



**CARLOW**  
COUNTY COUNCIL  
COMHAIRLE CHONTAE CHEATHARLACH

County Buildings, Athy Road,  
Carlow, R93E7R7  
Oifigí an Chontae, Bóthar Átha Í,  
Ceatharlach, R93E7R7

Tel: 059 9170300  
Fax: 059 9141503  
Email: [secretar@carlowcoco.ie](mailto:secretar@carlowcoco.ie)  
Web: [www.carlow.ie](http://www.carlow.ie)

Mr. David Kelly.  
A/Director,  
Southern Regional Assembly,  
Assembly House,  
O'Connell Street,  
Waterford.

6<sup>th</sup> March 2019

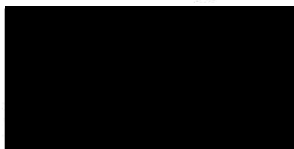
RE: Draft Regional Spatial and Economic Strategy for the Southern Region.

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Dear Sir/Madam,

Please find attached submission of Carlow County Council regarding the Draft Regional Spatial and Economic Strategy for the Southern Region.

Yours sincerely,



Director of Planning and Corporate Services.

**DIRECT LINES: CODE 059**

Carlow MD Area Engineer	9136272	Information Technology	9136215	Fire Service & Building Control	9131144
Planning	9170346	Housing	9136296	County Museum	9131554
Human Resources	9170314	Waste & Environment	9136231	Rent Payments	9172497
Muinebhag MD Area Engineer	9172415	Rates	9172489	Recreation & Amenity	9170377
Local Enterprise Office	9129783	County Library	9129705	Arts	9136203
Register of Electors	9170313	Community	9136204	Motor Taxation	9170342
Roads / Transportation	9170379	Loan Payments	9172491		





**Draft Regional Spatial and Economic Strategy  
For the Southern Region**

**Carlow County Council  
Submission to  
Southern Regional Assembly**

**March 2019**



## Content

### 1.0 Introduction

### 2.0 Amendments to Draft RSES

#### 2.1 Settlement Strategy / Regional Growth Centre

#### 2.2 Consistency and Co-ordination between Regional Assembly Areas

#### 2.3 Carlow Town

#### 2.4 Economic Corridor along the M9 and Dublin – Waterford Rail Line

#### 2.5 RPO 3

#### 2.6 Section 3.8

#### 2.7 RPO 25

#### 2.8 RPO 136

#### 2.9 RPO 200 and RPO 203

### 3.0 Strategy Map

### 4.0 Conclusion





## 1.0 Introduction

Carlow County Council welcomes the opportunity to make a submission to the Draft Regional Spatial and Economic Strategy (RSES) for the Southern Region. Outlined hereunder, specific amendments are being requested to facilitate the future sustainable development of the whole of the region. This includes key strategic settlements including Carlow Town which will complement the strategic importance of the three cities to perform as a counterweight to the over development of Dublin and wider eastern areas and to drive the sustainable and economic development of the region.

## 2.0 Amendments to Draft RSES

Carlow County Council requests that the amendments and items for consideration / clarity as outlined hereunder are incorporated as amendments to the Draft RSES.

### 2.1 Settlement Strategy / Regional Growth Centre

The RSES Settlement Strategy must provide an appropriate tailored hierarchy and designation of settlement centres within the region with the identification of regionally important towns followed by other key towns and smaller towns which provide important county / inter-regional functions at a lower level.

While the primacy of the Cities is appropriate the 14 no. Key Towns identified incorporate towns varying from those in excess of 20,000 population which are regionally significant having a scale of population, services and employment functions which are significantly beyond smaller scale settlements which are included within the same hierarchy. Key Towns which have critical mass in population and employment potential in regional terms should be appropriately recognised at a higher level within the settlement hierarchy. In this regard, it is noted that the Southern Region is the only Assembly area within the Country wherein a regional growth centre was not identified as part of the National Planning Framework (NPF). Notwithstanding same the provisions of the NPF (ref: pg. 21) do not preclude the designation of other Regional Growth Centres as part of the RSES. **As previously outlined, Carlow Town has a number of strategic attributes and growth enablers that contribute to it being appropriate for designation as a regional and inter regional growth driver.**

These include:

- Strategically located on the M9 and the Dublin – Waterford rail line between the Dublin Metropolitan Area and Waterford City.
- Established critical mass and accessibility to a significant population catchment.
- Significant zone of influence and catchment area.



