



# Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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## Draft Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030

The Eastern and Midland Regional Assembly notes the publication of the draft Carlow-Graigucullen Joint Urban Local Area Plan (JULAP) 2024-2030 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

### 1.0 Legislative Context

The role and function of the Regional Assembly, including the scope of the RSES, is currently provided for in the Planning and Development Act 2000 (as amended). It should be noted that this legislation is currently under review, with the new Planning and Development Bill 2023 approved by Cabinet on 3<sup>rd</sup> October 2023 and published by the Department of Housing, Local Government and Heritage on 21<sup>st</sup> November 2023.

The Regional Assembly is not required under Section 27 of the Planning and Development Act 2000 (as amended), to prepare a submission and observations on a local area plan prepared by a local authority as is the case for a development plan, or variation thereof, however the Regional Assembly considers that regionally important and strategic plans should be commented upon by the Assembly, and in this case a plan for a designated Key Town is considered as such. In this regard the Assembly makes this submission and the comments hereunder to be taken into consideration by the local authorities in the making of the Carlow-Graigucullen Joint Urban Local Area Plan 2024-2030. In accordance with Section 18(2) of the Planning and Development Act 2000 (as amended), Carlow and Laois County Councils are collaborating in the preparation of this Joint Urban Local Area Plan (JULAP).

### 2.0 Regional Spatial and Economic Strategy (RSES)

The RSES for the Eastern and Midland Region, which was made by the Members of the Assembly on 28<sup>th</sup> June 2019, is a strategic plan and investment framework to shape future growth throughout the Region. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure that a local area plan is consistent with the objectives of the development plan, its core strategy, and the Regional and Spatial Economic Strategy of the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy.

### **3.0 Submission**

The draft JULAP outlines the strategic policy framework, which highlights that the JULAP will be informed by a hierarchy of planning guidance, including the National Planning Framework (NPF), the Regional Spatial and Economic Strategies for both the Eastern and Midland Region and the Southern Region, and the Laois and Carlow County Development Plans. This submission broadly follows the chapter headings of the draft JULAP, under the following headings:

1. Introduction, Plan Review and Context
2. Carlow-Graiguecullen Strategic Planning and Vision
3. Core Strategy and Housing
4. Economic Development, Retail and Tourism
5. Urban Design, Town Centre and Regeneration
6. Sustainable Travel and Transportation
7. Infrastructure and Environmental Services
8. Sustainable Communities
9. Built Heritage
10. Natural Heritage, Green Infrastructure and Landscape
11. Climate Action
12. Land Use Zoning Objectives and Implementation
13. SEA, AA and SFRA

The Assembly considers that these areas of focus align well with the three key principles of the RSES (healthy placemaking, climate action and economic opportunity) and the sixteen Regional Strategic Outcomes (RSOs), which are outlined in Section 2.3 of the RSES.

#### **3.1 Introduction, Plan Review and Context**

The draft JULAP states that Carlow and Laois County Councils have worked collaboratively to prepare the draft JULAP and that the plan once adopted will replace the previously operative Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 (as extended).

As noted under Section 3.0, the draft JULAP has been informed by the NPF, the RSES' for both the Eastern and Midland Region and the Southern Region, and the Laois and Carlow County Development Plans. The preparation of the draft JULAP is consistent with the Key Town Regional Policy Objective (RPO) 4.75 in the RSES which states that a cross-boundary Joint Local Area Plan shall be prepared for Carlow by Carlow and Laois County Councils having regard to its location within the combined functional area of both local authorities.

The Assembly notes that whilst Carlow is largely located within the Southern Regional Assembly's functional area, part of the town around Graiguecullen is located within County Laois and so within the functional area of the Eastern and Midland Regional Assembly.

