contained and separately accessed commercial premises.</p>  <p>(ii) Requests modifying Neighbourhood Centre policies / objectives (including the zoning objective wording) to reflect existing patterns, to more closely align to the adjoining Laois County Council approach, and to align classifications to the <i>Retail Planning Guidelines, 2012</i>.</p>		<p>Draft Development Plan to 'Neighbourhood Facilitates/Centre' having regard to the existing use of these lands and to align with the overall Lidl site zoning.</p> <p>Recommendation Agreed. (see zoning recommendation for enlarged site no. (iii) below.</p> <p>(ii) <u>Neighbourhood Centre Policies/ Objectives</u> The Retail Planning Guidelines, 2012 define Neighbourhood Centre as: "Comprise a small group of shops, typically comprising newsagent, small supermarket/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population." The limit of 1,200</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		<p>sqm net floorspace contained in the Draft Development Plan for a convenience supermarket in a Neighbourhood Centre is considered to align with a 'small supermarket' to serve a localised catchment as per the stated provisions of the Retail Planning Guidelines, 2012.</p> <p>The Retail Planning Guidelines, 2012 promote the vitality and viability of town centres and the need for a continued focus on and investment in same. A key objective and message of the Guidelines is the enhancement of the vitality and viability of town centres in all their functions through sequential development. Specifically, the Guidelines state that a range of caps on the size of convenience stores is required to ensure both competitiveness in the retail sector and strong town centres. In line with the provisions of the Retail Planning Guidelines, 2012, the Draft Development Plan contains a number of policies that support and reinforce the role and function of the core retail areas and promote and encourage Town Centre development, including the application of a 1,200 sqm net floorspace cap on convenience retail provision in Neighbourhood Centres.</p> <p>Recommendation To ensure clarity the figure of 1,200 sqm net floorspace for a convenience supermarket in a Neighbourhood Centre shall be included throughout the Draft Development Plan in reference to Neighbourhood Centres.</p> <p>(iii) <u>Tullow Road Neighbourhood Centre - Policies/Objectives</u> The Draft Development Plan zones the Lidl site on Tullow Road, not including the additional area of land to the north east, as 'Commercial/ Residential'. Having regard to the established retail function of the site and its role in</p>

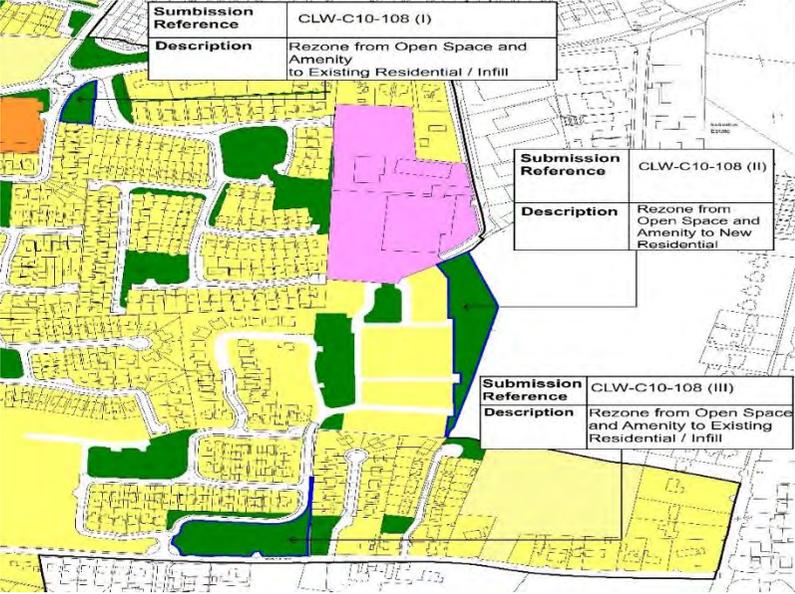
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>(iii) Re-designate / rezone the enlarged Carlow Town site as a Neighbourhood Centre (subject to above changes to Neighbourhood Centre policies / objectives / limits). The subject site can act as a multi-nodal / polycentric centre in conjunction with adjoining smaller clusters. There are existing examples of same in Carlow town presently.</p> <ul style="list-style-type: none"> ▪ Floor area limit of 1,200sq.m net for Neighbourhood Centres on pg. 145 of Retail Strategy and 1,500sq.m. gross limit in zoning objective would result in failure to achieve the necessary focus as recognized as an important Neighbourhood Centre consideration in the existing Retail Strategy for the Joint Spatial Plan 2012. ▪ In comparison, Draft Laois County Retail Strategy allows for medium scale convenience along with small to medium comparison in Neighbourhood Centres. Medium scale convenience would be in the order of up to 1,750sq.m. net. 		<p>serving the retail needs of the surrounding residential areas, 'Neighbourhood Facilities/Centre' is considered a more appropriate zoning for the site.</p> <p>In relation to the 'Commercial/Residential' zoning objective, given the out of centre location of such sites, the current Permitted in Principal use of 'Shop (convenience)' is considered to be too open-ended, potentially allowing for convenience stores larger than those permitted at a Neighbourhood Centre which may compete with the Town Centre and impact its vitality and viability. Limiting the scale of retail permitted on such lands to ensure both competitiveness in the retail sector and strong town centres is in line with the provisions of the Retail Planning Guidelines, 2012 and is considered to be required to ensure a healthy retail environment.</p> <p>Recommendation Change from Commercial / Residential to Neighbourhood Centre.</p> <p>No change is recommended to the limit of 1,200 sqm net floorspace for a convenience supermarket in Neighbourhood Centres.</p>
<p>Proposed changes in zoning see Figures attached Carlow town Green spaces around the Carlow Youth Centre and Castle Rangers FC to be changed from Business and Innovation to Open Space and Amenity, Green Space south of Woodies to be changed from Retail Warehousing to Open Space and Amenity, and Green Space east of Eire Og to be changed from Enterprise and Employment to Open Space and Amenity.</p>	CLW-C10-106	<p>Three areas have been identified for rezoning from the Draft Plan:</p> <ul style="list-style-type: none"> (i) Lands zoned Retail Warehousing in the draft plan are located adjoining the Carlow Retail Park and immediately adjoining significant areas of open space associated with the River Burren. Given the location of these lands within Carlow Town, the need for consolidated development within towns thereby facilitating compact growth, the need to restrict the siting of such uses on the outskirts of towns and given the level of open space immediately adjoining the site, it is

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
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3.15 Town and Village Plans / Settlement Plans

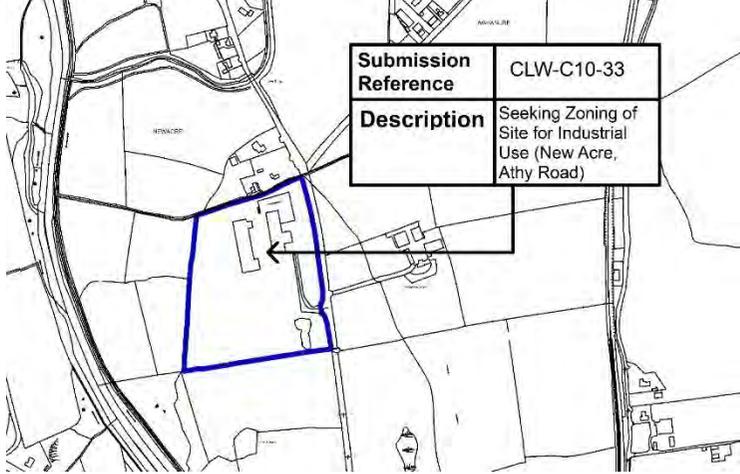
<p>(i)</p>  <p>Submission Reference CLW-C10-106 (I) Description Rezone from Retail Warehousing to Open Space and Amenity</p> <p>Submission Reference CLW-C10-106 (II) Description Rezone from Enterprise and Employment to Open Space and Amenity</p> <p>Submission Reference CLW-C10-106 (III) Description Zone Site as Amenity and Open Space</p> <p>Submission Reference CLW-C10-106 (IV) Description Rezone from Business and Innovation to Open Space and Amenity</p>	<p>considered that the proposed rezoning request would be contrary to the proper planning and sustainable development of the area.</p> <p>(ii) Lands identified for Enterprise and Employment in the Draft Plan comprise the only area of undeveloped employment lands to the south of Carlow Town. These lands are strategically located along the inner relief road that in the future will connect with the Southern Relief Road. There is a need to consolidate development within towns including locating employment uses proximate to residential communities. This will ensure more sustainable travel patterns and support compact growth. The lands also adjoin significant areas of public open space within Carlow Town.</p> <p>(iii) The lands identified as part of this submission are located within the Carlow Environs Local Area Plan boundary which comprises part of the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area . The review of the Joint Urban Area Plan for Carlow will commence in 2022 at which time a comprehensive review of land use zonings will be conducted. This will establish an appropriate comprehensive framework for the future development of the greater urban area having regard to national, regional and local planning considerations. It would be premature to consider pending a full review of all land use zonings in the area which will be carried out as part of the Joint Urban Area Plan.</p> <p>(iv) Proposed change from business and innovation to open space and amenity. This site is located within an opportunity site (no.9) associated with the Railway Station and is viewed as one of strategic</p>
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Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		<p>importance particularly with regard to economic development and the future development of the Greater Carlow Graiguecullen Urban Area. Within this zoning, playing fields, playground etc are open for consideration.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission is made specifically in relation to three separate pieces of land in family ownership in the Browneshill area of Carlow Town:</p> <p><u>Hacketstown Road, Carlow (i)</u></p> <ul style="list-style-type: none"> The first piece is located on the left at the entrance to Sandhills estate from the Hacketstown Road in Carlow town. It is stated that this development site previously had planning permission (09/6206) for a medical centre under the same zoning. 	CLW-C10-108	<p>The area the subject of this submission was not designated as open space pursuant to any permission and has been subject to a permission for a medical centre in 2009 and subsequently extended in 2016 (expired in 2019). Having regard to same and the location of the site adjacent to established properties it is considered appropriate that the site be rezoned from open space in the draft Plan to existing residential / infill wherein ancillary support facilities are open for consideration.</p> <p>Recommendation Rezone from Open Space in Draft Plan to Existing / Infill Residential.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
<p><u>Browneshill Road (ii)</u></p> <p>It is submitted that there are two sections of the same lands located in Browneshill that have been identified as open space and amenity stating that these lands are not included in the agreed open space provision. These lands it is stated are also subject to an agreement between Carlow County Council, Irish Water, and Nesselside Builders which was</p>	<p>CLW-C10-108</p>	<p>The area identified for open space and amenity comprises part of a larger landholding which is being developed for residential purposes and which is subject to infrastructure delivery requirements. Furthermore, having regard to the absence of any planning permission on these lands to formally establish open space provision it is considered appropriate that the area remain zoned for existing /infill residential.</p>

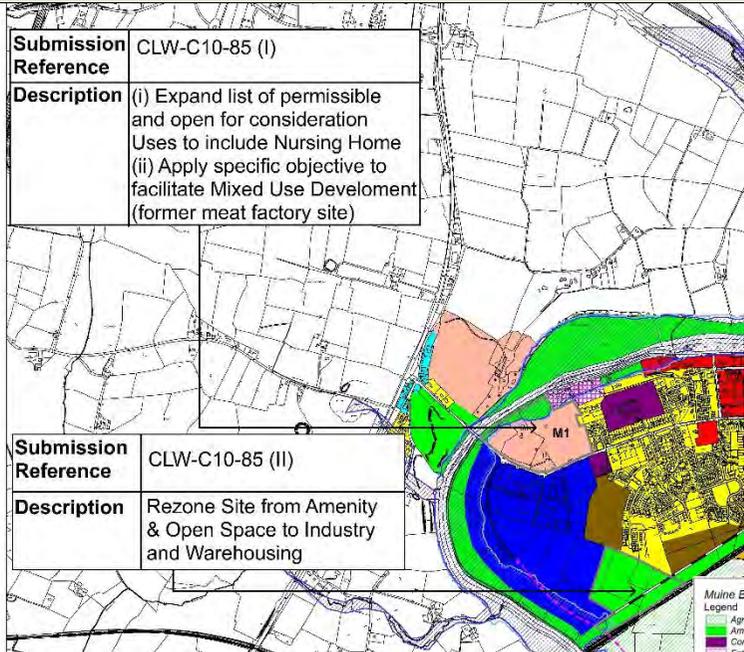
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
agreed on the 20/01/2020 to allow the diversion of an existing trunk main through our lands.		Recommendation Rezone from open space in draft plan to existing / infill residential.
<p><u>Browneshill Road (iii)</u></p> <ul style="list-style-type: none"> It is submitted that the site is serviced and is zoned Residential 1 in the current development plan. It is not open space, it a residential housing site, in a residential housing estate, with a long established and mutually agreed public open space provision. Respectfully request that Carlow County Council do not dezone this serviced residential site, at a time when housing need is at an all-time high. 	CLW-C10-108	<p>Part of the area subject of this submission was identified for supporting uses (creche / neighbourhood shop) for the significant residential community proposed for this area. It is considered that this area previously identified under PD 3698 would be appropriate to retain as existing residential / Infill with the access route relocated as per the original layout. Redevelopment of the proposed zoned area with a relocated access road / infrastructure will provide a more appropriate development having regard to good planning principles with development addressing the open space and public road. The area to the front of the site and adjoining to the west to be zoned open space and amenity.</p> <p>Recommendation</p> <ol style="list-style-type: none"> Rezone part of site from open space and amenity in Draft Plan to existing residential / Infill. Redevelopment of this site shall be subject to relocation of the access road to front any new development proposed and shall be fully located within the lands zoned existing residential / infill. Rezone existing residential / infill in Draft Plan to open space and amenity.
It is requested that the industrial zoning on a site at Newacre on the Athy Road should be reinstated and the following issues are noted in this regard:	CLW-C10-33	The site is located in a rural area over 2.5km from the development boundary of Carlow Town Environs zoned area within an unserviced location. It

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<ul style="list-style-type: none"> ▪ The zoning history of the site since 1997 and through to the present. ▪ With reference to the Development Plans Guidelines for Planning Authorities, existing zonings should be shown on a plan for the whole county, including where an existing use has been permitted. ▪ The requirement to prepare a Joint Urban Area Plan in cooperation with Laois County Council should not prevent the Draft Plan from including all existing areas of industry and retail outside the town boundaries of Carlow, Bagenalstown, and Tullow. ▪ Were only aware site on the Athy Road was unzoned when refused permission to erect an additional storage unit under reg. ref. 19/408. ▪ The removal of the zoning for the site on the Athy Road was not notified to them. ▪ The zoning is material to the financial position of the company, and they cannot wait for the preparation of a new Joint Urban Area Plan. ▪ The need to develop their business further, and financial support from a lending institution cannot be received without a proper zoning. 		<p>accommodates an established business operating on site. The site is located within a flood risk zone and immediately adjoining a Special Area of Conservation. The site would not pass the justification for zoning on the basis of the Flood Risk Management Guidelines.</p>  <p>Sufficient provision exists in the Plan under Policy RE P3 as contained in Chapter 14 to facilitate further development on this site as maybe deemed appropriate:</p> <p><i>Facilitate where deemed appropriate an extension of an existing established authorised rural based enterprise in the rural area provided that the scale and</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		<p><i>form of the enterprise is compatible with the character of the area, that there is capacity available in the local infrastructure to accommodate the expansion and that the development complies with other relevant objectives of this Plan, including normal planning and environmental criteria.</i></p> <p>Recommendation No change to Draft Plan.</p>
4.15.2 Muine Bheag		
<p>Submission relates to lands at Royal Oak Road "M1":</p>	<p>CLW-C10-85</p>	<p>Muine Bheag is governed under a separate Local Area Plan and is not being reviewed as part of the Carlow County Development Plan 2022-2028. The review of the Local Area Plan for Muine Bheag will commence within one year of the adoption of the CDP at which time a comprehensive review of land use zonings will be conducted. This will establish an appropriate comprehensive framework for the future development of the area having regard to national, regional and local planning considerations.</p> <p>It is however acknowledged that part of this site constitutes a regeneration site, the development of which is desirable in the context of the proper</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
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3.15 Town and Village Plans / Settlement Plans



In summary, it is requested that Carlow County Council consider:

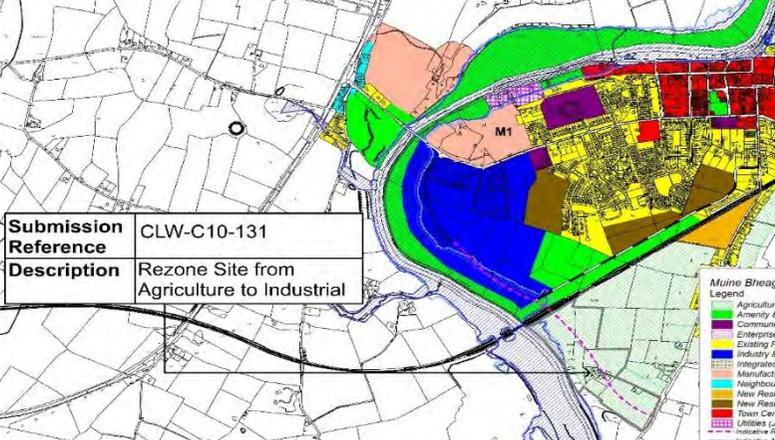
- Extending the list of permitted uses on the Parcel A I (12.2ha) lands currently zoned M1 Manufacturing, Tourism and Enterprise and Employment "to facilitate an appropriate mix of employment uses within a high- quality landscaped development including office-based industry, enterprise, incubator units, business, science and technology" with a small area zoned open space and amenity 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

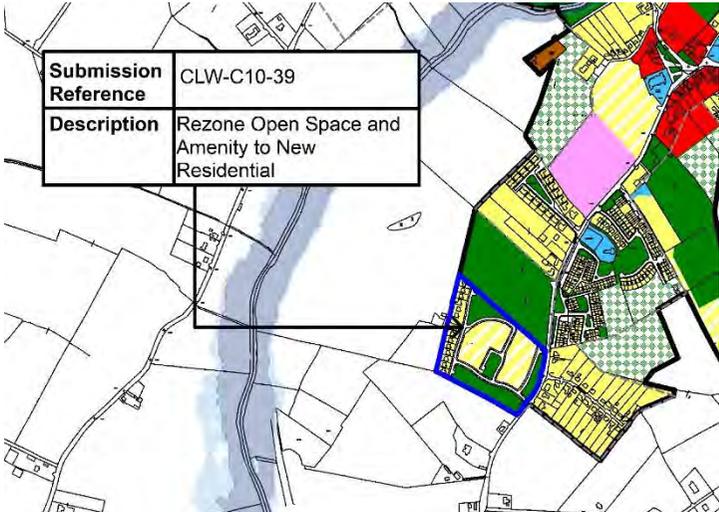
planning and sustainable development of the area and is supported by policies in the Draft Plan. Detailed considerations regarding appropriate land uses will inform potential future zonings at this location.

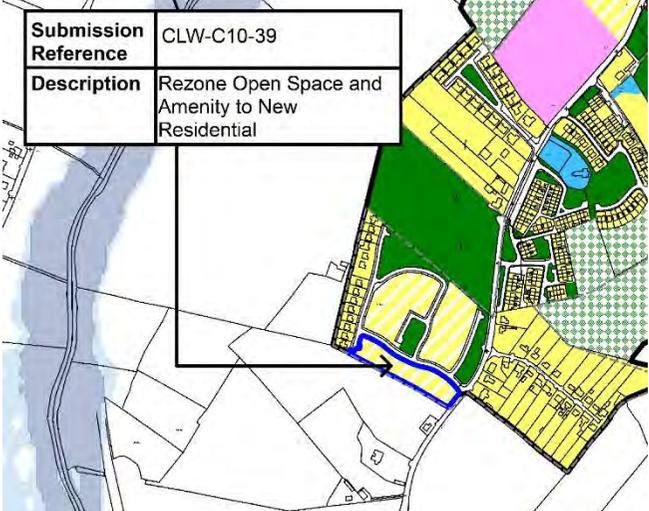
It would therefore be premature pending a full review of all land use zonings in Muine Bheag which will be carried out as part of the Local Area Plan.

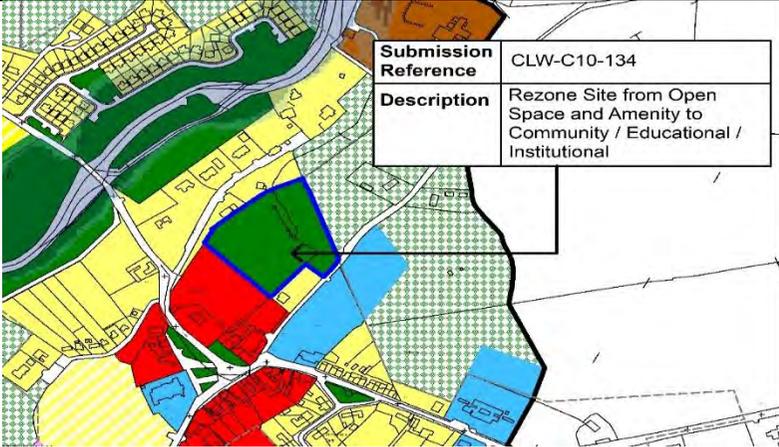
Recommendation
No change to Draft Plan.