- Established regional centre for education with a strong third and fourth level educational base with ongoing investment of €150m in IT Carlow, the continued expansion of Carlow College St. Patricks and location of Teagasc Agricultural Centre Headquarters within the town.
- Development of the Multi-Campus TUSE with a campus of equal status in Carlow which can facilitate transformational economic change.
- Substantial investment in infrastructure including an expanding public transport infrastructure.
- Diversified economic base with expanding enterprise, engineering, manufacturing and pharmaceutical base.
- Investment in public realm / place making and economic led regeneration of key strategic sites within the town.
- Growing tourism sector located within Irelands Ancient East with growing emphasis on Cultural and Food Tourism including development of Cultural Quarter in Carlow Town around the George Bernard Shaw Theatre, Visual Art Gallery, County Museum and Carlow Cathedral.
- 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 with strategic regeneration / employment sites including underutilised lands along the River Barrow, the former Braun Site and Greencore site within the town boundary.

### **Amendment**

- (a) On the basis of the foregoing it is requested that an appropriate tailored settlement hierarchy having regard to critical mass, services and employment functions be defined for the region.
- (b) Carlow Town to be recognised and designated as a Regional Growth Centre within the Southern Region.
- (c) Tullow and Muine Bheag to be recognised as strategic locations for development at a county and a sub-regional context and as important economic and services providers which must be recognised at an appropriate level within the settlement typology for the region. Subject to infrastructural improvements these towns have the capacity and potential for employment growth and should therefore be recognised as important towns at a sub-regional level.



## 2.2 Consistency and Co-ordination between Regional Assembly Areas

The Greater Carlow Urban Area is located within two Regional Assembly areas and accordingly it is necessary that there is a level of consistency and co-ordination between the Regional Assembly Areas (EMRA and SRA) in the context of Carlow Town. In this regard it is requested that the following RPOs are incorporated to ensure it can grow sustainably and achieve appropriate investment as a regional economic growth centre.

### ***Amendment***

#### Recognise inter regional role of Carlow with inclusion of new RPO to reflect EMRA Draft RSES

- (i) To support the preparation of a **cross-boundary Joint Urban Area Plan (UAP)** for Carlow by Carlow County Council and Laois County Council having regard to its location within the combined functional area of both local authorities. The Joint UAP shall provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow to ensure it achieves targeted compact growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre.

The Joint UAP 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. Regard shall be had to the respective housing, retail and other Local Authority strategies that may be in place.

#### Facilitate collaboration at inter regional level with inclusion of RPO

- (ii) The Assembly will **foster collaboration in the allocation of funds** to maximise the value for money and delivery of RSES policy and will enable cross boundary collaboration between local and regional bodies in relation to enterprise and employment, transport, education, retail and service delivery.

More effective strategic planning and co-ordination of the future development of strategic locations that straddle inter- or intra-regional boundaries will be facilitated including the Greater Carlow Urban Area. The Regional Assembly will ensure that joint urban area plans where required are delivered for these urban centres by the relevant Local Authorities to deliver regional economic centres of scale.



## 2.3 Carlow Town

The provisions of the Draft RSES pertaining to Carlow as a Key Town (pg.'s 60-61) are noted, however a number of minor amendments are requested to the narrative, attributes and key infrastructural requirements for Carlow. Amended paragraphs are outlined hereunder.

