



'Ireland 2040 Our Plan'
National Planning Framework

Carlow County Council

Submission No. 2
Department of Housing, Planning,
and Local Government

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Submission Draft National Planning Framework (NPF)

1.0 Introduction

Carlow County Council welcomes the opportunity to make a further submission to the preparation of the National Planning Framework 2040 (original submission attached for reference purposes). The overall objective of the Draft NPF is supported which seeks to grow the regions, build centres of scale and ensure more compact and sustainable forms of development. It is acknowledged that the strategy will require investment, fiscal measures and new governance and institutional arrangements to ensure successful implementation. While it is noted that much of the detail of the implementation of the strategic elements of the Draft NPF are to be applied regionally through the Regional Spatial and Economic Strategy process, outlined hereunder are strategic issues which it is the view of Carlow County Council must be addressed at a national level.

2.0 Strategic Issues for County Carlow

2.1 Inter-Regional Role

As outlined in the original submission, Carlow is strategically located to the north of the South East Region and closest to Dublin and the Mid East Region. Its zone of influence extends into the Greater Dublin Area / Eastern and Midlands Region and equally into the south east / Southern Region. **Carlow has developed a**

significant inter-regional role and can promote economic integration between urban centres within the regions. The NPF must recognise large towns that operate on an inter-regional basis which includes Carlow. The relevant Regional Assemblies must provide a level of co-ordination in relation to such towns to ensure more effective sub-regional and regional outcomes, thereby ensuring that population growth and employment provision are appropriately aligned to create sustainable vibrant communities into the future.

2.2 Waterford City Region

Carlow County Council supports the concentration of investment and growth in the South East Waterford City Region (SEWCR), with Waterford City supported by the strong urban areas of Carlow, Kilkenny, Clonmel and Wexford. The collective offer of the SEWCR located closest to Dublin and accessible to mainland Europe and Britain must be of a scale that can exert critical mass leverage at an international level and a strategic vision articulated to achieve same is required in the NPF. The projections as currently proposed will not address proportionate growth between the regions and additional population allocations based on revised projections contained in the ESRI report “*Projections of Demand for Healthcare in Ireland 2015-2030*”¹ which recognise greater population growth rates

¹ . Projects an increase in population by between 14% (0.64 million) and 23% (1.08 million) from 2015 to 2030.

should be accommodated in the Southern Regional Assembly Area. National Strategic Outcomes must specifically identify clear priorities including establishment of the Technological University for the South East, connectivity and accessibility issues including Waterford airport, rail upgrades, transportation infrastructure etc.

2.3 Population Targets

County Carlow: Projected growth rates as identified in the NPF are significantly below that anticipated for County Carlow over the projected time period. Between 1996 and 2016 County Carlow experienced a growth rate of +36.6%. Applying the projected growth rates as contained in the Draft NPF (i.e. 25% to Carlow Urban Area and 15% elsewhere) the projected growth rate will be 67,834, +19% growth rate in a twenty four year period - significantly below that experienced in the recent past. At a national level projected growth levels as indicated in the Draft NPF are estimated at +21.8%. With the exception of the intercensal period 1991 – 1996 Carlow has consistently exceeded the national percentage growth rates since 1981 and an allocation significantly below the national growth rate is considered inappropriate. Carlow's strategic location between Dublin, Ireland's key international / global city of scale and its position within the SEWCR reinforces the inter-regional role of Carlow giving rise to increasing demands to accommodate significant additional employment and population growth rates in excess of that provided for in the Draft NPF.

Carlow Town: Excluding the five cities identified for significant growth Carlow Town is the 8th largest Town in the Country. Under the Census 2016, the population of Carlow Urban was recorded as 24,272. Targeted population growth rates under the Draft NPF estimate a target of 30,340 by 2040 (+25%). This level of growth is significantly below that experienced in the recent past with recorded growth rates of 62% between 1996 -2016. The application of a standard 20-25% growth rate to all large towns above 10,000 population fails to recognise towns with significantly greater population levels and those which have an established critical mass supported by established infrastructure, enterprise, community, educational infrastructure and social infrastructure to support

greater levels of growth. Accordingly, proportionately higher levels of population growth should apply to various settlement sizes with large Urban Centres in excess of 15,000 accommodating growth levels in excess of 25%.