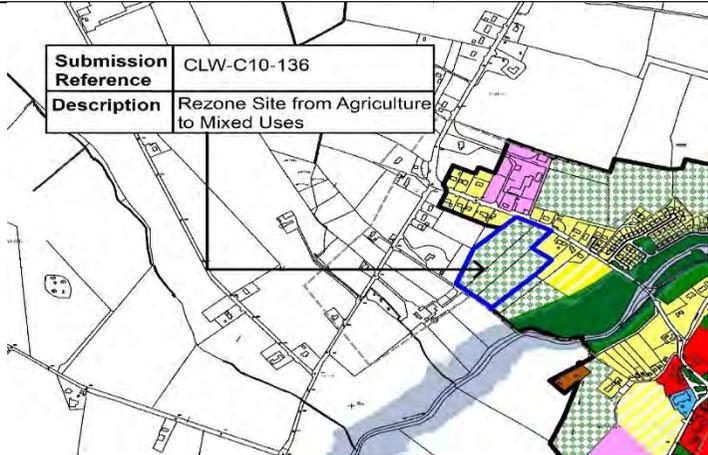
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
example of such a development; Alternatively, it is stated that should the council consider such an objective to be better suited to the LAPS less specific objective is requested as follows: <i>"It is an objective of the Council to work with landowners of large underutilised sites within the town centres to facilitate comprehensive redevelopment"</i>		
Submission relates to lands at east of Royal Oak Road zoned "open space and amenity": - Rezoning the amenity/open space lands "to protect and provide for recreation, open space and amenity provision" to the east of the Royal Oak Business Park to Industry and Warehousing. The Parcel B lands (10ha) are located next to the business park and it is indicated that there is potential to facilitate further industrial units to cement Muine Bheag's leading role in the manufacturing and industrial industry.	CLW-C10-85	As per response to CLW-C10-85 above. Recommendation No change to Draft Plan.
Requesting the rezoning of lands in Muine Bheag from agriculture to industrial as it is stated that they are a natural progression of existing industrial lands on adjacent sites.	CLW-C10-131	As per response to CLW-C10-85 above. Recommendation No change to Draft Plan.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
SMALL TOWNS		
4.15.3 Rathvilly		
<p>OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Rathvilly (existing residential and utilities lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
<p>Reference is made to Ard Bhaile an unfinished estate in Rathvilly which has considerable works carried out to-date noting:</p> <ul style="list-style-type: none"> Ard Bhaile in Rathvilly is a 10 acre 80% fully serviced site and the Draft Plan proposes that nearly 50% of the land is to be used for open space and amenities. 	CLW-C10-39	57 no. units were permitted on this site pursuant to permission 04/686. Part of the site identified as existing residential /infill accommodates c. 13 no. units. Given the constraints on unit numbers for the settlement, the Draft Plan recommended 18 no. units for the landholding over the Plan period. This was in recognition of other lands within the settlement which were deemed more

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.15 Town and Village Plans / Settlement Plans						
<p>The original plans for Ard Bhaile granted permission under Reg. Ref. 04/686 were very well laid out with standalone detached houses on generous plots and with access to large open spaces. Requests changes to zoning be re-evaluated noting that the development could provide for decent sized affordable houses.</p> <ul style="list-style-type: none"> ▪ The Draft Plan proposal to reduce the number of houses in Ard Bhaile would mean that the price paid for the land was unsustainable, and that a completely new site layout is required, extensive civil works are needed, existing services need to be removed, and roads would need to be reinstated. ▪ Should the proposal for Ard Bhaile be passed there would be no option but to wait a number of years before it would be cost effective to develop the site, possibly the next Development Plan.  <table border="1" data-bbox="367 919 745 1051"> <tr> <td>Submission Reference</td> <td>CLW-C10-39</td> </tr> <tr> <td>Description</td> <td>Rezone Open Space and Amenity to New Residential</td> </tr> </table>	Submission Reference	CLW-C10-39	Description	Rezone Open Space and Amenity to New Residential		<p>appropriately sited in the context of the settlement core. Having regard however, to the publication of the Draft Development Plan Guidelines (August 2021) some limited flexibility in relation to additional zoning has been provided subject to justification on the basis of proper planning considerations.</p> <p>In this circumstance, it is considered that the allocation of a further 16 no. units to this site would be appropriate for a number of reasons:</p> <ul style="list-style-type: none"> • Investment to date in the infrastructure on site • The need to improve the residential amenities of properties already within the estate. • Public safety considerations • Visual amenity of the settlement. • And the objective to complete the estate to a satisfactory standard within a reasonable timeframe. <p>Recommendation</p> <ol style="list-style-type: none"> Rezone the area to the south along the access route to the site from open space and amenity to new residential. Amend Settlement Plan 15.3.1 providing for an additional 16 no. units in Ard Bhaile (total 34 no. units).
Submission Reference	CLW-C10-39					
Description	Rezone Open Space and Amenity to New Residential					

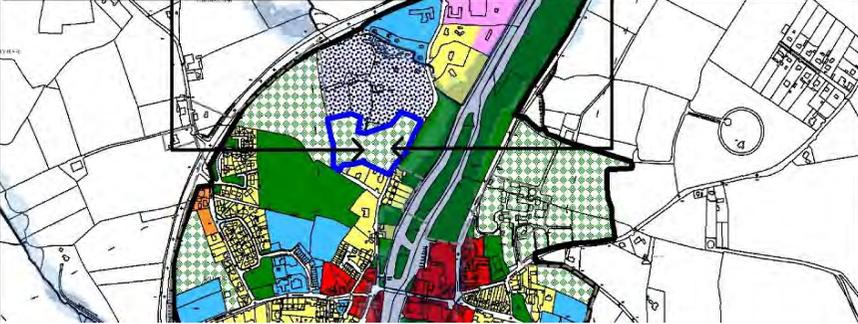
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
<p>Requests the rezoning of 2.8ha of lands from agriculture in the Draft Plan to Community / Educational/Institutional use given proximity to graveyard, church, community centre and town centre uses. Acknowledges use of the site for a potential town park.</p>	<p>CLW-C10-134</p>	<p>Under the provisions of the Draft Rathvilly Plan the area referenced has been identified as open space and amenity. The requested change in zoning from open space and amenity to Community / Education is considered acceptable, given proximity to the town centre, residential properties and other community uses and would also facilitate community uses.</p> <p>The requested change in zoning is considered acceptable and would be in accordance with the proper planning and sustainable development of the area.</p> <p>Recommendation Rezoning lands identified as open space and amenity in the draft plan to Community / Education.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
<p>Requests the rezoning of 4.5ha of lands from agriculture in the Draft Plan to mixed uses, due to proximity to town centre, the site being serviced by an adjacent footpath and the need for future development of Rathvilly for an expanding community.</p>	<p>CLW-C10-136</p>	<p>Having regard to the location of the site off the N81 and location proximate to other enterprise and employment lands it is considered appropriate that these lands be zoned for employment related uses. This will facilitate the sustainable development of Rathvilly which will seek to address high levels of commuting from the town. Use of the land for residential purposes is not warranted under the provisions of the current plan given target growth levels between 2022-2028 and the level of lands already identified to accommodate same.</p> <p>Recommendation Rezone lands 4.5ha identified as Agriculture in the draft plan to Enterprise and Employment and include objective that any development proposals shall incorporate measures to protect the residential amenities of adjoining properties.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		
4.15.4 Leighlinbridge		
<p>A number of submissions have been received regarding a 2.2ha of land at Leighlinbridge Carlow:</p> <p>One submission is seeking the rezoning of the land from agriculture to residential zoning to facilitate retirement homes (16units/0.7ha) and low density serviced sites (10units/ 1.5ha), while the remaining submissions (5no.) are seeking the retention of the lands as agricultural use as identified in the Draft Leighlinbridge Plan.</p> <p>In support of the proposed rezoning reference is made to:</p> <ul style="list-style-type: none"> - The previous LAP where lands were zoned as residential. 	CLW-C10-13	<p>Leighlinbridge is designed as a Small Town within the Draft CDP. Facilitating housing at appropriate locations within the settlement is paramount to ensuring sustainability, vitality and viability of the town. There is currently no LAP operative for Leighlinbridge having expired in 2016.</p> <p>The Draft CDP identifies an allocation of 99 no. units within Leighlinbridge. The majority of the units are to be accommodated within Ballyknockan Manor (41 permitted units) and Friars Lough. These schemes comprise unfinished estates and their completion is appropriate and in accordance with the proper planning and sustainable development of the town. Any concerns regarding noise considerations as identified in the submission can be appropriately</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<ul style="list-style-type: none"> - Subject lands are serviced and submits that there is compliance with certain stated provisions of the NPF and the RSES. - Proximity to town centre. - Facilitating regeneration of a sequentially appropriate infill site. <p>It is further stated that:</p> <ul style="list-style-type: none"> - lands along the R448 within the settlement are inappropriately zoned due to noise levels from the adjoining road – requiring same to be reallocated within the settlement to the area identified in this submission. - Infrastructural Assessment carried out is not consistent with Section 28 Guidelines or objective 72A of the NPF as the lands subject of the submission are to be regarded as Tier 1 Serviced Lands. - The HNDA is out of date and is not consistent with certain requirements of the NPF or Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning'. <p>Five no. submissions have been received supporting the retention of the land in agricultural use having regard to the following provisions and concerns:</p> <ul style="list-style-type: none"> - Location of landholding on Milford Road which is on a narrow road with severe blind bends and poor sight lines. - Absence of any legal entitlement to access the site from the private access lane to the south of the site. - Serious lack of infrastructure to serve these lands by way of safe vehicle access and pedestrian permeability to nearby community facilities. - Access laneway is currently unsuitable for public vehicle, pedestrian and cyclists use and not to a taking in charge standard (i.e. no lighting, footpaths for water / foul sewer infrastructure) and lack of sightlines at junction with public road. 	<p>CLW- C10-67 CLW- C10-127 CLW- C10-129 CLW- C10-132 CLW- C10-133</p>	<p>addressed where necessary as provided for under the Carlow Noise Action Plan 2018-2023.</p> <p>The lands identified in this submission for proposed zoning are not recommended for the following reasons:</p> <ul style="list-style-type: none"> - Sufficient lands at appropriate locations have been zoned to accommodate anticipated housing targets in accordance with the core strategy. - Site specific constraints currently exists regarding the identified landholding for residential purposes including inadequacy of access arrangements, traffic safety considerations, adequacy of sight lines, absence of adequate pedestrian linkages to the town centre, potential visual amenity considerations given the elevated nature of the landholding, potential adverse impact on the setting and character of the settlement. <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<ul style="list-style-type: none"> - Access from Milford Road is unsuitable for an potential increase in pedestrian and cyclist movement without substantial infrastructure works carried out including land take south towards the village. The existing road lacks suitable safe footpath provision due to its narrow width and alignment with high boundary walls dominating its corridor. Concern expressed that this would result in potential traffic safety concerns. - Significant activity on Milford road will require substantial traffic calming measures and land take. - Concerns are expressed regarding existing traffic safety, blind bends and speeds on the Milford Street and lack of safety for pedestrians and increased traffic volumes from the development from both access points onto Millford Street. The current Development Plan specifies " the provision of additional new housing on appropriately zoned lands and the completion of Ballyknockan Manor & Friars Lough to the west of the town", with the necessary services in place, which meet the current allocation for housing and completes the developments. It is also stated that sufficient land for housing has been provided in the existing draft. 		

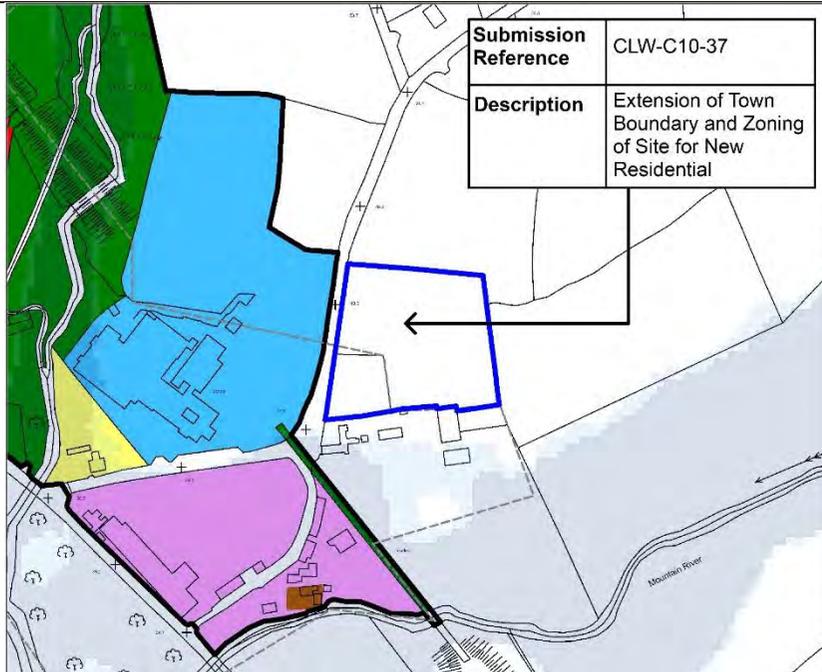
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation								
3.15 Town and Village Plans / Settlement Plans										
<table border="1" data-bbox="257 475 1115 608"> <tr> <td>Submission Reference</td> <td>CLW-C10-13</td> <td>Submission Reference</td> <td>CLW-C10-67,127,129,132,133</td> </tr> <tr> <td>Description</td> <td>Rezone Site from Agriculture to New Residential</td> <td>Description</td> <td>Retain Zoning of Site for Agriculture</td> </tr> </table> 	Submission Reference	CLW-C10-13	Submission Reference	CLW-C10-67,127,129,132,133	Description	Rezone Site from Agriculture to New Residential	Description	Retain Zoning of Site for Agriculture		
Submission Reference	CLW-C10-13	Submission Reference	CLW-C10-67,127,129,132,133							
Description	Rezone Site from Agriculture to New Residential	Description	Retain Zoning of Site for Agriculture							
<p>OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Leighlinbridge (existing residential lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)								
<p>OPW notes that Highly vulnerable Community and Educational, Tourism which can allow for highly vulnerable accommodation, and less vulnerable Enterprise and Employment lands to the north of the settlement have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A or B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test, completed by the local authority, can be satisfied. Flood Zone extents are shown to increase in future scenarios, putting highly vulnerable Existing Residential at risk.</p>	CLW-C10-24	<p>The Justification Test has been applied and passed for these zonings with caveats to ensure that the sequential approach is applied, and flood risk is managed appropriately. Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)</p> <p>Recommendation Include Flood risk mitigation measures in settlement Plan. See also SRFA Amendments (Appendix III – Vol II).</p>								

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
 <p data-bbox="271 710 537 829">Highly vulnerable Community & Educational, Tourism, and less vulnerable Enterprise and Employment in Flood Zones A and B</p> <p data-bbox="555 710 801 790">Leighlinbridge present day scenario from CFRAM mapping on www.floodinfo.ie</p> <p data-bbox="819 710 1048 790">Leighlinbridge future scenarios from CFRAM mapping on www.floodinfo.ie</p>		
4.15.5 Ballon		
<p data-bbox="192 994 1182 1086">OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Ballon (existing residential and utilities lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	<p data-bbox="1193 994 1292 1050">CLW-C10-24</p>	<p data-bbox="1314 994 2170 1054">Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)</p>
<p data-bbox="192 1126 1182 1246">OPW notes that highly vulnerable Community & Education zoned lands at the Garda station has been zoned in Flood Zone A. Highly vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test, completed by the local authority, can be satisfied.</p>	<p data-bbox="1193 1126 1292 1182">CLW-C10-24</p>	<p data-bbox="1314 1126 2170 1246">The Justification Test has been applied and passed for this zoning with caveats to ensure that the sequential approach is applied, and flood risk is managed appropriately. Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)</p> <p data-bbox="1314 1286 2170 1374">Recommendation Include Flood risk mitigation measures in settlement Plan. See also SRFA Amendments (Appendix III – Vol II).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
 <p>Highly Vulnerable Community &</p>		
4.15.6 Borris		
<p>Submission seeks an amendment to the proposed development boundary for the Draft Borris Small Town Plan in relation to land which was the subject of a grant of permission for 9 houses in 2007 under Reg. Ref. 06/1063 to facilitate low density development.</p>	<p>CLW-C10-37</p>	<p>These lands are directly adjacent to the existing development boundary and proximate to the secondary school. The lands can also be serviced by Irish water infrastructure and will provide additional opportunities to cater for housing demand in the area.</p> <p>Recommendation Extend the Town Boundary and zone the site c. 1.ha for low density residential development (max 10 units).</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
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3.15 Town and Village Plans / Settlement Plans



Submission Reference	CLW-C10-37
Description	Extension of Town Boundary and Zoning of Site for New Residential

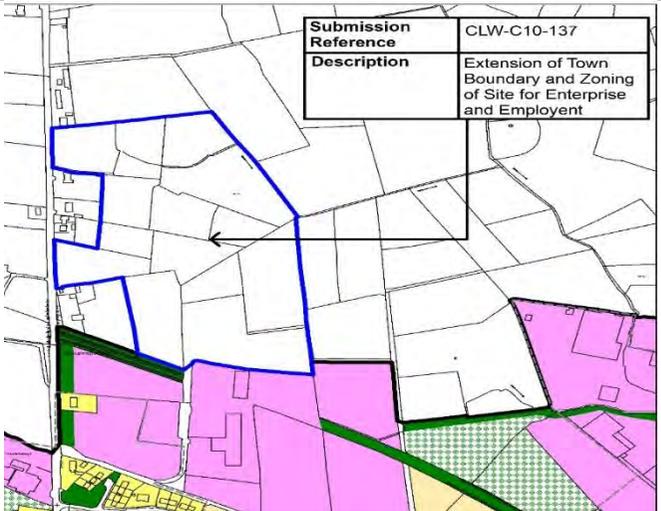
In support of the proposed amendment to the development boundary, the submission refers to the following details:

- Proposal to alter permitted development design to provide more integrated and low-density development.
- Low-density development will offer viable and controlled alternative to one-off dwellings.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<ul style="list-style-type: none"> ▪ The lands are readily serviced and form a natural expansion of the village and a consolidation of the existing settlement pattern. 		
<p>Submits that there is an urgent need to zone more land in Borris to accommodate housing need having regard to:</p> <ol style="list-style-type: none"> 1. Borris House Estate owns significant tract of land on the west side of the main street 2. Lands on the east of the main street are not being made available. Suggests that zoning on existing lands in the town centre and Fenagh road be replaced with zoning in areas of the town land of Old Yard Borris and Kilcoltrim. (No map submitted). 	CLW-C10-22	<p>Additional lands have been recommended for zoning as identified in the foregoing submission. These lands are directly adjacent to the existing development boundary and proximate to the secondary school. The lands can also be serviced by Irish water infrastructure. These lands will provide additional opportunities to cater for housing demand in the area. The location of old yard and Kilcoltrim are at some remove from the serviced area of Borris and would leapfrog more appropriate land proximate to the settlement which contains necessary services and community facilities to support a growing population base.</p> <p>Recommendation No change to land use zoning in Old Yard and Kilcoltrim.</p>
<p>Requests the zoning of 11.66ha of lands outside the town of Borris to Enterprise and employment to facilitate future expansion of Kelly's of Borris.</p>	CLW-C10-137	<p>It is acknowledged that Kelly's is an important enterprise to the settlement of Borris and future proofing of the landholding at an appropriate level is considered acceptable. In this regard it is considered appropriate to extend the zoned enterprise and employment lands to accommodate future expansion appropriate over the Plan period. In this regard it is recommended that an area of 6.06ha located to the north of the site be zoned enterprise and employment. Further zoning of the landholding can be considered as part of the next review of the Borris Plan.</p> <p>An area to the west of the landholding which accommodates residential / agricultural uses to be zoned for agricultural use.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
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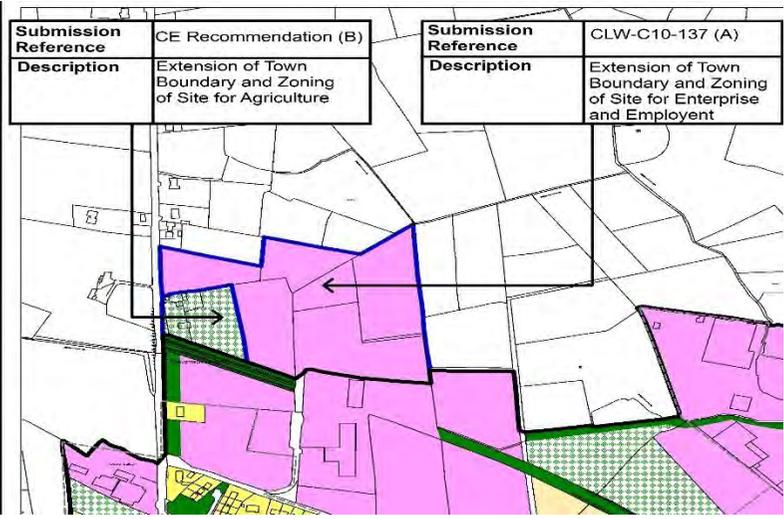
3.15 Town and Village Plans / Settlement Plans



Submission Reference	CLW-C10-137
Description	Extension of Town Boundary and Zoning of Site for Enterprise and Employment

a. Extend the development boundary of Borris and zone 6.06ha for Enterprise and Employment related uses with a specific objective that development extends sequential from the existing developed area, shall provide for appropriate traffic access arrangements, the protection of residential amenities of adjoining properties and detailed landscaping plan to protect the visual amenities of the area including proposals to seek the retention of mature established trees and field boundaries to the landholding.

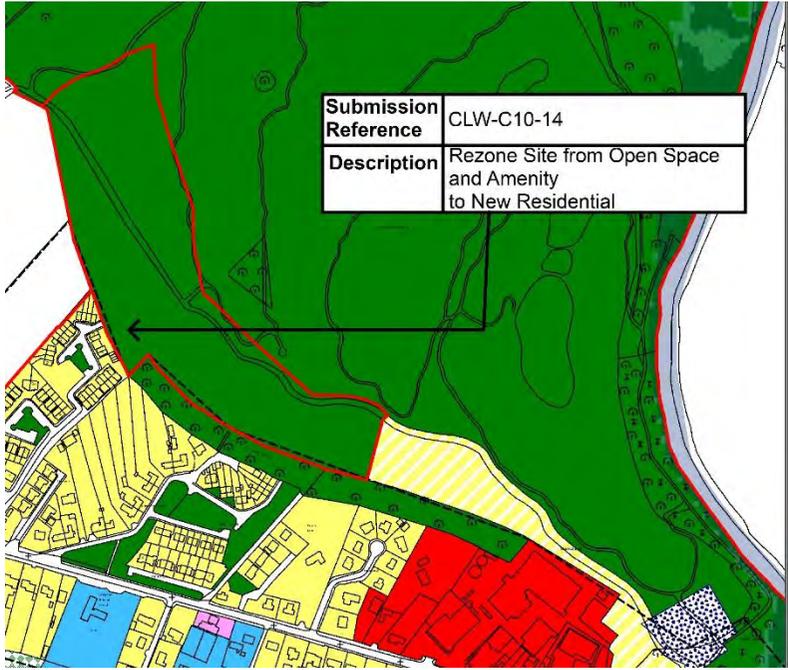
b. Extend the development boundary and zone site for agricultural purposes.