### **Amendment**

Carlow Town has a strategic location in the South-East Waterford City Region and has a pivotal inter-regional role with strong links to the Eastern and Midlands Region including the Dublin Metropolitan Area supported by good access to transport infrastructure through its location on the M9 Dublin - Waterford Motorway, the Dublin-Waterford Rail line and the N80 linking Rosslare Europort to the Midlands. With a population of 24,272 and total jobs of 7,868 in 2016, Carlow is a Regional Growth Centre for employment education, healthcare, public services, shopping and arts, culture, leisure and recreation for a wide area extending into Counties Laois, Kildare and Wicklow.

### **Attributes**

- **Strategic location on the M9 Corridor** linking Waterford City to the Dublin-Belfast Economic Corridor and on the N80 with extensive zone of influence and significant capacity to facilitate economic integration between towns in the Southern Region and the Eastern and Midlands Region including the Dublin Metropolitan Area.
- **Important Regional Centre of Education and Research** with IT Carlow (ITC) and Carlow College St. Patrick's located in the town. The education, research and innovation capacity of the ITC will be further strengthened with the establishment of the Multi-Campus Technological University of the South East. Teagasc Agricultural Centre Headquarters is also located within the town providing important research capabilities for the agri industry.
- **Diverse employment** in pharmaceutical, engineering and finance sectors with notable companies being MSD, UNUM and Netwatch. Further significant expansion of the MSD facility is currently proposed with the establishment of a second manufacturing facility in Carlow Town.
- **Rail Network connectivity** to Dublin and Waterford.
- **Road Network Connectivity** to Dublin, Waterford via the M9 and to the Midlands and South-East via the N80 linking to Rosslare Europort which can be further developed and augmented.
- **International Connectivity.** Direct access routes to the **Ports of Rosslare Europort and Waterford, Dublin and Waterford Airports.**
- Important role of **St. Dymphna's Hospital/ Carlow District Hospital** in health provision.
- **Strong retail sector** in Carlow is an important part of the economic base.
- Attractive destination for Arts, Culture and Heritage located within **Ireland's Ancient East.** Significant investment in the Arts and Cultural offering of Carlow Town including development of the **Cultural Quarter** in Carlow Town in an area around the George Bernard Shaw Theatre, Visual Art Gallery, County Museum and Carlow Cathedral.
- **Bi-lingual County** supporting cultural, education and commercial diversity.



- **Strategic Recreational Assets** of the River Barrow, Oak Park Forest Park and Duckett's Grove in the Carlow Town Environs.

### **Key Infrastructural Requirements in Addition to Overarching Key Towns Infrastructure**

- i. Priority Transport Infrastructure** for Carlow - enhanced rail services and improved line speeds; Provision of Town Bus Services; Kilkenny Road – Wexford N80-R448 (**Carlow Southern Relief Road**); **N80 upgrade** as a key inter-regional route and link to Rosslare Europort;
- ii.** To strengthen 'steady state' investment in **rail infrastructure** to ensure its continued renewal and maintenance to a high level to provide quality levels of safety, service, accessibility and connectivity.
- iii.** Potential location for a **Regional Logistics Facility** to serve the region along the M9 and/or on the Dublin-Waterford Rail line (Junction 5/6 interchanges of the M9 Dublin – Waterford and N80 Rosslare to the Midlands). **Rail Freight Handling** facilities to support modal shift from road to rail.
- iv. Urban regeneration** of strategic opportunity sites and underutilised lands within the town centre and along the River Barrow together with the development of an **economic quarter** on lands around the Railway Station and **improved linkages** to/from Fair Green and Barrack Street within the Town Centre.
- v. Water Infrastructure:** The upgrading and development of water supply and additional investment in waste water infrastructure to support the economic development and anticipated growth of Carlow.

### **Draft RPO no. 19 for Carlow to be replaced to read as follows:**

- a. To strengthen and support the role of Carlow Town as a regional and an inter-regional economic growth driver supporting investment in the strategic employment development potential of the town, while promoting and facilitating economic integration between urban centres in the county including Tullow and Muine Bheag, other urban centres within the Southern Region and the Eastern and Midlands Region including the Dublin Metropolitan Area.
- b. To strengthen the regional and inter-regional role of the education, research and innovation capacity of Higher Education Institutes in Carlow and to support the development of the Multi-Campus TUSE in the provision of internationally recognised higher education and research opportunities which can facilitate transformational change and act as a key driver and enabler for sustainable future employment growth within Carlow and the Southern Region.
- c. To support the town centre led economic regeneration of Carlow, leveraging its strategic location and accessibility on inter regional road and rail networks building upon its inherent strengths of education, connectivity, skills, innovation, enterprise, tourism, culture/arts and retail services.