2.4 Regional Economic Growth Driver

Given the strategic nature of the Draft NPF, it is the view of Carlow County Council that the designation of regional economic growth drivers should form part of the overarching national document. As outlined in the original submission, Carlow Town has a number of strategic characteristics that contribute to it being appropriate for designation as a regional growth driver. These include:

- Established **critical mass** and accessibility to a significant population catchment
- **Strategic location** and extensive catchment area
- Substantial **investment** in infrastructure including an expanding public transport infrastructure
- Diversified **economic base**
- **Expanding enterprise**, engineering, manufacturing and pharmaceutical base
- Strong **third and fourth level educational base** with ongoing investment of €150m in IT Carlow and the continued expansion of Carlow College St. Patricks
- Growing **tourism** sector, particularly Cultural Tourism
- Availability of **more affordable land**, housing and community / social services offering a good quality of life
- Appropriately **zoned employment lands and Office Enterprises** to

facilitate existing, expanding and new enterprises

- **Addressing opportunities for improved public realm in Carlow Town Centre**

2.5 Multi Campus Technological University of the South East

The Institute of Technology Carlow plays an important role in the South East and the Mid-East / Greater Dublin Area in the provision of internationally recognised higher education and research opportunities and in the development of enterprise and industry. The Institute is a key driver of progress and development and plays an important role in working with state agencies to promote FDI to the South East Region. Further major capital investment has recently been announced to facilitate an advanced science and technology building for the Institute of Technology Carlow. This will facilitate higher education opportunities, research and innovation across the science and health disciplines. This latest significant investment will complement the current roll out of a €150m physical master plan for the IT Carlow that has already delivered - The Dargan Centre for Research and Innovation in 2014; the Centre for Aerospace Engineering in 2015; the Houghton Building for Teaching and Learning in 2016; the commencement of a 30-acre South Sports Campus; the acquisition of additional land for future growth in Carlow and Wexford; and the expansion of the Institute's Learning Resource Centre. While it is noted that the Draft NPF references an Institute of Technology with proposals to form part of a Technological University in Section 3.9 *Waterford* it is requested that this section of the document and strategic outcomes acknowledges the shared vision between IT Carlow and IT Waterford to progress towards the Multi-Campus Technological University for the South East of

Ireland (ref: IT Carlow Strategic Plan 2014-2018) together with the role of the Technological University as a key driver and enabler for sustainable future employment growth.

2.6 Planning for Diverse Rural Communities

Rural Towns and Villages

Rural towns and villages in Co. Carlow are intrinsic to sustaining viable rural communities. In particular the district towns of Tullow and Bagenalstown have well developed urban structures, services and community facilities and have the capacity to accommodate additional growth subject to certain physical infrastructural investment. In such towns it is considered that the allocation of 15% growth is insufficient to accommodate future requirements. Population and additional employment growth must be aligned within these urban centres supported by necessary infrastructure in order to maintain the vibrancy and vitality of these important district towns.

Smaller towns and villages many of which have experienced population decline in the most recent intercensal period must also be protected from rural decline and supported to develop in a sustainable manner into the future delivering sustainable reuse and regeneration outcomes. Measures to support redevelopment of towns and villages, use of brownfield and infill sites will require investment at a national level and the proposed National Smart Growth Initiative is welcomed in this regard. Sufficient funding and mechanisms must be established to ensure adequate water and wastewater infrastructure, regeneration, an improved public realm and the appropriate adaptation and reuse of our built heritage to ensure viable and vibrant rural economies into the future.

Open Countryside

The Draft NPF recognises that there is a continuing need for housing provision for people to live and work in Irelands rural areas. In this regard, there is a differentiation between areas under strong urban influence which are to be protected and structurally weak areas wherein population is to be sustained. The exact implications of this policy provision in particular the area defined as under urban influence and the economic requirement for housing need is undefined in the Draft NPF. The impact for rural communities and the viability of sustaining rural communities is therefore unclear.