#### **3.2 Carlow-Graiguecullen Strategic Planning and Vision**

The Carlow-Graiguecullen vision is stated within the draft JULAP as follows;

*'To ensure that Carlow-Graiguecullen maximises and builds on its Key Town designation, strategic accessible location, regional and inter-regional connectivity, and existing inherent strengths, prioritising quality of life considerations, the economic and employment potential of the town, town*

*centre led urban regeneration, focusing on a low carbon and compact pattern of development, while seeking to conserve and enhance the town's existing natural and built heritage assets.'*

Eight strategic objectives and priorities to deliver the vision have also been outlined in the draft JULAP as follows:

- SO.1 – Town Centre Led Urban Regeneration
- SO.2 – Economic Development and Employment
- SO.3 – Urban Design
- SO.4 – Sustainable Travel and Transport
- SO.5 – Housing and Communities
- SO.6 – Climate Action
- SO.7 – Protection of Natural and Built Heritage
- SO.8 – Arts, Culture and Tourism

The Growth Strategy of the RSES identifies Graiguecullen-Carlow as located inside the Gateway Region and is identified as a Key Town in Table 4.2 Settlement Hierarchy. Key Towns within the RSES are identified as towns serving as large economically active service and/or county towns, that provide employment for their surrounding areas, with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres. The Key Towns in the Gateway Region provide important connections with adjoining regions and have capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport. These include Longford town, Mullingar, Tullamore, Portlaoise and Graiguecullen-Carlow.

RPO 4.75 in the RSES relates specifically to Graiguecullen-Carlow and states that the Joint LAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. It also states that regard shall be had to the respective housing, retail and other local authority strategies that may be in place.

The draft JULAP identifies Carlow-Graiguecullen as a Key Town with a focus on compact growth. The draft JULAP states that in accordance with the principle of compact growth, at least 30% of all new homes to be built in Carlow-Graiguecullen are to be built within the existing built-up footprint of the joint urban area. The draft JULAP contains urban regeneration and compact growth policies and objectives to prioritise compact growth in preference to greenfield land consumption. Chapter 12 in the draft JULAP relating to land use zoning also supports compact growth in Carlow-Graiguecullen by following the sequential approach in the identification of lands for development. This aligns with Regional Strategic Objective (RSO) 2 Compact Growth and Urban Regeneration of the RSES which promotes regeneration and better use of under-used land and buildings within the existing built-up urban footprint.

### **3.3 Core Strategy and Housing**

The draft JULAP states that Carlow-Graiguecullen has a recorded population of 27,351 in 2022, (22,496 in County Carlow and 4,855 in County Laois). The draft JULAP states that the population and housing targets in the Core Strategies in the Carlow and Laois County Development Plans were set by the National Planning Framework (NPF), the Implementation Roadmap for the NPF (July 2018) and Section 28 Guidelines 'Housing Supply Target Methodology for Development Planning'. The Core Strategy Table (Table 2.16) in the Laois County Development Plan 2021-2027 identifies a projected population

for Graiguecullen by 2027 of 700 people, and an associated housing allocation of 280 units; this figure of 280 units represents 7% of the projected housing target for County Laois. The draft JULAP indicates that applying the Core Strategy housing unit target figure of 280 units for Graiguecullen to the Plan translates into a projected requirement for 276 units to be built over the lifetime of the Plan, as indicated in the table below;

Laois County Council – Functional Area	Units
Core Strategy unit allocation to 2027	280
Plus 3-year projected unit allocation to 2030	141
Less units constructed since 2021	145
<b>Graiguecullen total unit target</b>	<b>276</b>

Source: Draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030.

The draft JULAP states that the quantum of ‘New Residential’ zoned land in Graiguecullen is circa 17.65 hectares, and extant permissions exist for circa 106 units. It is stated that ‘New Residential’ zoned land can deliver an estimated 441 units, utilising an indicative density of 25 units per hectare in accordance with Chapter 13 (Table 13.4) of the Laois County Development Plan 2021-2027.

The focus in the RSES for the area is the preparation of a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved, which requires a focused approach and co-ordinated action amongst local authorities and other agencies. The RSES states that the distribution of population between the two local authorities should be decided by both local authorities in the joint local area plan and this distribution should be commensurate with existing population levels.

### 3.4 Economic Development, Retail and Tourism

The draft JULAP sets out the strategy to support economic development and outlines that while Carlow-Graiguecullen is a predominant driver of employment, it also has above average unemployment of 11.9% in 2022 (the State is 8.3%), and that the traditional core of the town has been negatively affected by the suburbanisation of commercial activities. Census 2022 revealed that many workers, particularly those in higher level occupations, commute to and from the town. Specifically in relation to Graiguecullen, the draft JULAP states that c. 11 hectares of land is zoned for Enterprise and Employment uses; c. 1.5 hectares of which is undeveloped. The draft JULAP states that these lands are considered adequate to serve the needs of a wide range of enterprise and employment opportunities over the lifetime of the JULAP.