- d. To seek the improvement of the Public Realm, increasing the attractiveness of the Town Centre through development and connectivity of a number of key urban regeneration locations in the town centre including improved accessibility from the historic town centre to the Railway Station and Fair Green.
- e. To seek investment in water and wastewater infrastructure to facilitate the sustainable development of the town as a regional growth centre.
- f. To seek investment and support delivery of the Carlow Southern Relief Road N80 – R448 and other transportation linkages and to co-ordinate with adjoining local/regional authorities and stakeholders to achieve same including the provision of an appropriate crossing of the River Barrow and completion of the Carlow Southern Relief road to link the N80 within County Laois. .
- g. To seek investment in sustainable transport solutions, improved walking and cycling connectivity routes throughout the town including provision of a Town Bus Service;
- h. To seek further investment in sustainable transport measures through a Local Transport Plan;
- i. To strengthen ‘steady state’ investment in existing rail infrastructure along the Waterford to Dublin line and to ensure its continued renewal and maintenance to high level in order to provide quality levels of safety, service, accessibility and connectivity including improved frequency and journey times.
- j. To seek investment and support in the delivery of culture, arts, and tourism infrastructure together with other physical and community infrastructural requirements identified for Carlow town and the wider county area subject to the outcome of the planning process and environmental assessments.
- k. To support development of underused lands along the River Barrow and to promote and enhance the environmental qualities of the River Barrow as a strategic natural asset for the town. Any future development of underused lands along the River Barrow will include an assessment of any impacts that may arise on sensitive Natura 2000 habitat.



## 2.4 Economic Corridor along the M9 and the Dublin – Waterford Rail Line

The strategic location of Carlow and Kilkenny along the M9 and the Dublin-Waterford rail line Economic Corridor contribute and interact economically with the Waterford and Dublin Metropolitan Areas and should be recognised in the RSES and within the Growth Strategy Map for the Southern Region.

### ***Amendment***

Include additional RPO to recognise Economic Corridor on the M9

To recognise the strategic location of Carlow and Kilkenny within the Southern Region located along the M9 and the Dublin-Waterford rail line Economic Corridor which contribute and interact economically with the Waterford and Dublin Metropolitan Areas. These strategic towns located along this established economic corridor share similar economic strengths, resources and attributes which provide a strategic opportunity to drive the regional economy. Working collaboratively these towns present strategic opportunities for collaborative projects and shared benefits which will be supported by the Regional Assembly to ensure the delivery of strategic investment opportunities to support significant employment growth and investment.

## 2.5 RPO 3 Infrastructure Investment

RPO 3 recognises the need for Infrastructure investment to be aligned with the spatial planning strategy of the RSES. It is requested that this RPO be amended to include reference to towns and villages identified as part of the Core Strategies of respective local authority Development Plans.

### ***Amendment***

Infrastructure investment shall be aligned with the spatial planning strategy of the RSES and the Core Strategies of respective local authority development plans to ensure appropriate servicing of towns and villages identified for sustainable growth.

## 2.6 Section 3.8 Networks

Include reference to Carlow – Kilkenny located along the M9 and the Dublin-Waterford rail line Economic Corridor.

### ***Amendment***

**Section 3.8 Networks** include bullet point “Carlow – Kilkenny located along the M9 and the Dublin-Waterford rail line Economic Corridor contribute and interact economically with the Waterford and Dublin Metropolitan Areas and comprise strategic towns of critical mass,



services and established employment locations suitable as strategic employment locations and second site locations for businesses within the Dublin Metropolitan Area.”

## **2.7 RPO 25 One Off Rural Housing**

The rural housing policy objective is amended to reflect the provisions of the NPF, however, clarity regarding the definitions to be applied has not been indicated in any policy document or amended Ministerial Guidance. Implementation of this RPO will give rise to significant variation / interpretation which would not be in accordance with the proper planning and sustainable development of rural areas.

### ***Amendment***

In the interests of consistency and clarity a clear indication / guidance should be provided within the RSES / National Government Policy Statement regarding the definitions applicable to “*demonstrable economic, social or exceptional need to live in a rural area*”.

Areas of urban influence should be mapped as appropriate to facilitate implementation of the appropriate policy provision.

## **2.8 RPO 136 Regional Freight Strategy**

RPO 136 acknowledges the requirement to prepare a regional freight strategy. In the interests of consistency it is requested that reference is made to the potential location along the M9 and / or the Dublin Waterford Rail Line as provided for in point no (iii) Key Infrastructural Requirements for Carlow (See Section 2.3 above) and underlined in the following RPO.

### ***Amendment***

Develop a RSES Regional Freight Strategy having regard to appropriate locations within the Region including the potential location along the M9 and /or the Dublin Waterford Rail line in Carlow (Junction 5/6 Interchanges of the M9 Dublin – Waterford and N80 Rosslare to the Midlands). The Strategy will include consideration of rail freight in consultation with the Department of Transport, Tourism and Sports, Transport Infrastructure Ireland, National Transport Authority, Local Authorities, Irish Rail, relevant delivery agencies and the port and airport authorities.

## **2.9 RPO 200 and RPO 203 Irish Water and Water Supply and Wastewater**

RPO 200 and 203 seek Irish Water to revise the Draft Investment Plan (2020-2040) and subsequent plans to align with the settlement strategy and objectives of the RSES. As currently drafted settlements below the level of Key Town are not recognised within the settlement hierarchy of the Draft RSES and accordingly, there is no explicit provision to ensure towns and villages (not listed) are serviced with water and wastewater within an appropriate time frame.



It is requested that the settlement hierarchy is suitably identified within the RSES to address the foregoing. Furthermore the following projects to be recognised to ensure the sustainable development of population centres and provision of services to facilitate development in accordance with the Core Strategy of the Carlow County Development Plan:

Short to Medium Term - upgrading of all waste water treatment plants in the major population centres of Carlow Town, Muine Bheag, Tullow and Borris. All are at capacity and the plants require immediate investment to facilitate future growth.

In addition wastewater treatment plants at Tinryland, Ballinabranagh, Clonegal and Kildavin require upgrading in the short to medium term.

Short – medium term investment in the upgrading of the North Regional Water Supply Scheme at Rathvilly and the replacement of the ageing AC trunk main from Rathvilly to the main population centres. Also critical is a strategic linking of the NRWSS to the Central Regional Scheme, to avail of the full potential of the Carlow North Regional Water Supply Scheme at Rathvilly.

### **3.0 Strategy Map**

The RSES Strategy map is noted and as per item no. 2.4 above it is requested that the established economic corridor along the M9 and Dublin Waterford rail line servicing the strategic settlements of Carlow and Kilkenny and linking to the Metropolitan Area of Dublin and Waterford be recognised.

It is also unclear from the document the methodology used for the selection and categorisation of other towns within the Strategy Map. Some locations identified as per the Draft Strategy would comprise rural locations being centres of population <1,500. Alternatively, more strategic towns including Muine Bheag an important engineering / manufacturing location with a population of 2,837 and a resident workers to jobs ratio of 1:1.5 is not recognised.

#### ***Amendment***

Economic interactions established along the M9 servicing Carlow and Kilkenny to be recognised with strategic links to the Metropolitan Areas of Dublin and Waterford.

Inclusion of Muine Bheag as a designated town within the strategy map for the Region with a consistency of approach adopted to the selection of these settlements.

### **4.0 Conclusion**

Carlow County Council requests that the foregoing amendments be incorporated into the RSES and looks forward to continued engagement in the process of finalisation of the Regional Spatial and Economic Strategy for the Southern Region.