Diversification of the Rural Economy

Carlow County Council supports the objective to enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise and through the sustainable diversification of the rural economy. The Council welcomes the establishment of a mechanism to co-ordinate structures for funding rural development that align with the NPF.

2.7 National Investment Plan 2018-2027/ Strategic Infrastructure Provision

The need for physical and digital access improvements for the benefit of businesses, residents and visitors extends from ports / airports and road development to high speed digital access is paramount.

The NPF must be the catalyst for prioritisation of Government Investment in infrastructural development and in particular addressing, where feasible, infrastructural deficiencies that may be hindering economic development and aim to ensure that sustainable infrastructural development precedes economic development.

The location of Carlow Town on an intersection of the M9 and N80 provides a

unique gateway to north, south, east and west. Significant upgrade of the N80 is required, including completion of the Carlow Southern Relief Road to exploit the full benefits which would accrue and would provide a network of strong urban centres strategically located proximate to Dublin City which could build synergistic competences attractive to FDI companies. The impending impact of Brexit on Rosslare Euro Port would support the upgrading of the N80 as a strategic linking corridor to allow for easier movement of freight and facilitating access to other regional and rural destinations. The N80 also intersects with the M9 Dublin - Waterford Motorway at Junction 5 (Rathcroogue) and provides a unique opportunity for the development of a National / Regional Logistics Park facility². It is requested that the central spine concept (N80) as contained in the NSS be reinstated in the strategic outcomes of the NPF.

Other strategic assets which could contribute significantly to the County / Region include investigating the development potential arising from the proximity of Powerstown / Junction 6 on the M9 to the Rail Line, upgrading of the existing rail stations at Carlow and Muine Bheag and the provision of a second rail line from Kildare Town to Carlow.

2.8 [Environmental Sustainability](#)

Carlow County Council supports the sustainable management and upgrading of water and other environmental resources, the transition to sustainable energy systems and enhanced urban and rural amenity objectives as contained in the Draft NPF.

The NPF however must be a catalyst for Irish Water Investment, to ensure continued growth

and to accelerate the provision of water and sewerage services to eliminate any delay in the progression of development. Irish Water Programmes must recognise and align delivery with the spatial planning framework and needs and priorities identified.

Strategic water investment priorities for County Carlow include;

- Requirement for Irish Water to invest in the Water Services Infrastructure in the county, so that the county can continue to meet the demand and allow for growth not only for drinking water but also waste water facilities.
- Short to Medium Term - upgrading of all waste water treatment plants in the major population centres of Carlow Town, Bagenalstown, Tullow and Borris. All are at capacity and the plants require immediate investment to facilitate future growth.
- Long term investment in the upgrading of the NRWSS at Rathvilly and the replacement of the ageing AC trunk main from Rathvilly to the main population centres. Critical is a central reservoir at Graiguenaspodogue, serving Carlow Town and the Central Regional Scheme, to avail of the full potential of the Carlow North Regional Water Supply Scheme at Rathvilly.

3.0 [Conclusion](#)

Longer term sustainable growth outside Dublin and the Mid –East Region must be clearly supported within the National Policy Objectives and National Strategic Outcomes.

² A Feasibility Study has been commissioned by Carlow Co. Council which supports the provision of same.

In the context of County Carlow the following is requested:

- Recognition of inter-regional role played by larger towns within the region is required and should be supported within the National Policy Objectives.
- Greater population allocation to the southern regional assembly area based on updated population projections is required and appropriately allocated between the towns, villages and rural areas on the basis of their capacity to accommodate sustainable development.
- Carlow town should be identified as a Regional Economic Growth Driver.
- The national strategic outcomes to acknowledge the shared vision

between IT Carlow and IT Waterford to progress towards a Multi-Campus Technological University for the South East of Ireland (ref: IT Carlow Strategic Plan 2014-2018) together with an acknowledgement of the role the Technological University provides as a key driver and enabler for sustainable future employment growth.

- Strategic Outcomes to recognise the importance of rural towns and villages and ensure the necessary supports are available to create sustainable vibrant communities.
- The central spine concept provided by the N80 be included as a strategic outcome facilitating access to regional and rural destinations.