RSO 12 in the RSES relates to a strong economy supported by enterprise and innovation that supports smart specialisation, cluster development and sustained economic growth. In this respect the Regional Assembly draws attention to Figure 6.3 Economic Strategy of the RSES and RPO 4.27 which outlines that Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers.

The draft JULAP recognises that retail plays a significant role in the growth of the local economy. The draft JULAP outlines town centre key retail opportunity sites and recognises the changing nature of retail and highlights that improving the appearance of streetscapes and revitalising vacant spaces, including encouraging the provision a mix of retail, commercial, leisure and residential uses in town centres that support high quality living environments will be central to supporting the retail sector.

The Assembly welcomes that a key focus for retail policy is for the regeneration of towns and villages. The Assembly recognises the challenges facing traditional on-street retailing and welcome the efforts made by the Councils to develop new and enhanced experiences and a sustainable mix of functions within commercial centres. The Assembly supports the continued roll out of measures for opportunities to facilitate co-working and remote-working spaces and a greater mix of daytime and night time uses in urban centres; this aligns with RPO 6.31 in relation to the creation of a network of co-working hubs.

The Regional Assembly also draws attention to Table 6.1 Retail Hierarchy for the Region in the RSES which outlines Graiguecullen under Level 3 of the retail hierarchy entitled '*Town and/or District Centres and Sub-County Town Centres (Key Service Centres)*'; this should be clearly outlined in the JULAP.

In relation to tourism, Carlow-Graiguecullen is located within Ireland's Ancient East, Fáilte Ireland's regional tourist experience brand. The Assembly welcomes the attention made in the draft JULAP to culture and the arts recognising that RSO 5 of the RSES is to enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration. The draft JULAP notes that natural heritage amenities such as the River Barrow and Burren River, can together act as a major attractor and significant tourist asset for Carlow-Graiguecullen. This aligns with RPO 4.76 in the RSES which supports the sustainable development of amenity associated with the Barrow Blueway.

### **3.5 Urban Design, Town Centre and Regeneration**

The draft JULAP states that towns like Carlow-Graiguecullen have increasingly become less people friendly places that are dominated by the private car, and that with a 'people first' approach to urban design and planning, the public domain will be returned to the people residing and visiting in the town, while still ensuring high levels of accessibility. The draft JULAP identifies eleven key urban design principles along with a range of urban design and placemaking policies in order to provide a high-quality public realm. This approach is welcomed by the Regional Assembly and aligns with RSO 4 of the RSES in relation to Healthy Communities, which aims to enhance the quality of our built and natural environment. The Assembly draws attention in this regard to the Healthy Placemaking Regional Policy Objectives, RPOs 9.10, 9.12 and 9.13, of the RSES and Figure 9.2 Healthy Placemaking Strategy and recommends that the draft JULAP aligns with these.

The draft JULAP also recognises that national and regional guidance focuses on compact growth and the need for urban and village centres to contribute to a sense of place and identity, and the RSES acknowledges that a vital part of achieving compact growth is through regeneration of town centres. In this respect the Regional Assembly welcomes urban regeneration and public realm improvement measures that promote compact growth and support healthy placemaking. Furthermore, the draft JULAP states that it is an objective of both Laois and Carlow County Councils to advance and secure the implementation of *Project Carlow 2040 - A Vision for Regeneration* through the development of the strategic intervention areas in the strategy and in this respect, the draft JULAP has identified a strategic intervention area for Graiguecullen in County Laois. This is supported by the designation of Graiguecullen-Carlow as a Key Town in the RSES.

### **3.6 Sustainable Travel and Transportation**

The draft JULAP notes that Carlow-Graiguecullen is an accessible urban centre, with good access and transport infrastructure that includes road network connectivity to Dublin and Waterford via the M9,

and to the midlands and southeast via the N80. The urban area is also situated on the Dublin-Waterford railway line, with Carlow railway station located proximate to the town centre. A Local Transport Plan (LTP) has been prepared in conjunction with the National Transport Authority for the urban area which aligns with RPO 8.6 of the RSES; the assessment examined existing and proposed transport infrastructure and service provision across all modes of transport including sustainable means such as active travel modes (walking and cycling) in the joint urban area. The assessment provides an understanding of the existing constraints and modal share and identifies the proposed interventions within the plan area and in the wider context in order to facilitate a shift towards more sustainable travel and transportation options. A bus and rail strategy have also been outlined within the draft JULAP. The Assembly welcomes the commitment to promote the integration of land use and transportation and to improve public transport and active travel infrastructure with an increased shift towards sustainable modes of travel and this aligns with RSO 6 Integrated Transport and Land Use and RPOs 8.1 – 8.4 in the RSES.