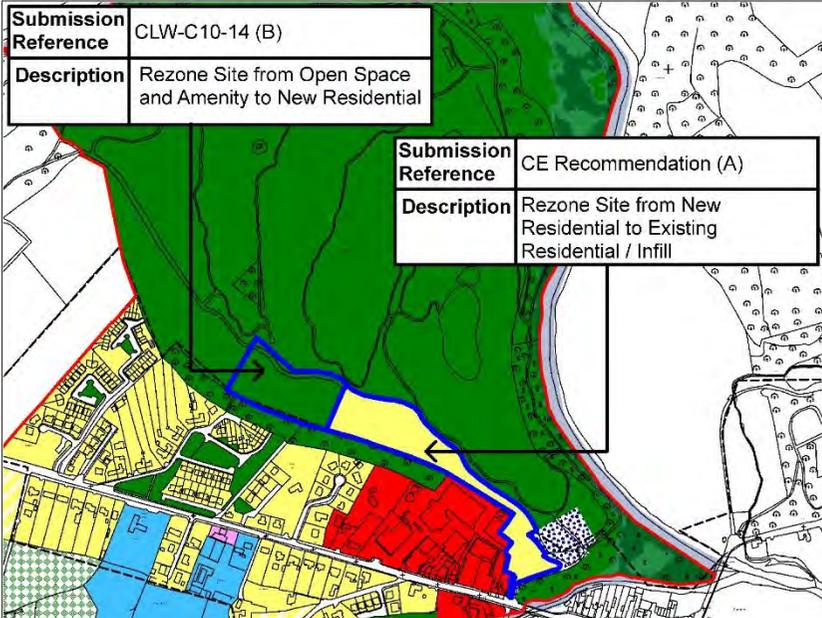


Submission Reference	CE Recommendation (B)
Description	Extension of Town Boundary and Zoning of Site for Agriculture

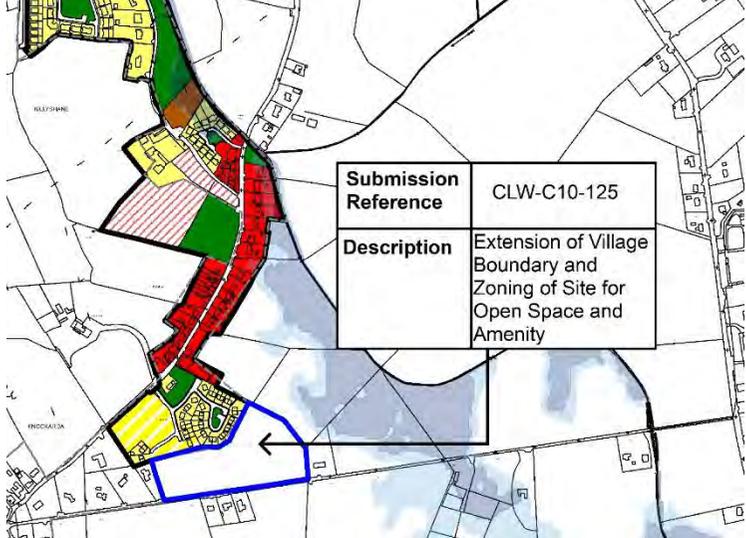
Submission Reference	CLW-C10-137 (A)
Description	Extension of Town Boundary and Zoning of Site for Enterprise and Employment

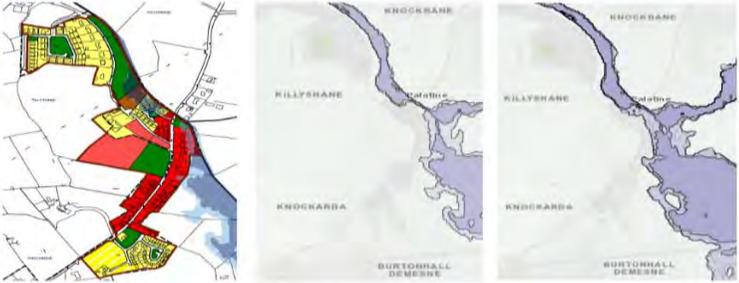
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Borris (community and education and enterprise and employment lands) be incorporated into the relevant settlement plan as specific policy objectives.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
<p>OPW notes that highly vulnerable Existing Residential lands adjacent to Kellys Steelwork and less vulnerable Enterprise & Employment lands to the north of the settlement have been zoned in Flood Zone A and B. Highly vulnerable development is not appropriate in Flood Zone A or B, and less vulnerable development is not appropriate in Flood Zone A unless a Plan-making Justification Test, completed by the local authority, can be satisfied.</p> <div style="display: flex; justify-content: space-around; align-items: flex-end;"> <div data-bbox="266 790 577 981" style="text-align: center;">  <p data-bbox="271 1007 589 1062">Existing Residential adjacent to Kelly's Steelworks Site in Flood Zone A and B</p> </div> <div data-bbox="616 790 873 981" style="text-align: center;">  <p data-bbox="620 1007 887 1082">Enterprise and Employment to north of Borris in Flood Zones A and B</p> </div> </div>	CLW-C10-24	<p>The Justification Test has been applied and passed for these zonings with caveats to ensure that the sequential approach is applied, and flood risk is managed appropriately. Refer to response to Recommendation no. 9 (OPR Submission Section 2.3).</p> <p>Recommendation Include Flood risk mitigation measures in settlement Plan. See also SRFA Amendments (Appendix III – Vol II).</p>
4.15.7 Hacketstown		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Hacketstown (existing residential lands) be incorporated into the relevant settlement plan as specific policy objectives.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)

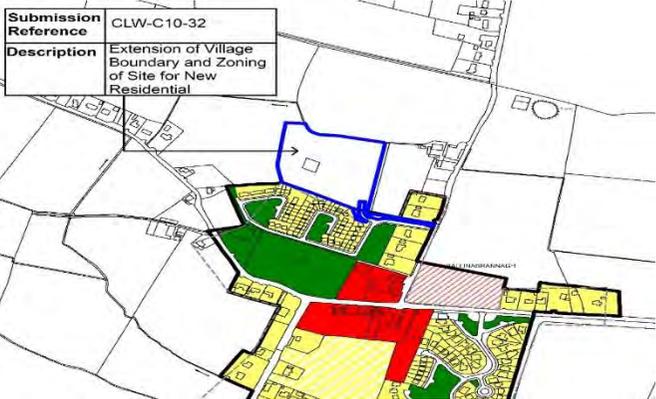
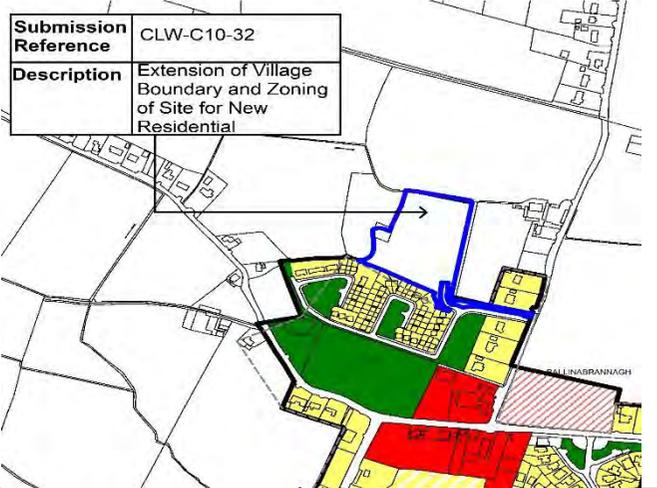
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
4.15.8 Carrickduff		
<p>Requesting zoning of c.7.3ha of land for 60 no. units (additional to area zoned permitted 19/163 – 9 no. units) due to strong demand for housing and for long term viability of the overall development (Bunclody Golf and Fishing Club).</p> 	CLW-C10-14	<p>Carrickduff is designed as a Small Town within the Draft CDP and is acknowledged as an integral part of the overall settlement of Bunclody. While the majority of the settlement is located within Co. Wexford Carrickduff contains important functions including part of the designated town centre, modern retail developments, community facilities and commercial uses. Facilitating housing at appropriate locations within the settlement is therefore acknowledged as of paramount importance to ensure sustainability, vitality and viability of the town.</p> <p>The Draft Plan recommended 33 no. units for the settlement. Since the publication of the Draft Plan development has commenced on permission reference no. 19/163 (9 units) and likely to be substantially complete prior to the adoption of this development Plan. Accordingly, it is recommended that the site immediately adjoining the proposed submission be rezoned from new residential to existing residential and that an additional area subject of this submission be rezoned new residential to accommodate a maximum of 14 no. units.</p> <p>This allocation comprises an additional 5 no. units over the existing allocation in the Draft Plan and is considered acceptable the following reasons:</p> <ul style="list-style-type: none"> • Designation of Carrickduff as a Small Town would be acceptable and result in a provision of 1.5% of the overall County housing target to Carrickduff. • Investment currently being undertaken on the landholding through the commencement of the adjoining residential development. • Proximity to town centre

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation								
3.15 Town and Village Plans / Settlement Plans										
		<ul style="list-style-type: none"> Potential for high residential amenity development given location of development. <p>Recommendation</p> <ol style="list-style-type: none"> Rezone proposed new residential lands immediately adjoining the proposed submission lands to existing residential / infill. Zone circa. 1.5ha of land from open space and amenity to new residential to accommodate a maximum of 14 no. units. <div data-bbox="1323 746 2145 1364"> <table border="1"> <tr> <td>Submission Reference</td> <td>CLW-C10-14 (B)</td> </tr> <tr> <td>Description</td> <td>Rezone Site from Open Space and Amenity to New Residential</td> </tr> </table>  <table border="1"> <tr> <td>Submission Reference</td> <td>CE Recommendation (A)</td> </tr> <tr> <td>Description</td> <td>Rezone Site from New Residential to Existing Residential / Infill</td> </tr> </table> </div>	Submission Reference	CLW-C10-14 (B)	Description	Rezone Site from Open Space and Amenity to New Residential	Submission Reference	CE Recommendation (A)	Description	Rezone Site from New Residential to Existing Residential / Infill
Submission Reference	CLW-C10-14 (B)									
Description	Rezone Site from Open Space and Amenity to New Residential									
Submission Reference	CE Recommendation (A)									
Description	Rezone Site from New Residential to Existing Residential / Infill									

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Carrickduff (town centre lands) be incorporated into the relevant settlement plan as specific policy objectives.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3).
LARGER SERVICED VILLAGES		
4.15.9 Palatine		
Requests an area of c.7ha outside the proposed development boundary of Palatine to be zoned for residential purposes.	CLW-C10-7	<p>Palatine is designated as a larger serviced village with a growth rate of c.25no. units which is considered a proportionate level of growth to the scale of the existing settlement. The area of zoning requested is of a scale which is excessive for a sustainable level of growth for the village over the plan period and is located at a remove from the village core. Consolidation of the village core and expansion lands are a priority over the plan period. Given core strategy allocations further additional residential zonings of this scale is not required to accommodate anticipated levels of growth.</p> <p>Recommendation No change to Draft Plan.</p>
Requests provision of soccer pitch with parking facilities at Limegrove, Palatine. Reference made to previous planning application for same which was not provided. Indicates that this remains a much-needed facility and requests rezoning to facilitate same as well as a possible playground.	CLW-C10-125	<p>The laying out of land for use as playing fields constitutes exempted development subject to compliance with a number of criteria. Accordingly, the zoning of the site is not considered necessary to accommodate the intended use. Ancillary provisions such as car parking / lighting etc to support same would be considered on the merits of a relevant planning application.</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
		No change to Draft Plan.
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the Palatine be incorporated into the relevant settlement plan as a specific policy objective.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
Regarding Palatine the OPW notes that increases in Flood Zone extents in future scenarios will put an area zoned Town Centre which can allow for highly vulnerable development at risk.	CLW-C10-24	Potential future increases in flood risk to the Town Centre lands has been noted in the SFRA.

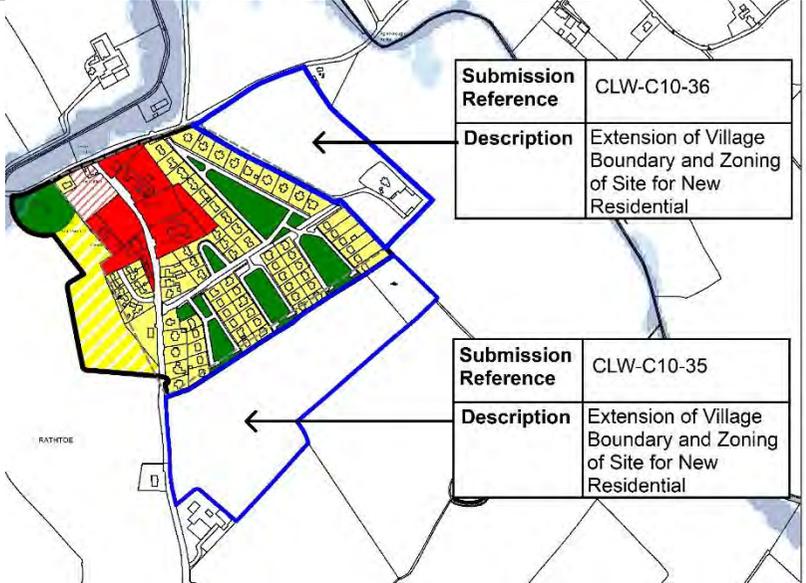
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
 <p>Palatine Land Use Zoning Map</p> <p>Palatine present day scenario from NIFM mapping</p> <p>Palatine future scenarios from NIFM mapping</p>		<p>Recommendation No change to Draft Plan. See SRFA Amendments (Appendix III – Vol II).</p>
4.15.10 Ballinabrannagh		
<p>The submission seeks an amendment to the proposed development boundary for Ballinabrannagh (Larger Serviced Village) to facilitate the completion of the housing estate at Gort Na Gréine, and cites the following issues in this regard:</p> <ul style="list-style-type: none"> ▪ The lands in question form part of a parcel of land the subject of a planning permission for 82 houses under reg. ref. 06/429. ▪ Of the 82 houses permitted, only 42 have been constructed and sold to date, and an undeveloped parcel of land comprising c. 6.8 acres forms part of an uncompleted housing estate. ▪ It was always the intention of the developer to complete the housing estate as per the original planning permission and/or by reapplying for planning permission to complete it. ▪ The developer entered into an agreement with the Council to provide public infrastructure for the village with substantial financial investment, and this was in the form of mains public surface and foul water provision. 	<p>CLW-C10-32</p>	<p>Since the publication of the Draft Plan Irish Water has announced projects selected for upgrade as part of the Small Town and Village Growth Programme. In the context of County Carlow, this includes Ballinabrannagh WWTP. The purpose of the STVGP is to provide funding for water and wastewater treatment plant growth capacity which would not otherwise be provided for in the Irish Water 2020-2024 Capital Investment Plan. Ballinabrannagh WWTP is now progressing through the next stages including design, planning, procurement and construction. Irish Water have confirmed that the upgrade will take place during the lifetime of this Development Plan. Accordingly, it is recommended that additional growth be allocated to Ballinabrannagh comparable to other serviced settlements designated as Larger Serviced Villages. Accordingly, to align with other villages at this scale an additional 17 no. units will be allocated to Ballinabrannagh.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>There was an agreement with the Council to offset the costs of the infrastructure investment for the developer by a reduction in each of the development charges for the 82 houses, and as 42 houses have been built to date, there is a significant shortfall in monies due under the agreement. If the proposed development boundary for the village is to remain it will eliminate any prospect of the completion of an established housing estate and will deny the developer, the opportunity to recoup the substantial investment to date.</p> 		<p>16 no. units to be provided in part of the site subject of this submission. This site shall be serviced by the upgraded WWTP once completed.</p> <p>Recommendation Amend Ballinabrannagh / Raheendoran Village Plan zoning 1.79ha of land for new residential development (16. No. units).</p> 
<p>(i) States that in the current 2015-2021 County Development Plan the lands at Clogrennane Lime Quarry have been zoned in the Ballinabrannagh/Raheendoran LAP as 'Quarry.'</p> <p>(ii) It is of great concern that zoning map provided for Ballinabrannagh/Raheendoran in Chapter 15 of the Draft CDP has omitted the quarry zoning and is in contradiction with Section 14.16.2.</p>	CLW-C10-73	<p>There is no Landuse zoning map for Ballinabrannagh / Raheendoran under the CDP 2015-2021 as stated in this submission. The settlement is identified by a settlement boundary and is contained in Appendix 11. The quarry is located outside the settlement boundary. There is no zoning for quarries within the existing CDP or the proposed draft Plan. Quarries are located in rural areas and governed by supportive policies subject to environmental, traffic and social</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
(iii) It is submitted that the quarry land use zoning be reinstated as this would facilitate the necessary provisions to secure the future operation of the quarry.		<p>impact considerations (Section 14.16). The importance of Clogrennane Lime Quarry is acknowledged in Section 14.16.2 of the Draft Plan.</p> <p>Recommendation: No change to Draft Plan.</p>
4.15.11 Rathtoe		
<p>(i) <u>Chapter 15, Rathtoe Village Plan</u> The submission requests that the development boundary for Rathtoe (Larger Serviced Village) in the Draft Plan is extended to include lands to the south that were zoned under the Rathtoe Village Local Area Plan 2006, and that the lands are zoned 'New Residential'. i.e. 10.3ha</p> <p>(i) <u>Chapter 15, Rathtoe Village Plan</u> The submission requests that the development boundary for Rathtoe (Larger Serviced Village) in the Draft Plan is extended to include lands to the east that were zoned under the Rathtoe Village Local Area Plan 2006, and that the lands are zoned 'New Residential'. i.e. 10.35ha</p>	<p>CLW-C10-35</p> <p>CLW-C10-36</p>	<p>Two number submission have been received for Rathoe which cumulatively could deliver over 260 units (@ a low density of 10 units/ha) significantly in excess of the growth allocated to the settlement (18 no. units). Existing population levels recorded in Rathoe in 2016 amounted to 304 persons, development of the scale submitted in these two submissions could increase the population of the settlement by c. 702 persons more than doubling the population of the village. The development anticipated by these submissions is unsustainable and would be contrary to the provisions of the core strategy and the proper planning and sustainable development of the settlement.</p> <p>In the context of the two landholdings identified it is considered that the lands located to the south of the village are more appropriately sited with existing footpath access and services available. Lands located to the east are more removed from the settlement core being located on a separate access road L1024-144 without footpath access and outside the designated speed limits of the settlement.</p> <p>The existing Draft Plan provides new residential zoning to accommodate 12 no. units with 6 no. units identified in village centre lands. It is considered that the lands identified for new residential in the Draft Plan located proximate to</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
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3.15 Town and Village Plans / Settlement Plans



Submission Reference	CLW-C10-36
Description	Extension of Village Boundary and Zoning of Site for New Residential

Submission Reference	CLW-C10-35
Description	Extension of Village Boundary and Zoning of Site for New Residential

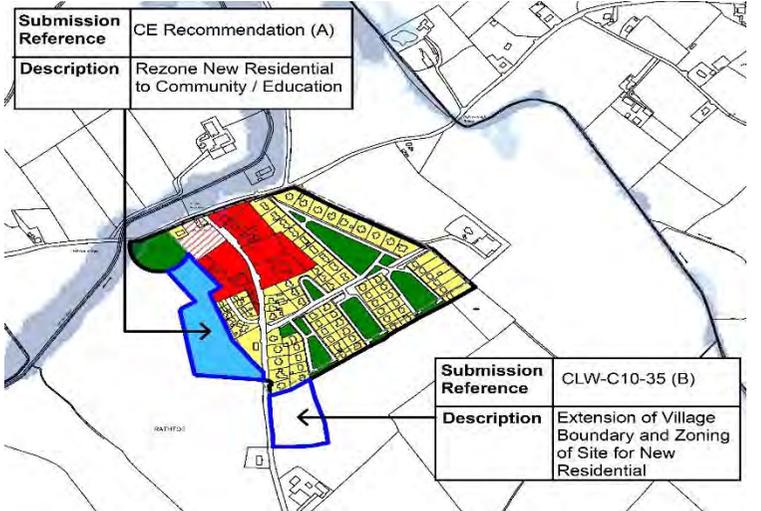
The following is referred to in support of these requests:

- National and Regional planning policy as contained in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).
- Local policy as contained in the current Carlow County Development Plan 2015-2021 and as relating to development objectives for smaller towns and villages.
- Rathtoe has its own School (Rathtoe National School) and any residential development will only contribute the viability of this local School.
- The subject lands are well served by Rathtoe Wastewater Treatment Plan i.e. has a pe of 2000.

the childcare centre and community centre should be zoned from new residential to community / educational. This would facilitate expansion of community related uses to support the existing and expanding population within the village. The 12 number units to be reallocated to an area to the front of site subject to submission CLW-C10-35.

