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Laois County Council,
Senior Planner,
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# Re: Issues Paper for the Carlow-Graiguecullen Joint Urban Local Area Plan 2023-2029

#### A chara,

The Office of the Planning Regulator (the Office) acknowledges and welcomes the publication of the Issues Paper for the Carlow-Graiguecullen Joint Urban Local Area Plan 2023-2029 (JULAP).

The Office commends the on-going collaboration between Carlow County Council and Laois County Council in commencing the preparation of the JULAP under section 18(2) of the *Planning and Development Act 2000*, as amended, (the Act).

The Office notes the extant Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018, which is due to expire 4<sup>th</sup> November 2022. The Office acknowledges the success of the JULAP 2012-2018, to date, in enhancing the town as a key driver for



education and training as well as a destination for pharmaceutical, engineering and finance sectors.

The JULAP 2012-2018 has put in place the development framework for a vibrant town centre with a quality public realm and attractive cultural quarter. The preparation of the new JULAP should ensure this success is continued into the future in line with the policies and objectives of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Regional Assemblies for the East and Western region and the Southern region, and the regeneration framework set out in *Project Carlow 2040 – A Vision for Regeneration* (2020) (Project Carlow 2040).

In this respect, the Office agrees with the key strategic areas identified in the Issues Paper - regeneration, climate change, economic development, residential development and enabling infrastructure. However, in view of the strong link between development growth and traffic generation, and impact of traffic growth on Greenhouse Gas (GHG) emissions, the Office advises that transport should also be addressed as one of the critical strategic considerations of the JULAP.

In accordance with the provisions of section 31AO of the Act, the Office is obliged to evaluate and assess local area plans in the context of certain parameters including:

- matters generally within the scope of section 19;
- consistency with the objectives of the relevant development plans, its core strategies, the relevant regional spatial and economic strategies that apply to the areas and the transport strategy of the National Transport Authority (NTA);
- Ministerial guidelines under section 28;
- Ministerial policy directives issued under section 29; and
- such other matters as the Minister may prescribe under section 262, or otherwise prescribe.



The Office has set out some broad areas for your authority to consider in formulating the LAP, under the following headings:

- Strategic Policy Framework
- Population and Housing
- Economic Development, Tourism and Retail
- Urban Design and Regeneration
- Movement and Active Travel
- Infrastructure and Environmental Services
- Environment and Climate Change
- Sustainable Communities
- Heritage, Amenity and Landscape

These comments are offered without prejudice to any observations and recommendations as may be forthcoming from the Office at future stages of the plan making process. They do not affect the obligation on your planning authority to comply with the relevant legislative requirements, or to be consistent with the fullness of the detailed policy context of the higher order plans and strategies and Ministerial guidelines.

#### 1. Strategic Policy Framework

The planning authorities will be aware that section 20(5) of the Act requires the JULAP to be consistent with the objectives of the RSES, in addition to the NPF, the specific planning policy requirements (SPPRs) of section 28 guidelines and the relevant Development Plans.

The Issues Paper demonstrates a clear understanding of the strategic role of the combined settlement of Carlow-Graiguecullen within the wider area and in terms of its designation as a Key Town in the RSES.

It also identifies the key strategic issues for Carlow-Graiguecullen from the RSES, including the strategic role of the settlement in education, the opportunities to grow with its neighbours, the significant potential for regeneration and the need for investment.



The Office welcomes the setting out of a clear strategic purpose of the new JULAP, to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the area consistent with compact, sustainable growth, and the role of Carlow-Graiguecullen as a Key Town.

## 2. Population and Housing (Compact Growth)

The Issues Paper highlights the significant population growth (31%) experienced by Carlow Town and its immediate surrounds since 2002 and, in particular, the strong growth of the urban area since 2016 (13%). The core strategy of the Carlow County Development Plan 2022-2028 anticipates a similar growth rate going forward and sets a housing target of approximately 1,330 new residential units within Carlow Town and environs. The Office notes that the land use zoning objectives for Carlow town are included in the County Development Plan.

The Laois County Development Plan 2021-2027 core strategy includes a housing supply target of 280 units for Graiguecullen up to 2027. No zoning objectives were included for Graiguecullen as part of the Laois County Development Plan 2021-2027 on the basis that the preparation of the JULAP was due to commence.

In setting out the intended land use strategy in the JULAP, inclusive of maps indicating objectives for purpose such as the zoning of land, the planning authority will need to ensure consistency with the objectives of the two development plans, their core strategies and the RSES, having regard to the provision under section 19(2) of the Act.

In the case of Graiguecullen, it will be important to ensure that the JULAP zones land to facilitate the future growth targets in a sustainable and compact manner, and in accordance with the settlement hierarchy set out in the Development Plans' core strategies.

For the combined settlement, it will be important to focus on policies and objectives that support meaningful compact growth and prioritise the sequential development of land.