### **3.7 Infrastructure and Environmental Services**

The draft JULAP recognises that infrastructure for public water supply, wastewater, energy, surface water drainage and ICT, together with services such as waste management, must be planned for in the urban area to ensure there is adequate capacity to cater for the land use zonings and proposed level of development. An Infrastructure Assessment (IA) has been prepared alongside the draft JULAP to assess the suitability of lands for future development and to ensure that the growth planned is in line with the capacity and delivery of the necessary supporting infrastructure. The Infrastructure Assessment has been carried out utilising a standardised Tier 1 and Tier 2 methodology termed in the NPF as a Tiered Approach to Zoning (TAZ).

The draft JULAP states that Carlow-Graiguecullen is served by the Mortarstown Wastewater Treatment Plant (WWTP) which has a capacity of 36,000PE. While Uisce Éireann confirm their current capacity registers that the WWTP has spare capacity, improvement and upgrade works are planned to bring it up to 58,000PE. This aligns with RPO 10.3 in the RSES which requires local authorities to liaise and cooperate with Uisce Éireann to ensure the delivery of Uisce Éireann's investments and other relevant investment works programme of Uisce Éireann that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and local authority core strategies and provide for long term solutions for wastewater treatment for the Region.

In terms of waste management, the location of the joint urban area on the border of Counties Carlow and Laois means that the management of waste is governed at a regional level by the Southern Region Waste Management Plan 2015-2021 (Carlow Town) and the Eastern -Midlands Region Waste Management Plan 2015-2021 (Graiguecullen). The draft JULAP sets out a comprehensive suite of policies and objectives that support the principles of the circular economy, and the implementation of best practice in relation to waste management in the County. This aligns with the RSES which supports a move towards achieving a circular economy.

In relation to ICT infrastructure, it is noted that RPO 8.25 in the RSES relates to the promotion of ICT infrastructure and a high-quality ICT network throughout the Region.

Overall, the Regional Assembly welcomes the County Councils' commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner.



### 3.8 Sustainable Communities

The draft JULAP states that the concept of the 10-minute neighbourhood is a central starting point to building inclusive and sustainable communities as it focuses on reducing car dependency by seeking to have all community facilities, services and amenities accessible within a 10-minute walk or cycle from homes or by public transport. This aligns with RSO 4 in the RSES, healthy communities, which relates to the protection and enhancement of the quality of the built and natural environment to support active lifestyles.

The draft JULAP also states that in order to remain an attractive place to live and retain its high quality of life, the joint urban area needs to plan for diverse, inclusive, and healthy communities through the provision of affordable and accessible housing, education, community and health facilities, and access to amenity and recreation spaces. In this respect Carlow-Graiguecullen has two third-level education institutions, SETU (formerly Carlow IT and Waterford IT) and Carlow College (St. Patricks); the RSES notes that both of these well-established institutions have substantial links with the surrounding regions. This aligns with RSO 13 which relates to the improvement of education and the promotion of social inclusion and attention is also drawn to RPOs 9.1 and 9.2 in the RSES which support a diverse and inclusive region.

### 3.9 Built Heritage

The draft JULAP recommends that the built heritage chapter within the draft JULAP should be read in conjunction with the built heritage policies, objectives, and related provisions set out in Chapter 12 of the Laois County Development Plan 2021-2027. Within the draft JULAP, a list of the protected structures in the joint urban area is included in Table 9.2, along with Built Heritage Maps (Maps 9.8 to 9.13) identifying locations, and the zone of Archaeological Potential for Carlow-Graiguecullen is identified on Map 9.7. Regarding heritage-led regeneration, the draft JULAP notes that Carlow County Council commenced the preparation of a Historic Towns Initiative Plan for Carlow Town in 2023 to examine existing levels of vacancy/dereliction and to determine what funding interventions are required to resolve this matter. The draft JULAP states that the crucial role of heritage-led regeneration is also reflected in the proposed interventions contained in *Project Carlow 2040 - A Vision for Regeneration*.