Recommendation

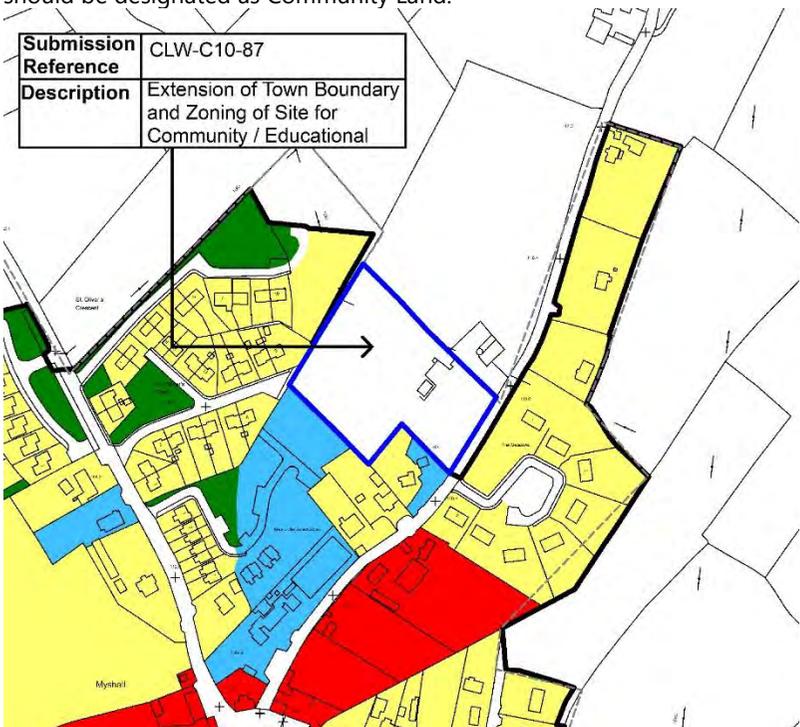
- Rezone new residential to Community / Educational.**
- Extend village boundary and zone site (1.3ha) new residential (12 no. units).**



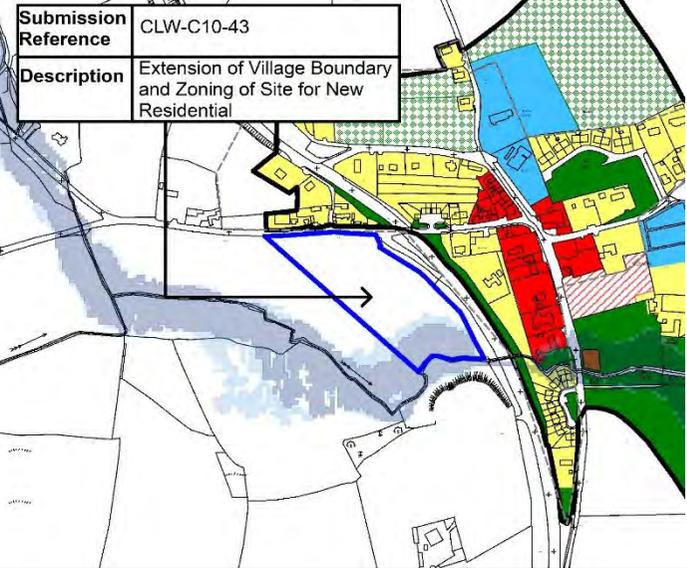
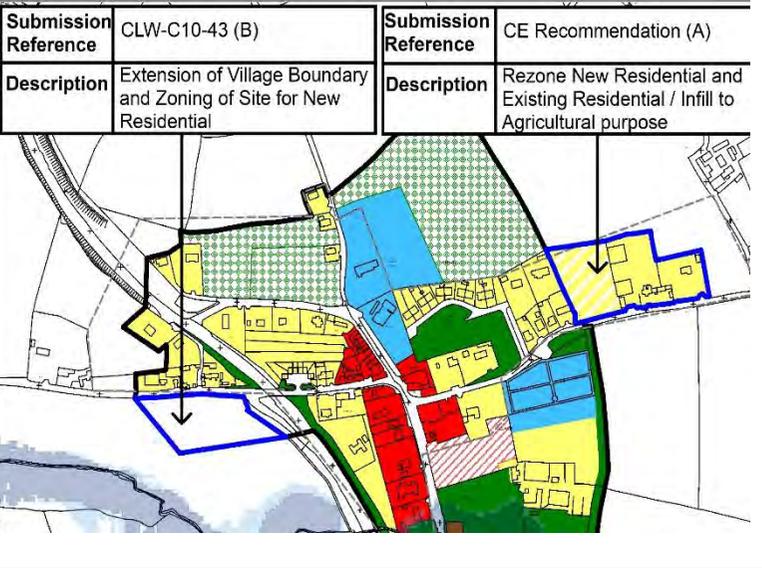
Submission Reference	CE Recommendation (A)
Description	Rezone New Residential to Community / Education

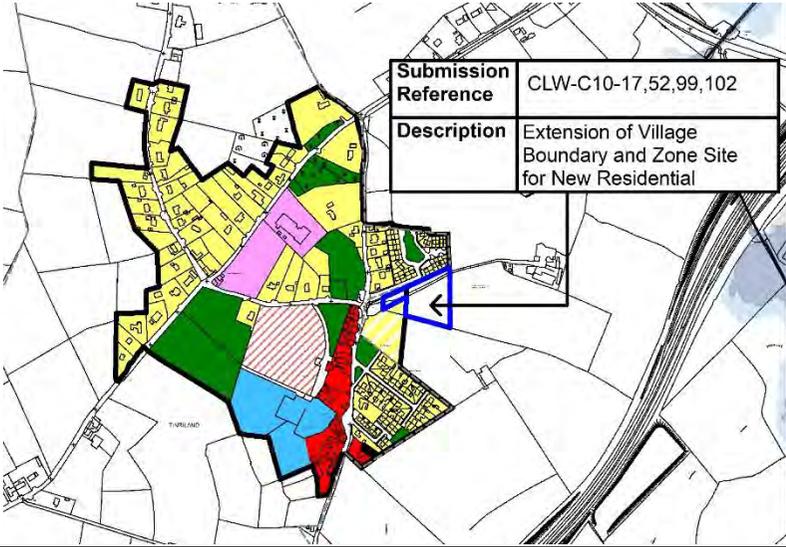
Submission Reference	CLW-C10-35 (B)
Description	Extension of Village Boundary and Zoning of Site for New Residential

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<ul style="list-style-type: none"> ▪ The subject lands are well served by a public water main with adequate capacity and pressure to sustain future village development. ▪ The subject lands are serviced by existing pathways and can be extended easily. ▪ All related services for the subject lands are next to adjacent residential developments. ▪ The subject lands are a 4-minute walk to the village centre. ▪ The subject lands have been deemed acceptable for low density residential in the Local Area Plan 2006 and were the subject of planning permission for residential development in the past (Reg. Refs. 07/496 and 12/241- Sub 35). ▪ The subject lands have been deemed acceptable for low density residential in the Local Area Plan 2006 and were the subject of planning permission for residential development in the past (Reg. Refs. 03/351 and 10/347 – Sub 36). ▪ Rezoning the subject lands can only assist in reversing population decline and will improve the supply of residential units for Rathtoe. 		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing Rathtoe or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
4.15.12 Fennagh		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing settlements or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)

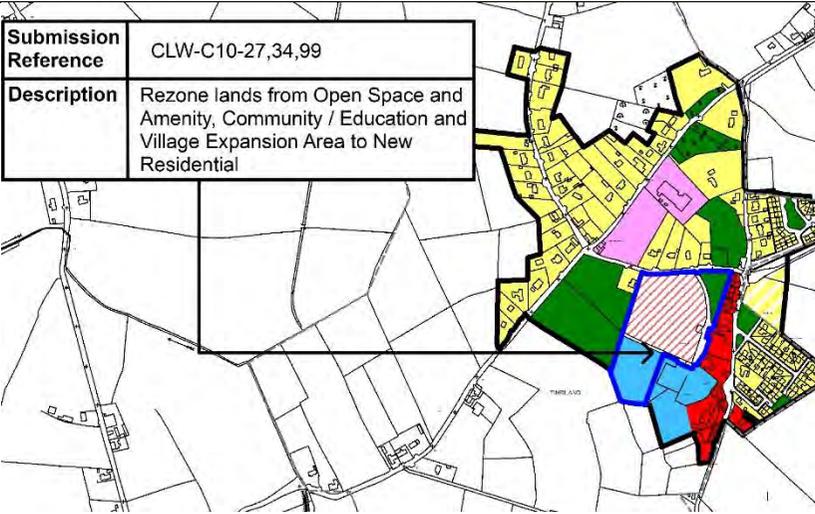
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
<p>3.15 Town and Village Plans / Settlement Plans</p>						
<p>4.15.13 Myshall</p>						
<p>Requests that the village boundary line should include land that has been used as social enterprise since the 1960s and is owned by Myshall Muintir na Tire. Requests that the land should be designated as Community Land.</p> <table border="1" data-bbox="219 667 607 786"> <tr> <td>Submission Reference</td> <td>CLW-C10-87</td> </tr> <tr> <td>Description</td> <td>Extension of Town Boundary and Zoning of Site for Community / Educational</td> </tr> </table> 	Submission Reference	CLW-C10-87	Description	Extension of Town Boundary and Zoning of Site for Community / Educational	<p>CLW-C10-87</p>	<p>Myshall is designated as a larger serviced village with a population of 286 persons in 2016. It has a strong village core with important retail, community and services provisions located therein. The village has also been identified as an appropriate hub for tourism at an appropriate scale to support sustainable growth. The zoning of this site for community related uses would help enhance and strengthen existing facilities / services within the village catering for residents of the village and the wider hinterland.</p> <p>The zoning of this site for Community / Education would be in accordance with the core strategy policy CSP 10: which seeks to <i>promote serviced villages as an attractive housing option for rural areas of the county through the promotion of quality of life, placemaking and sufficient local services and infrastructure provision.</i></p> <p>Recommendation: The lands located as outside the village boundary in the Draft Plan be rezoned to community/ Education and the village boundary extended accordingly.</p>
Submission Reference	CLW-C10-87					
Description	Extension of Town Boundary and Zoning of Site for Community / Educational					

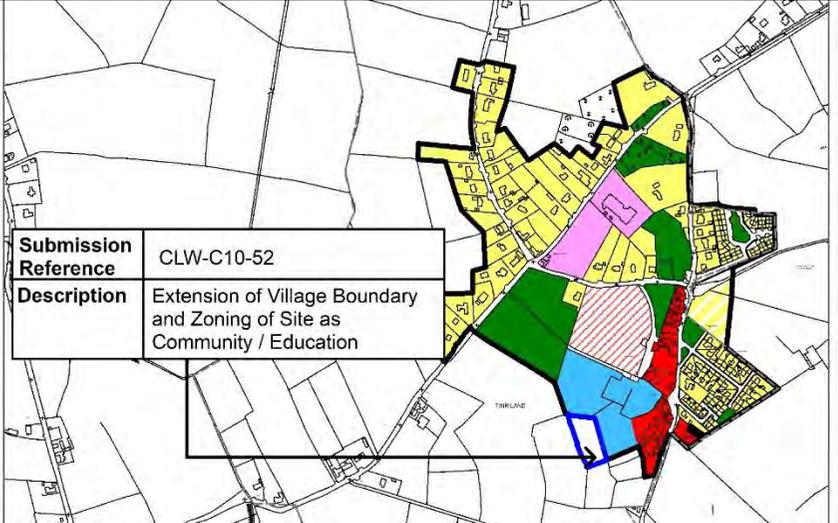
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
4.15.14 Clonegall		
OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing settlements or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
4.15.15 Kildavin		
<p>Requests that the village boundary of Kildavin is amended to include 2.61 hectares of land at the western side of the village and notes the following in this regard:</p> <ul style="list-style-type: none"> ▪ The previous Kildavin Village Local Area Plan 2007 included a much greater area of zoned land for potential development, including a larger area of 6.85 hectares owned by the Murphy family. ▪ The zoning request is timely for Kildavin as it will enable the construction of additional dwellings that will increase the sustainability of the local community in terms of school attendance and to contribute to commercial viability and sustainability. ▪ Recent shift in work practices brought about by Covid-19 Pandemic provides a new and realistic opportunity for rural areas to participate and share the overall growth in Ireland's economy. ▪ The lands are situated off the N80 in an ideal location for high quality development of medium density residential dwellings within the village community. ▪ The land can provide sustainable housing within easy access to support local services such as childcare, education, village and commercial enterprise/amenities. 	CLW-C10-43	<p>Under the provisions of the Draft Plan Kildavin is designated as a serviced village to accommodate 16 no. units over the Plan period. A further review of the lands identified for new residential has been conducted. An estimated 10 no. units were proposed for new residential to the east of the village. Following further consideration of this site it is considered that the likelihood of the development of this area for residential purposes is limited given the established use of the site and adjoining lands / property for an established agricultural enterprise.</p> <p>Accordingly, it is considered that lands to the east of the settlement be rezoned from new / existing residential / infill to agricultural purposes. The 10 no. units to be re- allocated to the site the subject of this submission, located to the front of the site outside existing flood zones wherein vulnerable lands uses would not pass the justification test .</p> <p>Recommendation</p> <ol style="list-style-type: none"> a. Rezone new residential and existing residential / infill to agricultural purpose. b. Extend the village boundary and zone c.1ha for new residential purposes.

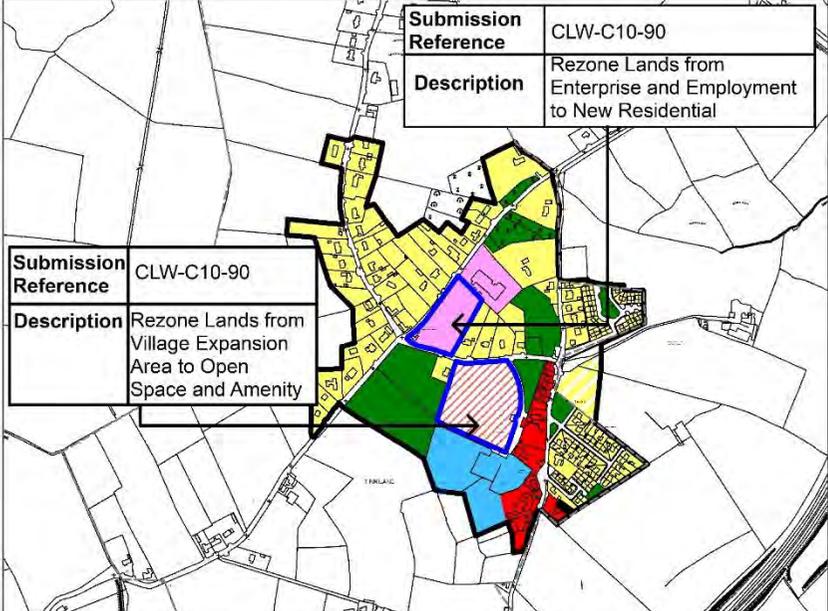
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation												
3.15 Town and Village Plans / Settlement Plans														
<table border="1" data-bbox="347 459 750 582"> <tr> <td>Submission Reference</td> <td>CLW-C10-43</td> </tr> <tr> <td>Description</td> <td>Extension of Village Boundary and Zoning of Site for New Residential</td> </tr> </table> 	Submission Reference	CLW-C10-43	Description	Extension of Village Boundary and Zoning of Site for New Residential		<table border="1" data-bbox="1377 459 1758 582"> <tr> <td>Submission Reference</td> <td>CLW-C10-43 (B)</td> </tr> <tr> <td>Description</td> <td>Extension of Village Boundary and Zoning of Site for New Residential</td> </tr> </table> <table border="1" data-bbox="1758 459 2139 582"> <tr> <td>Submission Reference</td> <td>CE Recommendation (A)</td> </tr> <tr> <td>Description</td> <td>Rezone New Residential and Existing Residential / Infill to Agricultural purpose</td> </tr> </table> 	Submission Reference	CLW-C10-43 (B)	Description	Extension of Village Boundary and Zoning of Site for New Residential	Submission Reference	CE Recommendation (A)	Description	Rezone New Residential and Existing Residential / Infill to Agricultural purpose
Submission Reference	CLW-C10-43													
Description	Extension of Village Boundary and Zoning of Site for New Residential													
Submission Reference	CLW-C10-43 (B)													
Description	Extension of Village Boundary and Zoning of Site for New Residential													
Submission Reference	CE Recommendation (A)													
Description	Rezone New Residential and Existing Residential / Infill to Agricultural purpose													
<p>OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the settlement / sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.</p>	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)												
4.15.16 Tinryland														
<p>Requests that an area of 0.833ha be included in a future Plan for Tinryland due to its location in the centre of the village, proximity to church, school and local amenities,</p>	CLW-C10-17	<p>Given the wastewater infrastructural constraints in Tinryland limited residential development is anticipated over the period of this Plan. However, given the location of this site within the centre of the settlement and the size of same at</p>												

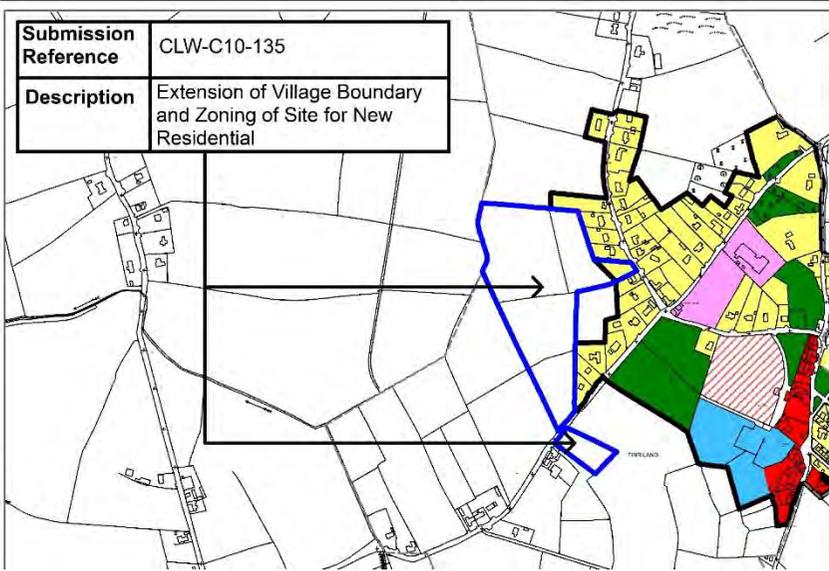
Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>appropriateness for infill development, proximity to Carlow, the motorway and availability of suitable lands.</p> 	<p>CLWC10-99 CWI-C10-102</p>	<p>0.8ha, it is considered that an additional three number additional units on private treatment systems pending provision of an upgraded effluent treatment system would be open for consideration and accordingly it is recommended that the lands be zoned for new residential development.</p> <p>Recommendation Extend the village boundary and rezone the site new residential.</p>
<p>Submissions:</p> <ul style="list-style-type: none"> (i) Welcomes zoning of lands in use by St. Josephs AFC Soccer club at McArdle's Cross (ii) Proposes the rezoning of area in front of the Parochial House from Village Expansion to a mixture of new residential and social housing. 	<p>CLW-C10-27 CLW - C10-34 CLW-C10-99</p>	<ul style="list-style-type: none"> (i) Noted (ii) The area identified for village expansion provides for a variety of potential uses to include residential, commercial, retail, community, services etc. The provision of residential uses is not precluded on this site subject to infrastructural wastewater constraints being addressed. It is appropriately located within the centre of the village to accommodate a variety of uses and the zoning of the site for village expansion provides a level of

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>(iii) Requests inclusion in residential zoned also of an area of open space.</p> <p>(iv) Requests the area between the cemetery and the soccer pitch zoned community and education be changed to residential in the draft plan.</p> <p>(v) A small area below the school to be retained for education to provide extra ground for the school.</p>		<p>flexibility which is appropriate to the proper planning and sustainable development of the village.</p> <p>(iii) It is considered that the rezoning of lands to the front (avenue) of the Parochial House from open space and amenity to residential would be inappropriate and would have an adverse visual impact on the setting and character of the Parochial House which is a protected structure (CW 505) which would be contrary to Council policy PS P2 which seeks to ensure the protection and conservation of the character, setting and special interest of all buildings in the record of protected structures, including their curtilage, attendant grounds, and fixtures and fittings.</p> <p>(iv) Having regard to the location of the site adjoining a concentrated nucleus of community related uses i.e the cemetery, the Church and school it is considered appropriate that the landholding be identified for future expansion of existing or new community uses to service the village and surrounding rural area. Uses permitted in principle include education facility, cultural uses, places of worship, health related facilities, cemetery, medical related uses, nursing home, recreational facilities etc.</p> <p>(v) Noted</p> <p>Recommendation</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.15 Town and Village Plans / Settlement Plans						
<table border="1" data-bbox="331 470 801 630"> <tr> <td>Submission Reference</td> <td>CLW-C10-27,34,99</td> </tr> <tr> <td>Description</td> <td>Rezone lands from Open Space and Amenity, Community / Education and Village Expansion Area to New Residential</td> </tr> </table> 	Submission Reference	CLW-C10-27,34,99	Description	Rezone lands from Open Space and Amenity, Community / Education and Village Expansion Area to New Residential		No change to Draft Plan.
Submission Reference	CLW-C10-27,34,99					
Description	Rezone lands from Open Space and Amenity, Community / Education and Village Expansion Area to New Residential					
<p>Submission proposes that the area behind Tinryland National School should be zoned as Community/Education, and refers to the following details:</p> <ul style="list-style-type: none"> ▪ The school is increasing in size and is currently engaged in a large construction project. ▪ The new school extension will take a considerable amount of an existing playground area once complete. ▪ The area behind the school, current used as agricultural land, is ideally location to provide extra playground space. 	CLW-C10-52 CLW-C10-99	<p>Tinryland is designated as a larger serviced village with a population of 378 persons in 2016. It has a strong village character with important community and services provisions located therein. The school is located within the village and is experiencing growth in numbers. The zoning of this site for community/ education related uses would help future proof development potential for the school, would enhance and strengthen existing facilities / services within the village catering for residents of the village and the wider hinterland.</p> <p>The zoning of this site for Community / Education would be in accordance with the core strategy policy CSP 10: which seeks to <i>promote serviced villages as an attractive housing option for rural areas of the county through the promotion of</i></p>				

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
 <p data-bbox="210 1011 1133 1102">Separately the submission refers to a very small area proposed as New Residential, that this is most disappointing, and that there are parents of pupils actively seeking sites/housing in Tinryland Village</p>		<p data-bbox="1317 459 2078 517"><i>quality of life, placemaking and sufficient local services and infrastructure provision.</i></p> <p data-bbox="1317 555 2107 676">Recommendation: The lands located as outside the village boundary in the Draft Plan be rezoned to community/ Education and the village boundary extended accordingly.</p>
<p data-bbox="210 1110 1133 1168">Submission is seeking proposed changes in zoning from Enterprise and Employment to New Residential.</p>	<p data-bbox="1196 1110 1279 1216">CLW-C10-90 CLW-C10-91</p>	<p data-bbox="1317 1110 2157 1391">Tinryland is designated as a larger serviced village with a population of 378 persons in 2016. It has a strong village character with important community and services provisions located therein. To the north east of the site subject of this zoning request is a long-established business in the village. Supporting the continued expansion and concentration of employment related uses in the village in the medium to long term is appropriate creating more sustainable communities and village centres. This approach is in accordance with the proper planning and sustainable development of the area. Additional zoning for significant residential development would be also be contrary to the core</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
 <p>Submission Reference CLW-C10-90 Description Rezone Lands from Enterprise and Employment to New Residential</p> <p>Submission Reference CLW-C10-90 Description Rezone Lands from Village Expansion Area to Open Space and Amenity</p>		<p>strategy given the significant constraints due to wastewater infrastructure capacity.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Change from Village Expansion area to Open Space and Amenity as this is a much-used walking route by members of the community and the Tinryland Athletics Club also forming an integral part of the route for the Carlow Cross Country Championships and Odium Cup (see map above).</p>	<p>CLW-C10-90 CLW-C10-91</p>	<p>Sufficient lands have been designated public open space and amenity within the settlement of Tinryland to cater for the needs of the local population. The lands identified for Village Expansion are appropriately located adjoining the existing village core to provide for a variety of potential uses to include residential, commercial, retail, community, services etc. Reinforcing the centre of the village to ensure its long-term vitality and viability is in accordance with the proper planning and sustainable development of the settlement. Significant development will be subject to addressing wastewater infrastructural capacity constraints.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation				
3.15 Town and Village Plans / Settlement Plans						
		<p>Recommendation No change to Draft Plan.</p>				
<p>Requests the zoning of 11.8ha for low residential density 0.5km from the village centre and 1km from the school and within 1km of the N80. It is submitted that these land holdings are pivotal for the future development of Tinryland as an expanding community providing for the local school and service infrastructure.</p> <div data-bbox="273 718 1102 1289"> <table border="1"> <tr> <td>Submission Reference</td> <td>CLW-C10-135</td> </tr> <tr> <td>Description</td> <td>Extension of Village Boundary and Zoning of Site for New Residential</td> </tr> </table>  </div>	Submission Reference	CLW-C10-135	Description	Extension of Village Boundary and Zoning of Site for New Residential	<p>CLW-C10-135</p>	<p>A small portion of the landholding along the public road (L-1022-0) has been zoned existing / residential / infill and could potentially accommodate a single dwelling unit on a private treatment system subject to compliance with siting and design considerations. The zoning of the remainder of the landholding having regard to its scale, leapfrogging more appropriate sequentially appropriate land and given the capacity constraints in the wastewater treatment system servicing Tinryland would be contrary to the core strategy and the proper planning and sustainable development of the area.</p> <p>Recommendation No change to Draft Plan.</p>
Submission Reference	CLW-C10-135					
Description	Extension of Village Boundary and Zoning of Site for New Residential					

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
SMALLER SERVICED VILLAGES		
4.15.17 Bennekerry / Glynn / Old Leighlin / St. Mullins		
OPW welcomes the measures outlined in the SFRA to restrict new highly vulnerable development to Flood Zone C, and less vulnerable development to Flood Zone B. It would be beneficial if these measures were incorporated into the settlement plans supported by settlement policy objectives.	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
RURAL NODES		
4.15.18 Ballymurphy		
OPW welcomes the measures outlined in the SFRA to restrict new highly vulnerable development to Flood Zone C, and less vulnerable development to Flood Zone B. It would be beneficial if these measures were incorporated into the settlement plans supported by settlement policy objectives	CLW-C10-24	Agreed; Refer to response to Recommendation no. 9 (OPR Submission Section 2.3)
4.15.19 Grange		
Request that the future Development of the lands at Slaney-Quarter Grange, Tullow remain zoned for development as it is the intention of the owner to complete the previously permitted development (PI No 04/686). 10 houses of a previously permitted development	CLW-C10-58	As indicated in Section 15.6 Grange is serviced by a number of wastewater treatment plants not in the control of Irish Water. On this basis it has been designated as a rural node with residential development where deemed

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
3.15 Town and Village Plans / Settlement Plans		
<p>(104 units, shop and creche), including services for approx. 35 more units were laid to include, Roads, Footpaths, ESB, Public Lighting and Storm and Foul sewer.</p> <p>References that there are ongoing talks with Irish Water / Carlow Co Co in relation to services in the greater Grange Area from Tullow. Notes that once works on the Tullow Plant are due to be completed by the end of 2022. States that leaving these Lands out of the 2022-2028 Carlow Development Plan leaves the existing 10 residents in a very vulnerable position for the next 10 years and that there is no reason why this development of affordable Houses should not be going to market in Late 2023 due to the large amount of works already carried out on this land.</p>		<p>appropriate to be facilitated on sites of 0.2 ha serviced by private individual treatment systems.</p> <p>In the event that public infrastructure is provided in the settlement the position regarding the designation of the settlement and scale of residential development deemed appropriate can be reviewed. At the present time it is premature in the absence of necessary infrastructure to cater for residential development schemes.</p> <p>Recommendation: No change to Draft Plan.</p>
3.15.20 General Comment		
<p>It is submitted that more lands in our towns and villages needs to be zoned in the Plan to allow expansion in population and to control house prices.</p>	CLW-C10-130	<p>Lands have been zoned with the towns and villages throughout the county to accord with the settlement strategy and further to submissions received following the consultation phase.</p> <p>Recommendation No further changes recommended apart from those contained in the foregoing section.</p>

Chapter 16: Development Management Standards

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
3.16.1 Climate Action and Development		
<p>Submission recommends that:</p> <ul style="list-style-type: none"> - Development Plans should encourage new development to move towards zero carbon across the full life-cycle by 2025. - All development must integrate circularity and resource efficiency principles. - All new development must integrate water efficiency measures. - Mitigation should be considered against increasing the carbon load over the plan period. - Design in adaptation for climate change in buildings. 	CLW-C10-3	<p>Chapter 16 promotes sustainable building practices and as identified in <i>Section 16.12.1 Built Environment - Climate Action</i> encourages all new development proposals to incorporate sustainable building practices and incorporate design and layout criteria which minimise energy use, including by passive solar design, energy efficient building design and emission reduction measures. An Energy Statement is also required to be submitted for all applications of 1000+sqm commercial / business development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered. It is considered that the foregoing suitably addresses the intent of this submission.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Submission would welcome:</p> <ol style="list-style-type: none"> 1. Consideration by the Council of the inclusion of an objective in the adopted Development Plan in relation to renewable energy and in relation to safeguarding the national road network, indicating that grid connection routing options should be developed to safeguard the strategic function of the national road network in accordance with Government policy by utilising available alternatives, 2. Applications for Solar Farm developments should be accompanied by glint and glare assessments to assess impact on any nearby 	CLW-C10-16	<ol style="list-style-type: none"> 1. The plan references "the Spatial Planning and National Road Guidelines (2012)" which safeguards the strategic function of National Roads. Any planning applications received for such infrastructure which impact on National Roads will be forwarded to TII for comment. 2. Section 16.12.4 addresses solar energy and outlines the criteria for consideration as part of a planning application. This includes Glint and Glare impacts on roads, dwellings, national monuments, protected structures and other sensitive receptors. This provision will also cover national roads as referenced in the submission.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
national roads and such a requirement, relating to national roads, should be included as a provision of the Development Plan prior to adoption.		<p>Recommendation No change to Draft Plan.</p>
Submission requests that Carlow County Council promote the use of sustainable timber products in the forthcoming <i>Carlow County Development Plan 2022-2028</i>	CLW-C10-42	<p>Chapter 16 promotes sustainable building practices and as identified in Section 16.12.1 Built Environment - Climate Action encourages all new development proposals to incorporate sustainable building practices and incorporate design and layout criteria which minimise energy use, including by passive solar design, energy efficient building design and emission reduction measures. An Energy Statement is also required to be submitted for all applications of 1000+sqm commercial / business development or applications of 30+ residential units to demonstrate what energy efficiency and carbon reduction design measures are being considered. It is considered that the foregoing can be amended to include sustainable products.</p> <p>Recommendation Amend section 16.12.1 to include reference to sustainable products Built Environment - Climate Action.</p> <p>The Council will encourage all new development proposals to incorporate sustainable building practices, sustainable products and incorporate design and layout criteria which minimise energy use, including by passive solar design, energy efficient building design and emission reduction measures.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
3.16.2 Tourism Development		
Submission requests inclusion of proposed new policy/ objective to support the provision of accessible tourism.	CLW-C10-60	<p>Section 16.15 outlines development management standards for tourism related development and requires the submission of a supporting business and design statement outlining a number of criteria. One of the criteria to be addressed includes the provision of inclusive access. It is accepted that accessible tourism extends beyond access arrangements and entails ensuring that facilities are accessible to people with mobility issues, people with learning disabilities, visual or hearing impairment, young children and elderly people. Accordingly, additional text is recommended to reflect same.</p> <p>Recommendation Amend Section 16.15 Tourism Development with additional text. Any proposal for a tourism related activity or development shall include a supporting business and design statement outlining the following (bullet point no.7):</p> <ul style="list-style-type: none"> • Promotion of accessible tourism and provision of inclusive access.
3.16.3 Sustainable Travel and Transport		
NTA makes the following observations: <u>Section 5.1.4 Car Parking, Chapter 16 Table 16 Car Parking Standards</u>	CLW-C10-97	<u>Section 5.1.4 Car Parking, Chapter 16 Table 16 Car Parking Standards</u>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
<ul style="list-style-type: none"> ▪ Supports the Draft Plans use of maximum standards and in particular for non-residential uses. In locations where the highest intensity of development occurs an approach that caps car parking on an area wide basis should be considered. ▪ It is recommended that criteria relating to public transport accessibility levels (PTALS) and access to opportunities and services (ATOS) should be used to determine the most appropriate level of parking provision with the maximum standards specified. ▪ Within larger urban settlements PTALS and ATOS approach would be best supported by the preparation of Local Transport Plans. <p><u>Section 5.15 Bicycle Parking Facilities, Section 16.10.13 Cycle Parking, Table 16 Cycle Parking Standards</u></p> <ul style="list-style-type: none"> ▪ Inclusion of bicycle parking standards, specified as minima, is supported. ▪ Recommend use of <i>'Standards for Cycle Parking and Associated Cycling Facilities for New Developments'</i> issued by Dun Laoghaire-Rathdown County Council' in 2018 to inform specific policies relating to the provision and design of cycle parking in the urban realm. 		<p>Noted further consideration regarding car parking can be considered as part of the Local Transport Plan for Carlow Town as appropriate.</p> <p>Recommendation No change to Draft Plan.</p> <p><u>Section 5.15 Bicycle Parking Facilities, Section 16.10.13 Cycle Parking, Table 16 Cycle Parking Standards</u> Section 5.15 and Policy BP. P1 recognise the increasing contribution cycling provides as a healthy form of transport for work, education and leisure trips, and the importance of cycle parking facilities for promoting cycling as a sustainable mode of transport. Cycle parking standards are also included in Chapter 16, Section 16.10.13 and Table 16.6. In terms of the submissions reference to the <i>Standards for Cycle Parking and Associated Cycling Facilities for New Developments'</i>, it should be noted that the provision of cycle parking in urban areas of the County will be considered as part of the Council's preparation of Area Based Transport Assessments (ABTA) in accordance with relevant guidance documents, and as part of any local authority public realm projects.</p> <p>Recommendation No change to Draft Plan.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
3.16.4 Waste Management Infrastructure		
<p><u>Proposed inclusion of reference to Waste Management Infrastructure – Guidance for Siting Waste Management Facilities</u></p> <p>Notes that the upcoming National Waste Management Plan for a Circular Economy (NWMPCE), which is likely to be made in early 2022, will replace the Southern Region Waste Management Plan 2015-2021 and will include the new guidance document 'Waste Management Infrastructure – Guidance for Siting Waste Management Facilities', the scope of which includes broad siting criteria and facility specific guidance for consideration when siting a waste facility. It is recommended that reference is made to new guidance document <i>Waste Management Infrastructure – Guidance for Siting Waste Management Facilities</i>, within Chapter 16 <i>Development Management Standards</i>, in particular Section 16.11.8 <i>Waste Management Infrastructure</i>.</p>	CLW-C10-107	<p>It is considered premature at this stage to reference the guidance document given that same is not currently available to review and therefore requiring compliance with same at this stage in the process would be premature. Notwithstanding same, the guidance document if / when adopted will inform future policy considerations in the area of waste management and is appropriately covered under policy WM P1 wherein it is stated that it is the policy of the Council to "Implement European Union, National and Regional waste related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes".</p> <p>Recommendation No change to Draft Plan.</p>
<p><u>Submission recommends proposed inclusion of reference to new Draft Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects</u></p> <p>Recommend that reference be made to these new draft guidelines - <i>Best Practice Guidelines for the preparation of Resource Management Plans for Construction & Demolition Waste Projects</i>, in Section 16.11.5 on Construction and Environmental Management Plans.</p>	CLW-C10-107	<p>Reference as requested to best practice guidelines is considered appropriate and in accordance with proper planning and sustainable development.</p> <p>Recommendation Include additional text referencing best practice guidance as indicated in green:</p> <p>16.11.5 Construction and Environmental Management Plans Construction Environment Management Plans shall be a requirement of any major planning permission for residential, community, employment or infrastructure related development and implemented throughout the</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
		construction / operational period as appropriate. The Plan shall be prepared having regard to the EPA Best Practice Guidelines for the preparation of Resource Management Plans for Construction and Demolition Waste Projects , Such plans shall incorporate relevant mitigation measures which have been integrated into the plan / project and where relevant any Environmental Impact Assessment or Appropriate Assessment
3.16.5 Land Use Zoning / Matrix		
<p>This submission has requested that Carlow County Council consider the following during the finalisation of the new County Development Plan:</p> <ul style="list-style-type: none"> • Provide flexibility under the land use zonings and objectives in the County Development Plan in relation to An Post's existing facilities and operational requirements for both its retail and distribution/logistics-type land uses; • The inclusion of a new land use classification – <i>postal facilities (i.e. a building which facilitates mail services that can include processing, sorting and distribution of mail* this can be assessed open a case by case basis appropriate to site context and all other relevant policies, objectives and standards set out in the plan.)</i> – in the County Development Plan and identifying this use as 'Permitted in Principle' or 'Open for Consideration' across all zoning objectives including for Town Centre, Enterprise and Employment and Retail Warehousing zonings; 	CLW-C10-83	<p>Section 16.8 in Chapter 16 sets out the land use zoning categories and objectives for the town and village plans contained Chapter 15 of the Draft Plan. The permitted in principle and open for consideration uses for each land use zone as listed category in Table 16.9 are intended as general guidance only and are therefore not exhaustive. This is further clarified by sub-section 16.18.5 which states in this regard that <i>"Whilst an extensive list of potential land uses in the 'Permitted in Principle' and 'Open for Consideration' categories has been provided for each of the land use zones, it is recognised that there may be scenarios where there are proposals for uses that are not listed. Where this arises such proposals will be considered on their individual merits, with reference to the most appropriate use of a similar nature that is listed, and taking account of surrounding land uses, the compatibility of the use/development in the area in which it is proposed to locate, compliance with the relevant policy, objectives, standards and requirements as set out in this Plan, and the proper planning and sustainable development of the area"</i>.</p> <p>In view of the foregoing, it is considered that a new use classification for postal facilities as requested in the submission is not required. The land use</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
4.16 Development Management Standards		
		<p>zoning provisions in the Draft Plan are sufficiently comprehensive, robust, and flexible such that the development of existing and proposed postal services and facilities can be provided for subject to compliance with proper planning and sustainable development.</p> <p>Recommendation No change to Draft Plan.</p>
<p>Floor area limit of 1,200sq.m net for Neighbourhood Centres on pg. 145 of Retail Strategy and 1,500sq.m. gross limit in zoning objective would result in failure to achieve the necessary focus as recognized as an important Neighbourhood Centre consideration in the existing Retail Strategy for the Joint Spatial Plan 2012.</p>	CLW-C10-96	<p>See response to submission received CLW-C10-96.</p> <p>Recommendation It is recommended to amend the Permitted in Principal Uses under the zoning objective for Neighbourhood Facilities/Centre, provided in Table 16.9, from 'Shop (convenience ≤ 1,500 sqm)' to 'Shop (convenience ≤ 1,200 sqm net)'.</p>

Appendices to Chief Executive's Report

Appendix I – List of Persons / Bodies who made Submissions

Submissions	
CLW-C10-1 Seamus Grogan	CLW-C10-30 Sean Mahon on behalf of Jimmy O'Toole
CLW-C10-2 Social Enterprise Republic of Ireland	CLW-C10-31 Sean Mahon on behalf of Doyle's Shop Royal Oak Bagenalstown
CLW-C10-3 Irish Green Building Council	CLW-C10-32 Mark Bannon on behalf of Edward Nolan
CLW-C10-4 <i>Not valid</i>	CLW-C10-33 Thompson Project Management Ltd.
CLW-C10-5 <i>Not valid</i>	CLW-C10-34 Diocese of Kildare and Leighlin
CLW-C10-6 Health and Safety Authority	CLW-C10-35 Kehoe Architectural Design on behalf of Seamus O'Toole
CLW-C10-7 Pamela Glynn	CLW-C10-36 Kehoe Architectural Design on behalf of William Rooney
CLW-C10-8 <i>Not valid</i>	CLW-C10-37 Mark Bannon on behalf of Donald Coady
CLW-C10-9 Environmental Protection Agency	CLW-C10-38 Carlow Public Participation Network (PPN)
CLW-C10-10 Department of Transport	CLW-C10-39 Woodlawn Developments
CLW-C10-11 Eastern and Midlands Regional Assembly	CLW-C10-40 Carlow Chamber of Commerce, Industry and Tourism CLG
CLW-C10-12 Ger Barnard	CLW-C10-41 Tom McGimsey on behalf of Shamrock Square Ltd.
CLW-C10-13 Genesis Planning Consultants on behalf of Leslie Graham	CLW-C10-42 Coillte CGA
CLW-C10-14 Burgess Construction Services Ltd on behalf of Bunclody Estates Ltd.	CLW-C10-43 Kehoe Architectural Design on behalf of Edel Murphy
CLW-C10-15 Kildare County Council	CLW-C10-44 Ger Lawlor
CLW-C10-16 Transport Infrastructure Ireland	CLW-C10-45 Gillian Merrigan
CLW-C10-17 Edmond Hayden	CLW-C10-46 Alan Kenny
CLW-C10-18 Tom Walsh	CLW-C10-47 Bryan Thompson
CLW-C10-19 Lightsource bp	CLW-C10-48 Laois County Council
CLW-C10-20 Noelle Dunne	CLW-C10-49 Paul & Thelma Nolan
CLW-C10-21 Peter Thomson on behalf of Euro Care Limited	CLW-C10-50 Gerard Lister
CLW-C10-22 Ann Gittons	CLW-C10-51 Wind Energy Ireland
CLW-C10-23 Ronan O Riain	CLW-C10-52 Tinryland NS
CLW-C10-24 Office of Public Works	CLW-C10-53 Ailish Dore
CLW-C10-25 Gary Gill	CLW-C10-54 Dept. Environment Climate and Communications
CLW-C10-26 Coillte Renewable Energy	CLW-C10-55 Olivia O'Leary Save the Barrow Line Committee
CLW-C10-27 Thomas Little	CLW-C10-56 Art Mooney
CLW-C10-28 Local Authority Waters Programme	CLW-C10-57 Olivia O'Leary Save the Barrow Line Committee Duplicate 10-55
CLW-C10-29 Sean Mahon on behalf of Jim Farrell	CLW-C10-58 Woodlawn Developments

Submissions	
CLW-C10-59 Aviva	CLW-C10-93 Galetch Energy Developments
CLW-C10-60 Failte Ireland	CLW-C10-94 Niall Kelly
CLW-C10-61 Keep Ireland Open	CLW-C10-95 Irish Water
CLW-C10-62 Breda Ryan	CLW-C10-96 Lidl Ireland GmbH
CLW-C10-63 Turlough O'Brien	CLW-C10-97 National Transport Authority
CLW-C10-64 David Durdin Robertson	CLW-C10-98 Damian Howard
CLW-C10-65 Turley Town Planning Associates on behalf of Michael Quinn	CLW-C10-99 Jim Deane
CLW-C10-66 Lisa McCaffery	CLW-C10-100 Maisey O Sullivan
CLW-C10-67 Grainne Moran	CLW-C10-101 Office of the Planning Regulator
CLW-C10-68 Sarah Durdin Robertson	CLW-C10-102 Andy Gladney
CLW-C10-69 Pat Webb	CLW-C10-103 Dept of Housing, Local Government and Heritage - DAU
CLW-C10-70 Ceola Webb	CLW-C10-104 Department of Education
CLW-C10-71 Carlow Regional Game Council	CLW-C10-105 Irish Traveller Movement
CLW-C10-72 Save Mount Leinster	CLW-C10-106 Pádraig Webb
CLW-C10-73 Clogrenane Lime Ltd	CLW-C10-107 Southern Region Waste Management Plan Office
CLW-C10-74 National Scientific Committee for Cultural Landscape - ICOMOS	CLW-C10-108 Nesselside Builders UC
CLW-C10-75 James McDonnell	CLW-C10-109 Bernadette Power
CLW-C10-76 ESB	CLW-C10-110 Vanessa Liston
CLW-C10-77 Andy Beach	CLW-C10-111 3cea
CLW-C10-78 Carlow Barrow Users Group	CLW-C10-112 Ros Murray
CLW-C10-79 Bobby Quinn	CLW-C10-113 3cea
CLW-C10-80 Iarnód Éireann	CLW-C10-114 Swift Conservation Ireland
CLW-C10-81 Carlow Branch Birdwatch Ireland	CLW-C10-115 3cea re
CLW-C10-82 Southern Regional Assembly	CLW-C10-116 Theresa Shulver
CLW-C10-83 An Post	CLW-C10-117 Rosemary Rooney
CLW-C10-84 Swim Ireland	CLW-C10-118 Waterways Ireland
CLW-C10-85 Firtree Developments Ltd	CLW-C10-119 DAU - Duplicate of CLW-C10-103
CLW-C10-86 Margaret Brennan	CLW-C10-120 Peter Egan
CLW-C10-87 Myshall Muintir na Tire	CLW-C10-121 Brenda Kirwan
CLW-C10-88 The Arts Council	CLW-C10-122 Naomi and Robert Moore
CLW-C10-89 Susan Nancy Kelly	CLW-C10-123 St. Fiacc's Swimming Club
CLW-C10-90 Aoibhín Webb	CLW-C10-124 Niall Kelly Duplicate of CLW-C10-94
CLW-C10-91 Carole Webb	CLW-C10-125 Nicky Parle
CLW-C10-92 Galetch on behalf of Carlow Wind Limited	CLW-C10-126 Marty White

Submissions	
CLW-C10-127 Philip and Grainne Moran	CLW-C10-133 Richard and Helen Marnell
CLW-C10-128 Richard Walsh- Submission withdrawn	CLW-C10-134 Yvonne Bolger
CLW-C10-129 Arboretum Rachel Doyle and others	CLW-C10-135 Marie, Gerard and Leo Moore
CLW-C10-130 Gerry Dunne	CLW-C10-136 Paul Doyle
CLW-C10-131 Pat Purcell	CLW-C10-137 Richard Kelly
CLW-C10-132 Leighlinbridge Improvement Group	

Appendix II – Advertisement

CARLOW COUNTY COUNCIL
COMHAIRLE CONTAE CHEATHARLACH
DRAFT CARLOW COUNTY DEVELOPMENT PLAN 2022-2028

Notice is hereby given that Carlow County Council, being the Planning Authority for County Carlow has pursuant to Section 12 (1)(b) of the Planning and Development Act, 2000 (as amended), prepared a Draft County Development Plan for the period 2022-2028.

The Draft Plan is accompanied by:

- a Strategic Environmental Assessment (SEA) Environmental Report, prepared in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I No. 436 of 2004) (as amended),
- an Appropriate Assessment (AA) Natura Impact Report pursuant to the Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (as amended).
- and a Strategic Flood Risk Assessment pursuant to The Planning System and Flood Risk Management Guidelines (2009).

Display of Draft Plan

The Draft Plan (Written Statement, including Appendices), SEA Environmental Report, AA Natura Impact Report, Strategic Flood Risk Assessment and Maps may be inspected online from **21st July 2021 to 1st October 2021** inclusive at <https://consult.carlow.ie/>

The Draft Plan (Written Statement, including Appendices), SEA Environmental Report, AA Natura Impact Report and Maps will be on display from **21st July 2021 to 1st October 2021** and available to view by appointment only during opening hours (subject to COVID-19 restrictions) at the following locations:

Public Display	Address	Contact for appointment
Carlow County Council Planning Department	Athy Road, Carlow	059 9170310 or by emailing carlowcdp@carlowcoco.ie
Carlow Library	Tullow Street, Carlow	059 9129705 or by emailing library@carlowcoco.ie
Tullow Library	Inner Relief Road, Tullow	059 9136299 or by emailing library@carlowcoco.ie
Muinebheag Library	Main Street, Bagenalstown	059 9129703 or by emailing library@carlowcoco.ie
Borris Library	Lower Main Street, Borris	059 9170350 or by emailing library@carlowcoco.ie

Please note that the above offices / libraries and opening hours are subject to change in accordance with COVID-19 pandemic restrictions.

Copies of the Draft Plan are available for purchase from the Planning Department Carlow County Council, Athy Road, Carlow (Tel: 059 9170310 or by emailing carlowcdp@carlowcoco.ie)

Making a Submission

Submissions or observations regarding the Draft Plan and the associated environmental reports are hereby invited from the public and interested bodies between **21st July 2021 to 1st October 2021** inclusive. Children, or groups or associations representing the interests of children, are entitled to make submissions or observations. All written submissions or observations will be duly considered by the Planning Authority and taken into consideration before the making of the Plan.

Submissions may be made in one of the following ways:

1. Write to: Senior Executive Officer, Draft Carlow County Development Plan 2022-2028, Planning Department, Carlow County Council, Athy Road, Carlow.

or

2. Online: Via the online consultation portal at <https://consult.carlow.ie/>

Please note that submissions or observations that are emailed **cannot** be accepted and will be returned.

Closing date for submissions: 5.00pm 1st October 2021

NOTE

- All submissions are to be clearly marked with '**Draft Carlow County Development Plan 2022-2028**'.
- Be in one medium only i.e. hard copy or via the consultation portal online. This will avoid the duplication of submission reference number and will streamline the process.
- Include your name and address and, where relevant, details of any organisation, community group or company you represent on a separate page to the content of your submission in order to assist Carlow County Council in complying with the provisions of the Data Protection Act, as submission are legally required to be published on line.
- Include a map if you refer to particular location or features.
- Be clear, concise, and to the point. If you need to make a lengthy submission, please attach an executive summary to it.
- Preferably be in typed format in the interests of legibility.
- All submissions will form a part of the statutory Chief Executive's report to be presented to the elected members of Carlow County Council.
- Please be advised that all submissions received will be published online in accordance with the requirements of Section 12(8A) of the Planning and Development Act 2000 (as amended). You should ensure that no vexatious, libellous or confidential information, including confidential information relating to a third party (in respect of which the third party has not, expressly, or impliedly in the circumstances, consented to its disclosure) is included in your submission. The Planning Authority reserves the right to redact any submission or part thereof that does not comply with this requirement. Please be advised that the name of the person(s)/group(s) who made the submission will be published, but personal data will be redacted. This processing of your personal data is lawful under Article 6(1)(e) of the GDPR Regulations. The Council's Data Protection Policy, is available at <http://www.carlow.ie/wp-content/documents/uploads/Data%20Protection%20Policy%20GDPR%20Carlow%20Co%20Co%2013th%20June%202018.pdf>

YOU ARE STRONGLY ADVISED TO MAKE YOUR SUBMISSION AS EARLY AS POSSIBLE. LATE SUBMISSIONS WILL NOT BE ACCEPTED. LATEST TIME FOR RECEIPT OF SUBMISSIONS (POST/ONLINE) IS 5PM 1st OCTOBER 2021.

Michael Rainey
Director of Services
Planning, Economic Development and Corporate

Appendix III – List of Bodies Notified

Name	Organisation
Chief Executive	Laois County Council
Forward Planning	Laois County Council
Chief Executive	Kilkenny County Council
Senior Planner	Kilkenny County Council
Chief Executive	Wicklow County Council
Senior Planner, Forward Planning	Wicklow County Council
Chief Executive	Wexford County Council
Senior Executive Planner	Wexford County Council
Chief Executive	Kildare County Council
Forward Planning	Kildare County Council
Minister Darragh O'Brien	Department of Housing, Local Government and Heritage
The Manager, Development Applications Unit	Department of Housing, Local Government and Heritage
Eric Pepper, Corporate Support Unit	Department of the Environment, Climate and Communications
Cathy Hewitt	Department of Agriculture, Food, and the Marine
Minister Simon Coveney	Department of Defence
Alan Hanlon, Higher Executive Officer, Site Acquisitions and Property Management	Department for Education
Minister Heather Humphreys	Department of Rural and Community Development
Minister Leo Varadkar	Department of Enterprise, Trade and Employment
Minister Eamon Ryan	Department of Transport
Regional Planning Officer	Regional Planning Officer, Southern Regional Assembly
Jim Conway, Director	Eastern & Midland Regional Authority
Dr Ciaran Byrne, CEO	Inland Fisheries Ireland
Tadhg O'Mahoney, Senior Scientific Officer	Environmental Protection Agency
John Curtin, Director of Flood Risk Management	OPW
Jana Goold, Regional Forward Planning Specialist	Uisce Eireann / Irish Water
John McDonagh, A/CEO	Waterways Ireland
Seán Woods, Executive Officer	Office of the Planning Regulator
Mary Tucker, Executive Officer	An Bórd Pleanála
Prof. Kevin Rafter	An Comhairle Ealaíon
Paul Kelly, Chief Executive	Fáilte Ireland
Virginia Teehan, CEO	Heritage Council
Dalton Philips, CEO	Dublin Airport Authority
Mark Foley, CEO	Eirgrid
Pat O'Doherty	ESB (Electric Ireland)

Ann Marie Part	Health Service Executive
Dr. Sharon McGuinness, CEO	The Health and Safety Authority
Ms Phoebe Duvall, Planning and Environmental Policy Officer	An Taisce
Michael McCormack, Senior Land Use Planner	Transport Infrastructure Ireland
To Whom It May Concern	National Transport Authority
Margaret Moore, Development Officer	LCDC
To Whom It May Concern	Commission for the Regulation of Utilities
To Whom It May Concern	Carlow County Development Partnership
Jennifer Murnane O'Connor	TD
Mr. Fergal Browne	Member Carlow County Council
Mr. John Cassin	Member Carlow County Council
Ms. Andrea Dalton	Member Carlow County Council
Mr. Michael Doran	Member Carlow County Council
Mr. Andy Gladney	Member Carlow County Council
Mr. Thomas Kinsella	Member Carlow County Council
Mr Arthur McDonald	Member Carlow County Council
Mr. John McDonald	Member Carlow County Council
Mr. Ken Murnane	Member Carlow County Council
Mr. Charlie Murphy	Member Carlow County Council
Mr. John Murphy	Member Carlow County Council
Mr. Brian O'Donoghue	Member Carlow County Council
Mr. Tom O'Neill	Member Carlow County Council
Mr. William Paton	Member Carlow County Council
Mr. John Pender	Member Carlow County Council
Mr. Fintan Phelan	Member Carlow County Council
Mr. William Quinn	Member Carlow County Council
Ms. Adrienne Wallace	Member Carlow County Council
Fiona Broadbery	Public Participation Network
IDA Ireland	Three Park Place
Julia Sinnamon, Chief Executive	Enterprise Ireland
Liam Kelly	SPC
Joe Campbell	SPC
George Collier	SPC
Brian Byrne	SPC
Brian O'Farrell	Carlow Chamber of Commerce

Appendix IV – Core Strategy Table Update

SETTLEMENT TYPE	SETTLEMENT NAME	Population and Housing						Land Zoning Required					
		Census 2016 Population	Census 2016 (%)	Projected Population Increase 2028	Housing Target (units)	Housing Target (%)	Residual Provision	Housing Yield on Existing undeveloped Zoned Land in Existing Plan	Quantum of undeveloped zoned Town / Village Centre that can accommodate an element of Residential 2022-2028 (ha)	Quantum of Land Zoned New Residential (ha)	Potential Units deliverable on town Centre / Village Centre Lands 2022-2028	Quantum of Housing Units for land zoned new Residential	% of Units that can be accommodated on brownfield / infill
County		56,932		3,064	3,107								
Key Town	Carlow Town ⁴	19,994	35%	3064	1352 1330 (900 within TC area)	42.8%	333	790 ⁵ 1087 ⁶	8.75	17	370	530	100% ⁷
District Towns	Tullow	4,673	8%	919	404	13%	101	514	4.31	21 ⁸	52	295	Subject to LAP Review (2023)
	Muine Bheag	2,837	5%	671	295	10%	74	494	2.42	32.5 ⁹	52	362	Subject to LAP Review (2023)
Small Towns*	Rathvilly	944	1.7%	141	62	2%	16	N/A	1.4	5.0 5.7	10	52 68	68%
	Leighlinbridge	914	1.6%	226	99	3%	-	N/A	0.2	4.42	6	93	100%
	Ballon	712	1.2%	141	62	2%	-	N/A	1.8	2.0	22	40	100%
	Borris	652	1.1%	141	62	2%	10	N/A	3.93	2.52 3.52	32	30 40	100% 86%
	Hacketstown	597	1%	127	56	1.8%	-	N/A	1.0	4.3	16	40	64%
	Carrickduff	442	0.8%	76	33	1%	5	N/A	0	3.5 3.4	0	33 38	73% 29%
	Tinnahinch	306	0.5%	60	26	0.8%	-	26	0	2.4	0	26	100%
Larger Serviced Villages*	Palatine	398	0.7%	57	25	0.8%	-	N/A	2.34	1.23	11	14	64%
	Ballinabrannagh	466	0.8%	14	6 25	0.8%	-	N/A	1.37	2.46 4.25	4	5 21	100%
	Rathoe	304	0.5%	41	18	0.6%	-	N/A	0.59	2.33 1.3	6	12	33%
	Fennagh	402	0.7%	57	25	0.8%	-	N/A	1.8	0.69	15	10	80%
	Myshall	286	0.5%	51	23	0.7%	-	N/A	0.8	2.17	2	20	52%
	Clonegal	278	0.5%	21	9	0.3%	-	N/A	0.87	2.5	0	9	100%
	Kildavin	184	0.3%	35	16	0.5%	-	N/A	0.7	0.74 1.0	6	10	63% 38%
	Tinryland	378	0.66%	21	9 12	0.3%	-	N/A	2.21	0.69 1.49	4	5 8	100% 75%
Smaller Serviced Villages	Bennekerry, Old Leighlin, Nurney, Ardattin, Glynn, Ticknock, Ballinkillen, Bilboa, St. Mullins, Clonmore												
				271	119	3.8%							
Rural Areas	Rural Nodes and Rural One Offs												
	Grange, Drumpheha, Ballymurphy, Garyhill, Rathanna, Newtown, Newtown- Fennagh.												
				934	406	13%							

Indicative Densities

	Town Centre	Edge of Centre
Carlow Town	>35ha	25-30ha
Tullow Muine Bheag	>30ha	20-30ha
Smaller Towns	25-30ha	20-25ha**
Villages	20-25	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) .

⁴ Allocation includes Carlow Environs which will be subject to a Joint Urban Area Plan with Laois County Council. This plan provides an allocation of 900 units to the former Town Council Area with the balance of units to be provided in the Carlow Environs Area.

⁵ Town Council Area.

⁶ Carlow Environs LAP Area.

⁷ Town Council Area.

⁸ As per Core Strategy of existing Tullow LAP 2017-2023- Zonings will be reviewed as part of LAP process in 2022/2023.

⁹ As per Core Strategy of existing Muine Bheag / Royal Oak LAP 2017-2023- Zonings will be reviewed as part of LAP process in 2022/2023.

Appendix V – Tullow and Muine Bheag Strategic Policy and Constraints Map

DRAFT CARLOW COUNTY
DEVELOPMENT PLAN
2022 - 2028



Legend

- Settlement Consolidation Sites
- Regeneration / Opportunity Sites
- Core Retail Area
(See Appendix V - Retail Strategy)
- Retail Opportunity Sites
(See Appendix V - Retail Strategy)
- Special Areas of Conservation
- Flood Zone A - Risk of Flooding Once Every 100 years
- Flood Zone B - Risk of Flooding Once Every 1000 years
- CFRAM Tullow Defended Area
- CSO Settlement Boundary
- Tullow LAP Boundary 2017 - 2023

Tullow - Strategic Policy & Constraints Map



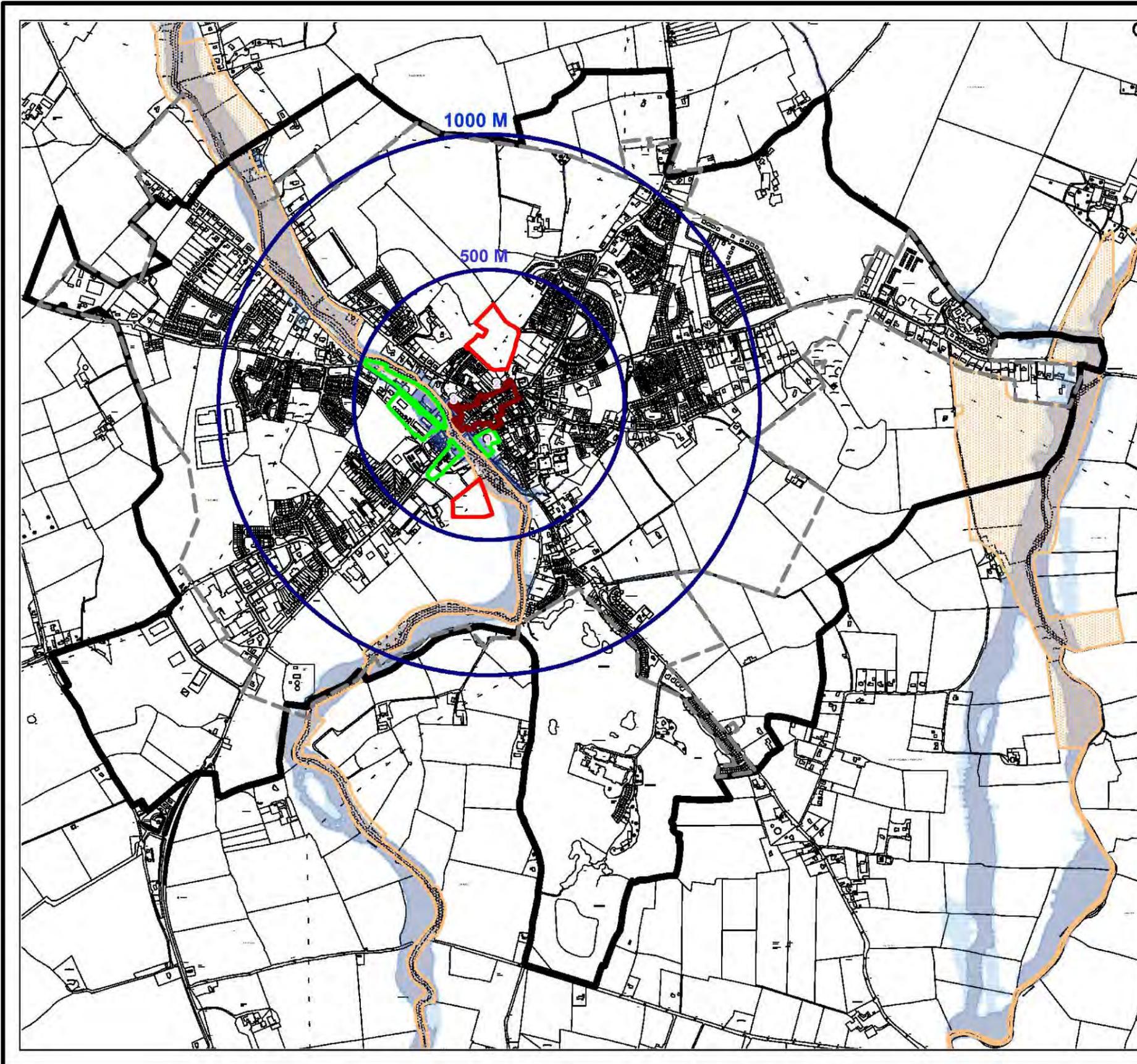
CARLOW COUNTY COUNCIL
FORWARD PLANNING SECTION

Drawn: William Barry

Checked: Anita Sweeney

Approved:

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DRAFT CARLOW COUNTY
DEVELOPMENT PLAN
2022 - 2028



Legend

- Settlement Consolidation Sites
- Regeneration / Opportunity Sites
- Core Retail Area
- Retail Opportunity Sites
(See Appendix V - Retail Strategy)
- Special Areas of Conservation
- Flood Zone A - Risk of Flooding Once Every 100 years
- Flood Zone B - Risk of Flooding Once Every 1000 years
- Dunleckny Stream Modelling - 10 Year Flood Event Extent
- Dunleckny Stream Modelling - 100 Year Flood Event Extent
- Dunleckny Stream Modelling - 1000 Year Flood Event Extent
- CSO Settlement Boundary
- Muine Bheag / Royal Oak LAP Boundary 2017 - 2023

Muine Bheag - Strategic Policy & Constraints
Map



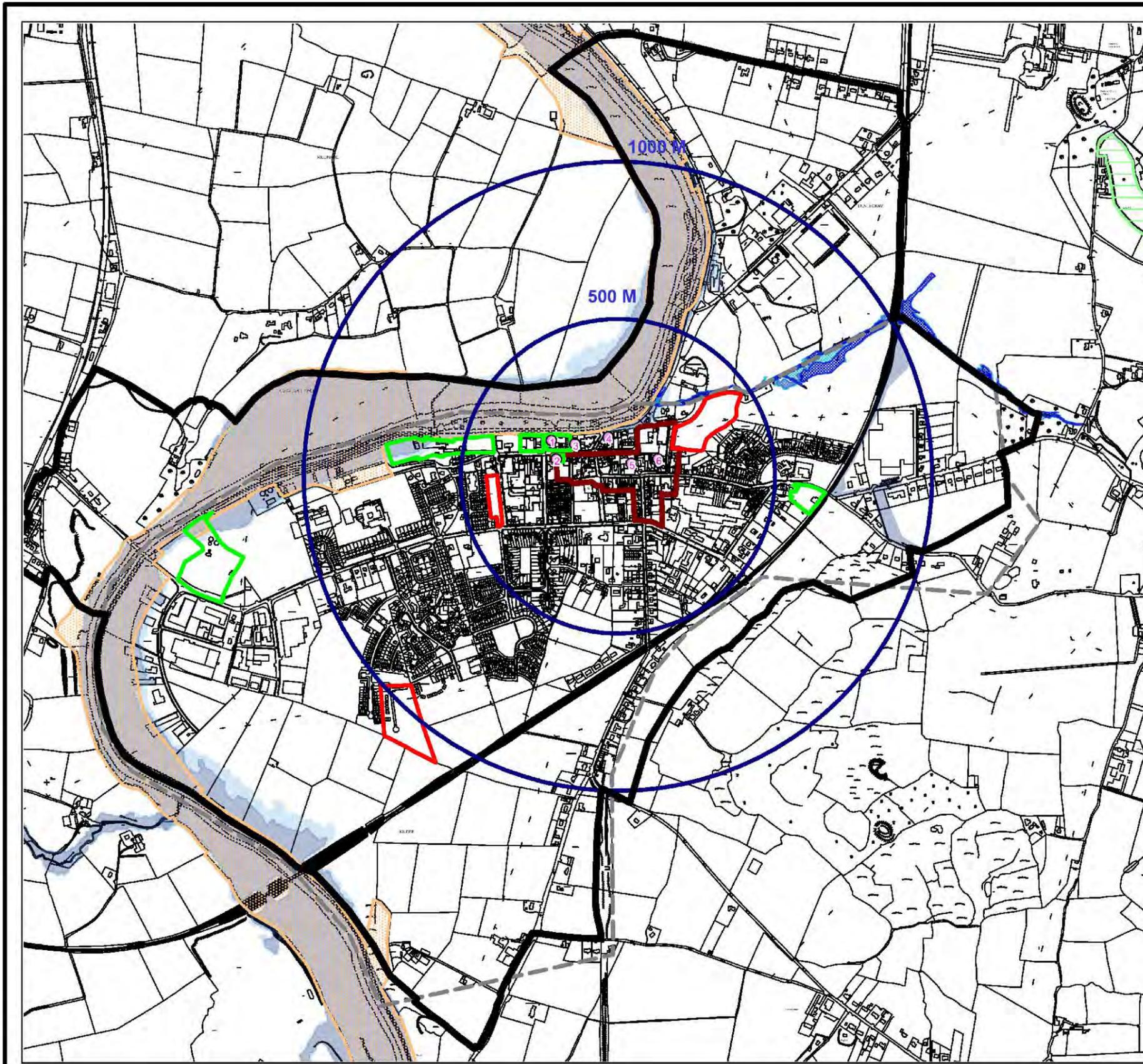
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Appendix VI – Implementation and Monitoring

16.19 Implementation and Monitoring

16.19.1 Introduction

Carlow County Council is committed to the continuous process of implementing and monitoring the policies and objectives contained in the Carlow County Development Plan 2022-2028 and will occupy a leadership role in progressing same.

Many policies and objectives in the Plan relate to development management processes, which can be implemented through established internal procedures in the Council. The intention of other policies and objectives in the Plan can be wide-ranging, and for this reason their successful implementation can necessitate a collaborative approach with a range of agencies and stakeholders, including local communities, governmental and non-governmental bodies and agencies, and adjoining local authorities.

It should also be noted that there are policies and objectives aimed at supporting an intended outcome, rather than being the direct means of delivering the outcome. In this regard, the implementation of policies and objectives in the Plan, including the desired planning outcomes, can be subject to external factors such as the availability of resources, political support, and economic circumstances in terms of Council funding and the availability of capital from other sources.

The Council's Planning Department is primarily responsible for implementing and monitoring the Plan through its forward planning and development management functions. However, the cross-functional content of the Plan is such that it also coordinates the policies and objectives of the Council's other internal departments, such as the Transportation Department, Environment and Water Services Departments, Housing Department, Community Department, and Local Enterprise Office. In addition, the scope of certain objectives in the Plan can be such that external bodies such as Irish Water, the Environmental Protection Agency, the OPW, or Transport Infrastructure Ireland, can be responsible for their implementation.

In the preparation and drafting of this Plan every effort has been made, as far as is practicable, to formulate policies and objectives that are specific, measurable, achievable, and realistic. The policies and objectives in the Plan have all also been formulated with the aim of fulfilling the Vision for County Carlow, including the cross-cutting themes which underpin the Plan and the Strategic Objectives, as set out in Chapter 1 (See Table 16.10 below). The Strategic Objectives in the Plan are themselves broadly aligned with the National Strategic Outcomes of the NPF, the Regional Strategic Outcomes of the RSES, and the United Nations Sustainable Development Goals.

Table 16.10

Strategic Objectives		
S. O1	Compact Growth, Consolidation, Regeneration.	Direct new development in accordance with the Core and Settlement Strategies which will provide for the sustainable development of the County for the period 2022-2028 in accordance with the principles of compact growth, consolidation and regeneration.
S. O2	Carlow Town	Support and promote the role of Carlow Town as a Regional and Inter-regional economic growth driver and to fulfil its role as a Key Town, focussed on regeneration, implementation of Project Carlow 2040 A Vision for Regeneration, sustainable development, quality of life and economic investment.
S. O3	IT Carlow & Technological University of the South East	Support and facilitate the development and further expansion of IT Carlow, its links with industry and its transition with IT Waterford to the Technological University of the South East which is critical for the optimum social and economic development of the region.

S. O4	Role of District Towns	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.
S. O5	Economic Development	Maintain and promote a broad economic and employment base in the County which seeks to maximise the economic assets of the County, including third level institutes, the strategic location of Carlow proximate to Dublin and Waterford Cities along the M9 and the Midlands along the N80.
S. O6	Rural Areas	Support the role of rural areas with an increased emphasis on the renewal of smaller towns and villages and to seek to sustain the livelihood of rural communities by promoting the development of the wider rural economy while recognising the need to sustainably manage land and resources.
S. O7	Quality of life, healthy placemaking & good design	Protect and enhance the unique character and identity of Carlow's towns and villages and improve quality of life and well-being through regeneration, healthy placemaking, good quality design with the creation of attractive public spaces that are vibrant, distinctive, safe and accessible and which promote and facilitate positive social interaction.
S. O8	Climate adaptation & mitigation	Transition to a low carbon and climate resilient County by developing renewable indigenous energy resources, by supporting energy efficiency, reducing energy demand, and by implementing mitigation and adaptation responses to climate change.
S. O9	Protection of natural & built heritage	Afford suitable protection to the environment, built, cultural and natural heritage assets of Carlow, to ensure their survival for future generations and to ensure they contribute to the future sustainable development of the County.
S. O10	Green infrastructure & eco-systems services	Conserve and enhance the County's Green Infrastructure and ecosystem services supporting the sustainable management of natural assets and the biodiversity of the County's protected habitats and species to provide a wide range of environmental, social and economic benefits to communities.
S. O11	Infrastructure & environmental services.	Promote the provision and maintenance of high-quality infrastructure and infrastructural networks and environmental services which seek to complement the overall economic and settlement strategy and contribute to the sustainable development of the area.
S. O12	Transportation & land use planning	Ensure the proper integration of transportation and land use planning through the increased use of sustainable transport modes and the minimisation of travel demand to achieve a sustainable, integrated and low carbon transport system.
S. O13	Sustainable communities	Promote, develop and maintain sustainable communities in the County, through the provision of a range of facilities and services to meet the diverse and expanding needs of all residents including the needs of younger persons, thereby supporting community participation and social inclusion, and improving the quality of life for everyone.

16.19.2 Legislative Context

16.19.2.1 Office of the Planning Regulator

The legal basis for the Office of the Planning Regulations (OPR), including its role and functions, was established under the Planning and Development (Amendment) Act 2018. The OPR operates an independent monitoring

role in relation to the assessment of all local authority forward planning programmes and advises Government on the implementation of local authority statutory planning processes.

16.19.2.2 Two Year Progress Reports

In accordance with the provisions of Section 15 of the Planning and Development Act 2000 (as amended), the Council has a statutory obligation to:

- Secure the implementation of the objectives in this Plan; and,
- Prepare a report on achieving the objectives not more than 2 years after the making of this Plan.

The Council also has a statutory obligation to prepare and submit a report to the Southern Regional Assembly every 2 years, which must outline the progress made in supporting relevant objectives in the Regional Spatial and Economic Strategy (RSES). The requirements of Section 22A(2) of the Planning and Development Act 2000 (as amended) refer in this regard.

16.19.3 Implementation

The implementation of the Plan will be achieved in a number of different ways, including:

- The application of the policies, objectives, standards, and related provisions in the assessment of planning applications for permissions, including local authority development. In view of the cross-cutting and multi-faceted scope of many of the policies and objectives in the Plan, they will contribute to the achievement of multiple Strategic Objectives in the Plan, which are themselves interconnected.
- The integration of the strategies, policies, and objectives of the Plan with lower order plans including the Local Area Plans for Carlow Town and Environs, Tullow, and Muinebheag, and with the Small-Town Plans for Rathvilly, Leighlinbridge, Ballon, Borris, Hacketstown, and Carrickduff.
- Investment in infrastructure and environmental services that underpin the policies and objectives of the Plan. The Strategic Objectives in the Plan, and the Core Strategy, establish the priorities for the provision and improvement of infrastructure and environmental services by the Council and by other agencies, subject to the availability of funding.
- The ongoing monitoring of the strategies, policies, and objectives in the Plan as appropriate.
- Identifying the need for any adjustments to strategies, policies, and objectives over the lifetime of the Plan, as appropriate, and in future reviews.

16.19.4 Funding

The fulfilment of policies and objectives in the Plan, including strategies or projects, will be dependent on capital funding from the Government and other state agencies. The Council's own funds are allocated under the annual budget that is adopted each year by the Elected Members.

16.19.4.1 Development Contributions

Development contributions for the provision of infrastructure and services such as roads, footpaths, surface water drainage, amenity and open space provision, will be applied as appropriate to development proposals granted permission. The details and basis for the determination of the contributions are set out in the Council's Development Contributions Scheme, which is adopted in accordance with Section 48 of the Planning and Development Act 2000 (as amended).

16.19.4.2 Other Sources of Funding

Other sources of funding that will assist in the implementation of policies and objectives in the Plan include:

- **Rural and Urban Regeneration Funds (RRDF and URDF):** These funds arise from the National Development Plan in support of the National Planning Framework (NPF) and other national strategies and are available to support the implementation of local authority developments plans and local economic and community plan objectives. The types of projects eligible for funding include measures to address building vacancy and refurbishment, public realm improvements, enabling infrastructure, and sustainable mobility.
- **Climate Action Fund:** This aims to support initiatives that contribute to the achievement of Ireland’s climate and energy targets.
- **Smarter Travel and Active Travel Funding:** Funding allocated by the National Transport Agency (NTA) to support area-based transport assessments, local transport plans, and sustainable transport projects.
- **Irish Water Capital Investment Funding:** Funding for new and upgraded water and waste water infrastructure e.g. wastewater treatment plants.
- **Small Towns and Villages Growth Programme:** Funding to support growth in small towns and villages through upgrades to wastewater treatment plants.
- **National Biodiversity Funding and Grant:** Funding to support local authority biodiversity plans and projects.
- **Public Private Partnership:** Involves a partnership agreement between the public and private sector for the delivery of specific projects relating to public services and infrastructure. Such approaches ensure a commitment to funding due to interlinked public and private assistance and aims at ensuring the most economically efficient manner of development.

16.19.5 Environmental Monitoring

Article 10 of the SEA Directive requires monitoring of the significant environmental effects of the implementation of this Plan in order to identify, at an early stage, unforeseen adverse effects and to enable appropriate remedial action to be undertaken. While the ongoing implementation of the policies and objectives of the Plan and the monitoring processes detailed above incorporates some monitoring of environment related objectives, the full and comprehensive monitoring and evaluation assessment, required to be undertaken under Article 10 of the SEA Directive, is set out in the Strategic Environmental Assessment included in Appendix I.

Appendix VII – SFRA Measures to be Incorporated into Settlement Plans

Flood Risk Management Measures as Contained in SFRA to be incorporated into Chapter 15 Settlement Plans (OPR point (iii) and OPW submission (CLW-C10-24)

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
Carlow Town		
<p>OPR & OPW recommends that the key mitigation measures outlined in the Justification Tests for Carlow Town are included into the settlement plan supported by settlement policy objectives.</p>	<p>CLW-C10-24 CLW C10-101</p>	<p>The key mitigation measures outlined in the Justification Tests for Carlow Town to be incorporated into Chapter 15, Section 15.1.</p> <p>Recommendation Include additional policy as follows: It is an objective of the Council to require the following flood risk mitigation measures to be implemented in Carlow Town:</p> <ul style="list-style-type: none"> • Defended Town Centre lands: Flood risk to be mitigated by raising ground levels to achieve appropriate finished floor levels. • Undefended Town Centre lands: Development is to be restricted to existing vulnerability use and extensions/refits/changes of use. • Enterprise & Employment 2 lands (Ref: SFRA Section A4.5 Knocknagee Stream downstream of Castle Oaks area) No less vulnerable development to take place in Flood Zone A. • Community & Educational/Commercial and Existing Residential lands downstream of Castle Oaks: Development restricted to extensions renovations and changes of use. • Existing Residential/Enterprise & Employment in Mill Race/Springfield area to south of Town: Development restricted to extensions renovations and changes of use. • Town Centre and Existing Residential to the west of the Barrow: Development restricted to extensions renovations and changes of use in undefended areas, while in defended areas flood risk to be mitigated by raising ground levels to achieve appropriate finished floor levels.
Rathvilly		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Rathvilly (existing residential and utilities lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	<p>CLW-C10-24</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p>



Existing Residential



Utilities

**CLW
C10-101**

Recommendation

Include additional Policies as follows:

1. It is the policy of the Council that areas of the existing residential zoning (residential and low density residential) located within Flood Zone A and Flood Zone B. (as identified on Map 11.1 of the SFRA) are subject to the following requirements:

Development is;

- Limited to extensions, renovations and change of use.
- Infill residential development and demolition and reconstruction can only take place in Flood Zone C.

Any future development 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:

- Existing flood data is indicative (CFRAM MPW) and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B;
- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Finished floor levels should be above the 1% AEP level plus climate change and freeboard;
- Bedrooms should be located in the upstairs of two-storey buildings when extending existing property;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- 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.

2. It is the policy of the Council that any future expansion of the WTP should be subject to an FRA which should follow the

		<p>general guidance provided in Section 6 of the SFRA and must specifically address the following:</p> <ul style="list-style-type: none"> • An appropriately detailed hydraulic model will be required to confirm flood levels and extents as the existing flood data is indicative and does not provide flood levels. • The sequential approach should be applied, and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected; • 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. • Any development shall also be required to be built in accordance with CCC SuDS Policy.
<p>Leighlinbridge</p>		
<p>OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Leighlinbridge (existing residential lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	<p>CLW-C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policy in Section 15.3.2:</p> <p>It is the policy of the Council to manage flood risk in Leighlinbridge within the existing town centre and existing residential affected by flood risk in accordance with the following provisions:</p> <p>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:</p> <ul style="list-style-type: none"> • The sequential approach should be applied if possible; • FRA should address climate change scenarios in relation to

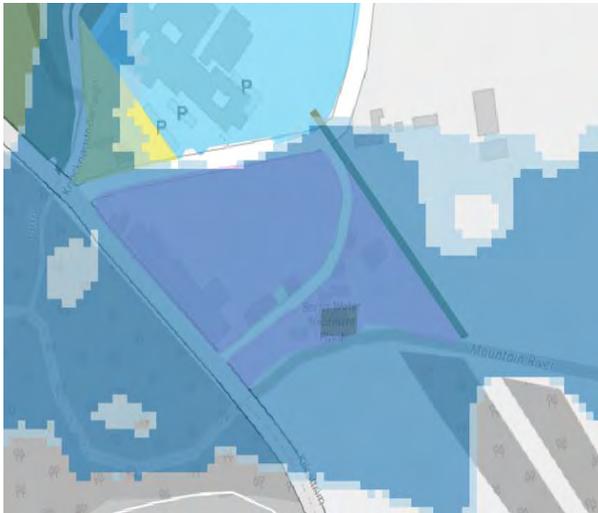
 <p>Existing Town Centre and Residential Lands</p>	<p>operational levels and potential mitigation measures;</p> <ul style="list-style-type: none"> Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and; Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events. Any development shall also be required to be built in accordance with CCC SuDS Policy
<p>Ballon</p>	
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Ballon (existing residential and utilities lands be incorporated into the relevant settlement plan as specific policy objectives.</p>  <p>Existing Residential</p>	<p>CLW-C10-24 CLW C10-101</p> <p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policy in Section 15.3.3:</p> <p>It is the policy of the Council to manage flood risk in Ballon in accordance with the following provisions:</p> <ol style="list-style-type: none"> Development of areas zoned existing residential within Flood Zone A and B shall be: <ul style="list-style-type: none"> Limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction can only take place in Flood Zone C. <p>Any future development should be subject to an FRA which should follow the general guidance provided in Section 6 of the SFRA and</p>

		<p>must specifically address the following:</p> <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B; • FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; • Finished floor levels should be above the 1% AEP level plus climate change and freeboard; • Bedrooms should be located in the upstairs of two-storey buildings when extending existing property; • Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; • 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. • Any development shall also be required to be built in accordance with CCC SuDS Policy <p>2. Developments within areas of the institutional zoning (WWTP) within Flood Zone A and Flood Zone B. shall be in accordance with the following provisions:</p> <p>Any future expansion of the WWTP 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:</p> <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately • detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly
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 <p>Waste Water Treatment Site</p>		<p>vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected;</p> <ul style="list-style-type: none"> • 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. • Any development shall also be required to be built in accordance with CCC SuDS Policy.
<p>Borris</p>		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Borris (community and education and enterprise and employment lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>	<p>CLW- C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policies in Section 15.3.4:</p> <p>It is the policy of the Council to manage flood risk in Borris in accordance with the following provisions:</p> <ol style="list-style-type: none"> 1. Any future expansion of the school 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; <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable



Existing Community Services and Education



Existing Enterprise and Employment

Hacketstown

elements of the site should be located in Flood Zone C, or raised/bunded/protected;

- Flood Zone A/B would principally be suitable for playing pitches/water compatible use only;
- 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.
- Any development shall also be required to be built in accordance with CCC SuDS Policy.

2. Development at the Kelly's Steel Works Site shall be limited to the existing less vulnerable use. Redevelopment as highly vulnerable housing would not be permitted. Any future planning applications on the site 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:

- Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- 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.
- Any development shall also be required to be built in accordance with CCC SuDS Policy.

OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Hacketstown (existing residential lands) be incorporated into the relevant settlement plan as specific policy objectives.



Existing Residential

**CLW-
C10-24
CLW
C10-101**

The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.

Recommendation:

Include additional policies in Section 15.3.5:

It is the policy of the Council to manage flood risk in Hacketstown in accordance with the following provisions:

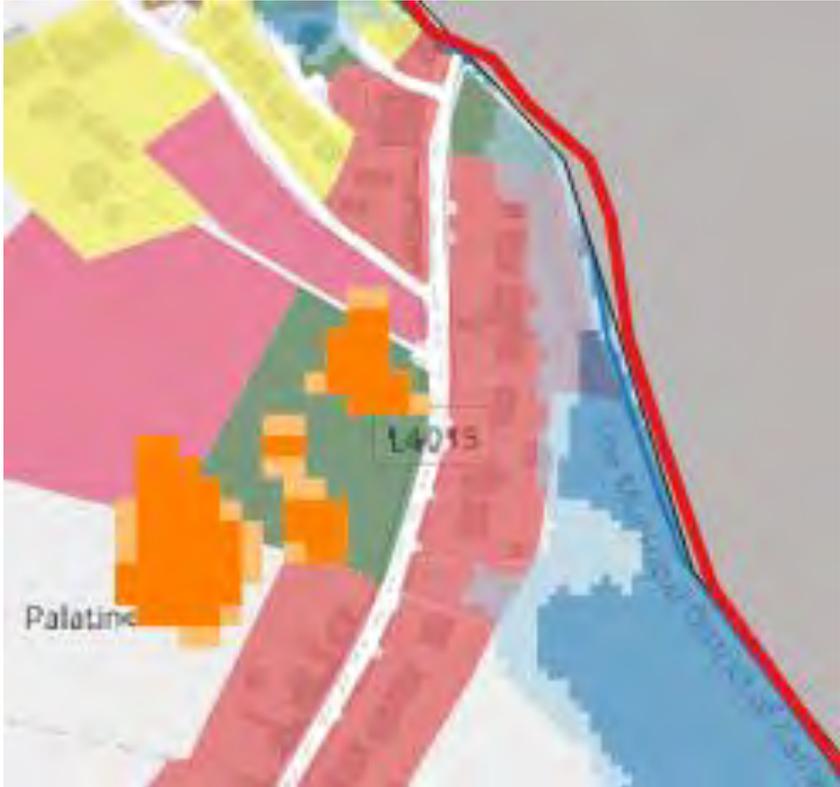
Development within the existing residential zoning along the steep unnamed stream flowing in culvert through the residential lands shall be;

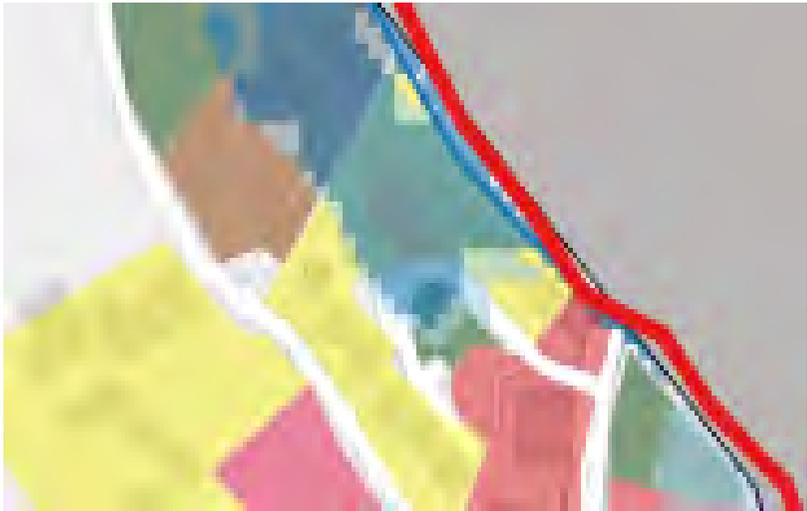
- Limited to extensions, renovations and change of use.
- Infill residential development and demolition and reconstruction can only take place in Flood Zone C.

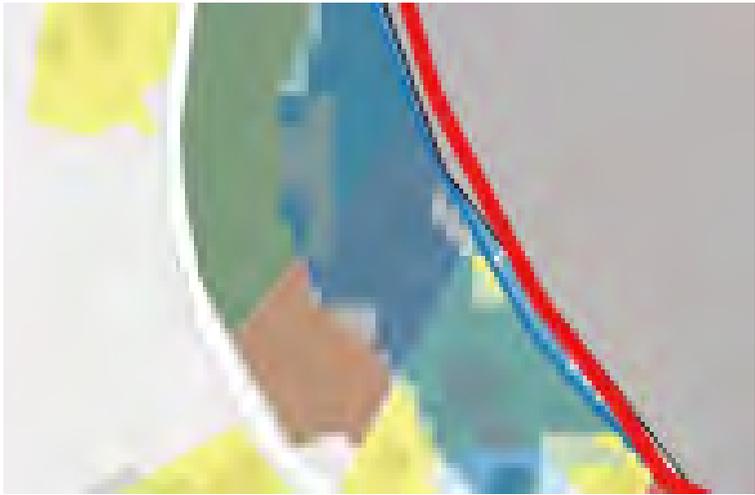
Any future development should be subject to an FRA which should follow the general guidance provided in Section 6 of the SFRA and must specifically address the following:

- Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B;
- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Finished floor levels should be above the 1% AEP level plus climate change and freeboard;
- The residual risk of culvert blockage should be investigated;
- Bedrooms should be located in the upstairs of two-storey buildings when extending existing property in Flood Zone A/B;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;

		<ul style="list-style-type: none"> 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. <p>Any development shall also be required to be built in accordance with CCC SuDS Policy.</p>
Carrickduff		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for Carrickduff (town centre lands) be incorporated into the relevant settlement plan as specific policy objectives.</p>  <p>Town Centre</p>	<p>CLW- C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policies in Section 15.3.6:</p> <p>It is the policy of the Council to manage flood risk in Carrickduff in accordance with the following provisions:</p> <p>Any future development in the town centre zoned lands at risk of flooding along the Clody River area must place water compatible development within Flood Zone A/B with no raising of land levels. All development 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:</p> <ul style="list-style-type: none"> The sequential approach should be applied, and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected; Flood Zone A/B would principally be suitable for water compatible use only; FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Proposals should not impede existing flow paths or cause flood risk

		<p>impacts to the surrounding areas, and;</p> <ul style="list-style-type: none"> Any development shall also be required to be built in accordance with CCC SuDS Policy.
Palatine		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing Palatine or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.</p>  <p>Village Core Lands – East of L4015</p>	<p>CLW- C10-24 CLW C10-101</p>	<ul style="list-style-type: none"> The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate. <p>Recommendation:</p> <p>Include additional policies in Section 15.4.1;</p> <ul style="list-style-type: none"> It is the policy of the Council to manage flood risk in Palatine in accordance with the following provisions: <ol style="list-style-type: none"> Development on part of the Village Core residential lands to the east of the L4015 and within Flood Zone A and Flood Zone B shall be: <ul style="list-style-type: none"> Limited to extensions, renovations and change of use. Infill residential development and demolition and reconstruction can only take place in Flood Zone C. Any future development 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: <ul style="list-style-type: none"> Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B; FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Finished floor levels should be above the 1% AEP level plus climate change and freeboard; Bedrooms should be located in the upstairs of two-storey

 <p>Parts of Meadowbank Estate</p>	<p>buildings when extending existing property;</p> <ul style="list-style-type: none"> • Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; • 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. • Any development shall also be required to be built in accordance with CCC SuDS Policy. <p>2. Development within areas of the existing residential zoning within the Meadowbank Estate within Flood Zone A and Flood Zone B shall be:</p> <ul style="list-style-type: none"> • Limited to extensions, renovations and change of use. • Infill residential development and demolition and reconstruction can only take place in Flood Zone C. <p>Any future development 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</p> <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B; • FRA should address climate change scenarios in relation to FFLs
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 <p>Wastewater Treatment Site</p>	<p>and potential mitigation measures;</p> <ul style="list-style-type: none"> • Finished floor levels should be above the 1% AEP level plus climate change and freeboard; • Bedrooms should be located in the upstairs of two-storey buildings when extending existing property; • Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; • 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. • Any development shall also be required to be built in accordance with CCC SuDS Policy. <p>3. Any future expansion of the WWTP 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</p> <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected; • 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.
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		<ul style="list-style-type: none"> Any development shall also be required to be built in accordance with CCC SuDS Policy.
Rathtoe		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing Rathtoe or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.</p> 	<p>CLW-C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policies in Section 15.4.3;</p> <p>It is the policy of the Council to manage flood risk in Rathtoe in accordance with the following provisions:</p> <p>New highly vulnerable development is only appropriate within Flood Zone C. New less vulnerable development is only appropriate within Flood Zone B/C. Any future development adjacent to the Flood Zones should be subject to an FRA which must follow the general guidance provided in Section 6 of the SFRA and specifically address the following:</p> <ul style="list-style-type: none"> Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Finished floor levels should be above the 1% AEP level plus climate change and freeboard; Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events. Any development shall also be required to be built in accordance with CCC SuDS Policy.

Fennagh

OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing settlements or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.



Existing Residential

CLW-
C10-24
CLW
C10-101

The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.

Recommendation:

Include additional policies in Section 15.4.4;

It is the policy of the Council to manage flood risk in Fennagh in accordance with the following provisions:

1. For areas zoned existing residential within the Woodglade Estate within Flood Zone A and B:

Development shall be;

- Limited to extensions, renovations and change of use.
- Infill residential development and demolition and reconstruction can only take place in Flood Zone C.

Any future development 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:

- Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B;
- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Finished floor levels should be above the 1% AEP level plus climate change and freeboard;
- Bedrooms should be located in the upstairs of two-storey buildings when extending existing property;



Village Core and Utilities Lands – East of R 724

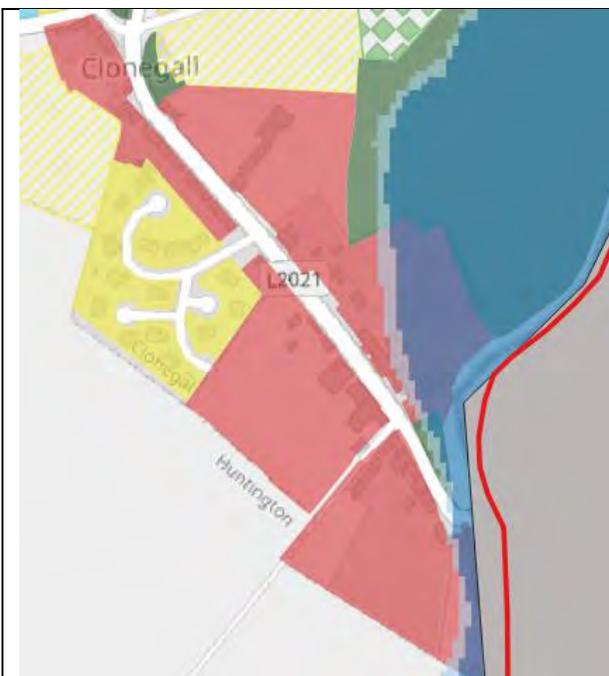
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- Proposals should not impede existing flow paths or cause flood risk impacts to the surrounding areas, and;
- Emergency evacuation plan and defined access / egress routes should be developed for extreme flood events.
- Any development shall also be required to be built in accordance with CCC SuDS Policy.

2. For part of the Village Core lands to the east of the R724 located within Flood Zone A and Flood Zone B.

Any future expansion of the WWTP should be subject to an FRA, it would not be appropriate to place residential or other highly vulnerable use in the Village Core lands. Any future FRA should follow the general guidance provided in Section 6 of the SFRA and must specifically address the following:

- Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- The sequential approach should be applied and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected;
- 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.
- Any development shall also be required to be built in accordance with CCC SuDS Policy

		<p>3. Parts of the Creche and Church site are located within Flood Zone A/B.</p> <p>Any future expansion of the creche 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:</p> <ul style="list-style-type: none"> Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. The sequential approach should be applied and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected; Flood Zone A/B would principally be suitable for playing pitches/water compatible use only; 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. Any development shall also be required to be built in accordance with CCC SuDS Policy. <p>The Church lands adjacent/within the Flood Zone are used as a burial ground. A groundwater impact assessment may be advisable for the lower lying part of the site adjacent/within the Flood Zones to ensure groundwater is not negatively impacted</p>
<p>Clonegall</p>		
<p>OPR & OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing settlements or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.</p>	<p>CLW- C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p>



Village Core – East of L2021

Recommendation:

Include additional policies in Section 15.4.6;

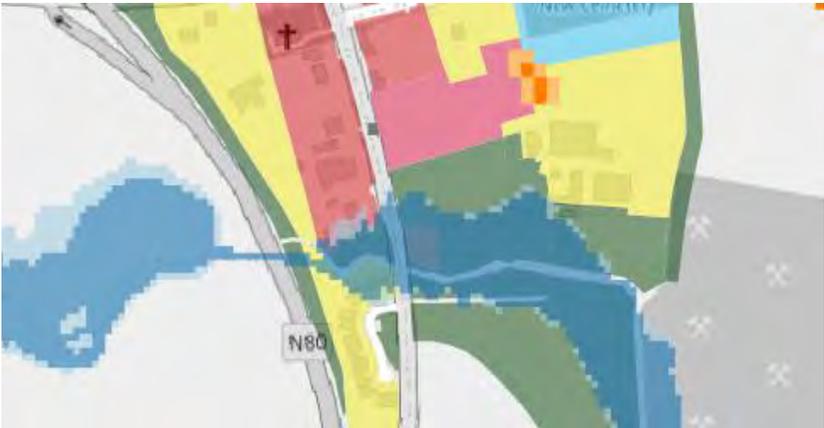
It is the policy of the Council to manage flood risk on part of the village core lands to the east of the L2021 within Flood Zone A and B in Clonegall in accordance with the following provisions:

Development shall be;

- Limited to extensions, renovations and change of use.
- Infill residential development and demolition and reconstruction can only take place in Flood Zone C.

Any future development 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:

- Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents.
- The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B;
- FRA should address climate change scenarios in relation to FFLs and potential mitigation measures;
- Finished floor levels should be above the 1% AEP level plus climate change and freeboard;
- The residual risk of bridge blockage should be investigated;
- Bedrooms should be located in the upstairs of two-storey buildings when extending existing property in Flood Zone A/B;
- Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;
- 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.
- Any development shall also be required to be built in accordance with CCC SuDS Policy.

Kildavin		
<p>OPW recommends that flood risk mitigation measures / guidance identified in the SRFA for the foregoing settlements or sites identified therein be incorporated into the relevant settlement plan as a specific policy objective.</p>  <p>Village Core and Utilities Lands</p> 	<p>CLW- C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policies in Section 15.4.7;</p> <p>It is the policy of the Council to manage flood risk in Kildavin in accordance with the following provisions:</p> <ol style="list-style-type: none"> 1. Village Core and utilities lands to the East and West of the R724 within Flood Zone A and B shall comply with the following provisions: <ul style="list-style-type: none"> • Any future expansion of the WWTP or Childcare facility Village Core and Utilities Lands 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: • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable elements of the site should be located in Flood Zone C, or raised/bunded/protected; • 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. • Any development shall also be required to be built in accordance

Existing Residential Lands		<p>with CCC SuDS Policy.</p> <p>2. Areas of the existing residential zoning within the Glasheen Estate within Flood Zone A and Flood Zone B shall comply with the following provisions:</p> <p>Development shall be;</p> <ul style="list-style-type: none"> • Limited to extensions, renovations and change of use. • Infill residential development and demolition and reconstruction can only take place in Flood Zone C. <p>Any future development 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:</p> <ul style="list-style-type: none"> • Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. • The sequential approach should be applied, and highly vulnerable infill and redevelopment shall not be permitted in Flood Zone A or B; • FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; • Finished floor levels should be above the 1% AEP level plus climate change and freeboard; • Bedrooms should be located in the upstairs of two-storey buildings when extending existing property; • Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; • 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. • Any development shall also be required to be built in accordance
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		with CCC SuDS Policy.
Bennekerry / Glynn / Old Leighlin / St. Mullins		
<p>OPR & OPW welcomes the measures outlined in the SFRA to restrict new highly vulnerable development to Flood Zone C, and less vulnerable development to Flood Zone B. It would be beneficial if these measures were incorporated into the settlement plans supported by settlement policy objectives.</p>	<p>CLW- C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation: Include additional policy in Section 15.5:</p> <p>It is the policy of the Council to manage flood risk in Bennekerry, Glynn, Old Leighlin and St. Mullins in accordance with the following provisions:</p> <p>New highly vulnerable development is only appropriate within Flood Zone C. New less vulnerable development is only appropriate within Flood Zone B/C. For existing development within Flood Zone A/B it is not appropriate to undertake significant redevelopment whereby additional numbers of people are introduced into the Flood Zone.</p> <p>Any future development should be subject to an FRA which must follow the general guidance provided in Section 6 of the SFRA and specifically address the following:</p> <ul style="list-style-type: none"> Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Finished floor levels should be above the 1% AEP level plus climate change and freeboard; For existing development in Zone A/B extensions/renovations bedrooms should be located in the upstairs of two-storey buildings; Flood resilient construction materials and fittings should be

		<p>considered if in Flood Zone A/B;</p> <ul style="list-style-type: none"> 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. Any development shall also be required to be built in accordance with CCC SuDS Policy.
Ballymurphy		
<p>OPR & OPW welcomes the measures outlined in the SFRA to restrict new highly vulnerable development to Flood Zone C, and less vulnerable development to Flood Zone B. It would be beneficial if these measures were incorporated into the settlement plans supported by settlement policy objectives</p>	<p>CLW-C10-24 CLW C10-101</p>	<p>The provisions referenced are contained in Appendix III Strategic Flood Risk Assessment. Inclusion of relevant requirements is considered appropriate.</p> <p>Recommendation:</p> <p>Include additional policy in Section 15.6:</p> <p>It is the policy of the Council to manage flood risk in Ballymurphy in accordance with the following provisions:</p> <p>New highly vulnerable development is only appropriate within Flood Zone C. New less vulnerable development is only appropriate within Flood Zone B/C.</p> <p>For existing development within Flood Zone A/B it is not appropriate to undertake significant redevelopment whereby additional numbers of people are introduced into the Flood Zone.</p> <p>Any future development should be subject to an FRA which must follow the general guidance provided in Section 6Error! No bookmark name given. of the SFRA and specifically address the following:</p> <ul style="list-style-type: none"> Existing flood data is indicative and does not provide flood levels. An appropriately detailed hydraulic model will be required to confirm flood levels and extents. FRA should address climate change scenarios in relation to FFLs and potential mitigation measures; Finished floor levels should be above the 1% AEP level plus climate change and freeboard; For existing development in Zone A/B extensions/renovations bedrooms should be located in the upstairs of two-storey

		<p>buildings;</p> <ul style="list-style-type: none">• Flood resilient construction materials and fittings should be considered if in Flood Zone A/B;• 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.• Any development shall also be required to be built in accordance with CCC SuDS Policy.
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Appendix VII – Record of Protected Structures Reports

- Limekiln – CW77
- Burrin Street – CT 18
- Shamrock Place CT 93 and CT 94

CONSERVATION ARCHITECT'S ASSESSMENT OF REQUEST TO DELETE PROTECTED STRUCTURE FROM THE RECORD PROTECTED STRUCTURES: FOR CARLOW COUNTY COUNCIL	
Name of Structure	Limekiln Tower (RPS ref. CW77)
Address of Structure:	Former Sugar Factory, Athy Road, Carlow
NIAH Ref.:	N/A
Date of Inspection:	1 st November 2021

1.	Description of Structure:	This disused limekiln tower comprises a circular tower with external circular perimeter maintenance gantries and staircases, constructed in the late-1980's. The structure is a prominent landmark on the north side of Carlow Town, primarily due to its height and unusual silhouette on the skyline. This structure was constructed to produce quicklime, which was used in the sugar manufacturing process. The present day structure replaced earlier limekiln towers on the site. The sugar factory closed in 2006. Most of the factory buildings on the site have been demolished.	
2.	Categories of Special Interest identified:	Technical	The tower is a relatively recent industrial heritage artefact that stands as a reminder of the production processes associated with the former sugar factory site.
	<i>Note: The categories of special interest noted are cross-referenced with the relevant section of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts Heritage and Gaeltacht, 2011)</i>	Social	Although the structure is of a relatively recent date, the disused limekiln is a prominent feature in the landscape and is of modest interest as a surviving component of a once thriving industry that helped to define the town of Carlow during the twentieth century.
3.	Information additional to or different from NIAH record:	The disused limekiln tower is not included in the published NIAH survey. <i>Note: The NIAH survey for County Carlow is a non-exhaustive survey. The non-inclusion of this structure should not be regarded as confirmation that the structure is not of significance.</i>	
4.	Recommendation:	I recommend that this structure is deleted from the Record of Protected Structures.	
5.	Reasons for recommendation:	The structure is a distinctive feature on the skyline of Carlow but it is of limited special interest in its own right. The demolition of most of the buildings of the former sugar factory has separated the structure from its industrial context. The tower is of local interest only.	



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Photographs (1st November 2021)



Photo 1: Contextual view of limekiln tower (RPS ref. CW77) from Athy Road



Photo 2: Detail of top of limekiln tower

CONSERVATION ARCHITECT'S ASSESSMENT OF REQUEST TO DELETE PROTECTED STRUCTURE FROM THE RECORD PROTECTED STRUCTURES: FOR CARLOW COUNTY COUNCIL	
Name of Structure	49 Burrin Street (RPS ref. CT18)
Address of Structure:	Burrin Street, Carlow
NIAH Ref.:	10000228
Date of Inspection:	1 st November 2021

1.	Description of Structure:	49 Burrin Street is a five-bay two-storey end of terrace building, constructed in c.1820-40 on the east side of Burrin Street. The external facades are finished in a cement dash render. The building has a pitched slate roof. Although vacant for many years, the house retains a strong architectural presence on the streetscape. The central door surround on the front façade and the vertical proportions of the windows contribute to the character of Burrin Street.	
2.	Categories of Special Interest identified: <i>Note: The categories of special interest noted are cross-referenced with the relevant section of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts Heritage and Gaeltacht, 2011)</i>	Architectural	The building makes a positive contribution to its setting, through its form, materials, and architectural detail.
3.	Information additional to or different from NIAH record:	The building is included in the NIAH survey (Ref. 10000228)	
4.	Recommendation:	I recommend that this structure is retained on the Record of Protected Structures.	
5.	Reasons for recommendation:	Although the building has been vacant for many years, its external form is in a remarkably intact condition. The late-Georgian detailing of the front façade makes a positive contribution to the streetscape of Burrin Street. The building merits inclusion on the Record of Protected Structures, as its demolition or removal would have a profound negative impact on the character of the street.	



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Photographs (1st November 2021)



Photo 1: Front (west) façade of 49 Burrin Street



Photo 2: Contextual view of building



Photo 3: Front door surround



Photo 4: Oblique view of rear façade of 49 Burrin Street

CONSERVATION ARCHITECT'S ASSESSMENT OF REQUEST TO DELETE PROTECTED STRUCTURE FROM THE RECORD PROTECTED STRUCTURES: FOR CARLOW COUNTY COUNCIL	
Name of Structure	Two-bay three-storey vacant building
Address of Structure:	Shamrock Square (east side, corner of Staplestown Road), Carlow Town
NIAH Ref.:	10000300
Date of Inspection:	1 st November 2021

1.	Description of Structure:	This corner semi-detached late-Georgian house was constructed as a pair with the adjoining house (RPS ref. CT94). The interior of the building was badly damaged by fire in 2008. The roof has been missing for many years. The external window surrounds and sills contribute to the interest of the building. The internal photographs submitted in the delisting show that the internal floors and walls are no longer extant. The panelled timber window shutters and some window surrounds appear to survive (as shown in the submitted documentation. This building is noted as having a 'good intact Victorian shopfront' in the RPS entry. This shopfront does not survive and has been replaced with a poor quality modern attached shopfront, which is now in poor condition.	
2.	Categories of Special Interest identified: <i>Note: The categories of special interest noted are cross-referenced with the relevant section of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts Heritage and Gaeltacht, 2011)</i>	Architectural	Notwithstanding its derelict condition, this building continues to make a positive contribution to the streetscape at the prominent junction of Barrack Street, Tullow Street, Staplestown Road, Pollerton Road and Green Lane
3.	Information additional to or different from NIAH record:	The building is included in the NIAH survey (Ref. 10000300)	
4.	Recommendation:	I recommend that this structure is deleted from the Record of Protected Structures.	
5.	Reasons for recommendation:	While the external form of the building survives and continues to make a positive contribution to the streetscape, the shopfront, roof and internal fabric and features have been lost, as a result of fire damage and subsequent dereliction. The building has lost much of its special interest value and is now of local significance only.	



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Photographs (1st November 2021)



Photo 1: View of protected structure CT93 (on right) from Shamrock Square

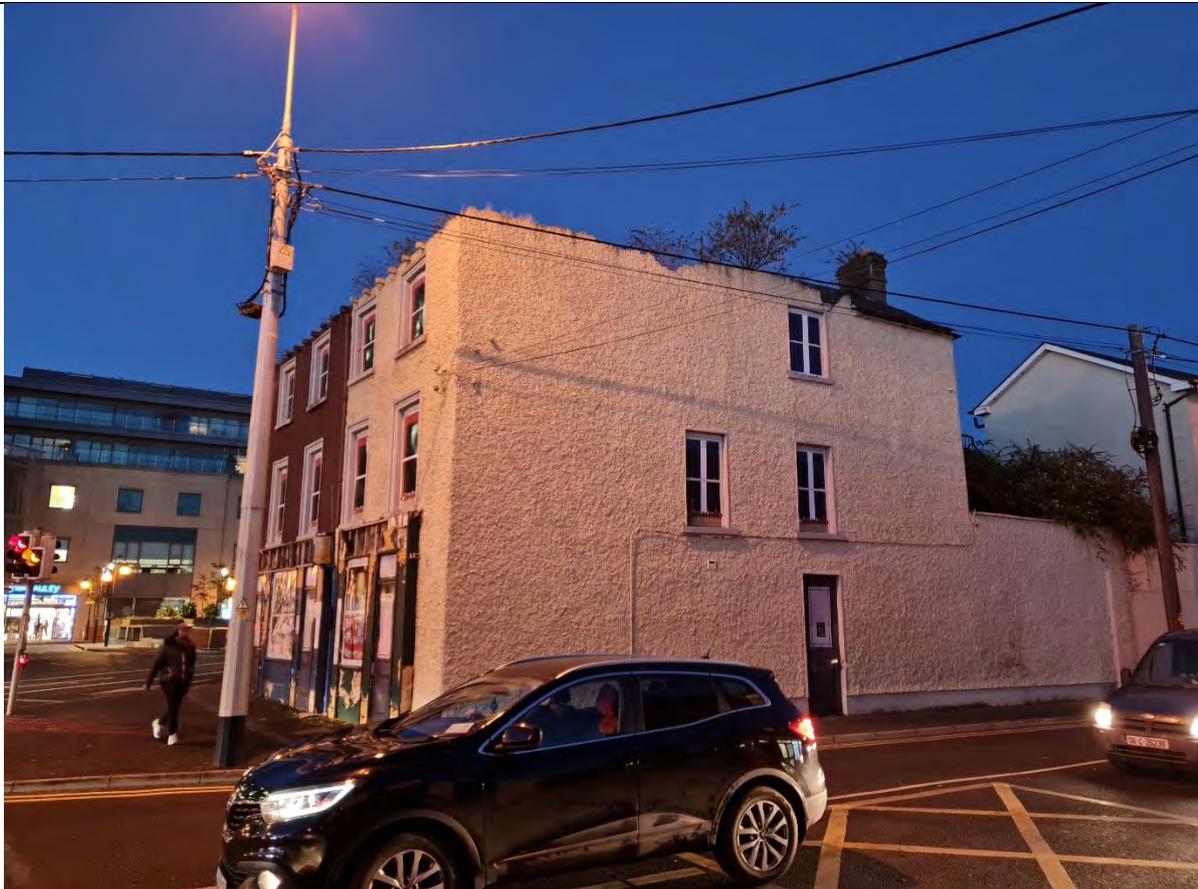


Photo 2: Side (south) façade of protected structure CT93, fronting onto Staplestown Road



Photo 3: Detail of front façade, showing replacement shopfront (now in poor repair)



Photo 4: Front façade of protected structure CT93, showing replacement shopfront (now in poor repair)

CONSERVATION ARCHITECT'S ASSESSMENT OF REQUEST TO DELETE PROTECTED STRUCTURE FROM THE RECORD PROTECTED STRUCTURES: FOR CARLOW COUNTY COUNCIL	
Name of Structure	Two-bay three-storey vacant building
Address of Structure:	Shamrock Square (east side, corner of Pollerton Road), Carlow Town
NIAH Ref.:	10000299
Date of Inspection:	1 st November 2021

1.	Description of Structure:	This corner semi-detached late-Georgian house was constructed as a pair with the adjoining house (RPS ref. CT93). The interior of the building was badly damaged by fire in 2008. The roof has been missing for many years. The external window surrounds and sills contribute to the interest of the building. The internal photographs submitted in the delisting show that the internal floors and walls are no longer extant. The panelled timber window shutters and some window surrounds appear to survive (as shown in the submitted documentation. This building is noted as having a 'gabled return' in the RPS entry, which does not survive. An earlier well-crafted shopfront been replaced with a poor quality modern attached shopfront, which is now in poor condition.	
2.	Categories of Special Interest identified: <i>Note: The categories of special interest noted are cross-referenced with the relevant section of the Architectural Heritage Protection Guidelines for Planning Authorities (Department of Arts Heritage and Gaeltacht, 2011)</i>	Architectural	Notwithstanding its derelict condition, this building continues to make a positive contribution to the streetscape at the prominent junction of Barrack Street, Tullow Street, Staplestown Road, Pollerton Road and Green Lane
3.	Information additional to or different from NIAH record:	The building is included in the NIAH survey (Ref. 10000299)	
4.	Recommendation:	I recommend that this structure is deleted from the Record of Protected Structures.	
5.	Reasons for recommendation:	While the external form of the building survives and continues to make a positive contribution to the streetscape, the shopfront, roof and internal fabric and features have been lost, as a result of fire damage and subsequent dereliction. The building has lost much of its special interest value and is now of local significance only.	



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Photographs (1st November 2021)



Photo 1: View of protected structure CT94 (on left) from Shamrock Square



Photo 2: Side (north) façade of protected structure CT93, fronting onto Pollerton Road



Photo 3: Detail of front façade, showing replacement shopfront (now in poor repair)

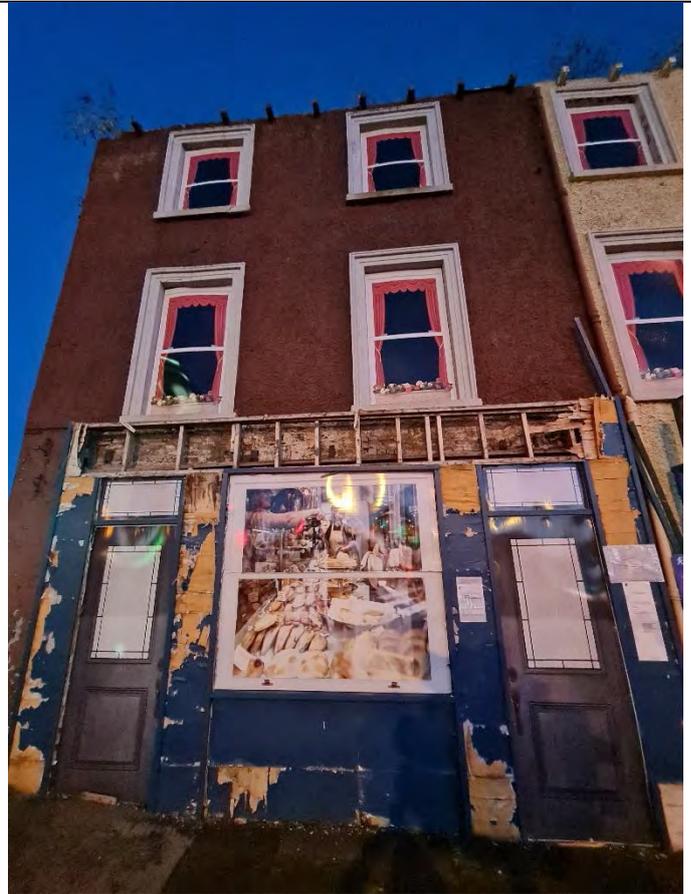


Photo 4: Front façade of protected structure CT94, showing replacement shopfront (now in poor repair)