The JULAP should also promote residential development that contributes to urban regeneration of town centre sites at appropriate densities in areas that are or will be well-served by walking and cycle facilities. This policy approach will need to be supported by



land activation measures to enable the development potential of key sites to be realised for housing delivery.

### 3. Economic Development, Tourism and Retail

The Office acknowledges the regional economic significance of Carlow-Graiguecullen as a gateway to all three regions, particularly in respect of education and research. The JULAP should build upon the success of the existing educational facilities including Carlow IT (ITC) and Carlow College (St. Patricks) and include specific policies and objectives to act as key drivers and enables for sustainable employment growth in the area in accordance with RPO 14 (a)(i).

Furthermore, the policy approach to economic development in the JULAP should be consistent with the RSES economic strategy, particularly RPO 39, in respect of strengthening education and training sector to attract further economic investment.

The Office notes the diverse employment in pharmaceutical, engineering and finance sectors set out in the RSES and welcomes the commitment in the Issues Paper to build on and enhance the role of the area as a driver for economic development.

The Office also acknowledges the significant investment in the development of the Cultural Quarter over the past number of years as a key tourist attraction to the town. The JULAP should support further enhancement of the tourism sector through increasing the accessibility of the town to increase pedestrian and cycle connections to key historic sites and enhancement of the town's role in Ireland's Ancient East.

In respect of retail development, the JULAP should focus on providing for the appropriate balance of retail development between Carlow, which is a designated Level 1 town in the retail hierarchy, and Graiguecullen, a level 3 town. In this regard, the planning authority should have regard to the *Retail Planning - Guidelines for Planning Authorities* (2012), and in particular the sequential approach to retail development. The health check assessment including required key actions from the Retail Strategy prepared for the Carlow Development Plan 2022-2028 will also provide an evidence basis for consideration of such matters.



#### 4. Urban Design and Regeneration

Both the NPF (NPO 4 and 6) and the RSES (section 9.3 and 9.4) place a strong emphasis on the opportunities for urban regeneration to create attractive, liveable, well designed, high quality urban places that provide for a high quality of life and well-being.

The Office acknowledges a strong commitment to urban regeneration in the existing JULAP and the recently adopted development plans. The Office also notes the publication of Project Carlow 2040 in November 2020, which seeks to provide for an innovative and sustainable approach to urban regeneration to improve the health and wellbeing of the town's occupants and create a better town centre to enhance competitiveness, commercial activity and encourage town centre living for the long term viability of Carlow.

The JULAP should align with the objectives of the regeneration strategy and focus development on the key regeneration sites identified. There is pressing need to implement a strong policy framework to support the utilisation of existing buildings, brownfield/infill sites, and derelict and underutilised sites. Proactive land activation measures, including the planning authorities' powers in respect of land acquisition / compulsory purchase, derelict sites and the vacant land should all be considered.

Also important in this respect is the Government's *Town Centre First: A Policy Approach for Irish Towns*, which policy envisages Town Centre First (TCF) Plans as central to informing the future direction of towns and the priority investment interventions supported through TCF-aligned funding streams.

The Office welcomes the successful application for funding under the *Urban Regeneration and Development Fund* (URDF) for key projects identified under Project Carlow 2040. The identification of intended sources of funding to facilitate, support or complement key regeneration projects, such as the recently announced *Croí Cónaithe (Towns) Fund Scheme*, is a further land activation measure to be considered in the JULAP.

#### 5. Movement and Active Travel

The Office supports the approach outlined in the Issues Paper, which emphasises the importance of an integrated approach to land use and transport planning as a key mechanism to support the development of a sustainable, healthy and low carbon urban area.



As identified in the RSES, only 3.4% of residents in Carlow Town use public transport as a mode of travel to work. MS.O1 in the Carlow County Development Plan 2022-2028, sets an objective to support a modal shift from private vehicles to sustainable modes to access work, school and college to 28% by 2028. RPO 91(b) states that it is an objective to pursue policies to reduce reliance on private car and achieve modal shift to sustainable transportation.

The Office welcomes the proposal to prepare a local transport plan (LTP) to inform the JULAP, consistent with RPO 14(a)(vi) of the RSES. The planning authorities are advised to consult with the NTA and Transport Infrastructure Ireland (TII) in the preparation of the LTP. They should also have regard to the *Area Based Transport Assessment (ABTA) Guidance Notes* prepared jointly by those two authorities.

The LTP should determine what practical actions, including objectives, policies and measures should be included in the JULAP to achieve a realistic modal shift target for the town, in tandem with projected population and economic growth over the plan period.

The proactive implementation of the *Design Manual for Urban Roads and Streets* (revised 2019), will ensure that over time Carlow-Graiguecullen will better accommodate pedestrians and cyclists, in addition to public transport where available. Similarly, the implementation of the NTA's *Permeability Best Practice Guide* will also ensure enhanced pedestrian and cycle routes within the town.

Overall, the Office considers that there is significant potential for the future JULAP to reduce the carbon footprint of the county in support of national targets, consistent with NPO 54 and the *Climate Action Plan 2021*, through the promotion of sustainable settlement and transportation strategies.