The RSES emphasises the benefits of heritage-led urban regeneration, for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of cultural or natural interest, which can play a key role in driving tourism and economic development in terms of placemaking and enhance the vibrancy of historic town centres, and is one of the key elements of compact growth. In this regard RSO 2 of the RSES refers to compact growth and supports urban regeneration.

Overall, the Assembly welcomes the suite of policies and objectives set out in the draft JULAP to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future.

### 3.10 Natural Heritage, Green Infrastructure and Landscape

The draft JULAP states that a list of natural heritage policies has been formulated by Laois and Carlow County Councils and are contained within the draft JULAP, and the draft JULAP notes that details on natural heritage, green infrastructure and landscape can be found in Chapter 11 of the Laois County Development Plan 2021-2027.

The draft JULAP outlines typologies of Green Infrastructure in Carlow-Graigucullen in Table 10.1 which includes parklands and woodlands, open spaces and rivers/water bodies. The draft JULAP states that the Carlow Town Biodiversity Strategy and Action Plan 2021-2025 recognises the potential in Carlow town to strengthen the green infrastructure network and promote habitat connectivity to the surrounding landscape through the implementation of a range of biodiversity enhancement measures. The draft JULAP outlines that a number of distinct Landscape Character Types (LCTs) have been designated within Carlow-Graigucullen and were prepared with regard to the DEHLG *'Draft Landscape and Landscape Assessment Guidelines for Planning Authorities'* (2000).

In addition, the draft JULAP outlines that Carlow-Graigucullen boasts two significant natural heritage sites which contribute greatly to the character of the joint urban area; these sites comprise the River Barrow, a Special Area of Conservation (SAC), and Oak Park, a proposed Natural Heritage Area (pNHA).

The draft JULAP also notes that Carlow County Council received approval from An Bord Pleanála for the development of a River Barrow Water Activity Centre on land beside the Carlow Town Park as part of an urban regeneration initiative.

The Assembly welcomes the policies and objectives set out in the draft JULAP to support, protect and enhance the County's landscape. The RSES outlines a growth enabler for the Gateway Region area to promote the Region as a key destination for tourism, leisure and recreation activities and to support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced. It is noted that the Graigucullen-Carlow Key Town RPO 4.76 in the RSES aims to support the sustainable development of environmentally sensitive, low intensity amenity development associated with the Barrow Blueway which aligns with the recommendations contained within the draft JULAP.

RSO 10 in the RSES also relates to enhanced green infrastructure and RSO 11 relates to biodiversity and natural heritage. In addition, the draft JULAP aligns with RPOs 7.22 and 7.23 of the RSES which note the importance of the identification, protection, enhancement and management of Green Infrastructure in an integrated and coherent manner and the further development of Green Infrastructure policies. In this regard, attention is also drawn to the guiding principles for the preparation of Green Infrastructure strategies as set out in Section 7.7 of the RSES. The benefits created with public open space, biodiversity, SuDs and active travel objectives are acknowledged within the RSES.

### **3.11 Climate Action**

The draft JULAP notes that the current Carlow and Laois County Development Plans both incorporate a suite of policies, objectives and related provisions to ensure that climate action, including adaptation and mitigation measures, are integrated into land use planning policy, in addition to the finalisation of Climate Adaptation Strategies by both Councils and the preparation of new Local Authority Climate Action Plans. Having regard to this the draft JULAP has a dedicated chapter relating to Climate Action, which incorporates climate action policies to support the implementation of national objectives on climate change, to prioritise measures to address climate change through effective mitigation and adaptation responses, and the promotion of sustainable settlement and transport strategies in line with national and regional policy.

The Regional Assembly considers that best practice should be applied in order to mitigate and reduce the effects of climate change, and in this respect the Assembly would like to draw attention to RSOs 8 and 9 in relation to building climate resilience and supporting the transition to low carbon and clean



energy and Figure 7.4 Climate Strategy of the RSES. In terms of sustainable transport, the Council's promotion of active travel as part of its ongoing commitment to climate action is welcomed. The Assembly welcomes policy supporting urban regeneration and compact growth which can also have a positive role in addressing the challenge of climate change. The Assembly also welcomes the Council's policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature-based solutions. In this respect Table 11.2 in the draft JULAP outlines how policies and objectives of the JULAP contribute to climate change mitigation and adaptation which is welcomed by the Regional Assembly.

### **3.12 Land Use Zoning Objectives and Implementation**

Chapter 12 Land Use Zoning Objectives and Implementation sets out the general land-use and zoning policies and objectives of the draft JULAP. The definition of key use classes has also been listed in this chapter. The draft JULAP also sets out how the implementation of the JULAP will be achieved. The Assembly welcomes the inclusion of monitoring and attention is directed to the Regional Development Monitor, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, which may provide additional support in relation to monitoring.

### **3.13 SEA, AA and SFRA**

The Assembly welcomes the preparation of the draft JULAP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA Environmental Report sets out an assessment of the environmental effects in combination with the wider planning framework arising from the draft JULAP to provide a clear understanding of the likely environmental consequences of decisions arising from the JULAP. Regarding mitigation, the draft JULAP states that by integrating all related recommendations into the draft JULAP, the Local Authorities have ensured that both the beneficial environmental effects of implementing the JULAP have been and will be maximised and that potential adverse effects have been and will be avoided, reduced or offset.

The draft JULAP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has been prepared which states that having incorporated mitigation measures into the draft JULAP, it has been demonstrated that the draft JULAP is not foreseen to give rise to any significant adverse effects to designated European sites, alone or in combination with other plans or projects. This demonstration has been made in view of the conservation objectives of the habitats and/or species, for which these sites have been designated. The Natura Impact Report will, alongside any other inputs from the Plan-preparation/AA process, inform the competent authority when it undertakes the final Appropriate Assessment determination at adoption of the JULAP. The AA process is ongoing and will inform and be concluded at adoption of the JULAP.

A Strategic Flood Risk Assessment (SFRA) has been undertaken, which aligns with RPO 7.12 of the RSES, alongside the preparation of the draft JULAP, the SEA and the NIR. The recommendations from the SFRA have been integrated into the draft JULAP which is welcomed. In keeping with best practice, it is recommended that the Local Authorities take opportunities to enhance biodiversity and amenities, including where flood risk management measures are planned, in line with RPOs 7.14 and 7.15 of the RSES.

## 4.0 Recommendations

The Regional Assembly advises the Local Authorities to pay particular attention to the following issues in the preparation of the Carlow-Graiguecullen JULAP 2024-2030 in order to ensure consistency with the RSES, and makes the following recommendations:

- The JULAP should align with Figure 6.3 Economic Strategy of the RSES and RPO 4.27 in the RSES which outlines that Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to workers.
- Table 6.1 Retail Hierarchy for the Region in the RSES, which shows Graiguecullen under Level 3 of the retail hierarchy entitled '*Town and/or District Centres and Sub-County Town Centres (Key Service Centres)*', should be clearly outlined in the JULAP.
- The JULAP should align with the Healthy Placemaking Regional Policy Objectives, RPOs 9.10, 9.12 and 9.13, and Figure 9.2 Healthy Placemaking Strategy of the RSES.
- The JULAP should align with RPOs 9.1 and 9.2 in the RSES which support a diverse and inclusive region.
- The JULAP should align with the Guiding Principles for the preparation of Green Infrastructure Strategies as set out in Section 7.7 of the RSES.
- The JULAP should align with Figure 7.4 Climate Strategy of the RSES.
- The JULAP should align with RPOs 7.14 and 7.15 of the RSES regarding flood risk management.

## 5.0 Conclusion

It is considered that the draft Carlow-Graiguecullen Joint Urban Local Area Plan 2024-2030 is generally consistent with the Regional Spatial and Economic Strategy (RSES) 2019-2031 and would be further enhanced by addressing the recommendations set out above.

It should be noted that the officials of the Eastern and Midland Regional Assembly are available to discuss the matters raised and the Assembly welcomes further opportunities to engage in the statutory process of the making of the draft Carlow-Graiguecullen Joint Urban Local Area Plan.

Regards,



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Claire Bannon

A/Director

Eastern and Midland Regional Assembly

31<sup>st</sup> January 2024