



inCarlow

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

Public Consultation

**VOLUME 2
NOVEMBER 2021**

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Appendix I & II: Strategic Environmental Assessment and AA

Appendices I and II SEA and AA – Updates Arising

No.	Issue of Relevance to SEA/AA Raised	Chief Executive’s Response and Recommendation
1. Environmental Protection Agency		
<p>1a</p>	<p>We acknowledge your notice, dated 16th July 2021, in relation to the Draft Carlow County Development Plan 2022-2028 (the ‘Plan’) and SEA Environmental Report.</p> <p>The EPA is a statutory environmental authority under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.</p> <p>As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a ‘self-service approach’ via the guidance document ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’.</p> <p>This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.</p> <p>Carlow County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p>	<p>Noted.</p> <p>The EPA’s ‘SEA of Local Authority Land Use Plans – EPA Recommendations and Resources’ document has been and will be taken into account in undertaking the SEA and preparing the Plan.</p> <p>The Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Southern Regional Spatial and Economic Strategy.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>
<p>1b</p>	<p>Content of the Environmental Report The SEA Regulations set out the information to be contained in an Environmental Report.</p> <p>Assessment of Alternatives You should describe the alternatives considered and how the selection and assessment of these has led to the selection of the preferred alternative. You should assess the alternatives against the ‘Strategic Environmental Objectives’ identified in the SEA ER.</p>	<p>Alternatives are described in SEA Environmental Report Section 6 “Description of Alternatives”.</p> <p>Alternatives are assessed, including against Strategic Environmental Objectives, as appropriate, in SEA Environmental Report Section 7 “Evaluation of Alternatives”. Section 7 identifies the selected alternative</p>

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		<p>Recommendation To add the following subsection to SEA Environmental Report Section 7 "Evaluation of Alternatives" (new text in bold):</p> <p>"Section 7.4 Selected Alternatives</p> <p>Selected alternatives for the Plan from each of the five types of alternatives that emerged from the planning/SEA process are indicated above.</p> <p>These alternatives have been incorporated into the Plan having regard to both:</p> <p>1. The environmental effects which are identified by the SEA and are detailed above; and 2. Planning - including social and economic - effects."</p> <p>No change to Draft Plan.</p>
1c	<p>Assessment of Environmental Effects You should assess and document the full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.</p>	<p>The full range of likely significant environmental effects of implementing the Plan, including the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects, are assessed and documented in SEA Environmental Report Section 8 "Evaluation of Plan Provisions".</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>
1d	<p>Mitigation Measures Where you have identified the potential for likely significant effects, you should provide appropriate mitigation measures to avoid or minimise these. You should ensure that the Plan includes clear commitments to implement the mitigation measures.</p>	<p>Appropriate mitigation measures are identified in SEA Environmental Report Section 9 "Mitigation Measures" and have been fully integrated in the Draft Plan.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>

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1e	<p>Monitoring</p> <p>The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Plan, Carlow County Council should ensure that suitable and effective remedial action is taken.</p> <p>Guidance on SEA-related monitoring is available on the EPA website at https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php</p>	<p>Noted.</p> <p>The required information on monitoring measures is provided in Section 10 of the SEA Environmental Report - this will inform the final Monitoring Programme to be included in the SEA Statement. The cited guidance has been and will be taken into account in undertaking the SEA and preparing the Plan.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>
1f	<p>State of the Environment Report - Ireland's Environment 2020</p> <p>In finalising the Plan and integrating the findings of the SEA into the Plan, the recommendations, key issues and challenges described in our State of the Environment Report Ireland's Environment – An Integrated Assessment 2020 (EPA, 2020) should be considered, as relevant and appropriate. This should also be taken into account, in preparing the Plan and SEA.</p>	<p>Noted. This report has been and will be taken into account in undertaking the SEA and preparing the Plan.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>
1g	<p>Future Amendments to the Plan</p> <p>You should screen any future amendments to the Plan for likely significant effects, using the same method of assessment applied in the "environmental assessment" of the Plan.</p>	<p>.</p> <p>Proposed material alterations will be screened using a method similar to that used for the Plan</p>
1h	<p>SEA Statement "Information on the Decision"</p> <p>Once the Plan is adopted, you should prepare an SEA Statement that summarises :</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Plan; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan; • The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.</p> <p>Guidance on preparing SEA Statements is available on the EPA website at the following link: https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php</p>	<p>An SEA Statement containing the required information will be prepared at the end of the process. The cited guidance will be taken into account in preparing the SEA Statement.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>

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1i	<p>Environmental Authorities</p> <p>Under the SEA Regulations, the following should be consulted:</p> <ul style="list-style-type: none"> • Environmental Protection Agency; • Minister for Housing, Local Government and Heritage; • Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media; • Minister for Environment, Climate and Communications; and, • Minister for Agriculture, Food and the Marine. • any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan. 	<p>Noted. Relevant environmental authorities are being consulted with as part of the SEA/Plan preparation process.</p> <p>None.</p>
2. Department of Housing, Local Government and Heritage		
2a	<p>1. Introduction and Context</p> <p>The Department recommends the inclusion of an overarching commitment to the conserve, protect and enhance the County's biodiversity in order to maintain and restore ecosystem services and increase the resilience of natural and human systems to climate change.</p>	<p>Various provisions in Chapter 10 Natural and Built Heritage, address this issue including the overarching Aim (To protect, conserve, manage and enhance the natural and built heritage features of the County, to ensure the survival of their intrinsic value for future generations and to ensure they contribute to the future sustainable development of the County) and Natural Heritage Policy NH P1 (Protect, manage and enhance the natural heritage, biodiversity, landscape and environment of County Carlow in recognition of its importance as a non-renewable resource, a unique identifier, and as a natural resource asset).</p> <p>It is considered the inclusion of the proposed overarching commitment is not required. The various policy provisions in Chapter 10 already addresses this matter, including in the overarching Aim of the chapter (<i>To protect, conserve, manage and enhance the natural and built heritage features of the County, to ensure the survival of their intrinsic value for future generations and to ensure they contribute to the future sustainable development of the County</i>). This is in addition to and Policy NH P1 (<i>Protect, manage and enhance the natural heritage, biodiversity, landscape and environment of County Carlow in recognition of its importance as a non-renewable resource, a unique identifier, and as a natural resource asset</i>).</p>

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		<p>Recommendation No change to Draft Plan / SEA or AA.</p>
<p>2b</p>	<p>National Biodiversity Action Plan (NBAP) 2017 - 2021 The Department recommends inclusion of a clear policy objective: To support the aims of and to implement and monitor the actions set out in the National Biodiversity Action Plan 2017-2021 and any subsequent plans over the lifetime of this plan recognising that the conservation of biodiversity is an essential component of sustainable development.</p>	<p>Noted. It is recommended that Natural Heritage Objective NHO 1 is amended.</p> <p>A range of indicators and targets have been integrated into the SEA Monitoring Programme that is detailed in Section 10 of the SEA Environmental Report, ensuring consistency with the Monitoring Programme for the Regional Spatial and Economic Strategy. One of the Overarching Strategic Objectives will be updated to correctly refer to the National Biodiversity Action Plan.</p> <p>Recommendation It is recommended that Natural Heritage Objective NHO 1 is amended as follows (new text in bold):</p> <p>To 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.</p> <p>To update the following SEO from the SEA Environmental Report Monitoring Programme (new text in bold, text to be deleted in strike through):</p> <p>Enhance biodiversity in line with the National Biodiversity Strategy Action Plan and its targets.</p>
<p>2c</p>	<p>Objective 1.1.3 of the NBAP requires all Public Authorities and private sector bodies move towards no net loss of biodiversity through strategies, planning, mitigation measures,</p>	<p>Noted. It is proposed to update Natural Heritage Policy P2.</p>

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	<p>appropriate offsetting and/or investment in Blue-Green infrastructure. The Department advises the inclusion of a no net loss biodiversity target for all developments, activities, programmes and plans arising from this CDP.</p> <p>The Department 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>Recommendation</p> <p>To update Natural Heritage Policy P2 as follows: 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>
2d	<p>The Department advises that policy objectives related to biodiversity and ecosystem conservation, protection, enhancement and restoration should be separated from policy objectives related to other matters such as recreation, amenity and landscape both in the CDP and settlement plans. This would assist the Council in securing and monitoring the implementation of the policies and objectives of this Plan and in the Department's monitoring of the NBAP which includes the performance indicator 'Number of explicit policies and objectives for biodiversity and ecosystem services in County Development Plans and other local plans per Local Authority'.</p> <p>The Department advises that policies 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>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> <p>None.</p> <p>Recommendation</p> <p>No change to Draft Plan / SEA or AA.</p>
2e	<p>1.2.1 Strategic Environmental Assessment</p> <p>It is the policy of Carlow County Council (SEA. P1) to implement a Strategic Environmental Assessment (SEA) monitoring programme which will include the preparation of standalone Monitoring Reports to accompany the report required of the Chief Executive under section 15(2) of the Act. These reports will include information in relation to progress on, and the results of, monitoring the significant environmental effects of implementation of the development plan.</p> <p>Monitoring during plan implementation should allow for corrective action and intervention if environmental damage is noted and will provide a learning opportunity for practitioners and decision makers for future land use plans. Monitoring can use existing sources of information including data collected by other government departments or agencies but the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process.</p>	<p>The SEA Environmental Report provides the Monitoring Programme at Section 10, which addresses all of the relevant requirements and is clear, specific and consistent with the SEA Monitoring Programme for the Southern RSES SEA. This Monitoring Programme will be finalised and included in the SEA Statement prepared following adoption of the Plan.</p> <p>Various indicators, targets, sources and remedial actions are specified for all environmental components, including biodiversity and flora and fauna. The Council will make the Monitoring Reports publicly available.</p> <p>Additional detail will be added to some sources in order to explicitly address the issues identified in the submission.</p>

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	<p>The Department would welcome a clear and specific monitoring programme to be included with the Strategic Environmental Report, outlining how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan.</p> <p>While the Department welcomes the commitment to provide SEA Monitoring Reports to the members of the authority not more than 2 years after the making of a development plan, in accordance with section 15(2) of the Planning and Development Acts 2000 to 2021, the Department would also encourage making these reports publicly available.</p> <p>Consideration should also be given to monitoring of indirect development impacts on biodiversity such as nitrogen deposition related to bioenergy and agricultural developments, disturbance / visitor pressure impacts of recreation, amenity and tourism development and impacts to water quality.</p> <p>The Department recommends inclusion of a policy objective: To monitor and record direct and indirect biodiversity loss and enhancement resulting from any developments arising from plan implementation, to include this data in Strategic Environmental Assessment Monitoring Reports and to publish these reports.</p>	<p>Recommendation</p> <p>To update the SEA Monitoring Programme at Section 10 of the SEA Environmental Report will be updated to identify that monitoring reports will be made publicly available.</p> <p>Update sources from Section 10 of the SEA Environmental Report as follows (new text in bold):</p> <p>Under Water: EPA Monitoring Programme for WFD compliance¹</p> <p>Under Biodiversity and Flora and Fauna: DHLGH report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive (every 6 years)²</p> <p>Under Biodiversity and Flora and Fauna: DHLGH National Birds Directive Monitoring Report for the under Article 12 (every 3 years)³</p> <p>Under Biodiversity and Flora and Fauna: Consultations with the NPWS⁴</p> <p>Under Biodiversity and Flora and Fauna: Internal monitoring of likely significant environmental effects of grants of permission⁵</p> <p>No change to Draft Plan.</p>
2f	<p>The Department recommends including a commitment in the CDP to undertake screening for SEA and if required, SEA, in relation to all downstream plans (which can be variously termed 'strategies', 'concept studies' 'programmes' and 'masterplans') as defined by Article 2(A) of the Strategic Environmental Assessment (SEA) Directive (Directive 2001/42/EC).</p> <p>Furthermore, the Department recommends that the Council ensures that all plans, defined by Article 2(A) of the SEA Directive (Directive 2001/42/EC), which are supported in whole</p>	<p>It is not within the scope of the SEA or the Plan to affect the undertaking of environmental assessment of initiatives that already exist; however, it is recommended that a measure is 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>

¹ Including monitoring of water quality and nitrogen deposition due to bioenergy and agricultural projects where available

² Including monitoring of disturbance / visitor pressure impacts of recreation, amenity and tourism development where available

³ Including monitoring of disturbance / visitor pressure impacts of recreation, amenity and tourism development where available

⁴ Including monitoring of disturbance / visitor pressure impacts of recreation, amenity and tourism development where available

⁵ Including monitoring of disturbance / visitor pressure impacts of recreation, amenity and tourism development where available

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	<p>or in part through policy objectives or otherwise have undergone screening for SEA and if required, SEA. The foregoing is in accordance with RPO 1 of the RSES for the Southern Region.</p> <p>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>	<p>Recommendation To integrate the following Policy into the Draft Plan:</p> <p>All plans and programmes⁶ 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>
2g	<p>1.2.2 Appropriate Assessment</p> <p>The Department recommends inclusion of a policy objective: To undertake screening for appropriate assessment and if required, appropriate assessment, in relation to all downstream plans and projects (including all planning applications) as required under Article 6 (3) of the EU Habitats Directive (92/43/EEC).</p> <p>The Department recommends that all plans, which are supported in whole or in part through policy objectives or otherwise, have undergone screening for appropriate assessment and if required, appropriate assessment, as required under Article 6 (3) of the EU Habitats Directive (92/43/EEC) in order to avoid of adverse effects on the integrity of European Sites and ensure implementation of mitigation measures where required.</p>	<p>Noted.</p> <p>Recommendation To amend Policy NS P2 as follows (new text in bold):</p> <p>Screening for Appropriate Assessment and if required, Appropriate Assessment is undertaken for all plans to be adopted and projects to be granted permission/authorised by the Council. Where likely significant effects have been identified, ensure an Appropriate Assessment, in accordance with Articles 6(3) and 6(4) of the Habitats Directive, is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site in order to determine that there will not be adverse impacts on a Natura 2000 site, either individually or in combination with other plans or projects, and to ensure that plans or projects which may give rise to significant, cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted unless for reasons of overriding public interest.</p>
2h	Strategic Objectives	Noted and agreed

⁶ 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

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	<p>The Department advises that Objective S. O10 'to 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' should be reworded.</p> <p>In relation to Policy Objective S. O10, the Department suggests the following rewording: 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)</p>	<p>Amend Strategic Objective S.O10 to:</p> <p>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>
2i	<p>2. Core Strategy</p> <p>Section 2.8.1 (Key Town – Carlow) states that key interventions are proposed that will reintegrate the River Barrow into the public realm through the development of pedestrian walkways and the development of key opportunity sites along the river. The River Barrow is part of an internationally important nature conservation site¹.The Department suggests that a focus on strengthening of Green Infrastructure network should also be included in this section.</p> <p>2.23.1 Plan Making It is noted that the preparation of a statutory Local Area Plan / Urban Area Plan (UAP) for the Greater Carlow Urban Area will be prioritised following the adoption of this CDP. Preparation of the UAP should be informed by a Green Infrastructure Plan for the UAP. This would be in keeping with the Council's Ecosystems Services Approach and will highlight the synergies that can be achieved with regard to the provision of open space, sustainable management of water, protection and enhancement of biodiversity.</p> <p>The Department recommends: prioritising a Green Infrastructure Plan for the Greater Carlow Urban Area to inform the Urban Area Plan. This should include a survey of existing habitats including the River Barrow and the Burren River, woodlands as well as other existing green spaces. Consideration should also be given to strengthening the Green Infrastructure network in accordance with RPO 124 of the RSES for the Southern Region.</p>	<p>This can be considered as part of the preparation of the Urban Area Plan for the Greater Carlow Urban Area.</p> <p>Recommendation No change to Draft Plan / SEA or AA.</p>
2j	<p>3.16 Single Housing in the Countryside</p>	<p>Noted. Provisions relating to Rural Housing Policy, including those relating to Rural Housing Policy Zone 2, are being subject to AA and</p>

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	<p>It is noted that the area around Hacketstown has been zoned as Rural Housing Policy Zone 2 (Other Rural Areas) (depicted in blue in Figure 1 below). Compliance criteria for single housing in 'Other Rural Areas' are less restrictive than criteria applicable to Rural Housing Policy Zone 1 (Rural Areas under Urban Influence). This is the only area of the county which has this zonation.</p> <p>The Department is concerned in relation to the possible impact of this policy on the Derreen River Freshwater Pearl Mussel catchment which it overlaps (shown in Figure 1 below). This catchment is protected under the European Communities Environmental Objectives (Freshwater Pearl Mussel) Regulations 2009 (S.I. No. 296/2009). Freshwater Pearl Mussel in the Derreen River catchment is a qualifying interest of the River Barrow and River Nore Special Area of Conservation (Site Code 002162) of which the Derreen River forms a part.</p> <p>On-site wastewater treatment systems and other small effluent systems can be significant sources of nutrients to rivers. Losses from such systems typically behave as diffuse nutrient sources, however, more serious leaks and inappropriate systems can cause point source pollution damage. On-site wastewater treatment systems were described as having 'significant risks' in the Derreen Freshwater Pearl Mussel Sub-Basin Management Plan with the proximity of many one-off houses to the river throughout the catchment is of particular concern. High numbers of one-off houses were observed along the main channel and the tributaries throughout the catchment. The Freshwater Pearl mussel population is at unfavourable conservation status in the Derreen catchment.</p> <p>The Department is concerned that cumulative impacts of new on-site wastewater treatment systems associated with single housing in Rural Housing Policy Zone 2 in combination with existing systems will have a negative impact on water quality within the Derreen River and on the Freshwater Pearl Mussel. In addition, there are risks of sediment pollution during construction, as well as hydrological impacts during construction and operation, owing to drainage, installation of hard surfaces, vegetation change.</p> <p>Appropriate assessment of the CDP must ascertain whether this policy will have significant adverse effects on the integrity of the River Barrow and River Nore Special Area of Conservation, in combination with the impacts of existing one off houses. The impacts of this policy must also be subject to Strategic Environmental Assessment.</p>	<p>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 To add the following requirement for Single Housing in Rural Housing Policy Zone 2:</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>The SEA and AA Reports will be updated to take account of this additional mitigation in relation to the potential effects and associated effects already identified.</p>

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	<p>The Department advises that Rural Housing Policy Zones and Criteria (RH. P1), in particular Rural Housing Policy 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>The Department advises that Rural Housing Policy Zones and Criteria (RH. P1), in particular Rural Housing Policy Zone 2, which lies partly within the Derreen River Freshwater Pearl Mussel Catchment, must be subject to Strategic Environmental Assessment</p>	
2k	<p>In relation to Policy RH. P6, the Department recommends 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 C753) and also to consider removing the reference to B.S. 8301:1985 which has been replaced.</p>	<p>Noted.</p> <p>Recommendation To include reference in Policy RH. P6 to the 'SUDS Manual' by the UK's Construction Industry Research and Information Association (CIRIA C753) and to remove reference to B.S. 8301:1985.</p>
2l	<p>Section 3.16.10 Replacement of Habitable Houses in the Countryside</p> <p>In relation to the replacement of derelict houses in the countryside and restoration and re-use of vernacular structures and houses in the countryside, consideration should be given to the protection of bat species listed on Annex IV of the Habitats Directive to ensure that the strict protection afforded to these species is met.</p> <p>The Department 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>The Department advises that if bat species are present, Carlow County Council must advise the applicant that an application for a derogation licence from complying with the requirements of Regulations 51 of the European Communities (Birds and Natural Habitats) Regulations 2011 to 2021, is required. The application should be made to National Parks and Wildlife Service of this Department under Regulation 54 of the above Regulations. It should 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.</p>	<p>Noted.</p> <p>Recommendation To include provisions in Policy RH P3 in the Plan:</p> <p>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.</p>

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2m	<p>6.5 Surface Water Drainage</p> <p>The Department 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. SuDS measures which favour biodiversity should be encouraged and in this regard, the Department 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> <p>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.</p> <ul style="list-style-type: none"> • The Department recommends that a link should be provided to the Carlow County Council SuDs policy referenced in Objective SW. O1. • The Department advises Carlow County Council to encourage above ground SuDS measures, rather than tanks and piped outfalls directly to watercourses, which will benefit biodiversity as well as attenuate floods. • The Department advises that a SUDS/Green Infrastructure selection checklist similar to that produced by Fingal County Council be submitted with all planning applications outlining all SuDs measures and the rationale for selecting/not selecting measure. • The Department 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. 	<p><u>6.5 Surface Water Drainage</u></p> <p>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> <p>Recommendation</p> <p>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>

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		<p>Include link to Council's SuDS policy in Objective SW. O1</p> <p>The SEA and AA Reports will be updated to take account of this additional mitigation in relation to the potential effects and associated effects already identified.</p>
2n	<p>6.9.1 Water Quality The Department suggests changing 'water-dependent ecosystems' to 'water dependent habitats and species' in Section 6.9.1.</p>	<p>Noted.</p> <p>Recommendation To replace 'water-dependent ecosystems' to 'water dependent habitats and species' in Section 6.9.1.</p>
2o	<p>6.10.4 Flood Risk Management - Policies In relation to policy FR. P5, the Department notes that Riparian Zone policies are contained in Section 10.7 of the CDP and not Section 10.8 as stated.</p>	<p>Noted.</p> <p>Recommendation To correct any typographical errors in the Plan.</p>
2p	<p>6.11.1 Air Pollution - Policies Nitrogen deposition is one of the leading causes of global decline in biodiversity alongside changing land use and climate. Intensive agriculture is a major source of nitrogen deposition with vehicular traffic also contributing. Natura 2000 sites which are intended to protect important habitats and species across Europe, require strict levels of protection to ensure designated features achieve favourable conservation status. Many of these sites are nitrogen-limited, and/or contain sensitive species such as lichens or mosses such as the Blackstairs Mountains Special Area of Conservation (Site Code 770). Details of nitrogen deposition mapping and impacts on habitats are included in the Department's latest Article 17 report. Impacts of nitrogen deposition include acidification and eutrophication resulting in biodiversity loss.</p> <p>The Department 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 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>	<p>Noted.</p> <p>Recommendation To amend Policy NS P2 as follows (new text in bold):</p> <p>Screening for Appropriate Assessment and if required, Appropriate Assessment is undertaken for all plans to be adopted and projects to be granted permission/authorised by the Council. Where likely significant effects have been identified, ensure an Appropriate Assessment, in accordance with Articles 6(3) and 6(4) of the Habitats Directive, is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site in order to determine that there will not be adverse impacts on a Natura 2000 site, either individually or in combination with other plans or projects, and to ensure that plans or projects which may give rise to significant, cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted unless for reasons of overriding public interest.</p>

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		<p>To amend Policy AG P4 as follows (new text in bold): 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>
<p>2q</p>	<p>6.13.1 Light Pollution – Policies</p> <p>Reported declines in insect populations have sparked global concern, with artificial light at night (ALAN) identified as a potential contributing factor. Recent scientific evidence indicates that ALAN and the ongoing shift toward white LEDs (i.e., from narrow- to broad-spectrum lighting) will have substantial consequences for insect populations and ecosystem processes.</p> <p>The Department 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.</p>	<p>Noted</p> <p>Recommendation Include additional policy LP P3 in Draft Plan; 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.</p> <p>The SEA and AA Reports will be updated to take account of this additional mitigation in relation to the potential effects and associated effects already identified.</p>
<p>2r</p>	<p>7. Climate Action and Energy</p> <p>7.13.4 Nature-Based Approaches and Green Infrastructure</p> <p>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.</p> <p>The Department 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.</p>	<p>Noted</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. O1 in Chapter 9 to develop a Green Infrastructure Strategy for the County in consultation with 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</p>

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		<p>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> <p>The SEA and AA Reports will be updated to take account of the foregoing.</p>
2s	<p>9.11 Green Infrastructure – A Strategy for Carlow</p> <p>It should be stated in this section that developing a Green Infrastructure Strategy for the County is an objective (GI. O1) of the CDP and not an intention.</p> <p>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.</p> <ul style="list-style-type: none"> The Department 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. 	As per response above.
2t	<p>In relation to Objective GI. P7 'Promote a network of walking and cycling trails to enhance accessibility to the County's green infrastructure network, and ensure such proposals are subject to route/site selection processes so that impacts to biodiversity and nature conservation interests are avoided', 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.</p> <p>Transport infrastructure (including walking and cycling trails) provides potential opportunities to act as Green Infrastructure corridors. It is an objective (RPO 125) of the RSES for the Southern Region to support local authorities acting together with relevant national infrastructure providers to co-develop infrastructural management plans to enhance biodiversity.</p> <p>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).</p> <ul style="list-style-type: none"> The Department recommends inclusion of an objective in the CDP: to seek to create new Green Infrastructure corridors incorporating walking and cycling trails, thereby avoiding areas of existing Green Infrastructure and biodiversity loss. 	<p>Noted.</p> <p>Recommendation</p> <p>To amend Objective GI. P7 (new text in bold):</p> <p>'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> <p>To amend Policy NS P2 as follows (new text in bold):</p> <p>Screening for Appropriate Assessment and if required, Appropriate Assessment is undertaken for all plans to be adopted and projects to be granted permission/authorised by the Council. Where likely significant effects have been identified, ensure an Appropriate</p>

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		Assessment, in accordance with Articles 6(3) and 6(4) of the Habitats Directive, is carried out in respect of any plan or project not directly connected with or necessary to the management of a Natura 2000 site in order to determine that there will not be adverse impacts on a Natura 2000 site, either individually or in combination with other plans or projects, and to ensure that plans or projects which may give rise to significant, cumulative, direct, indirect or secondary impacts on Natura 2000 sites will not be permitted unless for reasons of overriding public interest.
2u	<p>10. Natural and Built Heritage</p> <p>10.1 Policy Context</p> <p>The Department suggest the inclusion of the National Pollinator Plan 2021-2025 and the National Peatlands Strategy 2015 in this section.</p> <p>The Department advises that the following citations should be used in this section and the rest of the CDP:</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 	<p>Noted</p> <p>Recommendation To add reference to these as suggested in the Draft Plan.</p>
2v	<p>General: Natural Heritage – Policies</p> <p>The Department welcomes the strong and clear commitment by Carlow County Council outlined in Policy NH. P1 to 'Protect, manage and enhance the natural heritage, biodiversity, landscape and environment of County Carlow in recognition of its importance as a non-renewable resource, a unique identifier, and as a natural resource asset.' However, it is noted that the subsequent policy (NH. P2) undermines this commitment by the inclusion of the statement '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'.</p> <p>The Department recommends the removal of the words 'as far as practicable' from Policy NH. P2 in accordance with Objective 1 of the National Biodiversity Plan 2017-2021 to 'Mainstream biodiversity into decision making across all sectors'</p> <p>The Department recommends the removal of the words 'as far as is practicable' from Policy NH. P2 to strengthen the CDP's commitment to biodiversity protection and enhancement</p>	<p>Objective 1 of the National Biodiversity Plan 2017-2021 is as follows: "Mainstream biodiversity into decision-making across all sectors".</p> <p>It would not be reasonable to "ensure that development does not adversely impact on wildlife habitats and species" as this would prevent any future greenfield and possibly certain brownfield development in the County. The wording of Policy NH P2 is appropriate.</p> <p>Recommendation No change to SEA, AA or Draft Plan.</p>

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	and to ensure that the CDP meets its statutory obligations in relation to nature conservation.	
2w	The Department 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>Agreed.</p> <p>Recommendation Move Policy NH. P8 which seeks to <i>Promote, protect and enhance sustainable and appropriate access to the natural heritage of the county</i>, to Section 11.5 Tourism and Recreation.</p>
2x	<p>General Natural Heritage - Objectives</p> <p>The Department welcomes the commitment given in Objective NH. O1 to prepare a County Heritage Plan and Biodiversity Action Plan during the lifetime of the CDP. A policy objective should be included to implement, monitor and review these plans in accordance with RPO 126 of the RSES for the Southern Region.</p>	<p>Agreed.</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 designation of existing special areas of conservation i.e. Blackstairs Mountains, Slaney River Valley and River Barrow and River Nore SAC.</p> <p>The SEA and AA Reports will be updated to take account of this additional mitigation in relation to the potential effects and associated effects already identified.</p>
2y	<p>Natura 2000 Sites – Policies</p> <p>The Department recommends that the wording of Policy NS. P1 is changed to the following: '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</p>	<p>Agreed</p> <p>Recommendation Replace the wording of Policy NS. P3 with: <i>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</i></p>

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	<p>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>The Department recommends that the wording of Policy NS. P3 is changed to the following: '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'</p> <p>It is 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>	<p>amended), Flora (Protection) Order (or other such Orders), and the Habitats Directive. Consider impacts within a 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'.</p> <p>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>
2z	<p>Natural Heritage Areas – Policies</p> <p>The Department advises that Policy NHA. P1 must be strengthened. There should be a clear commitment made to protecting the ecological integrity of proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs) and to ensuring that development does not have a significant adverse effects on these sites.</p> <p>The Department 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 effects on these sites. In this regard, the protecting of visual, recreational and amenity value of these sites must be considered in a separate policy objective.</p>	<p>Agreed</p> <p>Recommendation</p> <p>It is recommended to amend Policy NHA P1 as follows (new text in bold, text to be deleted in strike through):</p> <p>NHA P1 is to "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>
2z-i	<p>The Department advises that protecting the visual, recreational and amenity value of these sites must be considered in a separate policy in a different section of the CDP. This would also assist the council in securing and monitoring the implementation of the policies and objectives of this Plan and in the Department's monitoring of the NBAP which includes the performance indicator 'Number of explicit policies and objectives for biodiversity and ecosystem services in County Development Plans and other local plans per Local Authority'.</p>	<p>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 CDP. 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</p> <p>No change to SEA, AA or Draft Plan.</p>

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2z-ii	The Department 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.'	<p>Agreed</p> <p>Recommendation Amend Policy NHA PI as follows (new text in bold, text to be deleted in strikethrough):</p> <p>NHA P2: To 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>
2z-iii	The Department 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>Noted.</p> <p>Recommendation To amend Policy NHA. P3 as follows (new text in bold):</p> <p>'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>
2z-iv	<p>10.5 Non-Designated Areas, Habitats and Species</p> <p>The Department recommends that the wording of Objective ND. P2 be changed to the following '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)'</p>	<p>Agreed.</p> <p>Recommendation To amend as recommended.</p> <p>Amend the wording of Policy NHA. P2 as follow (new text in green):- <i>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</i></p>

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		<i>Act 1976 (as amended), the Habitats Directive and the Birds Directive, including their habitats.</i>
2z-v	The Department recommends the removal of the words 'where deemed necessary' from Policy ND. P3.	<p>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.</p> <p>Recommendation No change to SEA, AA or Draft Plan</p>
2z-vi	The Department recommends that a clear commitment to restricting the use of herbicide is included in Policy ND. P6 'Ensure that the management of the Council's open spaces and parks is pollinator-friendly and provides more opportunities for biodiversity' and that this policy explicitly supports the objectives of the National Pollinator Plan 2021-2025.	<p>Agreed</p> <p>Recommendation It is recommended to amend Policy ND P6. as follows (new text in bold):</p> <p>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>
2z-vii	<p>It should be noted in this section that 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, all possible measures to avoid damage and disturbance to them must be taken 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.</p> <p>The Department recommends that a policy is included which outlines the strict protection afforded species listed in Annex IV of the Habitats Directive as well as licencing requirements.</p>	<p>Agreed.</p> <p>To add the following text to the Plan:</p> <p>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</p>

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	<p>The Department recommends that a section is included which outlines the strict protection afforded species listed in Annex IV of the Habitats Directive as well as licencing requirements.</p>	<p>indicate which of the reasons listed in the legislation cover the application and also include all suggested mitigation measures.</p> <p>To inserted the following provision into the Plan: The Council will fulfil its duties in relation to the strict protection afforded species listed in Annex IV of the Habitats Directive and associated national derogation licencing requirements.</p>
<p>2z-viii</p>	<p>Surveys carried out for the preparation of environmental assessments generally generate biodiversity data, and the Department advises the inclusion an objective to ensure these data are made available to the National Biodiversity Data Centre (NBDC) on an ongoing basis. This will strengthen the County's biodiversity knowledge base and ultimately aid its protection.</p> <p>The Department 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>	<p>Agreed.</p> <p>Recommendation To add the following commitment the Plan:</p> <p>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>
<p>2z-ix</p>	<p>Invasive Alien Species – Policies</p> <p>In relation to Policy IS. P1, the Department recommends the inclusion of the following best practice guidance by Transport Infrastructure Ireland (TII):</p> <p>1) 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</p> <p>2) TII (2020) The Management of Invasive Alien Plant Species on National Roads – Technical Guidance https://www.tiipublications.ie/library/GE-ENV-01105-01.pdf</p>	<p>Agreed</p> <p>Recommendation Include reference to the guidance documents in Policy IS P1.</p>
<p>2z-x</p>	<p>11. Tourism and Recreation</p> <p>Natural Heritage Amenities – Policies</p> <p>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. The Department considers 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 or 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.</p> <p>The Department recommends that all development resulting from Policy HT. P11, Policy HT. P12, and HT. P13 must be subject to environmental assessment including, as</p>	<p>Noted. These provisions have been assessed by the SEA and AA.</p> <p>Recommendation To insert the following text ahead of these policies:</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 accompanying SEA Environmental Report.</p>

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	<p>appropriate, Strategic Environmental Assessment, screening for appropriate assessment, appropriate assessment, Environmental Impact Assessment and Ecological Impact Assessment, as required. In accordance with European case law⁶, 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.</p> <p>The Department advises that all planning applications resulting from Policy HT. P11, Policy HT. P12, and HT. P13 should include Invasive Species Management Plans.</p>	<p>Applications for development/emerging plans or programmes under Policy HT. P11, Policy HT. P12, and HT. P13 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. Applications for development under these Plan provisions must demonstrate that the proposed use or development is sustainable and must be accompanied by an Invasive Species Management Plan.</p>
2z-xi	<p>Greenways and Blueways – Policies</p> <p>Policy GB. P1 is to 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. The Department advises 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. 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.</p>	<p>These provisions have been assessed by the SEA and AA.</p> <p>Recommendation</p> <p>To amend Policy GB P1 by adding the following text:</p> <p>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>
2z-xii	<p>13.4.7 Landscaping and Boundary Treatments</p> <p>Key Principles - Landscape and Boundary Treatments</p> <p>One of the key principles is to 'Avoid tarmacadam, concrete and brick driveways. Aim for self-draining gravel which is more suitable for a rural setting in terms of visual impact and surface water drainage.'</p> <p>The Department notes that keeping gravel weed-free will require the gravelled area to be regularly treated with herbicide unless weeds are dug out by hand. The Department therefore advises that gravel may not be environmentally sustainable and to consider the use of other sustainable paving systems such as grasscrete.</p>	<p>Agreed.</p> <p>Recommendation</p> <p>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 a rural setting in terms of visual impact and surface water drainage. In the

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<p>Another key principle is to 'Plant wild meadows or strim grass areas which are more natural to rural areas.' The Department advises that the wording of this key principle 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. Areas of grass should not be sprayed with herbicide to prepare seedbeds for wildflowers to grow. The Department suggests the following alternative wording '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.'</p> <p>The Department recommends the inclusion of the following key principle: 'Provide appropriate setback from watercourses (including streams and drains), woodlands and wetlands allowing natural vegetation to develop.'</p>	<p>interests of environmental protection and biodiversity use of herbicides should be minimised with weeds dug out by hand.</p> <ul style="list-style-type: none"> Plant wild meadows or strim grass areas which are more natural to rural areas. 'Incorporate wildflower meadows by enhancing existing grass areas through reduced mowing. When strimming these areas (in very early spring and late autumn) grass cuttings should be removed. Planting new areas of wildflowers should be seen as a last resort and then only native species of Irish origin should be used'. <p>Provide appropriate setback from watercourses (including streams and drains), woodlands and wetlands allowing natural vegetation to develop</p>
<p>2z-xiii</p>	<p>Archaeology</p> <p>The Department welcomes the opportunity to comment on the Carlow Draft County Development Plan 2022-2028 and notes that the plan contains a specific 'Natural and Built Heritage' Chapter (Chapter 10). The policies and objectives set out therein in relation to Built and Archaeological Heritage are to be welcomed and in general encompass a wide range of heritage protection measures and pro-active policies. Please 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.</p> <p>Please note that with regard to the County's Underwater Cultural Heritage, 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 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.</p> <p>Additional Policy/Objectives – for consideration</p>	<p>Agreed</p> <p>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 (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</i></p>

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<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, in that regard, as an alternative to extensions to historic graveyards to endeavour to find alternative locations where additional land for burial is considered necessary. • 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 behaviour, or are not left in, or allowed to deteriorate to be in, a condition 	<p>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.</p> <p>Amend the wording of Policy AH. P8 as follows (new text in green): <i>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.</i></p> <p>Include an additional Policy AH. P9 as follows:- <i>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 guidance and advice of the Department of Housing, Local Government and Heritage.</i></p> <p>Include an additional Policy AH. P9 as follows:- <i>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, 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 behaviour, 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.</i></p>

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<p>incompatible with public safety. Accordingly, where such incorporation takes place an appropriate and enforceable permanent management and conservation plan will be required.</p> <p>Recommended Climate Change Policies and Objectives for Archaeological Heritage</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. Material for this follows. • To promote awareness and the appropriate adaptation of Ireland's built and archaeological heritage to deal with the effects of climate change. • 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>Include an additional Policy BH. P6 as follows:- <i>Promote awareness and the appropriate adaptation of the County's architectural and archaeological heritage to deal with the effects of climate change.</i></p> <p>The SEA and AA Reports will be updated to take account of this additional mitigation in relation to the potential effects and associated effects already identified.</p>
3. Department of the Environment, Climate and Communications (Geological Survey of Ireland)		
3a	<p>Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our website for data availability. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'.</p> <p>With reference to your email received on the 16 July 2021, concerning the Carlow Draft County Development Plan 2022-2028, Geological Survey Ireland would encourage use of and reference to our datasets. Please find attached a list of our publicly available datasets</p>	<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation										
	<p>that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your Plan. The remainder of this letter and following sections provide more detail on some of these datasets and specific chapters in the Draft Plan.</p>											
<p>3b</p>	<p>Geoheritage</p> <p>In Chapter 10 'Natural and Built Heritage' of the draft Development Plan, we are pleased to see the 6 Carlow County Geological Sites (CGSs), listed in Section 10.9 'Geological Heritage'. We commend the inclusion of geoheritage as specific policies and objectives:</p> <table border="0" data-bbox="286 485 1236 916"> <tr> <td data-bbox="286 485 627 507">Geological Heritage - Policies</td> <td data-bbox="658 485 1236 507">Geological Heritage - Objectives</td> </tr> <tr> <td data-bbox="286 529 627 552">It is the policy of the Council to:</td> <td data-bbox="658 529 1236 552">It an objective of the Council to:</td> </tr> <tr> <td data-bbox="286 574 627 651">GH P1: Protect and enhance the geological and geomorphological heritage of the County.</td> <td data-bbox="658 574 1236 676">GH O1: Protect geological Natural Heritage Areas (NHAs) as they become designated during the lifetime of this Plan.</td> </tr> <tr> <td data-bbox="286 676 627 772">GH P2: Protect from inappropriate development the list of County Geological Sites (CGS) included in this Plan.</td> <td></td> </tr> <tr> <td data-bbox="286 794 627 916">GH P3: Consult with the Geological Survey of Ireland on development proposals which are likely to impact on County Geological Sites or involve significant ground excavations.</td> <td></td> </tr> </table> <p>In the SEA environmental report, we are pleased to see the 6 Carlow County Geological Sites listed in Section 4.8.1 'Geological Sites' and delineated in map form in Figure 4.9 'County Geological Sites'.</p> <p>The Geological Heritage Programme views the Local Authorities as critical partners in protecting, through the planning system, those CGS which fall within their county limits. In many cases these are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process.</p> <p>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. It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases</p>	Geological Heritage - Policies	Geological Heritage - Objectives	It is the policy of the Council to:	It an objective of the Council to:	GH P1: Protect and enhance the geological and geomorphological heritage of the County.	GH O1: Protect geological Natural Heritage Areas (NHAs) as they become designated during the lifetime of this Plan.	GH P2: Protect from inappropriate development the list of County Geological Sites (CGS) included in this Plan.		GH P3: Consult with the Geological Survey of Ireland on development proposals which are likely to impact on County Geological Sites or involve significant ground excavations.		<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>
Geological Heritage - Policies	Geological Heritage - Objectives											
It is the policy of the Council to:	It an objective of the Council to:											
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GH P2: Protect from inappropriate development the list of County Geological Sites (CGS) included in this Plan.												
GH P3: Consult with the Geological Survey of Ireland on development proposals which are likely to impact on County Geological Sites or involve significant ground excavations.												

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<p>development may facilitate enhanced geological understanding of a site by exposing more rock sections - for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development.</p> <p>County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest.</p> <p>As always we are available if you require any further information</p>	
3c	<p>Culture and Tourism</p> <p>We note in Chapter 11 'Tourism and Recreation', Section 11.12.1 'County Carlow's Outdoor Recreation Strategy 2020-2023', the aims to:</p> <ul style="list-style-type: none"> • Identify the required infrastructure for recreation (signage, parking, trail furniture etc.). • Identify cross-cutting themes i.e. rivers and walks. <p>We would ask that the 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 that are in the vicinity of waymarked and signposted walking routes/trails. We would also ask that geology be considered as a component in the cross-cutting themes. We would be more than happy to work with the Local Authority and to assist in providing relevant content for any such signage</p>	<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 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 SEA,AA or Draft Plan.</p>
3d	<p>Groundwater</p> <p>We are pleased to see use of our Groundwater Vulnerability and Aquifer maps and data and a list of the source protection areas for drinking water supplies in Co. Carlow in the draft SEA under Section 4.9.6 'Aquifer Vulnerability and Productivity', and in Section 4.8.3 'Source Protection Areas'.</p>	<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>
3e	<p>Geohazards</p> <p>We welcome the inclusion of our Landslide Events and Landslide Susceptibility database to highlight areas of risk in Co. Carlow in Section 4.8.4 'Landslides' in the draft SEA report.</p>	<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>
3f	<p>Geothermal Energy</p> <p>In Chapter 7 'Climate Action and Energy', We welcome the inclusion of our maps in Figure 7.10: 'Geothermal Maps for County Carlow' and Figure 7.11: 'Geothermal Resource – Open Loop Larger Commercial and Industrial Suitability'.</p> <p>We would like to highlight two new publications which will be of benefit to the CDP's geothermal energy strategy. The Roadmap for a Policy and Regulatory Framework for</p>	<p>Noted.</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 in decarbonising the energy sector, the Geological Survey</p>

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<p>Geothermal Energy was launched at the Geoscience 2020 Conference in November 2020. The Assessment of Geothermal Resources for District heating in Ireland and the Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland documents have been developed to support the Government's commitments under the Climate Action Plan 2019 and the Programme for Government.</p> <p>For further information please see our Geoenergy pages on our website or contact the Groundwater Programme of the Geological Survey Ireland directly.</p>	<p>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>
<p>3g</p>	<p>Natural Resources (Minerals/Aggregates)</p> <p>In Section 4.11.8 'Minerals and Aggregates' of the draft SEA report, we are pleased to see mention of our Minerals, Aggregate Potential Mapping, Bedrock Mapping, Quaternary and Physiographic datasets that would be of benefit to planning and individual projects.</p> <p>In Chapter 14 'Rural Development', Section 14.16 'Extractive Industry, Aggregates (stone, sand and gravel) and Limestone Reserves', we are pleased to see mention of our Aggregate Potential Mapping (APM) and inventory of active and historical quarries and pits datasets.</p> <p>In Section 14.16.3 '14.16.4 Extractive Industry - Aggregates (stone, sand and gravel) and Mineral Resources - Objectives', we commend objective EI 02:</p> <p>EI 02: Consult with the Geological Survey of Ireland (GSI) with regard to any developments likely to have an impact on Sites of Geological Importance listed in Chapter 10 of this Plan.</p> <p>With regard to policy EI P4 to "...to promote a whole of life plan for an extractive location, including restoration / rehabilitation plans and proper land use management.", Geological Survey Ireland would request that the local authority considers including the following, which could be included as a condition of planning for future extractive industry planning permissions as deemed appropriate by the planning authority:</p> <ol style="list-style-type: none"> 1. Allowing access to quarry faces by appropriate scientists (upon request and with due regards to Health and Safety requirements) during quarrying to record significant new stratigraphies / relationships as they might become exposed and to establish if the quarry site is worthy of recognition post extraction and through aftercare/restoration planning. 2. If deemed appropriate in (1) above, leaving a representative section of the quarry face at the end of the quarry life or inclusion of information panels to promote the geology to the public or develop tourism or educational resources if 	<p>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>Recommendation</p> <p>No change to SEA,AA or Draft Plan .</p>

No.	Issue of Relevance to SEA/AA Raised	Chief Executive's Response and Recommendation
	<p>appropriate depending on the future use of the site. Natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface.</p> <p>The Geoheritage Programme tries to promote a partnership between geological heritage and active quarrying, with such measures as those outlined in the 'Geological Heritage Guidelines for the Extractive Industry', which can be downloaded here. This document, written in association with Irish Concrete Federation, acts as a comprehensive guide in the sustainable extraction of natural resources while preserving the geological heritage of Ireland.</p>	
3h	<p>Geochemistry of soils, surface waters and sediments</p> <p>Geological Survey Ireland 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. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx. This page also hosts urban geochemistry Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture (Terra Soil), waste soil characterisation (Geochemically Appropriate Levels for Soil Recovery Facilities) and mineral exploration (Mineral Prospectivity Mapping).</p>	<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>
3i	<p>Geophysical data</p> <p>Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils & rocks as part of the Tellus programme. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.</p>	<p>Noted.</p> <p>Recommendation No change to SEA,AA or Draft Plan .</p>

Appendix III: Strategic Flood Risk Assessment

Strategic Flood Risk Amendments on Submissions to Draft Carlow County Development Plan 2022-2028 – Proposed Amendments

Amend Section 5.1

Table 5-1 Surface Water Policy

Policy	Description
SW P2	Ensure, as an alternative to underground tanks and piped outfalls to watercourses , that all development proposals incorporate Sustainable Drainage Systems and to 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.

Amend Section 5.2

Table 1 Flood Risk Management Objectives

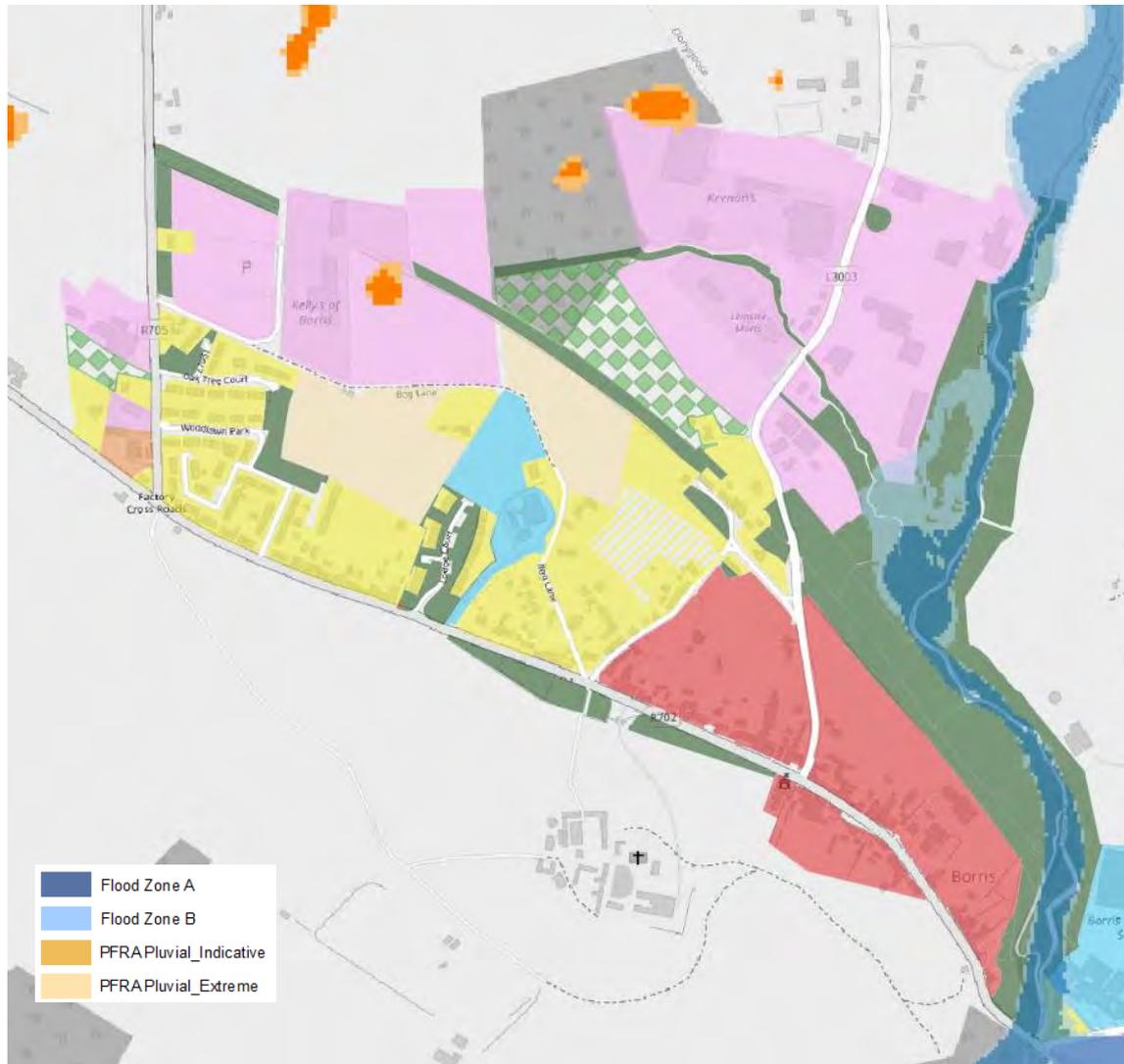
Policy	Description
FR O2	Facilitate the provision of new, or the augmentation of existing flood defences and protective measures where necessary, including natural flood management measures where deemed appropriate and to support the implementation of proposed flood schemes while also seeking to ensure zoning or development proposals support 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.

	There are some isolated low spots within the settlement that result in predicted pluvial flooding.
Climate Change	There is limited predicted increase in fluvial flood extent resulting from climate change. Potential increase in surface water runoff from increased rainfall.
Conclusion	<p>Risk is limited to existing development and the Justification Test has been applied and passed for existing residential, community and education (Garda Station) and utilities use (see Appendix A.1)</p> <p>The Justification Test for existing residential is passed on the basis that development is;</p> <p>Limited to extensions, renovations and change of use.</p> <p>Infill residential development and demolition and reconstruction can only take place in Flood Zone C. Any expansion of the Garda Station must avoid Flood Zone A/B.</p> <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 points detailed in Part 3 of the JT under Appendix A.1.1)</p> <p>The Justification Test for existing utilities use (WWTP) is passed on the basis that 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 points detailed in Part 3 of the JT under Appendix A1.3.</p> <p>Elsewhere in the settlement risk can be managed in line with approved CCCDP Policy (particularly surface water) and the guidance provided within Section 6. of this SFRA.</p>

Amend Section 7.9 Borris with additional text in Green

7.9 Borris

Hierarchy/Tier	Tier 3 - Small Towns
Area for Further Assessment under CFRAM programme?	No



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The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due to overtopping or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from defences are annotated separately.

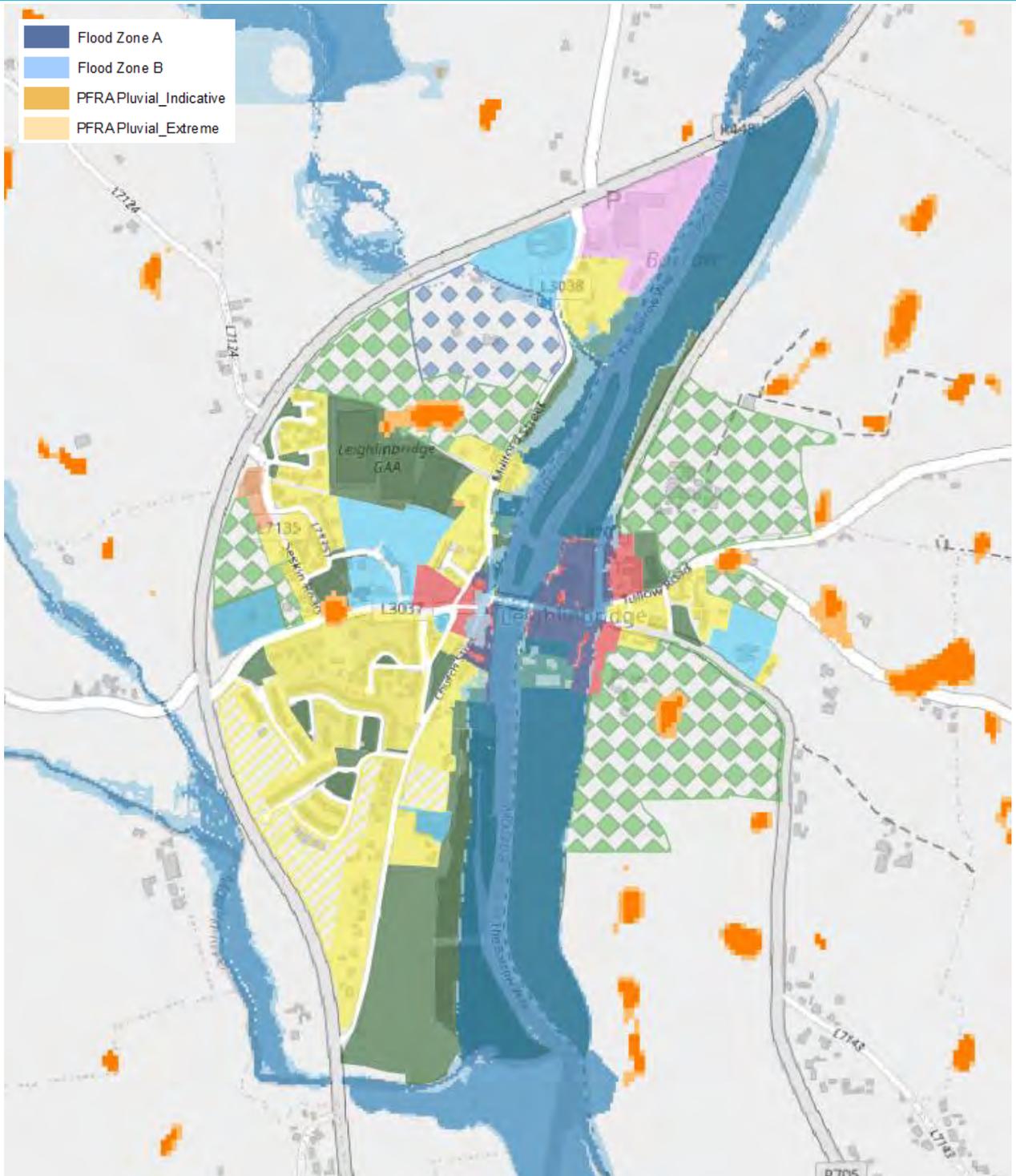
Flood Zone Data	NIFM & PFRA Pluvial
Historic Flooding	No historic records found within settlement boundary.
Comment	The Mountain River flows in a westerly direction along the southern boundary of the settlement. A tributary of the Mountain River (the River Durin) approaches from the north and is for the most part contained within Amenity and Open Space zoning. However, the tributary (Flood Zone A & B) impacts existing Community Services & Education lands and the Mountain River (Flood Zone A & B) impacts existing residential and enterprise and employment lands. The

	<p>Justification Test has been applied to these lands.</p> <p>Flood Zone B impacts undeveloped enterprise and employment lands to the east of the L303 which are under commercial use, the Justification Test does not apply here as the use is less vulnerable.</p>
Climate Change	<p>There is limited predicted increase in fluvial flood extent resulting from climate change on the Mountain River, but the River Durin has more sensitivity due to potential increase in surface water runoff from increased rainfall.</p>
Conclusion	<p>Risk to existing development has had the Justification Test applied and has passed for existing Community Services & Education (Borris Vocational School), existing Residential and existing Enterprise and Employment (Kelly's Steelworks & the Grass Technology site), see Appendix A.2.</p> <p>Any future expansion of the Borris Vocational 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 points listed in Appendix A.2.1 The existing Residential site must adhere to the recommendations in Appendix A2.2.</p> <p>The Justification Test for existing enterprise and employment (Kelly's Steelworks) is passed on the basis that development is limited to the existing less vulnerable use. Redevelopment as highly vulnerable housing would not be permitted and 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 points detailed in Part 3 of the JT under Appendix A.2.3. The small overlap with the Grass Technology site has also passed the Justification Test which will ensure application of the sequential approach as per Appendix A.2.4.</p> <p>Elsewhere in the settlement there are some Enterprise and Employment lands either bounding Flood Zone B or containing Flood Zone B. On these lands for any future applications these must be subject to an appropriately detailed FRA. In all other areas risk can be managed in line with approved CCCDP Policy and the guidance provided within Section 6 of this SFRA.</p>

Amend Section 7.21 with additional text in Green

7.21 Leighlinbridge

Hierarchy/Tier	Tier 3 - Small Towns
Area for Further Assessment under CFRAM programme?	Yes



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The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due to overtopping

or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from defences are annotated separately.	
Flood Zone Data	CFRAM & PFRA Pluvial
Historic Flooding	Recurring flooding has been recorded at Leighlinbridge, with events recorded in January 1995, November 2000 and November 2009. Extent of the flooding in 1995 and 2009 is unknown but flooding of 6 residential and 4 commercial properties is recorded to have occurred in Nov 2000.
Comment	<p>Leighlinbridge is partly protected by a scheme that comprises a storm water pumping station, flood defence walls, flood defence gates and embankments provide protection to the 1% AEP for 37 properties.</p> <p>Further works to augment the existing measures were proposed from the CFRAM Management Plan but are yet to be constructed.</p> <p>The River Barrow flows in a southerly direction through the settlement, a significant amount of the floodplain is appropriately set aside as open space. But there are areas of defended and undefended existing Town Centre, Community and Educational, Tourism, Enterprise and Employment and Residential development which requires application of the Justification Test.</p>
Climate Change	Low sensitivity to climate change, apart from under the HEFS scenario 0.1% which increases risk around Milford Street and the sports complex area. Potential increase in surface water runoff from increased rainfall.
Conclusion	<p>Although Leighlinbridge is subject to an existing scheme, this requires augmentation to fully achieve the required standard of protection for existing development, as such a precautionary approach has been applied to development and this is outlined in the Justification Tests under Appendix A.9 Appendix A.9.1 clarifies that the test has passed for the existing Residential land on the basis that development is limited to the existing vulnerability use and extensions/refits/change of use. Significant redevelopment within Flood Zone A/B would not be appropriate prior to any future flood relief scheme and then it would need to be justified at plan making stage, presumably in a future iteration of the development plan. Any future planning applications for extensions/refits/change of use should be subject to an FRA. The Justification Test was also passed for existing Community and Educational, Enterprise and Employment and Tourism lands and the sequential approach has been applied in each case as detailed in Appendix A.9.2, A.9.3. and A.9.4.</p> <p>Elsewhere, risk can be managed in line with approved CCCDP Policy and the guidance provided within Section 6 of this SFRA.</p>

Amend Section 7.27 for Palatine with additional text in Green

7.27 Palatine

Hierarchy/Tier	Tier 4 - Larger Serviced Village
Area for Further Assessment under CFRAM programme?	No
<p>© OpenStreetMap contributors, CC-BY-SA, The flood mapping has been produced in accordance with the Planning Guidelines and therefore ignores the impact of flood protection structures. Areas protected by flood defences still carry a residual risk of flooding due to overtopping or breach, there may also be no guarantee of maintenance in perpetuity. Areas that benefit from defences are annotated separately.</p>	
Flood Zone Data	NIFM & PFRA Pluvial
Historic Flooding	No records within the settlement boundary.

Comment	A tributary of the River Barrow flows in a north westerly direction through the settlement. It is predicted to impact some existing development including Village Core (residential), Existing Residential and the Utilities zoning (WWTP). The Justification Test must be applied for these areas. Some pockets of pluvial flooding are predicted in the central area of the settlement, principally in open space zoning, but some is within Village Core lands. The pluvial mapping is indicative and representative of topographic depressions.
Climate Change	High sensitivity to climate change impacts with some Village Core lands at risk under future climate change scenarios . Potential increase in surface water runoff from increased rainfall.
Conclusion	<p>Risk to existing development has had the Justification Test applied and has passed for existing zoned lands see Appendix A.10</p> <p>The Justification Test for Village Core and Existing Residential is passed on the basis that development is;</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 points detailed in Part 3 of the JT under Appendix A.10.1 and A. 10.2</p> <p>The Utilities lands within Flood Zone A/B are in use as a WWTP. The Justification Test has been applied and passed; development here must address the points highlighted in A.10.3.</p> <p>Elsewhere in the settlement risk can be managed in line with approved CCCDP Policy and the guidance provided within Section 6 of this SFRA. Development within Village Core areas that are adjacent to the predicted pluvial flooding should ensure that the risk is managed through the appropriate design of the stormwater system and compliance with the surface water policies and objectives.</p>

A Justification Tests

Include Additional Justification Test Section A 1.2 Ballon Community and Educational

Garda Station	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Ballon is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Zoning for community and education reflects existing established developed land use at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing development site.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises significant previously developed land.</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is within the established designated urban settlement.</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>Lands already developed</p>
<p>v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or</p>	<p>Lands already developed</p>

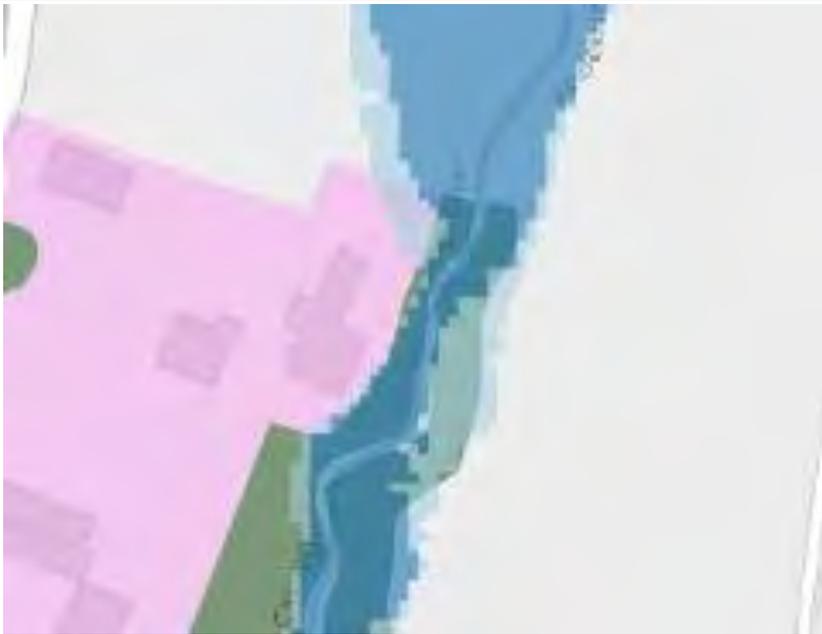
<p>adjoining the core of the urban settlement.</p>	
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>A very small area of the southern part of the site bounds the watercourse and is in Flood Zone A.</p> <p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that development is;</p> <ul style="list-style-type: none"> • Limited to 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 any extension to the Garda Station must not encroach into 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; • Any development shall also be required to be built in accordance with CCC SuDS Policy.

Include Additional Justification Test Section 2.2 Borris Existing Residential

Residential site next to Vocational School	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Borris is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Zoning for Existing Residential reflects existing established developed land use at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing development on site.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises significant previously developed land.</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is within the established designated urban settlement.</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>Lands already developed</p>
<p>v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>Lands already developed</p>
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts</p>	<p>The existing residential site is mostly within Flood Zone A and Flood Zone B.</p> <p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that development is;</p> <ul style="list-style-type: none"> • Limited to extension, renovation and change of use.

<p>elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<ul style="list-style-type: none"> • 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 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-story 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.
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Include Additional Justification Test Section A 2.4 Borris Existing Enterprise and Employment

Existing Enterprise & Employment to north of Borris	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Borris is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Lands are zoned enterprise and employment in recognition of a long-established employment uses at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing established development site and consolidation over the period of this plan is appropriate.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises previously developed and underutilised lands.</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is located within the established designated urban settlement.</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>This site is located in proximity to the Viaduct a tourist attraction in the area and where redevelopment of the site and utilisation of underutilised lands for appropriate uses would achieve compact development and would be in accordance with the proper planning and sustainable development of the area.</p>
<p>v. There are no suitable alternative lands for</p>	<p>Enterprise and employment use already</p>

<p>the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>established on these lands.</p>
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>There is a small margin of Flood Zone A in the north east corner of the site.</p> <p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that any future planning applications on the site/area should avoid development within Flood Zone A and 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 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; • Any development shall also be required to be built in accordance with CCC SuDS Policy.

Include Additional Justification Test Section 9.2 Leighlinbridge Existing Community and Educational

Nursing Home	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Leighlinbridge is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Zoning for Existing community and education reflects existing established developed land use at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing established development site.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises significant previously developed land.</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is within the established designated urban settlement.</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>Lands already developed</p>
<p>v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>Lands already developed</p>
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will</p>	<p>A very small area of the southern part of the site bounds the watercourse and is in Flood Zone A/B. Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that development</p>

<p>not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>is;</p> <ul style="list-style-type: none"> • Limited to 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 from the CFRAM but there is limited reporting on water levels. An appropriately detailed FRA would be required to demonstrate how flood risk is mitigated if developing in close proximity to Flood Zone A/B. • The sequential approach should be applied and any extension to the Nursing Home must not encroach into 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; • Any development shall also be required to be built in accordance with CCC SuDS Policy.
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Include Additional Justification Test Section 9.3 Leighlinbridge Enterprise and Employment

Arboretum Site	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Leighlinbridge is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Lands are zoned enterprise and employment in recognition of a long-established employment uses at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing development site and consolidation of use appropriate over the period of this plan.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises previously developed and underutilised lands.</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, is located within the established designated urban settlement.</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>This site subject to the zoning is occupied by an established garden centre and is largely developed. The area subject to flood risk is subject to open space / landscaping. Consolidating development outside the flood risk zones would achieve compact development and would be in accordance with the proper planning and sustainable development of the area.</p>
<p>v. There are no suitable alternative lands for</p>	<p>Enterprise and employment use already</p>

<p>the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>established on these lands.</p>
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>The eastern fringe of the Arboretum site bounds the River Barrow and is in Flood Zone A/B. The area is subject to open space/landscaping and no buildings are situated within the area.</p> <p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that the sequential approach is applied.</p> <p>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:</p> <ul style="list-style-type: none"> • The sequential approach should be applied; • 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; • Any development shall also be required to be built in accordance with CCC SuDS Policy.

Include Additional Justification Test Section 9.4 Leighlinbridge Existing Tourism

Rathvinden House	
	
<p>1. The urban settlement is targeted for growth under the National Planning Framework, Regional Spatial and Economic Strategy (RSES), statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>Leighlinbridge is designated as a Small Town within the Carlow County settlement hierarchy. It plays an important role in providing services for the town and the surrounding rural area. Facilitating sustainable development in existing towns and villages is recognised as paramount within the NPF and the RSES to ensuring sustainability, vitality and viability of rural areas.</p>
<p>2. The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and in particular:</p>	<p>Lands are zoned Tourism reflecting the established land use at this location.</p>
<p>i. Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement</p>	<p>Existing development established at this location.</p>
<p>ii. Comprises significant previously developed and/or underutilised lands,</p>	<p>Yes, comprises significant previously developed lands</p>
<p>iii. Is within or adjoining the core of an established or designated urban settlement,</p>	<p>Yes, the site is located within the established designated urban settlement</p>
<p>iv. Will be essential in achieving compact and sustainable urban growth, and</p>	<p>Lands already developed</p>
<p>v. There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>Lands already developed and occupied by established tourism enterprise.</p>
<p>3. A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse</p>	<p>The northern boundary of the tourism site bounds a small watercourse and there is a small margin within Flood Zone A/B.</p> <p>Parts 1 & 2 of the test found that it is considered appropriate to retain the existing zoning. This is on the basis that development is;</p> <ul style="list-style-type: none"> • Limited to extensions, renovations and

<p>impacts elsewhere. N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment</p>	<p>change of use (for highly vulnerable uses).</p> <ul style="list-style-type: none"> • Infill highly vulnerable development and demolition and reconstruction can only take place in Flood Zone C. <p>Any future development within 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:</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; • Bedrooms should be located in the upstairs of two-story buildings when extending existing property; • Flood resilient construction materials and fittings should be considered if in Flood Zone A/B; • 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; • Any development shall also be required to be built in accordance with CCC SuDS Policy.
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Appendix IV: Housing Strategy / HNDA – Supplementary Annex

Note: *The purpose of this appendix is to provide this assessment, as an additional annex to the existing Draft Housing Strategy. This approach 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 Guidance⁷ (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.*

⁷ <https://www.gov.ie/en/publication/ea99-housing-need-and-demand-assessment-hnda/>

Carlow County Council

Carlow Housing Strategy and HNDA 2022-2028 - Appendix A

Supplemental Assessment - Affordable Housing

KPMG Future Analytics

Contents

- A.1 Introduction and Purpose
- A.2 Methodology
- A.3 Outputs – affordable housing need

A.1 Introduction and Purpose

This Annex has been prepared by KPMG Future Analytics to support key updates to the draft Carlow Housing Strategy and Carlow County Development Plan 2022-2028. 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:

- 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.

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.

The purpose of this appendix is to provide this assessment, as an additional annex to the existing draft Housing Strategy. This approach 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 Guidance⁸ (published April 2021), as this provides an additional functionality not available at the time the Housing Strategy was drafted. This assessment does not contradict the Housing Strategy and its HNDA but is instead a supplemental and focused analysis of affordable housing need which fulfils the new statutory requirements. As a result, this appendix focuses solely on the need for affordable housing.

A.2 Methodology

The HNDA Tool is an Excel-based model which assesses key housing market drivers to forecast demographic housing demand in a Local Authority administrative area over the period 2020-2040, broken down by tenure. The Tool may be set up and (where justified) customised through setting key inputs in several stages, as outlined below.

A.2.1 Demographic Forecasts

ESRI forecasts of population and household growth to 2040 at local authority level are built into the Toolkit. The model includes five scenarios (based on different international migration scenarios and other assumptions), four of which comprise ESRI forecasts from December 2020 (see Section 2.1.8 of the Housing Strategy). The fifth scenario is the '**Convergence**' scenario, which comprises the ESRI 50:50 City scenario adjusted for new housing supply since 2017, to facilitate convergence to the

⁸ <https://www.gov.ie/en/publication/ea99-housing-need-and-demand-assessment-hnda/>

National Planning Framework per the Section 28 Planning Guidelines ‘Housing Supply Target Methodology for Development Planning’. This has been applied in this instance.

However, it should be noted that the Convergence Scenario (and the HNDA Tool itself) runs on a different timescale to the Housing Supply Target for the Carlow County Development Plan (with the adjustment calculated over 2020-2031, as opposed to 2022-2028 for the Housing Supply Target). As a result, the HNDA Tool effectively spreads housing need over a longer period. For this reason, this appendix focuses on the *proportion* of affordable need calculated by the Tool for each year considered, rather the number of households, to avoid confusion between different measurements of housing demand.

A.2.2 Existing Housing Need

The Toolkit includes built-in data on existing unmet housing need. This is a combination of estimated overcrowded households and homeless households. This comprises 61 households for County Carlow. This default has been applied for this Appendix as it broadly aligns with the Carlow Housing Supply Target calculation. All other default settings relevant to this measure have been applied

A.2.3 Income Growth Forecasts

The HNDA Toolkit is prepopulated with CSO data on household incomes sourced from Census 2016, the Revenue Commissioners and Department of Social Protection data, forecasted to 2019 . Three pre-set scenarios may be used to forecast household income growth, which apply the same growth rate for every projected year, or custom scenarios may be developed and used where justified. KPMG Future Analytics have applied the custom income growth scenario set out in the Housing Strategy. This is to align this exercise with the Housing Strategy and its assumptions and evidence base and reflects historic market trends and up-to-date economic information, as set out in Section 4.2.3 and 4.2.4 of the Housing Strategy.

A.2.4 House Price Forecasts

The Tool is pre-programmed with house price data from the CSO’s Property Price Register (PPR) index, and with five default house price forecast scenarios. Custom scenarios may also be developed and used. KPMG Future Analytics have applied the custom income growth scenario set out in the Housing Strategy. This is to align this exercise with the Housing Strategy and its assumptions. This price growth scenario reflects the most up to date house price data at the time of drafting of the Housing Strategy, as set out in Section 4.2.3 and 4.2.6 of the Housing Strategy. Default Tool settings have been applied with respect to affordability criteria.

A.2.5 Rental Price Forecasts

Within the HNDA Tool, several assumptions on the rental market may be made. The Tool is pre-programmed with rental price data sourced from the Residential Tenancies Board (RTB), and five rental price scenarios. As with incomes and prices, KPMG Future Analytics have applied the custom scenarios used in the Housing Strategy, as set out in Sections 4.2.3 and 4.2.7 of the Housing Strategy. Default Tool settings have been applied in terms of the proportion of those who buy and in terms of rental affordability thresholds.

A.2.6 Other modifications and changes

KPMG Future Analytics have made use of the most recently available version of the Toolkit, obtained in September 2021. Technical changes were made to the Toolkit to fix formula issues in the model to allow calculation of custom scenarios, as the unamended version would not otherwise read custom scenarios correctly. Changes were also made to ensure consistency in how the model applies custom projections for income, rents, and sales prices for each year, which were calculated on an inconsistent basis in the original model. Some minor issues in aligning years to the plan period correctly for output data summaries were also addressed.

A.3 Outputs – affordable housing need

Based on the application of additional anticipated households and the scenarios for existing need, incomes, affordability, house prices, and rental prices as described in the previous section, the HNDA Tool calculates housing need annually and forecasts how many households can afford to purchase homes or rent privately. Of those who cannot, it calculates how many require social housing, and how many are ‘affordability constrained’ and require a form of affordable housing tenures (such as Cost Rental or affordable purchase). It is these households that are the focus of this appendix and of the determination of Part V requirements in the Housing Strategy.

Households are deemed eligible for social housing if their net household income is below a cut-off threshold (€25,000 for County Carlow). The Tool does not take account of higher maximum income thresholds for additional adults and children in a household,⁹ as it is not currently designed to assess different household sizes. Those who cannot afford private housing but are deemed not eligible for social housing using this threshold are classed as “affordability constraint” (i.e. requiring affordable tenure types like Cost Rental/affordable purchase).

The following tables summarise this estimate of housing need across all tenures. Over the plan period of 2022-2028,¹⁰ a total of 10.7% of households are classed as ‘affordability constraint’ and in need of affordable housing.

Table A.1: Estimated affordable housing need, 2020-2028 (% of total)

Year	Affordability Constraint
2020	3.9%
2021	4.8%
2022	6.8%
2023	7.9%
2024	10.7%
2025	11.7%
2026	11.8%
2027	12.9%

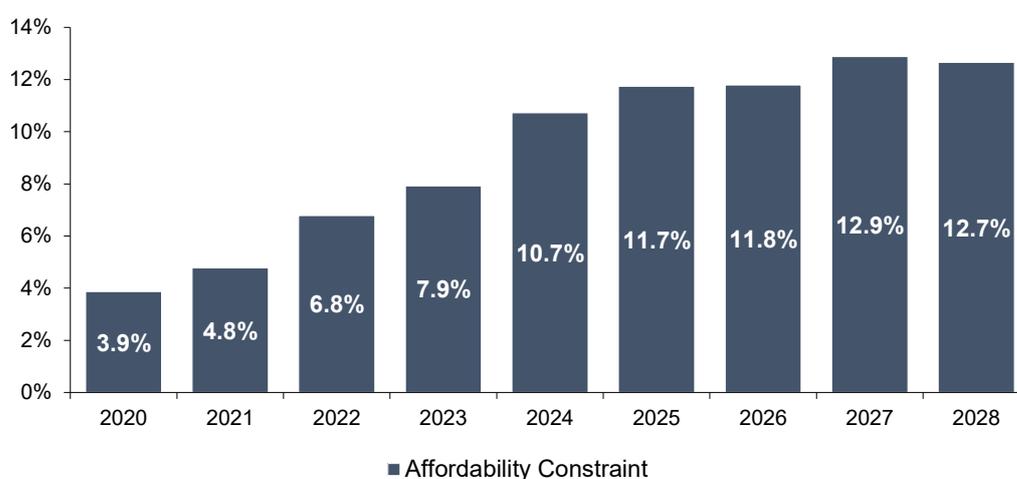
⁹ Under the Social Housing Assessment (Amendment) Regulations 2021, a household applying for social housing may get a 5% increase to the maximum income threshold for each additional adult household member, subject to a maximum increase of 10%, and separately, a 2.5% increase for every child living in the household.

¹⁰ As the HNDA Tool assesses full years, the period 2022-2028 in comprises seven years. The Carlow County Development Plan will be in force for six years comprising Q3 2022 – Q2 2028 inclusive. The full years have been considered in this appendix to ensure full impacts are captured.

Year	Affordability Constraint
2028	12.7%
2022-2028	10.7%

Figure A.1 below illustrates affordable housing need as a proportion of total housing demand (via the Convergence projections) over the period. This shows that the need for affordable housing as a proportion of total housing need rises steadily over period considered, rising from 3.9% in 2020 to 12.7% in 2028. This suggests a growing cohort above the eligibility threshold for social housing who cannot afford housing in the private market.

Figure A.1: Projected affordable housing need, 2020-2028 (% of total)



However, the proportion of buyers and private renters is projected as staying relatively steady over the period, suggesting that most of the increase in need for affordable housing may be considered a result of households in lower income deciles moving from social housing to affordable categories of need, as incomes grow generally and more households in lower incomes move above the €25,000 income cut-off point for social housing eligibility. This illustrates that the outputs of this exercise reflect the assumptions built into the HNDA Tool and broader national housing policy.

The Housing for All plan¹¹ from August 2021 states that the DHLGH will review and reform income limits for eligibility for social housing in local authorities, and in particular the efficiency of the current model of three income bands to categorise local authorities (with County Carlow in Band 3). If this review changes the income limit for social housing eligibility, it would in turn change the proportion of households eligible for either social or affordable housing in Carlow.

In addition, under the Social Housing Assessment (Amendment) Regulations 2021, the €25,000 net income limit only applies to a single-person household, with rises in this threshold available for additional adults and children. A broader consideration of social housing income limits and household sizes in the Tool would also change the proportion of households eligible for or affordable housing and could potentially reduce identified affordable housing need.

¹¹ Published Online, Aug. 2021: <https://www.gov.ie/en/publication/ef5ec-housing-for-all-a-new-housing-plan-for-ireland/>; Action 5.4, 'Review income eligibility for social housing.'

Material Updates to the Housing Strategy / HNDA comprise:

(i) Replace Section 2.1.3 Urban Regeneration and Housing Act with Affordable Housing Act 2021

The Affordable Housing Act has introduced several important changes to Irish housing. It establishes a legislative basis for new forms of affordable housing for households who cannot afford private market housing but are above eligibility thresholds for social housing. These new tenures are affordable purchase dwellings (sold by local authorities and other bodies at below-market costs) and cost rental, a new form of below-market rent with rents tied to delivery costs and subject to a minimum discount compared to market rents. The Act also amends Part V of the Planning and Development Act 2000 to introduce a requirement for Local Authority housing strategies to assess the need for affordable housing including cost rental over the course of a statutory development plan. The Act amends 'Part V' housing requirements to include a requirement for up to 20% social and affordable housing in developments in excess of four units (intended by Government to comprise 10% social and 10% cost rental and/or affordable purchase where justified).

(ii) Update Section 2.1.7 regarding new National Development Plan 2021-2030

Project Ireland 2040 – National Development Plan 2021-2030

The National Development Plan sets out investment priorities to deliver on the goals of the National Planning Framework, with a total investment of approximately €165 billion. It was revised and updated in 2021 to re-align with new national investment and development priorities and the Programme for Government. Infrastructure projects identified for County Carlow include Carlow Southern Relief Road (subject to appraisal) and supporting the establishment of a Technological University for the South-East to include IT Carlow.

In terms of housing, the National Development Plan (NDP) provides medium-term funding to deliver the national Housing for All strategy, with approximately €4 billion in State capital funding made available for housing annual from 2021 to 2025. This will support the delivery of the national targets in Housing for All of approximately 9,500 new-build social homes, 4,000 Affordable Purchase homes and 2,000 Cost Rental homes per year up to 2030. Local Authorities and Approved Housing Bodies will play a key role in delivering new homes, while the NDP also provides funding for the Land Development Agency to help deliver social and affordable housing on major public sites. The NDP also identifies critical infrastructure to support population and housing growth, with almost €6 billion of investment to be undertaken by Irish Water over 2021-25 (of which over €4.5 billion will be Exchequer funded), as well as other water infrastructure investment including 175 million in the Rural Water Programme. The NDP also supports the retrofitting of approximately 36,500 Local Authority-owned homes to promote energy efficiency and climate resilience.

(iii) Include Information on Housing for all in Section 2.1.9

'Housing for All: A New Housing Plan for Ireland' was published in 2021. It represents the Government's housing plan to 2030, replacing Rebuilding Ireland. It reiterates a national target of building an average of 33,000 new homes every year from 2021 to 2030, including approximately 10,000 social homes and 6,000 affordable homes for purchase or rent. It provides a comprehensive strategy and action plan across all tenures and elements of the Irish housing system, guided by four main 'pathways' to improving the housing system:

- Supporting home ownership and increasing affordability
- Eradicating homelessness, increasing social housing delivery and supporting social inclusion
- Increasing new housing supply
- Addressing vacancy and efficient use of existing stock

Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes under Housing for All. Each Local Authority will produce a Housing Delivery Action Plan by December 2021 to translate national targets into clear local targets and actions, underpinned by an evidence-based assessment of local housing need.

- (iv) **Include new Section 5.2.2.6**

‘Part V’ Housing Requirements

Under Part V of the Planning and Development Act 2000 (as amended), developers of residential or mixed-use schemes greater than 4 units are required to transfer 20% of the site to the local authority (or an AHB acting on their behalf) for social and affordable housing use, at a price based on delivery costs and limited profit.

The Affordable Housing Act 2021 defined new forms of affordable housing, comprising affordable purchase dwellings and Cost Rental housing. It also amends the legislative underpinnings and requirements of Local Authority Housing Strategies (under Part V of the Planning and Development Act 2000) in several ways, including:

- 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.

This Housing Strategy and HNDA is required to make an assessment of need for these affordable housing tenures (in addition to social housing), and to determine the breakdown of Part V housing requirements between social and affordable over the period of the development plan.

As this Housing Strategy and HNDA was originally drafted before the passing of the Affordable Housing Act 2021, an additional and supplemental analysis of need for these new affordable tenures in County Carlow has been undertaken and summarised in Appendix A. The outputs of this assessment are summarised in below.

Table..2: Estimated affordable housing need, 2020-2028 (% of total)

Year	Affordability Constraint
2020	3.9%
2021	4.8%
2022	6.8%
2023	7.9%
2024	10.7%
2025	11.7%
2026	11.8%
2027	12.9%
2028	12.7%
2022-2028	10.7%

This analysis demonstrates that there is an estimated need for affordable housing of approximately 10.7% over the plan period. This demonstrates that the envisaged equal breakdown of Part V requirements of 10% social and 10% affordable housing would be appropriate for County Carlow over the plan period 2022-2028. However, this requirement is subject to several factors when applied to individual planning applications:

- A lower Part V requirement of 10% (for use as social housing only) will apply to land purchased between 1st September 2015 and 31st July 2021 and granted permission for residential or mixed-use development between 3rd September 2021 and 31st July 2026. This is intended to prevent the new requirements impacting on development viability.
- The delivery of affordable purchase or Cost Rental dwellings on individual sites will be subject to national guidance and local factors. Carlow County Council will consider factors such as local demand, finance, viability, and operational factors in determining the suitability of Part V affordable housing delivery for individual planning applications. Alternative means of capturing Part V planning gain will be pursued where affordable housing is not appropriate, in line with national guidance.

Therefore, the Carlow County Development Plan 2022-2028’s requirement under Part V of the Planning and Development Act 2000 for lands granted permission for housing development will comprise 10% social housing and 10% affordable housing, subject to national guidance and regulation and subject to Carlow County Council’s determination of the appropriateness of affordable housing delivery on individual sites.

(v) Update Section 5.2 for New Targets for Social Housing

New targets for social housing new-build delivery have been set for County Carlow under Housing for All for the period 2022-2026, as set out below. Under Housing for All, there will be a greater emphasis on direct new-build delivery of social housing, with a gradual phasing-out of long-term leasing for social housing.

Table 3: Carlow new-build social housing targets under Housing for All (2021)

2022	2023	2024	2025	2026	Total
80	90	92	99	101	462

(vi) Update Policies

PO 5: To require that 20% of lands in respect of which permission for the development of houses is granted, be reserved for social and affordable housing in accordance with the Planning and Development Act 2000 (as amended) and national guidance and regulations. This requirement shall comprise 10% social housing and up to 10% affordable housing (including affordable purchase and/or Cost Rental), subject to local factors including 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.

PO 8: To support attractive and vibrant places through the renovation and re-use of obsolete, vacant and derelict homes. This shall be pursued through methods including the application of the vacant site levy in accordance with the Urban Regeneration and Housing Act 2015 (and any subsequent replacement schemes) and the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme, the Buy and Renew Scheme, and long-term leasing. The Council shall also endeavour to bring about the timely re-use of vacant Council-owned housing stock.

Proposed Amendments to Housing Strategy / HNDA

	Proposed Amendments
Table 1.2	<p>13. Calculation of Projected Social and affordable Housing Need Based on the determination of additional households required, the projected house price bands and the housing affordability, calculate the number of households not meeting the "Affordability Criteria". This informs the necessary provision of social and affordable housing units within the local authority.</p>
Section 2.1	<p>Under the Act, one of the key purposes of a Housing Strategy is to provide that 20% of a specified percentage (up to 10%) of land zoned for residential use, or for a mixture of residential and other uses, should be reserved for social and affordable housing provision.</p>
Section 2.1.3	<p style="text-align: center;">Urban Regeneration and Housing Act 2015</p> <p>This Act changed the statutory context for the provision of social and affordable housing. Changes include that there will be a requirement for up to 10% social housing in developments with more than nine units. It also introduces a series of measures to encourage urban regeneration, including the imposition of a vacant site levy to incentivise re-use of vacant and derelict sites for housing and urban renewal. Local Authorities are mandated to maintain a register of vacant sites to be subject to this levy.</p> <p>The Affordable Housing Act has introduced several important changes to Irish housing. It establishes a legislative basis for new forms of affordable housing for households who cannot afford private market housing but are above eligibility thresholds for social housing. These new tenures are affordable purchase dwellings (sold by local authorities and other bodies at below-market costs) and cost rental, a new form of below-market rent with rents tied to delivery costs and subject to a minimum discount compared to market rents. The Act also amends Part V of the Planning and Development Act 2000 to introduce a requirement for Local Authority housing strategies to assess the need for affordable housing including cost rental over the course of a statutory development plan. The Act amends 'Part V' housing requirements to include a requirement for up to 20% social and affordable housing in developments in excess of four units (intended by Government to comprise 10% social and 10% cost rental and/or affordable purchase where justified).</p>
Section 2.1.7	<p style="text-align: center;">Project Ireland 2040 – National Development Plan 2018-21-202730</p> <p>The National Development Plan sets out investment priorities to deliver on the goals of the National Planning Framework, with a total investment of approximately €146165 billion. It was revised and updated in 2021 to re-align with new national investment and development priorities and the Programme for Government. Infrastructure projects identified for County Carlow include Carlow Southern Relief Road (subject to appraisal) and supporting the establishment of a Technological University for the South-East to include IT Carlow.</p> <p>In terms of social housing, the National Development Plan (NDP) provides medium-term funding to deliver the national Housing for All strategy, with approximately €4 billion in State capital funding made available for housing annual from 2021 to 2025. This will support the delivery of the national targets in Housing for All of approximately 9,500 new-build social homes, 4,000 Affordable Purchase homes and 2,000 Cost Rental homes per year up to 2030. Local Authorities and Approved Housing Bodies will play a key role in delivering new homes, while the NDP also provides funding for the Land Development Agency to help deliver social and affordable housing on major public sites. The NDP also identifies critical infrastructure to support population and housing growth, with almost €6 billion of investment to be undertaken by Irish Water over 2021-25 (of which over €4.5 billion will be Exchequer funded), as well as other water infrastructure investment including 175 million in the Rural Water Programme. The NDP also supports the retrofitting of approximately 36,500 Local Authority-owned homes to promote energy efficiency and climate resilience. will, through a planned capital investment of over €4.2 billion, support the delivery of Rebuilding Ireland and some 40,000 new social housing homes by 2021. Direct Local Authority build, acquisitions, rejuvenation of formerly empty homes and provision by housing bodies are identified as the chief delivery mechanisms. By 2021, 12,000 social housing homes will be made available annually by Local Authorities and approved housing bodies for social</p>

	<p>housing. This level of provision is to be maintained over the remainder of the period of the National Development Plan, resulting in 112,000 households having their housing needs met in a social housing home by 2027.</p>
<p>Section 2.1.9</p>	<p>'Housing for All: A New Housing Plan for Ireland' was published in 2021. It represents the Government's housing plan to 2030, replacing Rebuilding Ireland. It reiterates a national target of building an average of 33,000 new homes every year from 2021 to 2030, including approximately 10,000 social homes and 6,000 affordable homes for purchase or rent. It provides a comprehensive strategy and action plan across all tenures and elements of the Irish housing system, guided by four main 'pathways' to improving the housing system:</p> <ul style="list-style-type: none"> — Supporting home ownership and increasing affordability — Eradicating homelessness, increasing social housing delivery and supporting social inclusion — Increasing new housing supply — Addressing vacancy and efficient use of existing stock <p>Local Authorities will play a key role (in partnership with Approved Housing Bodies) in delivering new social and affordable homes under Housing for All. Each Local Authority will produce a Housing Delivery Action Plan by December 2021 to translate national targets into clear local targets and actions, underpinned by an evidence-based assessment of local housing need.</p> <p>The Government is expected to expand on the Housing for All programme in 2021, setting out further strategy that will shape the housing landscape over the coming years.</p>
<p>Section 4.3.3</p>	<p>The anticipated social and affordable housing need for Carlow County Council of 926 households as set out in the preceding steps, reflects the assessments for mortgage qualification and the affordability for ownership and private rental. Throughout the plan period, 2022-2028, the social and affordable¹² housing requirement equates to 29.8% of the total additional households in County Carlow during this plan period (i.e. those that do not qualify for a mortgage and cannot afford private rental).</p>
<p>Section 5.2.2.2</p>	<ul style="list-style-type: none"> — Provision of social housing under Part V of the Planning and Development Act 2000 (as amended) – following the Urban Regeneration and Housing Act 2015 Affordable Housing Act 2021, 'Part V' housing requires developers to set aside up to 10% of housing on residential schemes greater than 49 units for social and affordable housing use for local authorities or other bodies on their behalf. This requirement can be delivered through the transfer of lands to the local authorities, the transfer of ownership of completed social housing units on the lands, the transfer of ownership of completed homes on other land not subject to the planning permission but within the same administrative area, or through the long-term leasing of properties. These requirements are set out in more detail in Section 5.2.2.6.

¹² At time of writing, eligibility criteria and other key features of emerging affordable housing tenures such as Cost Rental had not yet been defined and accordingly these have not been modelled for separately. However, as the households forecast above 1st decile (generally) to not qualify for a mortgage and are not be able to afford private rent, they are expected to require a degree of affordable housing provision. Individual cases, reflecting the social housing income thresholds are a relevant factor.

**Section
5.2.2.6**

'Part V' Housing Requirements

Under Part V of the Planning and Development Act 2000 (as amended), developers of residential or mixed-use schemes greater than 4 units are required to transfer 20% of the site to the local authority (or an AHB acting on their behalf) for social and affordable housing use, at a price based on delivery costs and limited profit.

The Affordable Housing Act 2021 defined new forms of affordable housing, comprising affordable purchase dwellings and Cost Rental housing. It also amends the legislative underpinnings and requirements of Local Authority Housing Strategies (under Part V of the Planning and Development Act 2000) in several ways, including:

- 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.

This Housing Strategy and HNDA is required to make an assessment of need for these affordable housing tenures (in addition to social housing), and to determine the breakdown of Part V housing requirements between social and affordable over the period of the development plan.

As this Housing Strategy and HNDA was originally drafted before the passing of the Affordable Housing Act 2021, an additional and supplemental analysis of need for these new affordable tenures in County Carlow has been undertaken and summarised in Appendix A. The outputs of this assessment are summarised below.

Table 1: Estimated affordable housing need, 2020-2028 (% of total)

Year	Affordability Constraint
2020	3.9%
2021	4.8%
2022	6.8%
2023	7.9%
2024	10.7%
2025	11.7%
2026	11.8%
2027	12.9%
2028	12.7%
2022-2028	10.7%

This analysis demonstrates that there is an estimated need for affordable housing of approximately 10.7% over the plan period. This demonstrates that the envisaged equal breakdown of Part V requirements of 10% social and 10% affordable housing would be appropriate for County Carlow over the plan period 2022-2028. However, this requirement is subject to several factors when applied to individual planning applications:

- A lower Part V requirement of 10% (for use as social housing only) will apply to land purchased between 1st September 2015 and 31st July 2021 and granted permission for residential or mixed-use development between 3rd September 2021 and 31st July 2026. This is intended to prevent the new requirements impacting on development viability.
- The delivery of affordable purchase or Cost Rental dwellings on individual sites will be subject to national guidance and local factors. Carlow County Council will consider factors such as local

	<p>demand, finance, viability, and operational factors in determining the suitability of Part V affordable housing delivery for individual planning applications. Alternative means of capturing Part V planning gain will be pursued where affordable housing is not appropriate, in line with national guidance.</p> <p>Therefore, the Carlow County Development Plan 2022-2028's requirement under Part V of the Planning and Development Act 2000 for lands granted permission for housing development will comprise 10% social housing and 10% affordable housing, subject to national guidance and regulation and subject to Carlow County Council's determination of the appropriateness of affordable housing delivery on individual sites.</p>																																				
<p>Section 5.2.3</p>	<p>New targets for social housing new-build delivery have been set for County Carlow under Housing for All for the period 2022-2026, as set out below. Under Housing for All, there will be a greater emphasis on direct new-build delivery of social housing, with a gradual phasing-out of long-term leasing for social housing.</p> <p>Table Error! No text of specified style in document..2: Carlow new-build social housing targets under Housing for All (2021)</p> <table border="1" data-bbox="357 792 1182 887"> <thead> <tr> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>80</td> <td>90</td> <td>92</td> <td>99</td> <td>101</td> <td>462</td> </tr> </tbody> </table>	2022	2023	2024	2025	2026	Total	80	90	92	99	101	462																								
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<p>Section 5.3</p>	<p style="text-align: center;">Conclusion: meeting future requirements</p> <p>Section 4 set out the overall housing requirements for County Carlow over the strategy period based on the HNDA analysis undertaken for the County. The outputs of this analysis are summarised below. This forecasts that there will be a total social and affordable housing requirement of 926 additional new households over the plan period 2022-2028, amounting to 29.8% of new anticipated households over the period.</p> <p>Table.3: Summary of social and affordable¹³ housing requirements 2022-2028</p> <table border="1" data-bbox="357 1205 1399 1541"> <thead> <tr> <th></th> <th>2022</th> <th>2023</th> <th>2024</th> <th>2025</th> <th>2026</th> <th>2027</th> <th>2028</th> <th>T</th> </tr> </thead> <tbody> <tr> <td>No. of Additional Anticipated Households</td> <td>259</td> <td>518</td> <td>518</td> <td>518</td> <td>518</td> <td>518</td> <td>259</td> <td></td> </tr> <tr> <td>Social and affordable housing requirement</td> <td>77</td> <td>154</td> <td>154</td> <td>154</td> <td>154</td> <td>154</td> <td>77</td> <td></td> </tr> <tr> <td>Housing Shortfall (%)</td> <td>29.8%</td> <td>29.8%</td> <td>29.8%</td> <td>29.8%</td> <td>29.8%</td> <td>29.8%</td> <td>29.8%</td> <td></td> </tr> </tbody> </table>		2022	2023	2024	2025	2026	2027	2028	T	No. of Additional Anticipated Households	259	518	518	518	518	518	259		Social and affordable housing requirement	77	154	154	154	154	154	77		Housing Shortfall (%)	29.8%	29.8%	29.8%	29.8%	29.8%	29.8%	29.8%	
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<p>Section 6.1</p>	<p>PO4: To provide social and affordable housing to meet forecast future housing need over the plan period as identified in the HNDA. The Council will endeavour to deliver a further 926 social and affordable housing units over the plan period 2022-2028 to meet forecasted need as resources allow. New units shall be delivered having regard to the aims and policies of the Core Strategy and the needs of local communities, including the need to deliver sustainable development, compact growth, social integration and an appropriate mix of housing types and tenures. Social and affordable housing shall be delivered through a</p>																																				

¹³ 'Affordable' here refers to the quantum of households above the 1st Decile who have identified challenges in securing their own home subject to affordability issues, or constrained supply.

¹⁴ Totals do not sum due to rounding

	<p>range of mechanisms including provision directly by Carlow County Council, by Approved Housing Bodies, and through short- and long-term tenancies arranged by the Councils with private landlords.</p> <p>PO5: To require that 20% 10% of lands 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 be reserved for social and affordable housing in accordance with the Urban Regeneration and Housing Act 2015, the Planning and Development Act 2000 (as amended) and any future revised Guidance national guidance and regulations. This requirement shall comprise 10% social housing and 10% affordable housing (including affordable purchase and/or Cost Rental), subject to local factors including 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.</p> <p>PO8: To support attractive and vibrant places through the renovation and re-use of obsolete, vacant and derelict homes. This shall be pursued through methods including the application of the vacant site levy in accordance with the Urban Regeneration and Housing Act 2015 (and any subsequent replacement schemes) and the conversion of vacant properties into new social and affordable homes through schemes including the Repair and Leasing Scheme, the Buy and Renew Scheme, and long-term leasing. The Council shall also endeavour to bring about the timely re-use of vacant Council-owned housing stock.</p>
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Appendix V: Retail Strategy

Key Issue	Sub. No. Map. No.	Chief Executive's Opinion & Recommendation
<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 recognised as an important Neighbourhood Centre consideration in the existing Retail Strategy for the Joint Spatial Plan 2012.</p>	<p>CLW-C10-96</p>	<p>The Retail Planning Guidelines, 2012 define Neighbourhood Centre as: <i>“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.”</i> The limit of 1,200 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. This cap is set out in Section 10.3.7 of the Carlow County Retail Strategy, 2015, and is still considered to be appropriate in the context of the guidance contained in 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>The limit of 1,200 sqm net floorspace for a convenience supermarket in a Neighbourhood Centre applies countywide.</p>

Key Issue	Sub. No. Map. No.	Chief Executive's Opinion & Recommendation
		<p>Recommendation No change is recommended to the limit of 1,200 sqm net floorspace for a convenience supermarket in Neighbourhood Centres.</p>

Appendix VI: Renewable Energy Strategy

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p>Submits that the Draft County Development Plan should consider the innovative approach known as co-location, where solar, battery storage and wind farms symbiotically co-exist. This is a highly sustainable use of existing infrastructure, with the solar farm and a nearby wind farm sharing infrastructure. We would suggest that a policy objective should be included as below: <i>'Favorable consideration will be given to the re-use, shared use (co-location), 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>CLW-C10-19</p>	<p>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 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</p> <p>Include additional text in subsection RES 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 in RES 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>In relation to the Renewable Energy Strategy in Appendix VI, the submission considers Carlow's onshore wind energy potential and level of ambition (MW), and refers to the following:</p> <ul style="list-style-type: none"> ▪ welcome references to SEAI's Local Authority Renewable Energy Strategy (LARES) methodology and adherence to the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017). ▪ 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 of the Mount Leinster-Blackstairs Mountains Landscape Character Area. 	<p>CLW-C10-26</p>	<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 and amenity value of upland landscapes. However, Policy WE. P1 will not apply to 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</i></p>

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<ul style="list-style-type: none"> ▪ 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'. ▪ the 30MW capacity detailed in Table 6.4 of the RES is optimistic, as it relies on existing fleet, consented as yet unconstructed fleet, potential for small number of wind farms in lowland areas, extensions to existing sites, and repowering. ▪ potential additional wind capacity for the County to 2030 is 24MW when the 2020 installed capacity is removed, which amounts to a potential contribution for County Carlow of only 0.6% to the wind energy target in the Climate Action Plan 2019. ▪ level of ambition by the Council needs to be increased. ▪ if the pattern of ambition in Carlow goes unrecognised, unchecked and unchallenged, the Draft Plan, and others across the county, will hinder a path to achieving national ambitions. <p>The submission includes a section entitled 'Finding a Balance between Landscape Sensitivity and Suitable Sites for onshore wind', and notes in same that:</p> <ul style="list-style-type: none"> ▪ the Draft Plan and RES accepts rather than tests/challenges the appropriateness of landscape sensitivity in the context of essential onshore wind national targets. This culminates in a land use policy (WE.P4) which proposes a designation of 'not normally permissible' on 'Uplands' which is where the RES identifies 18.3MW of suitable land. ▪ 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. ▪ Coillte RE has development interests in the County including the live wind farm application (Reg. Ref. 21/13), comprising 7 wind turbines at Croaghaun Hill with an output of up to 38.5MW, and which is the subject of first and third party appeals before An Bord Pleanala (Ref. 309937). ▪ Croaghaun site in current 2015 Plan is located on lands that are 'open to consideration' for wind farms are in an Uplands area but are now proposed to be 'not normally permissible' under policy WE.P4. 		<p><i>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>The analysis carried out by RPS for the Draft RES follows the SEAI LARES methodology and as a result is concerned with high-level mapping at a County level. It is therefore 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. For these reasons the mapping does not purport to be as accurate or detailed as the research expected for a specific project or planning application, and therefore further comment on the specific merits/characteristics of a parcel of land or site, for example in relation to separation distances to housing, or in relation to wind speed or ecological sensitivity, is beyond the scope of the draft RES.</p> <p>In the context of the foregoing, it is also important to note that the target for solar energy in the Draft Plan is relatively ambitious. 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 RES.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<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. ▪ 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>Renewable Energy Strategy & Spatial Planning of Wind Energy Suggest that the County Development Plan and Wind Energy Strategy must classify a sufficient quantum of land as being suitable for wind energy to ensure national renewable energy targets.</p>	CLW-C10-51	See response and recommendation for CLW-C10-26.
<p>Regional Approach (Regional Renewable Energy Strategies)</p> <ul style="list-style-type: none"> ▪ Wind Energy Ireland has been advocating for a regional approach to the spatial planning of wind farm developments to compliment the local authority level approach. ▪ Wind Energy Ireland's discussion document outlined a number of benefits to a regional approach including: <ul style="list-style-type: none"> - Compliments RSES. - Consistent methodology for an entire region and across all three regions. - Would ensure optimum locations for wind energy development are identified. - Would ensure national targets, objectives and requirements directly translate into the identification of suitable area and corridors. - Landscape sensitivity can be addressed on a broader regional scale rather than being limited to the confines of a county 	CLW-C10-51	<p>The content of the submission is noted. A regional approach to renewable energy is outside the scope of the development plan process. In terms of regional level policy, it is noted that the RSES for the Southern Region includes a Regional Policy Objective (i.e. RPO 98) to support the development of a Regional Renewable Energy Strategy with relevant stakeholders.</p> <p>Recommendation No change to Draft RES.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> - Landscape sensitivity and capacity assessments could be undertaken for wind energy and other infrastructure on a regional basis and without needing the National Landscape Strategy to be completed. ▪ Would provide a more appropriate platform for ensuring national policy can be transposed effectively to local level. 		
<p>Renewable Energy Strategy – Appendix VI</p> <p>Windfarm development in the more elevated upland landscape type not normally permissible needs further detail and clarification. Not normally permissible is unacceptably ambiguous and request similar definition to a neighbouring CDP.</p> <p>States that the maximum distance of 15km for grid connection from source to substation for all renewable developments needs to be maintained.</p> <p><u>Recommended amendments / additions to RES outlined as follows:</u></p> <ul style="list-style-type: none"> • Pg 23, 3.6.2 particularly sensitive receptors such as housing, schools and hospitals • Pg, 24 3.6.3 proposed renewable energy developments should be assessed for their impact on sensitive landscapes and measures put in place to minimise the impact on visual amenities within the county should not be located in areas of high sensitivity and low capacity which would contravene the LCA. • Pg, 24 3.6.5 The carbon cost of material supply and construction must be considered when assessing the impact of renewable energy developments. • Pg 37, 6.1.5: Wind Speed – using data presented in the SEAI Wind Energy Atlas, wind speed contours for the county have been plotted (see Fig 6-2). The uplands area with high wind speed has a LCA of high sensitivity and low capacity for windfarm development. • Pg, 40 6.1.5.3 Extensions to existing wind farms. One way to further avail of the wind energy resource in the county is to extend existing wind farms by adding new turbines, except in areas of high sensitivity and low capacity 	<p>CLW-C10-72</p>	<p>This submission suggests a number of detailed changes to the draft RES wording/content. In general, the changes run contrary to the SEAI LARES methodology and are not appropriate. The sieve analysis of the RES technical assessment has been carried out step by step and introducing restrictions or additional technical requirements would not be appropriate. In addition, it is considered that the recommended amendments regarding landscape, uplands, capacity and sensitivity, are already comprehensively addressed through the robust policy provisions contained in Chapters 7 and 9.</p> <p>Recommendation No change to draft RES.</p>

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<p>which would contravene the LCA. A site by site analysis of potential for extensions has not been carried out for this RES.</p> <ul style="list-style-type: none"> Pg, 40 6.1.5.4 Repowering existing wind farms except in areas of high sensitivity and low capacity which would contravene the LCA. Pg 42 6.1.5.5 Opportunities for new wind farms in lowland areas, extensions to existing windfarms and repowering of existing wind farms may be considered, but the environmental constraints and visual and landscape sensitivity need to be carefully considered on a case by case basis but will not be permissible in areas of high sensitivity and low capacity which would contravene the LCA. Pg, 42 6.1.6 Policy W1.2 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 assessment on a case by case basis with the exception of those in areas of high sensitivity and low capacity. 		
<p>The following comments are made regarding the content of the draft RES:</p> <ul style="list-style-type: none"> <u>Electricity Transmission & Distribution</u> <ul style="list-style-type: none"> The RES provides a robust policy position for the consideration of renewable energy in land-use planning. <u>Wind Energy</u> <ul style="list-style-type: none"> 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. 	<p>CLW-C10-76</p>	<p>The content of the submission is noted and welcomed.</p> <p>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 associated equipment needed to maximise renewable penetration on the grid. It is considered that a new policy can be included in the RES to address renewable energy co-location.</p> <p>In regard to the submission's recommendation for renewables-enabling plant, it is considered that at this time this matter goes beyond the scope of the RES study and the SEAI LARES methodology.</p> <p>Recommendation Include new policy provision in the RES to read as follows:- Support the co-location of renewable energy technologies on a case-by-</p>

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<ul style="list-style-type: none"> ▪ It is noted that there is good consistency between the mapping in the RES and the wind energy strategies for other counties. <u>Solar</u> ▪ Solar projects will play a critical role in diversifying renewable energy generation portfolio for the period out to 2030. ▪ Ireland is in a great position to take advantage of the significant reduction in the cost of solar energy over the few years as the technology has advanced. ▪ Solar energy is suited to Ireland's climate and in times of low wind there are often good solar conditions. <u>Hybrid Renewables</u> ▪ Consist of two or more renewable energy sources used together to provide increased system efficiency e.g. wind, solar and battery. ▪ ESB encourage the Council to consider the inclusion of a Policy Objective in 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>. <u>Renewables-Enabling Plant</u> ▪ 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. ▪ 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</i> 		<p><i>case basis subject to compliance with planning and environmental criteria.</i></p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p><i>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". This is noted in regard to fast-responding gas turbines (i.e. FlexGen Plant) for the provision of backup power.</i></p>		
<ul style="list-style-type: none"> • Client has been assessing the suitability of lands to the west of Oldleighlin for a number of years, (identified as Lackan in the Carlow County Development Plan 2015-2021) for the siting of a wind farm and is currently preparing a planning application for development at this location. ▪ Lands are currently designated as a 'Preferred Location' for wind energy development. ▪ Now very concerned that the Council is proposing to reverse this positive designation to 'Not Normally Permissible' and can find no substantive rationale 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, and that 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>The following is also referred to in relation to the foregoing:</p> <ul style="list-style-type: none"> ▪ Programme for Government commitment for reduction in overall greenhouse gas emissions to 2030 and renewable energy target. ▪ Climate and Low Carbon Development (Amendment) Bill 2021. ▪ Targets set out in Climate Action Plan 2019. ▪ Ireland's current GW installed capacity of wind energy and required GW delivery to 2030. ▪ Imperative for local authorities to set ambitious local targets. ▪ Client's extensive assessments have demonstrated there are lands at Lackan which are generally suitable for wind energy development. 	<p>CLW-C10-92</p>	<p>In addition to text hereunder, refer also to responses and recommendation for CLW-C10-26.</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 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>For the draft RES wind analysis a 7.6 m/s lower threshold was employed, again to focus on sites more likely to have strategic capacity (turbines with tip height up to 175m). As stated in the draft RES, "The</p>

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<ul style="list-style-type: none"> ▪ Lands assessed not of particular ecological significance, not susceptible to ground instability or flood risk and are not of any particular scenic value or quality. ▪ Suitability of lands further reinforced by virtue that adjoining land in Co. Kilkenny is designated as being 'Acceptable in Principle' for wind energy development in Kilkenny City and County Development Plan 2021-2027. ▪ Not apparent from the Draft RES as to precisely why the planning authority proposes to undertake such a radical reversal of the designation of the Lackan area. ▪ On the basis of key environmental, heritage and amenity criteria under which the planning authority have assessed the suitability 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. ▪ Substantial setback distances to dwellings, in excess of 500m, are readily achievable at Lackan and it is considered that Figure 6.3 in the Draft RES fails to fully identify all lands located in excess of 500m from dwellings. ▪ Vision and ambition in Draft RES is not reflected throughout, and does little to actively encourage and promote the delivery of onshore wind energy development. ▪ There is significant untapped potential within the county for a substantial increase to the volume of renewable electricity being generated, however this potential fails to be recognised by the planning authority. ▪ Calculations and assumptions in Draft RES significantly underestimate the available lands for development. ▪ No evidence base, justification or rationale has been offered for entirely arbitrary figure of minimum area of 5sq.km to accommodate wind energy development. It is overly restrictive and would preclude the delivery of small-scale developments e.g. less than 5 turbines. 		<p><i>technical mapping exercise in and of itself does not support nor preclude wind energy development". Hence turbines that can work in lower windspeeds and due to technological advances could be considered if a feasible project is developed.</i></p> <p>Recommendation No change to Draft RES.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> ▪ On the basis of 18.3MW estimate for County Carlow to contribute to wind energy, it will be a barely perceptible 0.29% to Ireland's overall wind energy generation. ▪ In Section 6.1.5 of the Draft RES the assessment of landscape and visual constraints is specifically excluded from the technical analysis and mapping exercise. ▪ It is noted that a revised Landscape Character Assessment has not been prepared, confirming there has been no substantive alteration to existing landscapes in terms of character areas, types, or sensitivities. ▪ The Lackan area is within the Killeshin Hills LCA, which has a moderate capacity to accommodate wind energy. ▪ Now proposing to designate all upland landscape types as 'Not Normally Permissible' for wind energy development without any justification and seems wholly irrational given the inference that the existing landscape has not been altered. ▪ The Draft RES fails to provide any clear direction or wind strategy map to clearly convey the location of suitable wind energy development areas in the county. ▪ Locations are identified as 'Not Normally Permissible', but no locations are identified where wind energy development should be directed i.e. Preferred Locations. 		
<p><u>Chapter 7 Climate Action and Energy and Renewable Energy Strategy</u> 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. 	CLW-C10-93	See response and recommendation for CLW-C10-92.

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<ul style="list-style-type: none"> ▪ Sufficient spatial extent to provide minimum setback of 500m from dwellings. ▪ 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. <p>Reference also made to:</p> <ul style="list-style-type: none"> ▪ Programme for Government commitment for reduction in overall greenhouse gas emissions to 2030 and renewable energy target. ▪ Climate and Low Carbon Development (Amendment) Bill 2021. ▪ Targets set out in Climate Action Plan 2019. ▪ Ireland's current GW installed capacity of wind energy and required GW delivery to 2030. ▪ Imperative for local authorities to set ambitious local targets. ▪ Client currently undertaking an extensive environmental scoping exercise to evaluate the subject lands capability to comply with the provisions of the Carlow County Development Plan 2015-2021, the incorporated Wind Energy Strategy, and the Draft RES. ▪ Vision and ambition in Draft RES is not reflected throughout and does little to actively encourage and promote the delivery of onshore wind energy development. ▪ There is significant untapped potential within the county for a substantial increase to the volume of renewable electricity being generated, however this potential fails to be recognised by the planning authority. ▪ Calculations and assumptions in Draft RES significantly underestimate the available lands for development. ▪ On the basis of 18.3MW estimate for County Carlow to contribute to wind energy, it will be a barely perceptible 0.29% to Ireland's overall wind energy generation. 		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<ul style="list-style-type: none"> ▪ Section 6.1.5 of the Draft RES without any rationale or justification, proceeds to solely consider that a wind speed of 7.6m/s to be viable and discounts all other areas. ▪ Subject lands are considered to have a wind speed of 7.5m/s, a mere 0.1m/s less than that which the planning authority deem to be viable without any evidence. ▪ Suitability of specific locations for wind energy development should not be based solely on wind speeds alone. ▪ The planning authority has not completed a detailed assessment of the subject lands to determine the presence or lack thereof of specific environmental constraints. ▪ No evidence base, justification or rationale has been offered for entirely arbitrary figure of minimum area of 5sq.km to accommodate wind energy development. It is overly restrictive and would preclude the delivery of small-scale developments e.g. less than 5 turbines. ▪ Figure 6.3 of the Draft RES fails to fully identify all available lands located in excess of 500m from a residential dwelling. ▪ In Section 6.1.5 of the Draft RES the assessment of landscape and visual constraints is specifically excluded from the technical analysis and mapping exercise. ▪ It is noted that a revised Landscape Character Assessment has not been prepared, confirming there has been no substantive alteration to existing landscapes in terms of character areas, types, or sensitivities. ▪ The subject lands are located wholly within the 'River Slaney – East Rolling Farmlands' principal landscape character area and the 'Rolling Rough Grazing', which is deemed to have a 'Moderate to High' potential capacity to accommodate wind energy developments. ▪ The Draft RES fails to provide any clear direction or wind strategy map to clearly convey the location of suitable wind energy development areas in the county. ▪ Locations are identified as 'Not Normally Permissible', but no locations are identified where wind energy development should be directed i.e. Preferred Locations. 		

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p><u>Appendix 6 Renewable Energy Strategy</u> The submission makes the following comments regarding Appendix 6 Renewable Energy Strategy:</p> <p><u>1.4 Existing Energy Profile:</u> There is an issue with units used regarding national and county consumption. All the figures in GWh should be in TWh.</p> <p><u>5. Energy efficiency and conservation</u> Ireland has a target of 20% energy savings through efficiency by 2020 and a more ambitious target of 33% in the public sector alone. Or Ireland has a target of 32.5% energy savings through efficiency by 2030 and a more ambitious target of 50% in the public sector alone.</p> <p><u>5.2 County Context:</u> The Plan4Irish application wasn't successful, however it is planned to submit a new application Plan4Europe.</p> <p><u>Table 7-2</u></p> <ul style="list-style-type: none"> ▪ Climate Change: CO2 target has been updated for the public sector. Reduce CO2 equivalent emissions from public sector by 50%. ▪ Renewable Electricity: 130W capacity of wind farm and solar would produce up to 178GWh of electricity which only represents 42% of the current electricity demand, it is not enough to reach the 2030 target of 70%. 	<p>CLW-C10-115</p>	<p>The technical points raised in the submission can be responded to as follows:</p> <ul style="list-style-type: none"> ▪ Energy Profile: It is pointed out that the energy unit needs to be changed to TWh rather than GWh. The draft RES can be updated to address this issue (i.e. Table 1 and text in Section 1.4. Also, units in Table 1.2 should read toe/person.). ▪ Energy efficiency and conservation: revised targets to 2030 can be inserted. ▪ Table 7-2: An update of the CO2 reduction target for public sector to 50% by 2030 can be included. ▪ In relation to the point that the renewable electricity target represents just 42% of current demand, there seems to be some misunderstanding of the targets as set out in Table 7-2, and it will benefit from clarification of the headings/title. The submission correctly points out that the total renewable energy target proposed for Carlow does not meet (or correspond with) the national target. The target of 130 MW relates to total target for RES-E for Carlow based on the final content of the Draft Plan and draft RES. It was not intended to represent Carlow meeting national targets. The simplest way to address this is to reframe/ clarify the Table 7-2 headings, as below, which differentiates between the national target and the actions in Carlow.

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation												
		<table border="1" data-bbox="1276 335 2033 542"> <thead> <tr> <th data-bbox="1276 335 1422 375">Sector</th> <th data-bbox="1422 335 1590 375">National Target to 2030</th> <th data-bbox="1590 335 2033 375">Delivery Actions</th> </tr> </thead> <tbody> <tr> <td data-bbox="1276 375 1422 542">Renewable Electricity</td> <td data-bbox="1422 375 1590 542">70% Renewable Electricity (RES-E)</td> <td data-bbox="1590 375 2033 542"> Target to achieve up to 130MW capacity (this represents about 42% of current electricity use in Carlow): <ul style="list-style-type: none"> Enabling more wind farm development – up to 30 MW installed capacity (see Table 6-4). Enabling solar farm development – up to 100 MW installed capacity (see Table 6-8). Micro-generation including rooftop solar, wind, hydro-electric and bioenergy CHP. </td> </tr> </tbody> </table> <p data-bbox="1276 550 1478 574">Recommendation</p> <ul data-bbox="1276 582 2033 957" style="list-style-type: none"> Energy Profile: Update the draft RES to change energy units to TWh i.e. Table 1 and text in Section 1.4. Also the units in Table 1.2 should read toe/person. Energy efficiency and conservation: Include revised targets to 2030. Table 7-2: Include an update of the CO2 reduction target for public sector to 50% by 2030. Amend Table 7-2 headings in Section 7 as below, which differentiates between the national target and the actions in Carlow. <table border="1" data-bbox="1276 989 2033 1197"> <thead> <tr> <th data-bbox="1276 989 1422 1029">Sector</th> <th data-bbox="1422 989 1590 1029">National Target to 2030</th> <th data-bbox="1590 989 2033 1029">Delivery Actions</th> </tr> </thead> <tbody> <tr> <td data-bbox="1276 1029 1422 1197">Renewable Electricity</td> <td data-bbox="1422 1029 1590 1197">70% Renewable Electricity (RES-E)</td> <td data-bbox="1590 1029 2033 1197"> Target to achieve up to 130MW capacity (this represents about 42% of current electricity use in Carlow): <ul style="list-style-type: none"> Enabling more wind farm development – up to 30 MW installed capacity (see Table 6-4). Enabling solar farm development – up to 100 MW installed capacity (see Table 6-8). Micro-generation including rooftop solar, wind, hydro-electric and bioenergy CHP. </td> </tr> </tbody> </table>	Sector	National Target to 2030	Delivery Actions	Renewable Electricity	70% Renewable Electricity (RES-E)	Target to achieve up to 130MW capacity (this represents about 42% of current electricity use in Carlow): <ul style="list-style-type: none"> Enabling more wind farm development – up to 30 MW installed capacity (see Table 6-4). Enabling solar farm development – up to 100 MW installed capacity (see Table 6-8). Micro-generation including rooftop solar, wind, hydro-electric and bioenergy CHP. 	Sector	National Target to 2030	Delivery Actions	Renewable Electricity	70% Renewable Electricity (RES-E)	Target to achieve up to 130MW capacity (this represents about 42% of current electricity use in Carlow): <ul style="list-style-type: none"> Enabling more wind farm development – up to 30 MW installed capacity (see Table 6-4). Enabling solar farm development – up to 100 MW installed capacity (see Table 6-8). Micro-generation including rooftop solar, wind, hydro-electric and bioenergy CHP.
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Appendix VII: Landscape Character Assessment

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p>Carlow urgently needs an up to date LCA Landscape Character Assessment and should obtain a Historic Character Assessment.</p>	<p>CLW-C10-112</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 support 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>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>Recommendation No change to Draft Plan</p>

Appendix VIII: Record of Protected Structures

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
Record of Protected Structures Carlow Town		
<p>Limekiln CW 77 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 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 	<p>CLW – C10-77</p>	<p>The content of the submission is noted. The disused Limekiln Cooling Tower comprises a circular tower with external circular perimeter maintenance gantries and staircases, and was 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. The 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 and most of the factory buildings on the site have been demolished.</p> <p>The structure is not included in the published NIAH Survey for the County. While it is a distinctive feature on the skyline of Carlow Town, 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 and it is now of local interest only.</p> <p>Recommendation Delete the Protected Structure (Ref. RPS CW77) from the Record of Protected Structures.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<p>1988, is inappropriate and does not take into consideration Section 51 and 54 of the Planning and Development Act 2000.</p> <ul style="list-style-type: none"> ▪ 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. 		
<p>49 Burrin Street CT 18 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 2000s. 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>CLW – C10-94</p>	<p>The content of the submission is noted. 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.</p> <p>Although vacant for many years, the external form of the building is in a remarkably intact condition, and it retains a strong architectural presence on the streetscape. Architecturally, the building makes a positive contribution to its setting, and through its form, materials, and architectural details. The central door surround on the front façade and the vertical proportions of the windows contribute to the character 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.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
<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> <p>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>		<p>Recommendation Retain the Protected Structure (Ref. RPS CT18) on the Record of Protected Structures.</p>
<p>Shamrock Square CT 93 and CT 94 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>	<p>CLW – C10-41</p>	<p>The semi-detached late-Georgian houses were constructed as a pair. The interior of the buildings was badly damaged by fire in 2008 and the roofs have been missing for many years. The external window surrounds and sills contribute to the interest of the building. The internal photographs submitted with the submission show that the internal floors and walls are no longer extant. The panelled timber window shutters and some window surrounds appear to survive.</p> <p>In the RPS entries the buildings are noted as having a 'good intact' Victorian shopfronts. These shopfronts do not survive and have been replaced with a poor quality modern attached shopfront, which is now also in poor condition.</p> <p>While the external form of the buildings survive, the shopfronts, roofs and internal fabric and features have been lost, as a result of fire damage and subsequent dereliction. The buildings have lost much of their special interest value and are now of local significance only.</p>

Key Issue	Sub. No.	Chief Executive's Opinion & Recommendation
		<p>Recommendation Delete the Protected Structures (Ref. RPS CT 93 and CT 94) from the Record of Protected Structures.</p>

Appendix X: Infrastructure Assessment

1.0 Infrastructure Assessment

The Infrastructure Assessment is provided to support the Draft County Development Plan 2022-2028 with regard to the co-ordination of proposed 'New Residential' land use zonings for undeveloped lands with existing and planned development services.

The National Planning Framework (NPF) requires that the zoning of undeveloped lands is carried out in accordance with a standardised methodology termed a Tiered Approach to Zoning (TAZ)¹⁵. The objective of the TAZ is to avoid zoning lands that cannot be brought forward for development due to deficiencies in necessary infrastructure and services. It provides an evidence-based approach that identifies which:

- Lands are already serviced;
- Lands can connect to services; and,
- Lands are to be provided with services within the lifetime of a development plan.

In accordance with the NPF, infrastructure and services include:

- Road and footpath access, including public lighting;
- Foul sewer drainage;
- Surface water drainage; and,
- Water supply.

It is a requirement that the Infrastructural Assessment is aligned with the approved infrastructure investment programmes(s) of relevant delivery agency(ies) such as Irish Water, or is based on a written commitment of the relevant delivery agency to provide the identified infrastructure within a specified timescale i.e. within the lifetime of the development plan.

The Planning Authority may also commit to the delivery of the required and identified

infrastructure in its own infrastructural investment programme (i.e. Budgeted Capital Programme) in order to support certain lands for zoning.

The methodology for TAZ is included in Appendix 3 of the NPF, which sets out a two-tier approach to land use zoning as follows:

Tier 1: Serviced Zoned Land

Comprises zoned lands that can accommodate new development as they can connect to existing services and there is service capacity available. The NPF states that these lands will generally be positioned within the existing built-up footprint of a settlement or be contiguous to existing development lands and will be within the footprint of or spatially sequential within the identified settlement.

Tier 2: Serviced Zoned Land

Comprises zoned lands that are not currently sufficiently serviced to support new development but have the potential to become serviced during the lifetime of the development plan. The NPF states that these lands may be positioned within the existing built-up footprint of a settlement or be contiguous to existing development lands or Tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of new development within the identified settlement.

The NPF requires that where lands are identified as Tier 2 lands, the potential for the delivery of the required services and/or capacity to support new development, must be identified and specific details provided by the planning authority at the time of publication of the draft and final development plan.

¹⁵ National Policy Objectives 72a-c and Appendix 3

1.1 Methodology for Infrastructural Assessment

In the absence of Departmental guidelines which as referred to in the NPF are expected to issue under Section 28 of the Planning and Development Act 2000 (as amended), the Infrastructural Assessment has been development in accordance with Appendix 3 of the NPF.

The Infrastructure Assessment applies to the Tier 1, Tier 3 and Tier 4 settlements as identified for the County’s Settlement Hierarchy detailed in Table 2.1 in Chapter 2 of the Plan, and for which proposed land use zoning maps have been prepared and incorporated into Chapter 15. The assessment involves a review of zoned undeveloped lands in each of these settlements ~~which have been zoned ‘New Residential’~~, **which includes lands zoned for town centre, mixed use and residential purposes, and which takes account of the potential for brownfield and infill development.** In relation to Tier 2 District Towns, it is an objective of the Council to commence a review of the Tullow Local Area Plan and the Muine Bheag / Royal Oak Local Area (which are due to expire in 2023) no later than one year following the adoption of this Plan.

Settlement Tier	Settlement Typology	Settlement Name
1	Key Town	Carlow Town
3	Small Towns	Rathvilly Leighlinbridge Ballon Borris Hacketstown Carrickduff Tinnahinch
4	Larger Serviced Rural Villages	Palatine Ballinabrannagh Rathtoe Fennagh Myshall Clonegal Kildavin Tinryland

The focus of the Infrastructural Assessment is on roads, foul sewer drainage, surface water, and water supply infrastructure. The assessment has been informed by consultation with the Council’s Transportation Department, Water Services Department, and Environment Department, as well as by consultation with Irish Water. This is in addition to the examination of the Council’s infrastructure and services mapping for the settlements concerned.

The consultations with the Council’s internal departments and with Irish Water provided an overview of future infrastructure requirements in each of the settlements, in addition to more detailed analysis on a site-by-site basis where this was deemed necessary. Each internal department was required to provide details of the following:

- Any infrastructure deficits that would impede the development of lands;

- The current status of any plans/programmes in place to address these infrastructure deficits; and,
- The anticipated timeframe for the delivery of these projects.

Transportation Infrastructure

Chapter 5 of the Plan identifies the transportation infrastructure required to ensure that people and goods can continue to be efficiently transported around the county and the wider region. This includes the construction of new roads, the upgrade of existing roads, and the provision of public transport infrastructure. In addition, there are many local projects in the settlements that will focus on delivering more sustainable travel patterns. This includes walking and cycling infrastructure and improvements to public transport infrastructure.

Costings

No new strategic road links to facilitate release of lands zoned for development have been identified on the zoning maps. The zoning of lands within the Settlements in the County are centrally located and serviced to a relatively high level by footpath infrastructure. Where footpath / cycling infrastructure is required current indicative costings may range between €150-€250 per sqm. However, full cost of delivery of such infrastructure would be informed at site specific detailed design stage. Smaller interventions to facilitate vulnerable road users will be facilitated over the period of the Plan and will be informed by the preparation of ABTA Plans in association with the Urban Area Plan and Local Area Plans as appropriate.

Water and Wastewater Infrastructure

Irish Water is responsible for the delivery of water services infrastructure. In collaboration with the Council’s Water Services Department,

Irish Water has identified the necessary investments in the water and wastewater treatment plans and associated collection and distribution network in the county to facilitate future population and economic growth. This includes working with and supporting Irish Water in progressing the “Small Towns and Villages Growth Programme” which is intended to provide growth capacity at WWTPs (and WTPs) in smaller settlements which would not otherwise be provided for in the current Investment Plan.

Costing

The specified services required for Tier 2 lands identified in the Infrastructure Assessment relate to the Larger Serviced Villages 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.

Tier 1 and Tier 2 Zoned Lands

Tier 1

In order for a parcel of land to be identified as 'Tier 1' there shall be no infrastructure impediments restricting the development of the lands i.e. all transportation and water services infrastructure needs to be in place.

Sites which may require minor additional works or investment have also been identified as Tier 1 in certain circumstances, depending on the nature and scale of the works required.

Tier 2

The identification of a site as 'Tier 2' highlights to landowners and potential investors that there are deficiencies in infrastructure that need to be addressed prior to the lands being developed. The nature of the deficiencies can vary between lands and settlements.

Apart from Tier 2 lands identified in the Larger Serviced Villages of Clonegall and Tinryland, all lands examined in the other settlements are designated as Tier 1.

Traffic Light Rating System

A traffic light rating system has been developed that highlights any deficiencies in the lands, analysed as follows:

- A green colour indicates that infrastructure/services are available;
- An amber colour indicates that infrastructure/services are not available or further investment in same is required and this investment is likely to be provided during the lifetime of the Plan;
- A red colour indicates infrastructure/services are not available and are unlikely to be provided during the lifetime of the Plan.

An example of this system is set out as Table X below:

Legend	Tier
Infrastructure/services available	
Further investment required	
Provision of infrastructure/services unlikely during period of Plan	

Table i: Traffic Light Rating System Example

Land Use Evaluation

The Infrastructure Assessment has also been combined with a land use evaluation, which also utilises the traffic light rating system. The land use evaluation takes account of compact growth considerations and physical suitability considerations in terms of built and natural heritage and flood risk. In this regard, the traffic light rating system also reflects a score rating of 1 to 3 for land use evaluation, with 1 being the most optimal and 3 being the least optimal score.

	1
	2
	3

Table X: Land Use Evaluation Scores

Infrastructure Assessment Matrixes

The infrastructure assessments for each of the settlements are set out in table form in this section. All settlement lands that have been examined are identified in the tables with an individual reference number. The corresponding maps for the settlements (Objectives Maps) can be found in Chapter 15.

TABLE 1: CARLOW TOWN – KEY TOWN
(SEE CARLOW TOWN OBJECTIVES MAP)

TABLE 1: CARLOW TOWN – KEY TOWN (SEE CARLOW TOWN OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/ Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	CW1				Infrastructure/services available & within existing built-up footprint
T1	CW2				Infrastructure/services available & within existing built-up footprint
T1	CW3				Infrastructure/services available & contiguous to existing development lands
T1	CW4				Infrastructure/services available & contiguous to existing development lands
T1	CW5				Infrastructure/services available & within existing built-up footprint
T1	CW6				Infrastructure/services available & within existing built-up footprint
T1	CW7				Infrastructure/services available & within existing built-up footprint
T2	CW8				Infrastructure/services available & within existing built-up footprint

T3	CW9				Infrastructure/services available & within existing built-up footprint
T4	CW10				Infrastructure/services available & within existing built-up footprint

TABLE 2: RATHVILLY – SMALL TOWN
(SEE RATHVILLY OBJECTIVES MAP)

TABLE 2: RATHVILLY – SMALL TOWN (SEE RATHVILLY OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	R1	Green	Green	Green	Infrastructure/services available & within existing built-up footprint
T1	R2	Green	Green	Green	Infrastructure/services available & within existing built-up footprint
T1	R3	Green	Yellow	Green	Infrastructure/services available & contiguous to existing development lands
T1	R4	Green	Green	Green	Infrastructure/services available & contiguous to existing development lands
T1	R5	Green	Green	Green	Infrastructure/services available & within existing built-up footprint
T1	R6	Green	Green	Yellow	Infrastructure/services available & within existing built-up footprint
T1	R7	Green	Green	Green	Infrastructure/services available & within existing built-up footprint

TABLE 3: LEIGHLINBRIDGE – SMALL TOWN
(SEE LEIGHLINBRIDGE OBJECTIVES MAP)

TABLE 3: LEIGHLINBRIDGE – SMALL TOWN (SEE LEIGHLINBRIDGE OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	L1				Infrastructure/services available & within existing built-up footprint
T1	L2				Infrastructure/services available & within existing built-up footprint
T1	L3				Infrastructure/services available & within existing built-up footprint
T1	L4				Infrastructure/services available & within existing built-up footprint
T1	L5				Infrastructure/services available & within existing built-up footprint

TABLE 4: BALLON – SMALL TOWN
(SEE BALLON OBJECTIVES MAP)

TABLE 4: BALLON – SMALL TOWN (SEE BALLON OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	BA1				Infrastructure/services available & within existing built-up footprint
T1	BA2				Infrastructure/services available & within existing built-up footprint
T1	BA3				Infrastructure/services available & within existing built-up footprint
T1	BA4				Infrastructure/services available & within existing built-up footprint

TABLE 5: BORRIS – SMALL TOWN
(SEE BORRIS OBJECTIVES MAP)

TABLE 5: BORRIS – SMALL TOWN (SEE BORRIS OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	BO1				Infrastructure/services available & within existing built-up footprint
T1	BO2				Infrastructure/services available & within existing built-up footprint
T1	BO3				Infrastructure/services available & within existing built-up footprint
T1	BO4				Infrastructure/services available & within existing built-up footprint
T1	BO5				Infrastructure/services available & within existing built-up footprint
T1	BO6				Infrastructure/services available & contiguous to existing development lands

TABLE 6: HACKETSTOWN – SMALL TOWN
(SEE HACKETSTOWN OBJECTIVES MAP)

TABLE 6: HACKETSTOWN – SMALL TOWN (SEE HACKETSTOWN OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	H1				Infrastructure/services available & within existing built-up footprint
T1	H2				Infrastructure/services available & contiguous to existing development lands
T1	H3				Infrastructure/services available & within existing built-up footprint
T1	H4				Infrastructure/services available & within existing built-up footprint
T1	H5				Infrastructure/services available & within existing built-up footprint

TABLE 7: CARRICKDUFF – SMALL TOWN
(SEE CARRICKDUFF OBJECTIVES MAP)

TABLE 7: CARRICKDUFF – SMALL TOWN (SEE CARRICKDUFF OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	C1				Infrastructure/services available & within existing built-up footprint
T1	C2				Infrastructure/services available & contiguous to existing development lands
T1	C3				Infrastructure/services available & within existing built-up footprint
T1	C4				Infrastructure/services available & within existing built-up footprint

TABLE 8: PALATINE – VILLAGE (LARGER SERVICED)
(SEE PALATINE OBJECTIVES MAP)

TABLE 8: PALATINE – VILLAGE (LARGER SERVICED) (SEE PALATINE OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	P1				Infrastructure/services available & within existing built-up footprint
T1	P2				Infrastructure/services available & contiguous to existing development lands

TABLE 9: BALLINABRANNAGH/RAHEENDORAN – VILLAGE (LARGER SERVICED)
(SEE BALLINABRANNAGH/RAHEENDORAN OBJECTIVES MAP)

TABLE 9: BALLINABRANNAGH/RAHEENDORAN – VILLAGE (LARGER SERVICED) (SEE BALLINABRANNAGH/RAHEENDORAN OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	BR1				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to
T1	BR2				further investment under Irish Water's 'Small Towns and Villages Growth Programme' (STVGP), which may become available during lifetime of Plan.
T1	BR3				Infrastructure/services will become available under Irish Water's 'Small Towns and Villages Growth Programme' (STVGP) during the lifetime of the Plan & within existing built-up footprint

- ~~• Detached one off dwellings on individual treatment systems may be considered in limited circumstances pending upgrade of the effluent treatment plant.~~

TABLE 10 RATHTOE – VILLAGE (LARGER SERVICED)
(SEE RATHOE OBJECTIVES MAP)

TABLE 10 RATHTOE – VILLAGE (LARGER SERVICED) (SEE RATHOE OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	RA1				Infrastructure/services available & contiguous to existing development lands
T1	RA1				Infrastructure/services available & within existing built-up footprint
T1	RA2				Infrastructure/services available & contiguous to existing development lands

TABLE 11: FENNAGH – VILLAGE (LARGER SERVICED)
(SEE FENNAGH OBJECTIVES MAP)

TABLE 11: FENNAGH – VILLAGE (LARGER SERVICED) (SEE FENNAGH OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	F1				Infrastructure/services available & contiguous to existing development lands
T1	F2				Infrastructure/services available & contiguous to existing development lands
T1	F3				Infrastructure/services available & within existing built-up footprint

TABLE 12: MYSHALL – VILLAGE (LARGER SERVICED)
(SEE MYSHALL OBJECTIVES MAP)

TABLE 12: MYSHALL – VILLAGE (LARGER SERVICED) (SEE MYSHALL OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	M1				Infrastructure/services available & contiguous to existing development lands
T1	M2				Infrastructure/services available & within existing built-up footprint

TABLE 13: CLONEGALL – VILLAGE (LARGER SERVICED)
(SEE CLONEGALL OBJECTIVES MAP)

TABLE 13: CLONEGALL – VILLAGE (LARGER SERVICED) (SEE CLONEGALL OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T2	CL1				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to further investment under Irish Water's 'Small Towns and Villages Growth Programme' (STVGP), which may become available during lifetime of Plan.
T2	CL2				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to further investment under Irish Water's 'Small Towns and Villages Growth Programme' (STVGP), which may become available during lifetime of Plan.
T2	CL3				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to further investment under Irish Water's 'Small Towns and Villages Growth Programme' (STVGP), which may become available during lifetime of Plan.

- Detached one off dwellings on individual treatment systems may be considered in limited circumstances pending upgrade of the wastewater treatment plant.

TABLE 14: KILDAVIN – VILLAGE (LARGER SERVICED)
(SEE KILDAVIN OBJECTIVES MAP)

TABLE 14: KILDAVIN – VILLAGE (LARGER SERVICED) (SEE KILDAVIN OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T1	K1				Infrastructure/services available & within existing built-up footprint
T1	K1				Infrastructure/services available & contiguous to existing development lands
T1	K2				Infrastructure/services available & within existing built-up footprint

TABLE 15: TINRYLAND– VILLAGE (LARGER SERVICED)
(SEE TINRYLAND OBJECTIVES MAP)

TABLE 15: TINRYLAND– VILLAGE (LARGER SERVICED) (SEE TINRYLAND OBJECTIVES MAP)					
		INFRASTRUCTURE ASSESSMENT	LAND USE EVALUATION		
		Infrastructure/Services (Roads, foul sewer, water supply, surface water)	Compact Growth (within existing settlement, infill/consolidation, proximity to town/village centre, promotes sustainable mobility)	Physical Suitability (built & natural heritage, flood risk)	
Tier	Map Ref.				Justification
T2	T1				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to further investment under Irish Water’s ‘Small Towns and Villages Growth Programme’ (STVGP), which may become available during lifetime of Plan.
T2	T2				Within existing built-up footprint. Capacity constraints at wastewater treatment plant serving village. Will be subject to further investment under Irish Water’s ‘Small Towns and Villages Growth Programme’ (STVGP), which may become available during lifetime of Plan.

- Detached one off dwellings on individual treatment systems may be considered in limited circumstances pending upgrade of the wastewater treatment plant.

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- ▨ Proposed Natural Heritage Areas
- ▨ Special Areas of Conservation
- ▨ Flood Zone A Chance of Flooding Once Every 100 Years
- ▨ Flood Zone B Chance of Flooding Once Every 1000 Years
- - - Carlow Town Council Boundary

Carlow Town Objectives Map



CARLOW COUNTY COUNCIL
FORWARD PLANNING SECTION

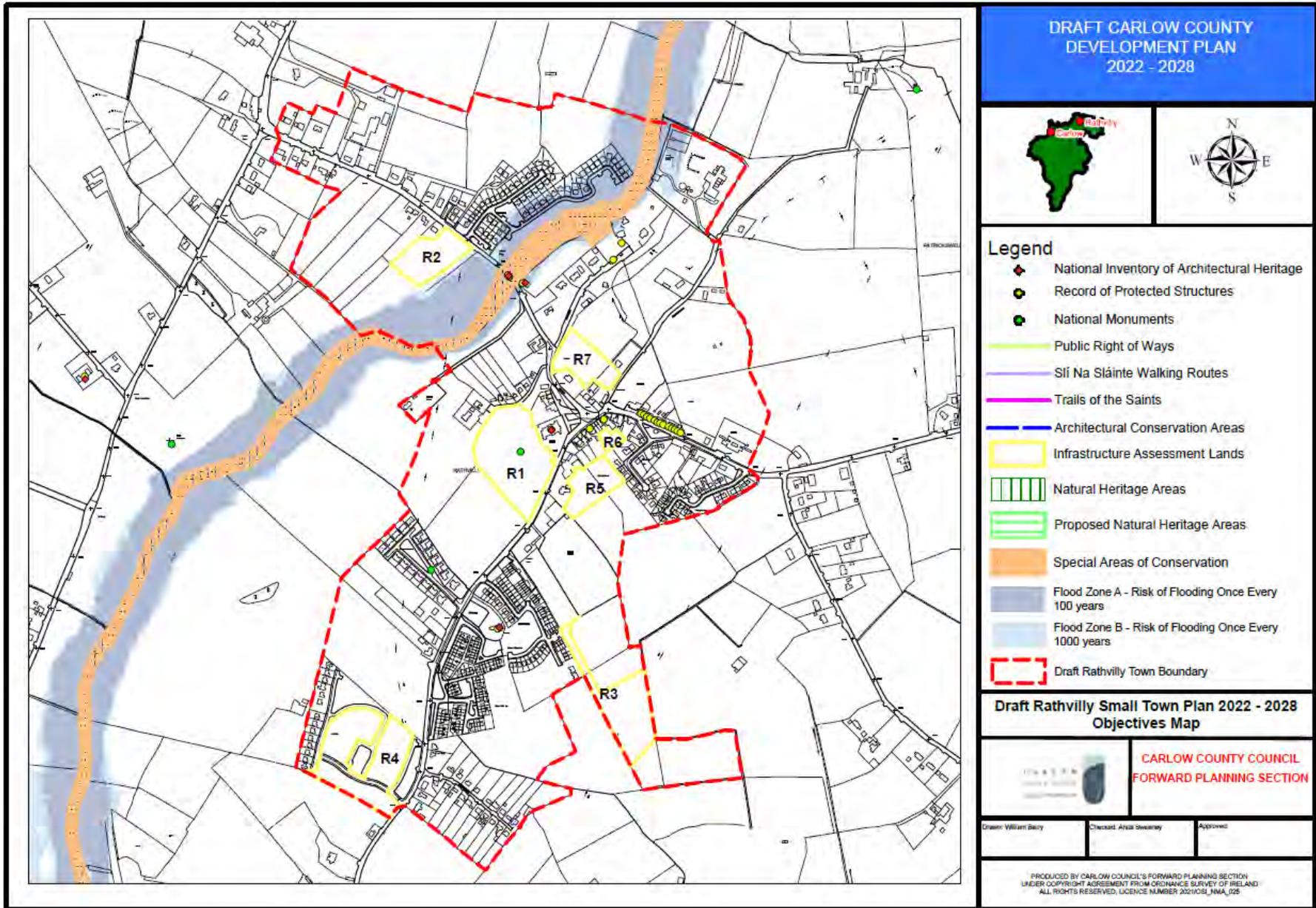
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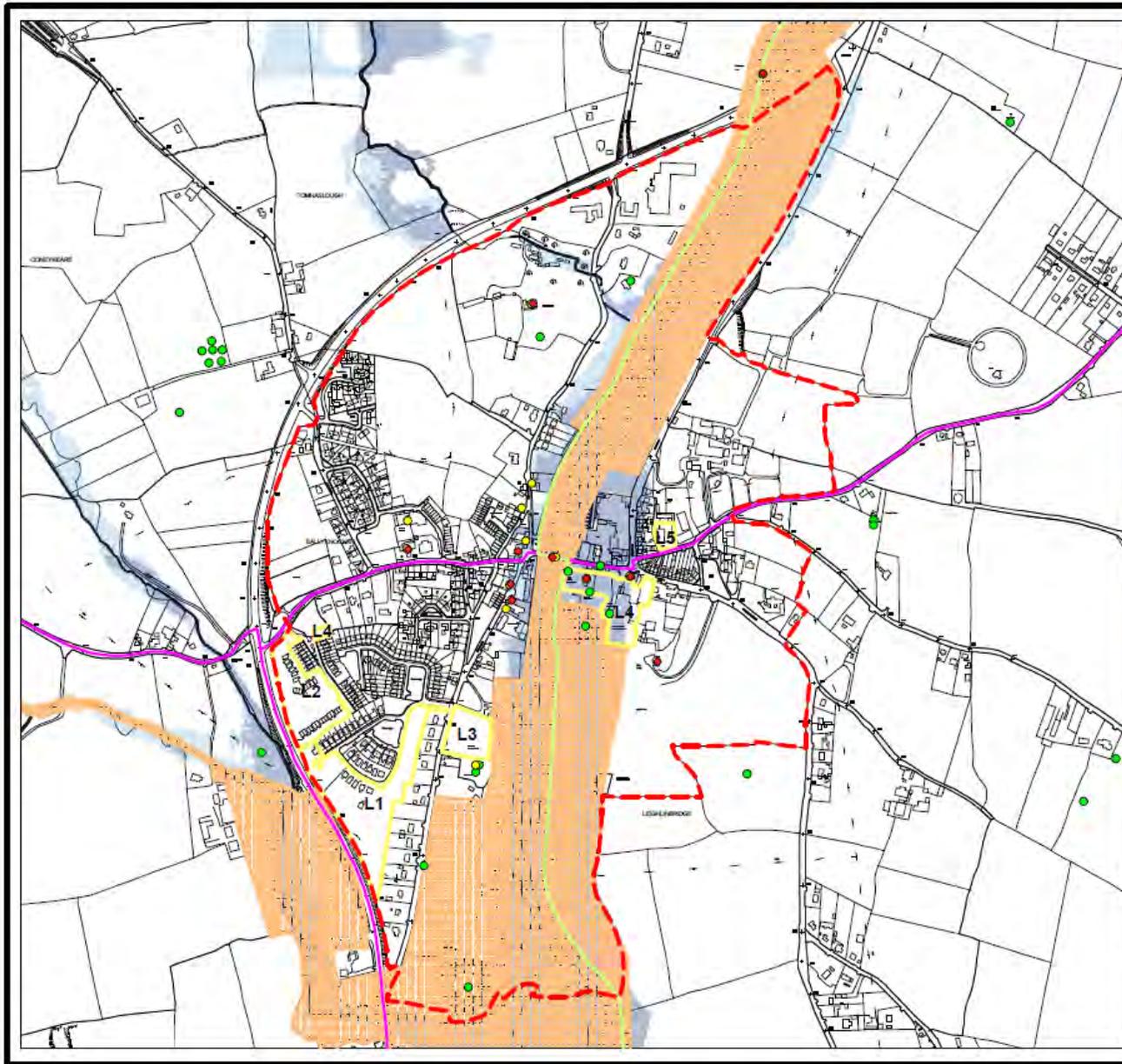
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Small Towns – Objectives Maps





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- Proposed Natural Heritage Areas
- Special Areas of Conservation
- Flood Zone A - Chance of Flooding Once Every 100 years
- Flood Zone B - Chance of Flooding Once Every 1000 years
- Draft Leighlinbridge Town Boundary

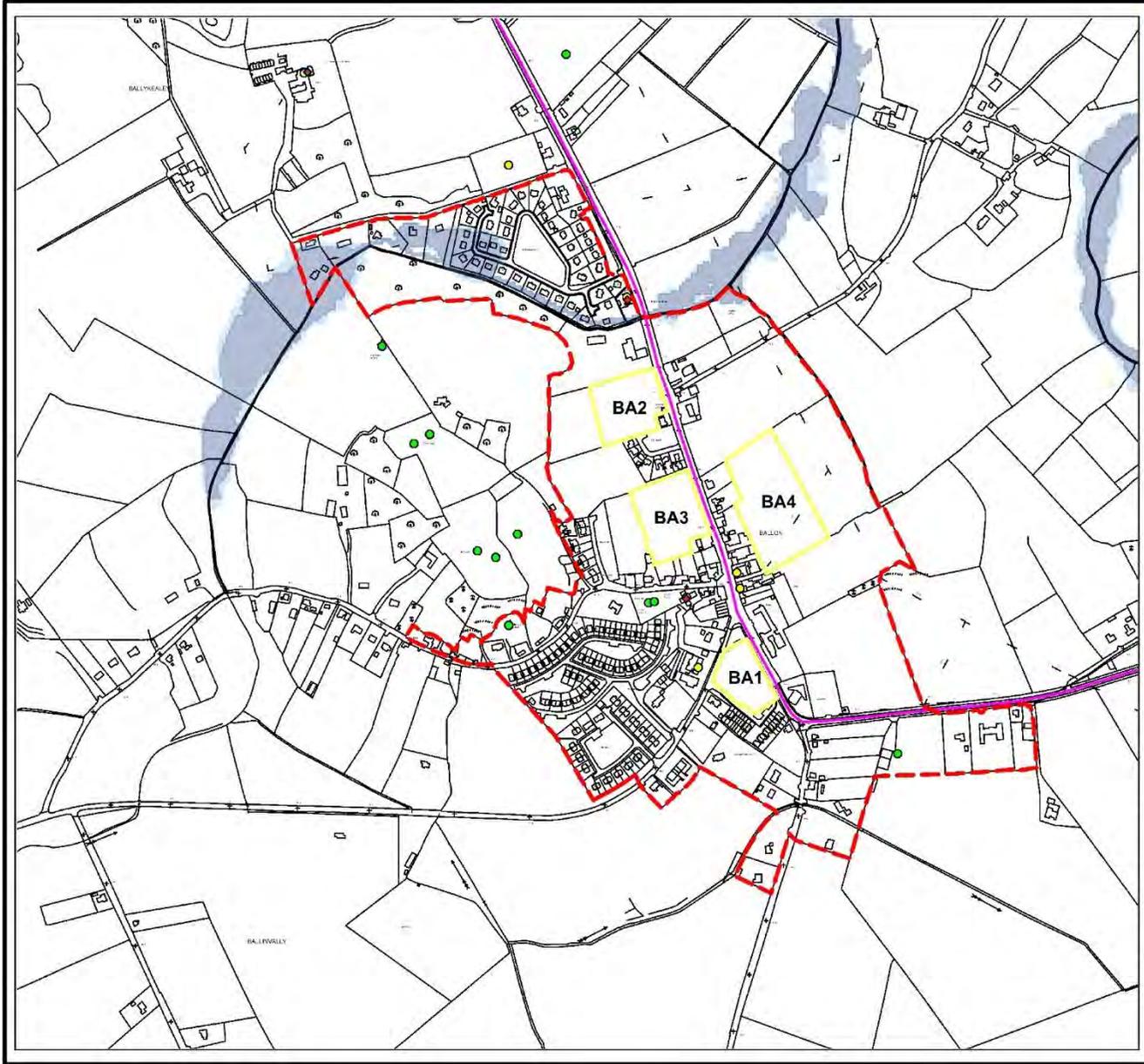
Draft Leighlinbridge Small Town Plan 2022 - 2028 Objectives Map



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 - Proposed Natural Heritage Areas
 - Special Areas of Conservation
 - Flood Zone A - Risk of Flooding Once Every 100 years
 - Flood Zone B - Risk of Flooding Once Every 1000 years
 - Draft Ballon Town Boundary

**Draft Ballon Small Town Plan 2022 - 2028
Objectives Map**



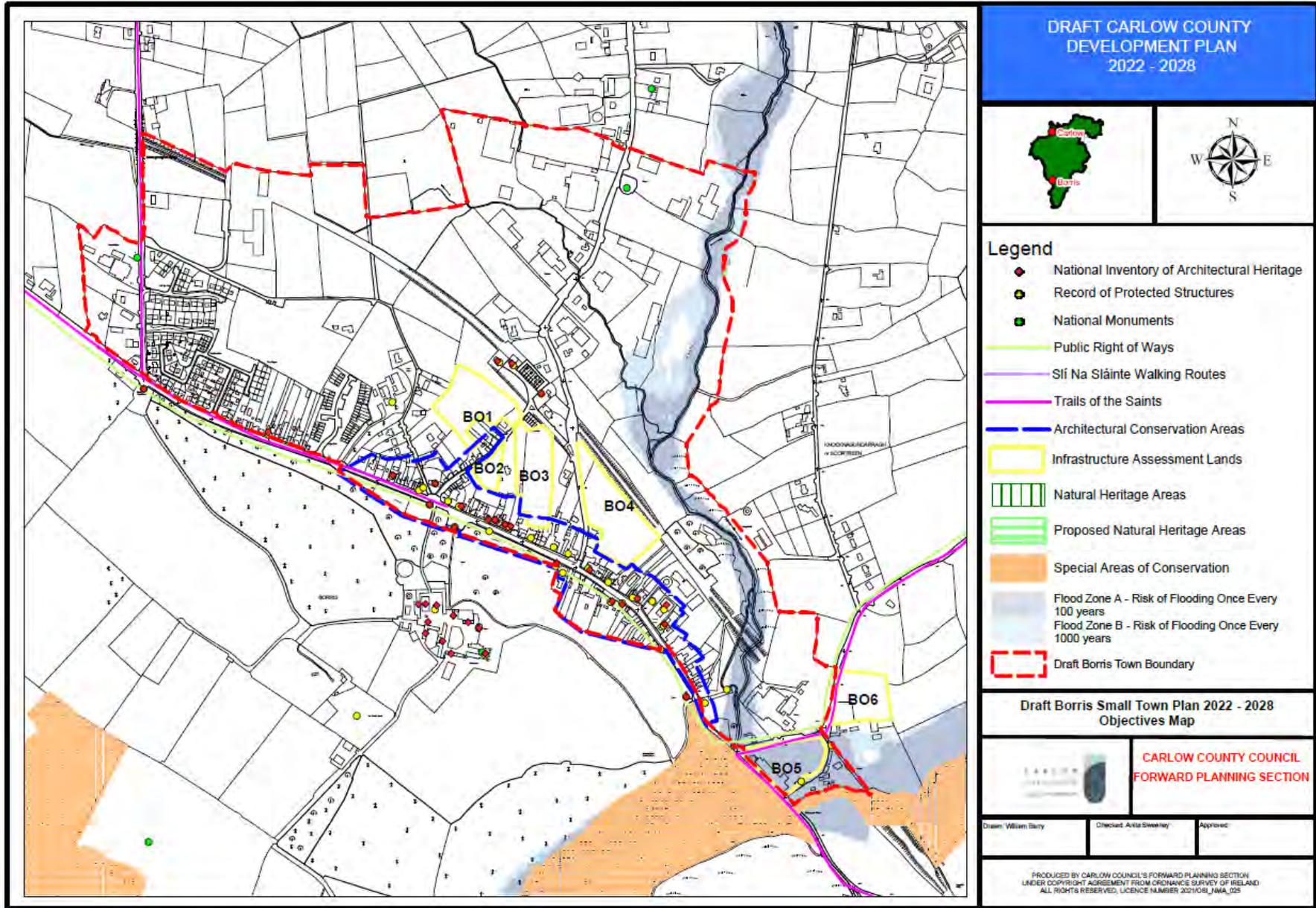
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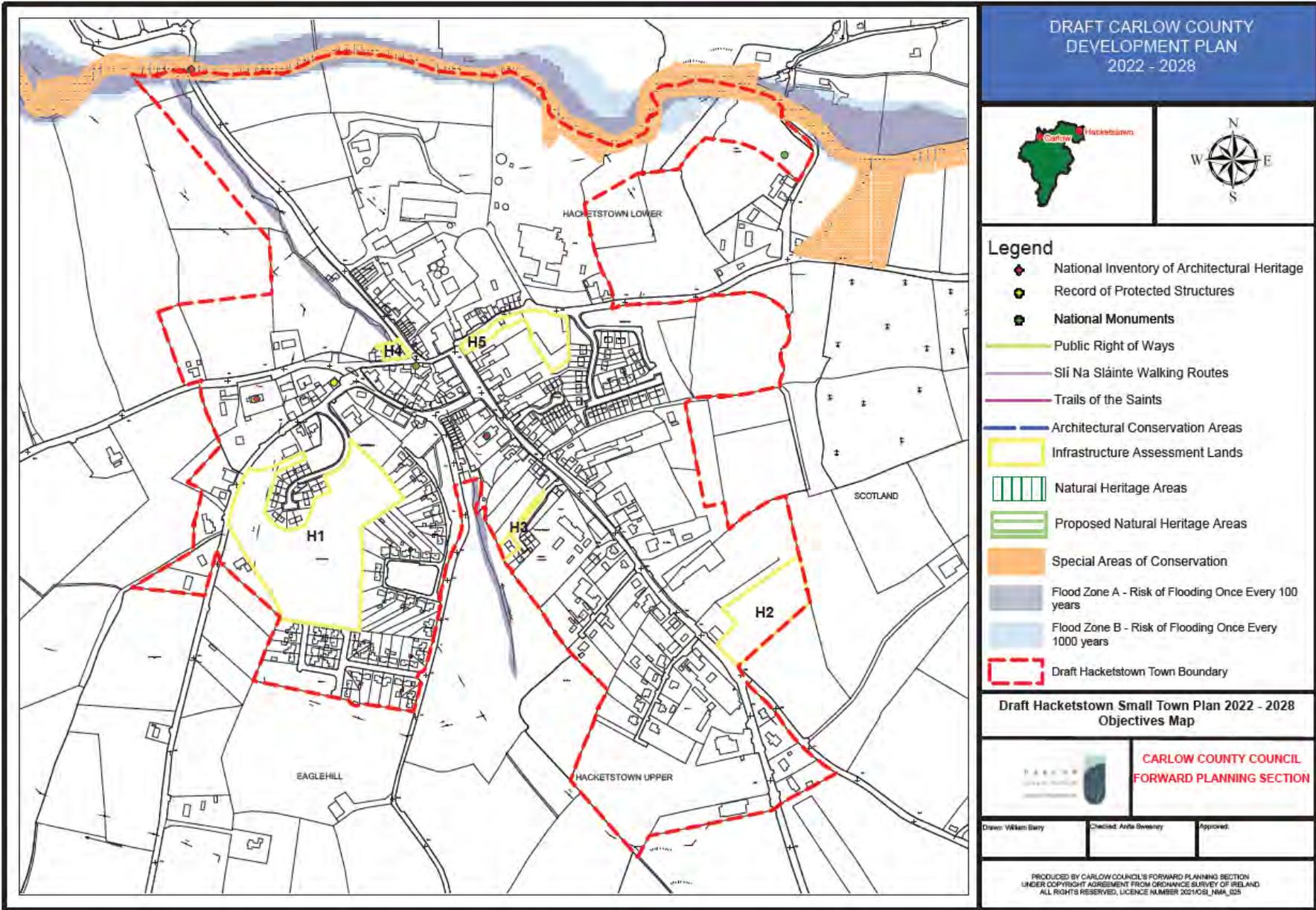
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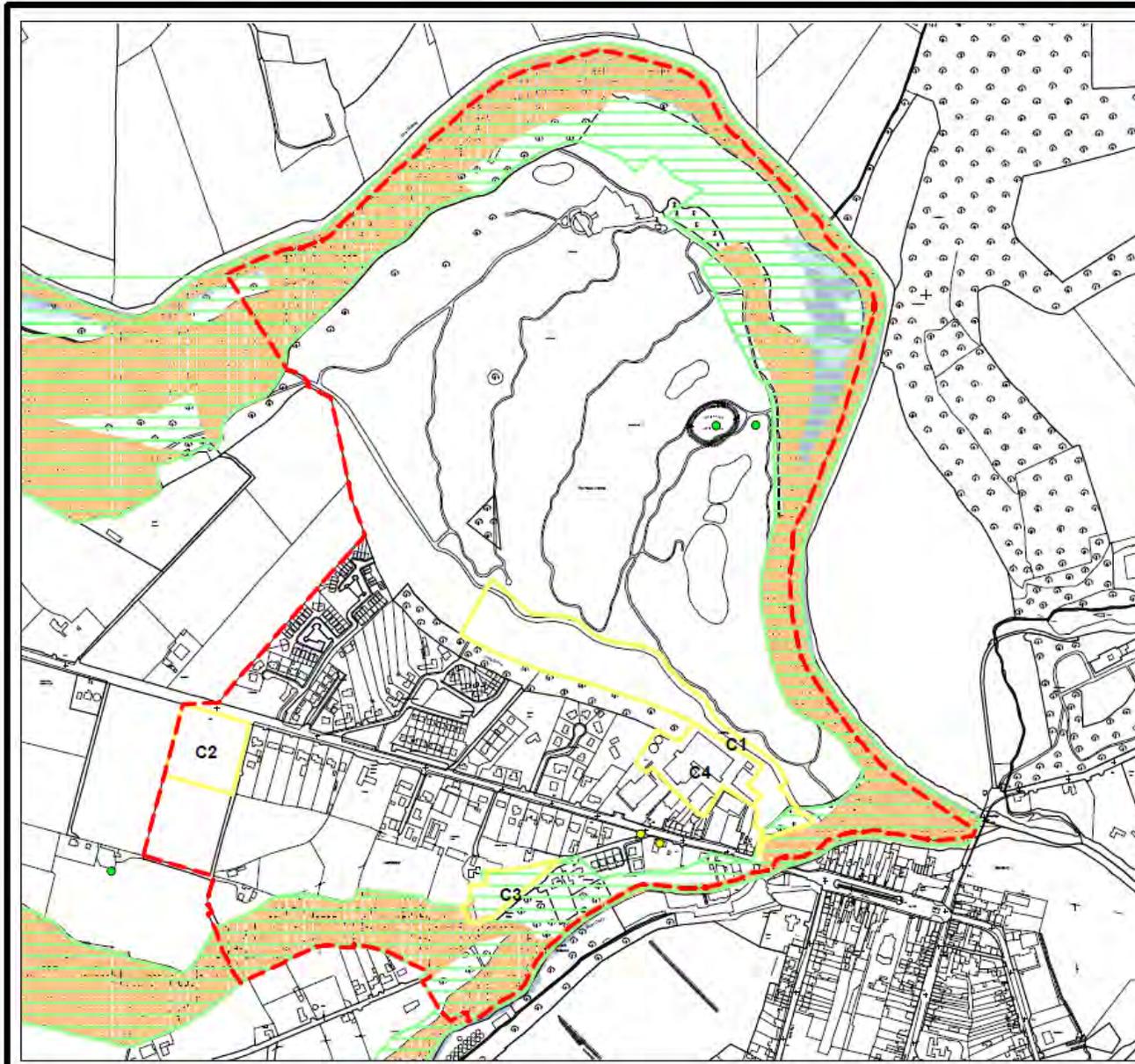
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- Flood Zone A - Risk of Flooding Once Every 100 years
- Flood Zone B - Risk of Flooding Once Every 1000 years
- Draft Carrickduff Town Boundary

**Draft Carrickduff Small Town Plan 2022 - 2028
Objectives Map**

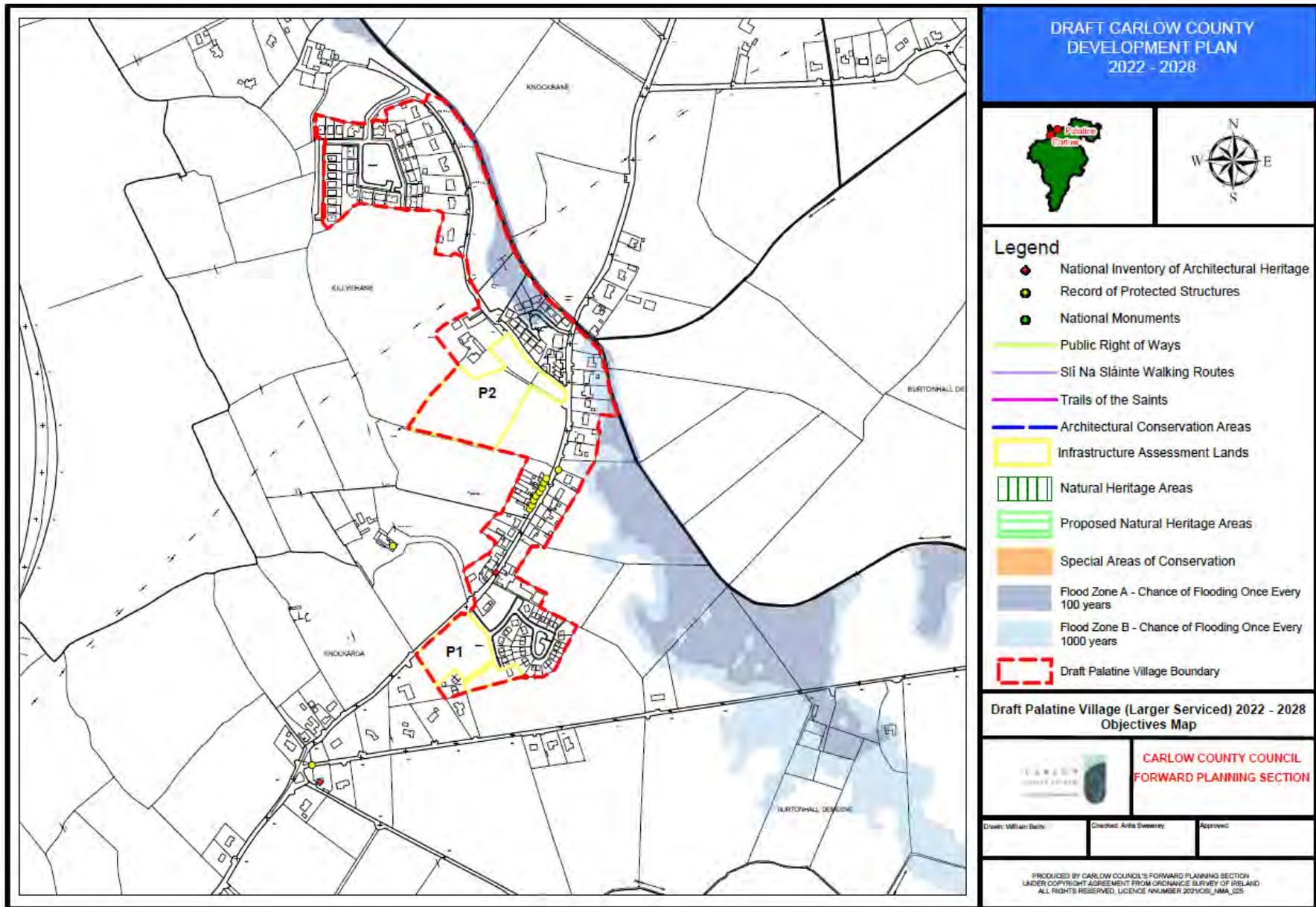


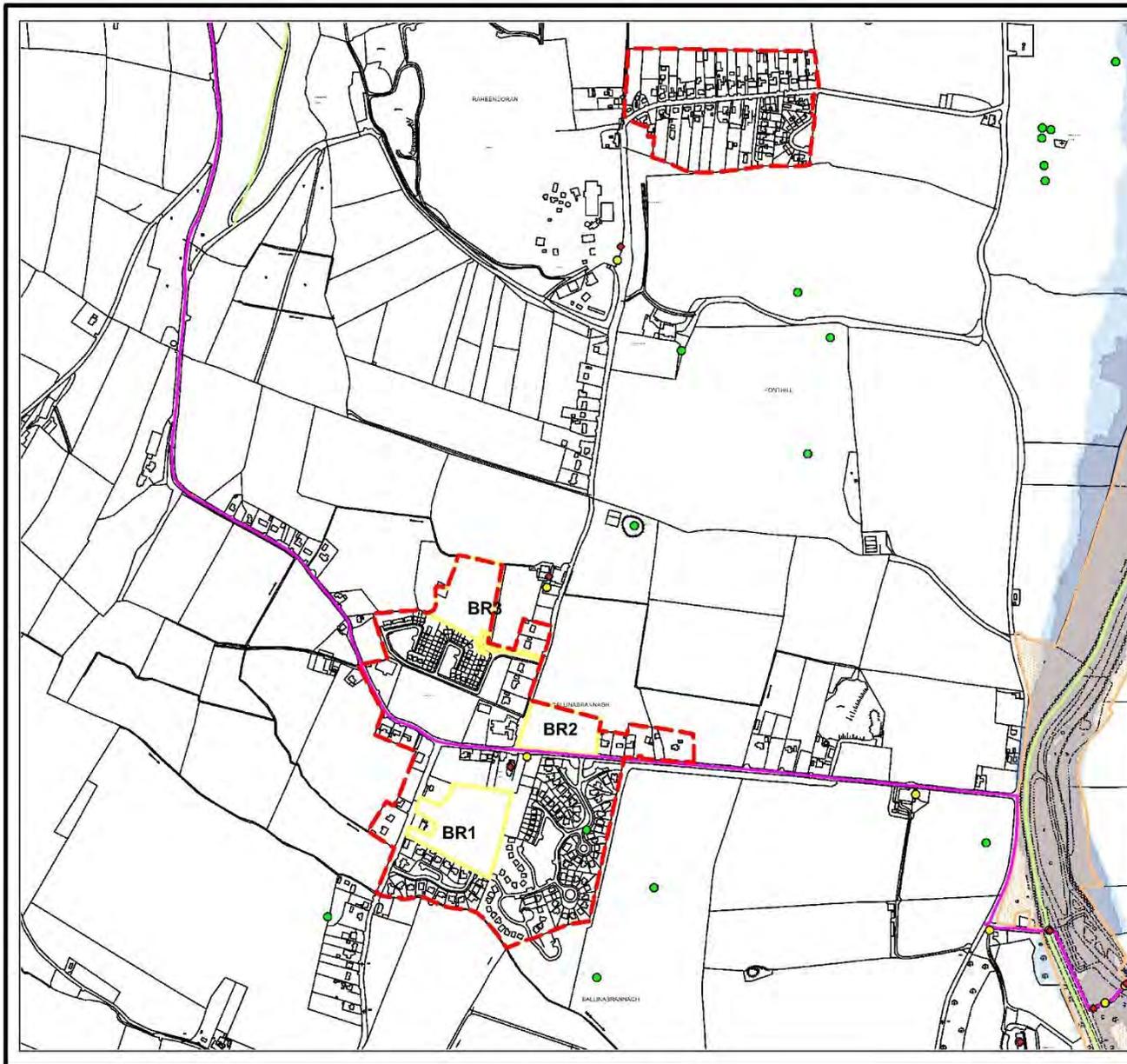
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Larger Serviced Villages – Objectives Maps





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- - - Draft Ballinabrannagh / Raheendoran Village Boundary

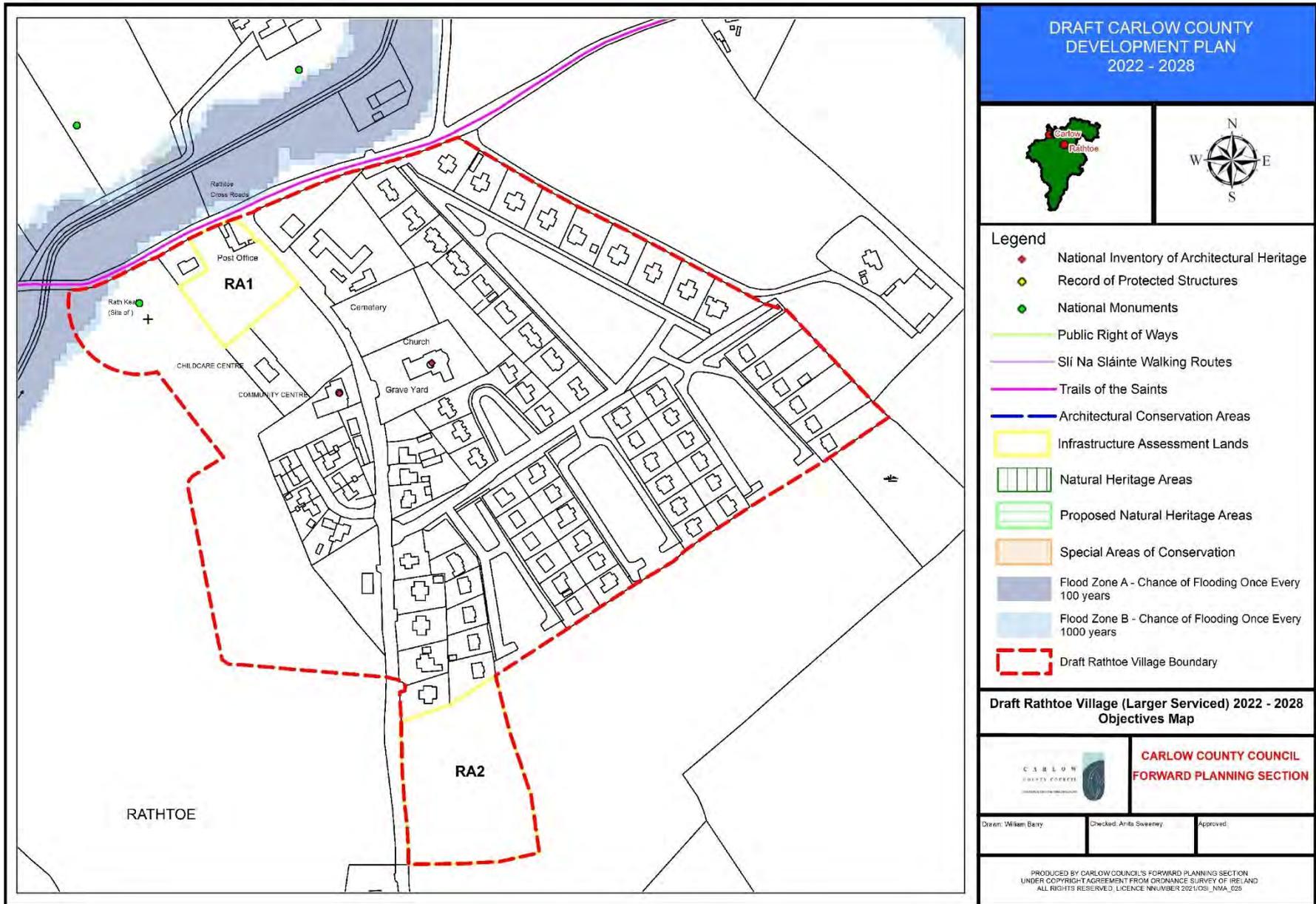
**Draft Ballinabrannagh / Raheendoran Village (Larger Served)
2022 - 2028
Objectives Map**

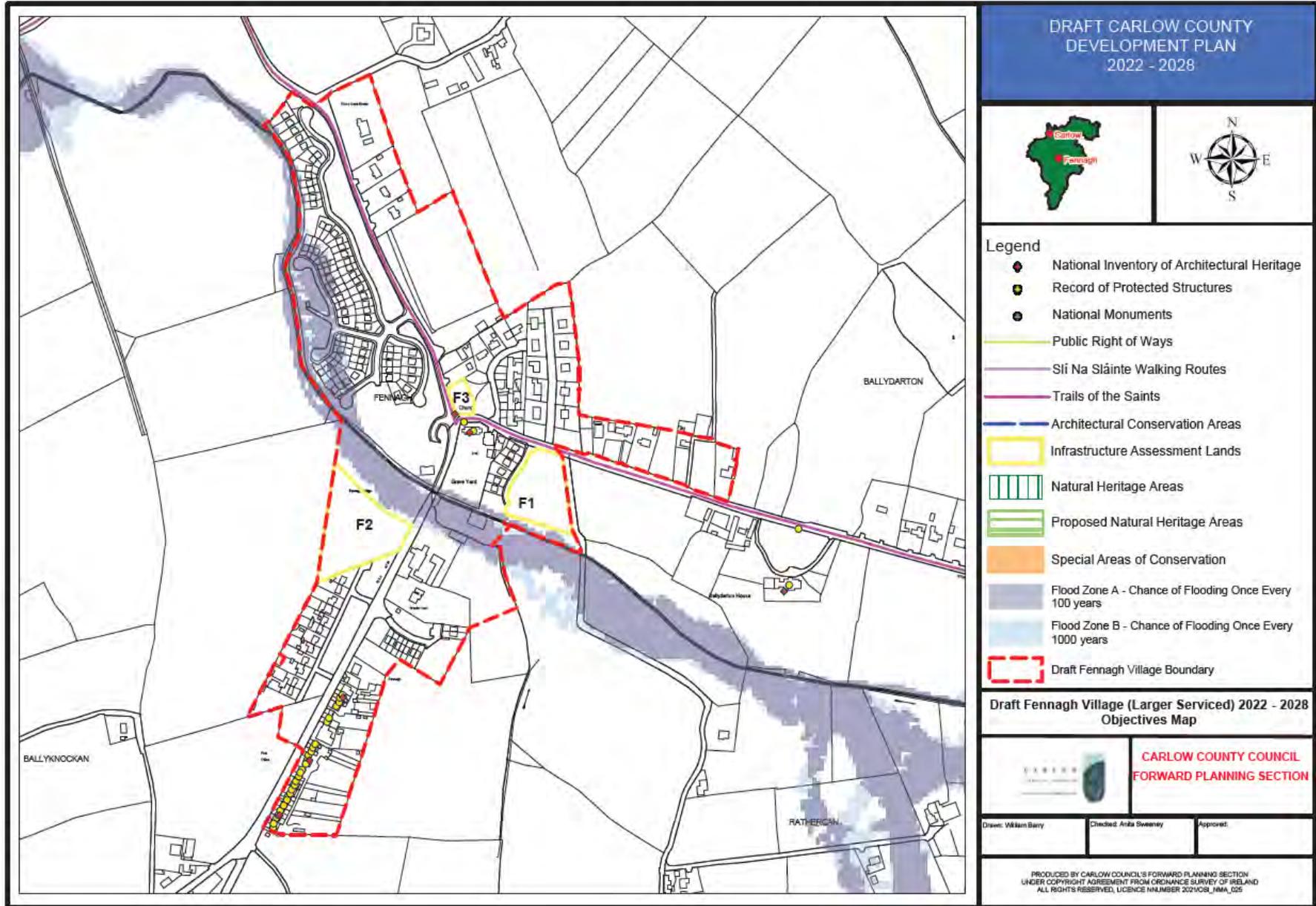


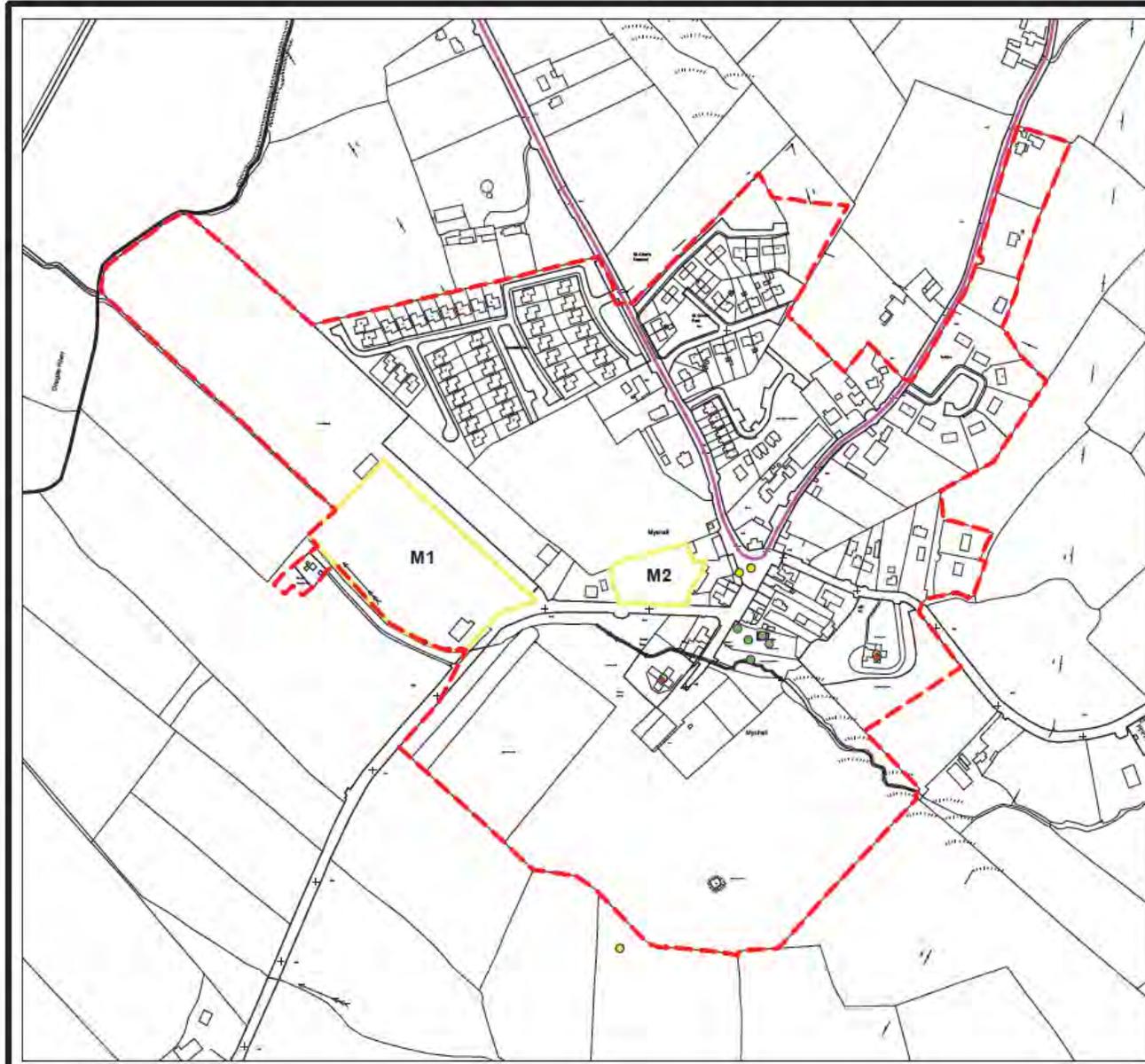
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- Draft Myshall Village Boundary

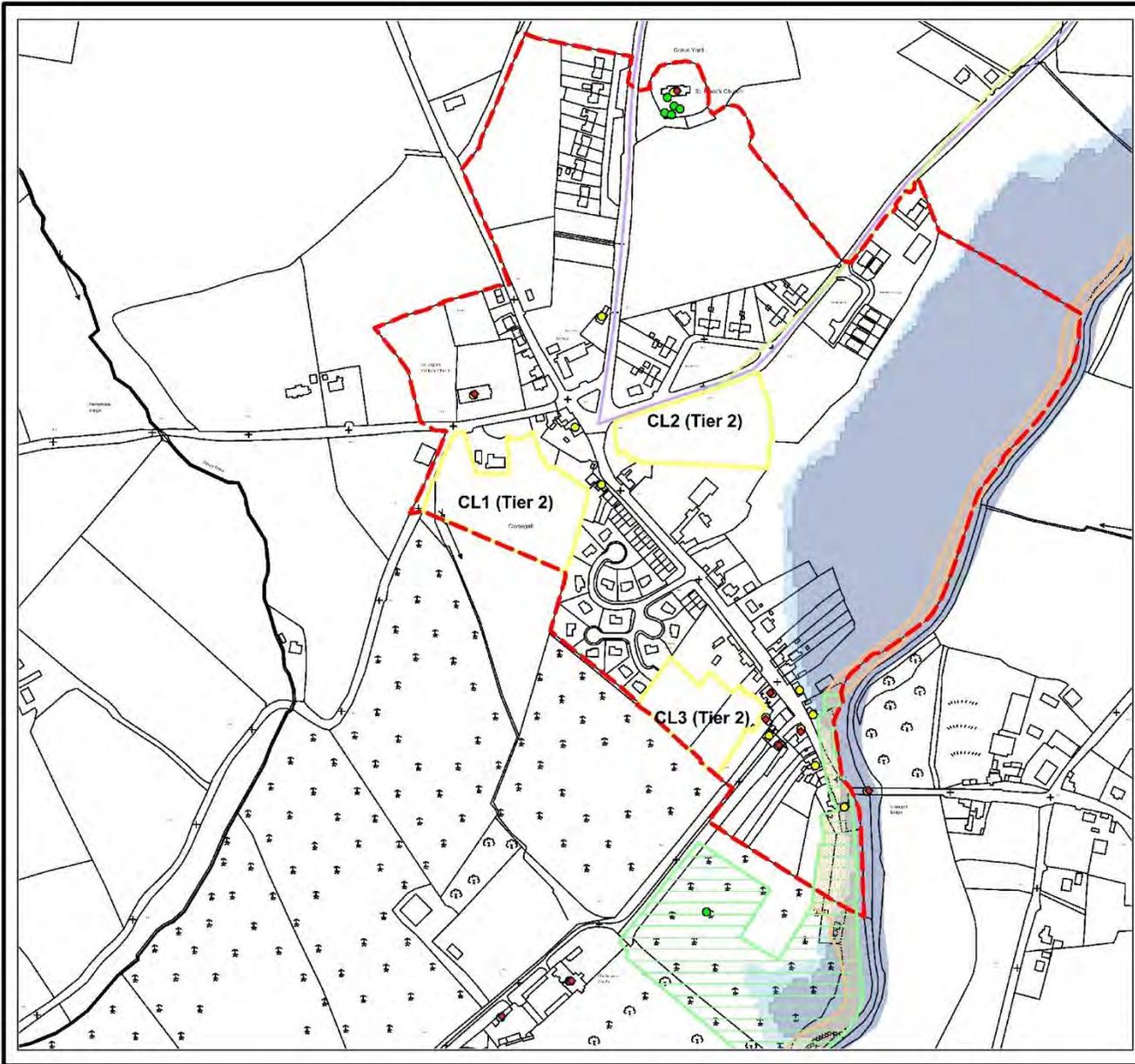
**Draft Myshall Village (Larger Serviced) 2022 - 2028
Objectives Map**



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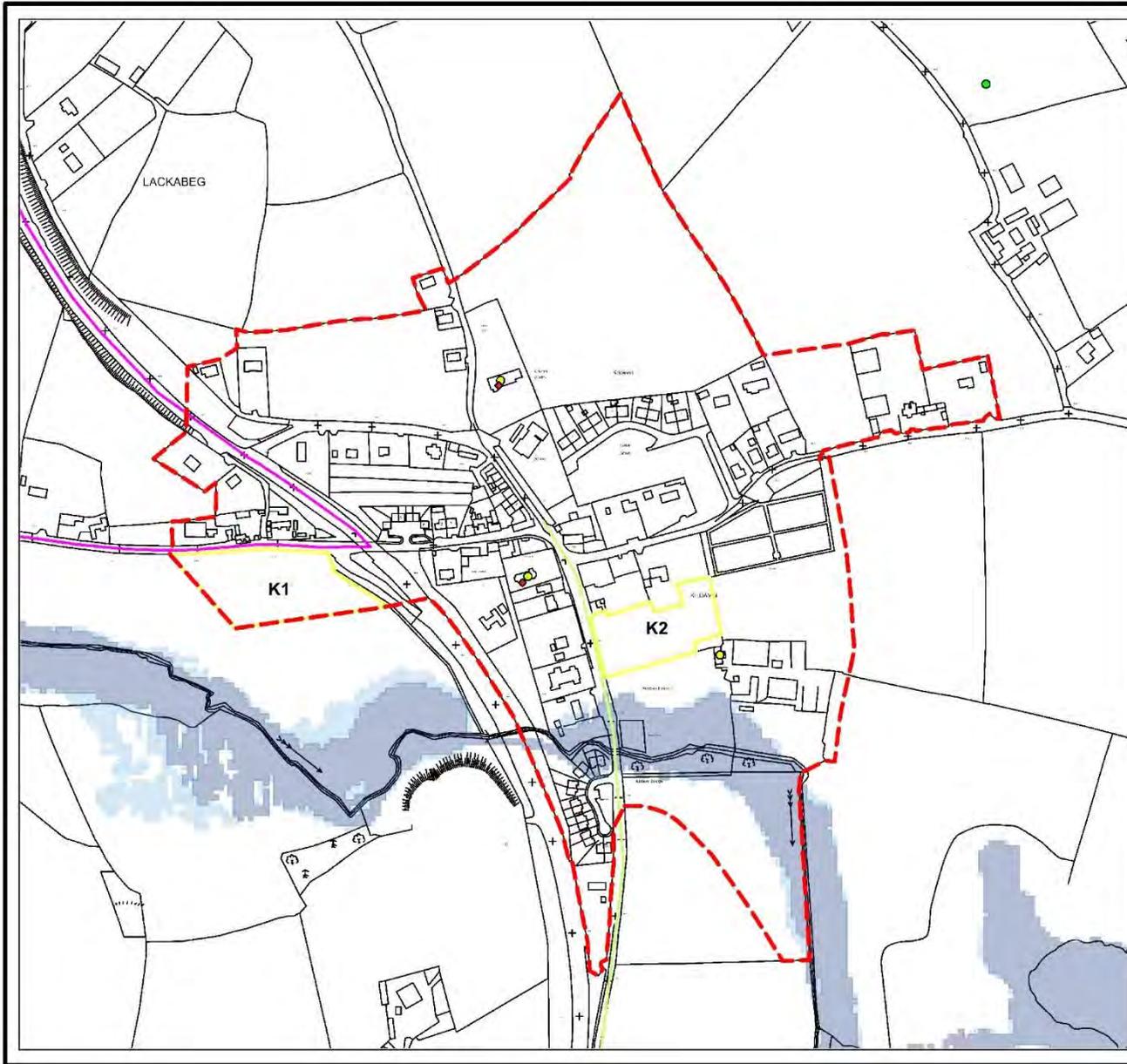
- Legend**
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 - Draft Clonegall Village Boundary

**Draft Clonegall Village (Larger Served) 2022 - 2028
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- Draft Kildavin Village Boundary

Draft Kildavin Village (Larger Served) 2022 - 2028 Objectives Map

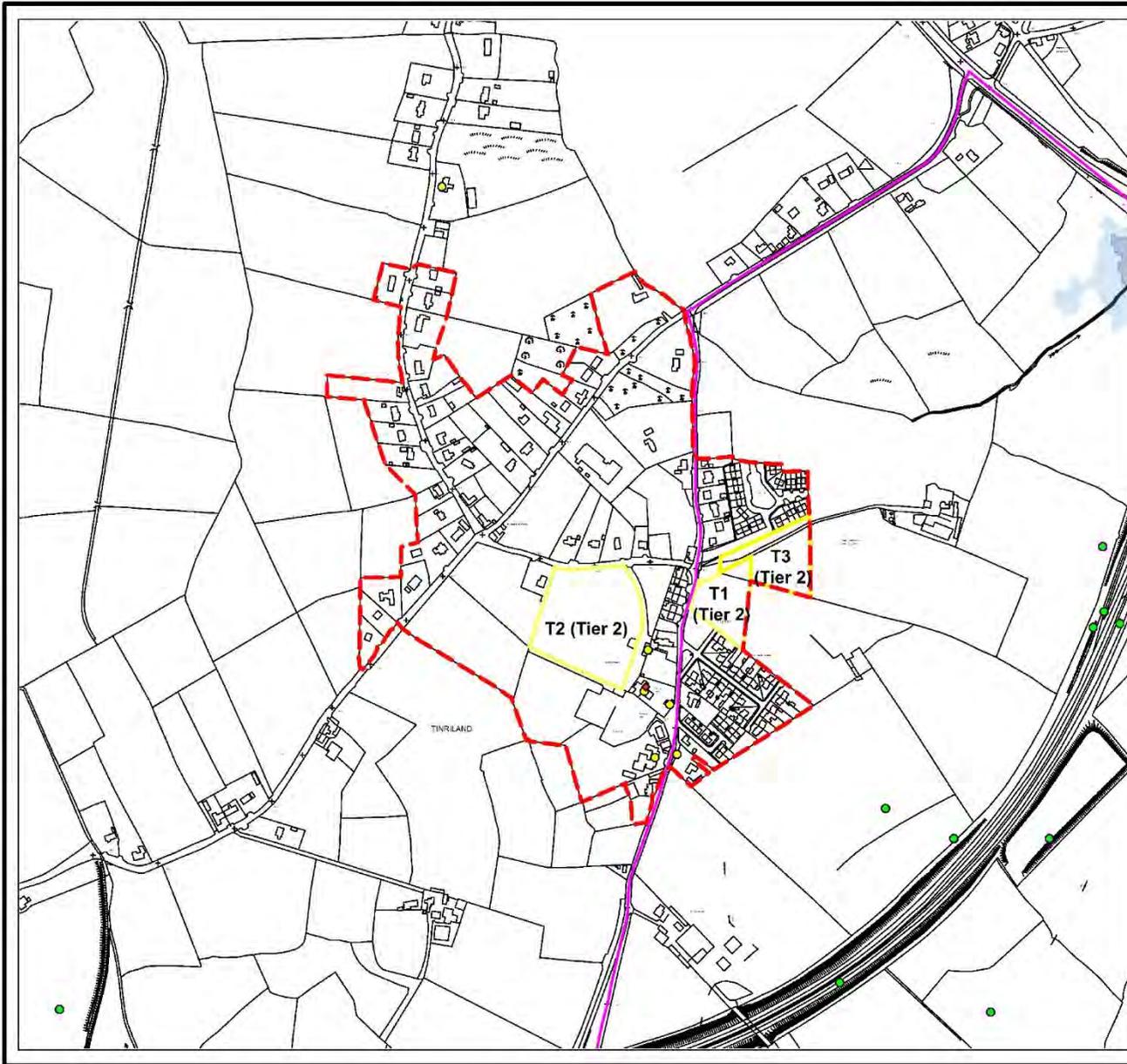


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- ▨ Flood Zone B - Chance of Flooding Once Every 1000 years
- - - Draft Tinryland Village Boundary

**Draft Tinryland Village (Larger Serviced) 2022 - 2028
Objectives Map**



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