## 6. Infrastructure and Environmental Services

The Office welcomes the objective in the Issues Paper to collaborate with Irish Water regarding future infrastructure provision and upgrade requirements for the greater Urban Area.

Having regard to the responsibility of the two planning authorities for surface water drainage, it would be appropriate for the JULAP to provide for the implementation of the *Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in* 



*Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document* (2022). This will ensure consistency with NPO 57, to integrate sustainable water management solutions such as Sustainable Urban Drainage Systems (SUDS) and facilitate adaption to climate change within the surface water drainage system.

The Office acknowledges the commitment in the Issues paper for the continued engagement with key energy providers for energy infrastructure. The Office also welcomes the commitment to promote renewable energy within the built and natural environment to meet national objectives toward achieving a low carbon economy in accordance with NPPO 55.

### 7. Environment and Climate Change

The Office notes the intent of the planning authority, as the competent authority to undertake Strategic Environmental Assessment and Appropriate Assessment as part of the JULAP process.

Regarding climate change and adaption, the JULAP should be consistent with the relevant objectives and be informed by the guiding principles of the RSES. The measures to be included in the JULAP should be cognisant of the actions under the *Climate Action Plan 2021* to implement the binding interim target to reduce greenhouse gas emissions by 51% by 2030 under the *Climate Action and Low Carbon Development (Amendment) Act 2021*.

The planning authority will be aware of the need to prepare a Strategic Flood Risk Assessment (SFRA) as part of the forthcoming draft JULAP, consistent with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009). The planning authority is advised to liaise with the OPW in the carrying out of SFRA to avoid issues arising at draft plan stage. This will be of particular importance where land use zoning objectives are proposed to be included.

It is noted that in conjunction with the OPW, Carlow and Laois County Councils have undertaken the National Catchment-based Flood Risk Assessment and Management Programme.

The Office also advises that flood maps be overlaid on proposed zoning maps in the JULAP to provide clarity and transparency for members of the public.



### 8. Sustainable Communities

The Office acknowledges the commitment in the Issues Paper to the creation of healthy, inclusive and vibrant communities with a focus on sustainability and accessibility. In this regard, the planning authority should have regard to the *Universal Design Guidelines for Homes in Ireland* issued by the National Disability Authority and the Department of Health and the National Disability Authority's *Building For Everyone: A Universal Design Approach* (2012).

The JULAP should also include policies and objectives to ensure developments proposals are designed to meet the mobility needs of all users and incorporate inclusive design principles into future development, particularly within the public realm in accordance with NPO 28.

#### 9. Heritage, Amenity and Landscape

The Office welcomes the recognition in the Issues Paper of the importance of the town's heritage assets and the role of the JULAP in acting as a medium to being the various forms of heritage and landscape protection together.

The Office also welcomes the acknowledgement of the significant natural and built heritage sites in the town. Protecting, conserving and managing sites and features of special interest can instigate a heritage-led regeneration of the town can generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life.

The Office agrees with the planning authority that enhanced green infrastructure and quality landscapes can provide for a range of benefits including the provision of clean water, better health, human wellbeing, flood alleviation and improved habitats. In this regard, the Office advises the planning authority to consider setting out a strategic integrated approach linking urban regeneration, built heritage protection / enhancement and green infrastructure to maximise the overall impact of the plan on the quality of the urban environment.



#### Summary

In summary, the Office commends your authority for the preparation of this Issues Paper. The Office advises your authority to pay particular attention to the following issues in the preparation of the JULAP:

- ensure that all relevant policies and objectives, including zoning objectives for residential, employment and retail uses support meaningful compact growth and prioritise the sequential development of land;
- ensure consistency with the principles set out in the Government's Town Centre First Policy;
- include clear and robust active land measures, linked to relevant sources of funding where possible;
- provide continued focus on improvements to the public realm, including features of special architectural and cultural interest, which will generate economic benefits in terms of tourist footfall, improved retail environment and improved quality of life;
- specify measures that will bring about a shift in travel choices towards active and sustainable modes, which could be informed by the LTP prepared in consultation with the NTA and TII and with particular regard to the *Area Based Transport Assessment (ABTA) Guidance Notes*;
- implementation of the Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas Water Sensitive Urban Design Best Practice Interim Guidance Document (2022) having regard to the practical need to provide and maintain surface water drainage infrastructure in a sustainable manner;
- Implementation of the Flood Risk Management and the Planning System, Guidelines for Planning Authorities (2009), as amended, and consultation with the OPW on any flood related matter. Flood maps should also be overlaid on proposed zoning maps to provide clarity and transparency for members of the public; and
- provide for monitoring and implementation of the various policies, objectives and actions in the final LAP.



The Office looks forward to reviewing the future draft LAP and is committed to continued positive engagement with your authority in implementation of national and regional policies at the county and local level.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through the undersigned or at plans@opr.ie.

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Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluations